

EXPLANATION OF SIGNIFICANT DIFFERENCES

34 FREEMAN'S BRIDGE ROAD SITE



Town of Glenville / Schenectady County / Registry No. 4-47-028 / July 2007

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

1.0 INTRODUCTION

The purpose of this notice is to describe the progress of the cleanup at the Freeman's Bridge Road Site and to inform you about a change in the site quantity of material to be removed and disposed off site. The 10 acre Freeman's Bridge Road Site is located in the Town of Glenville, Schenectady County. In March 2004, the New York State Department of Environmental Conservation (NYSDEC) issued a Record of Decision (ROD) which selected a remedy consisting of on-site thermal treatment of soil contaminated with PCBs, building demolition and drainage improvements.

This Explanation of Significant differences (ESD) will become part of the Administrative Record for this site. The information here is a summary of what can be found in greater detail in documents that have been placed in the following repositories:

Glenville Municipal Center (Town Hall) 18 Glenridge Road Glenville, NY Contact: Town Clerk (518) 384-0019 Hours: M-F 9 a.m. - 5 p.m. (518) 408-5423	NYSDEC Div. of Environmental Remediation Remedial Bureau E 625 Broadway, 12 th Floor Albany, NY 12233-7017 Contact: Michael Mason Project Manager (518) 402-9814 Hours: M-F 7:00 a.m. - 3:30 p.m.	Schenectady Co. Public Library (Glenville Branch) 20 Glenridge Road Glenville, NY Contact: Librarian (518) 386-2243 Hours: M-Th 10 a.m. - 8:30 p.m. F-Sat 10 a.m. - 5 p.m.
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Although this is not a request for comments, interested persons are invited to contact the NYSDEC's Project Manager for this site to obtain more information or have questions answered.

2.0 SITE DESCRIPTION AND ORIGINAL REMEDY

Hazardous wastes including volatile and semi-volatile organic contaminants, PCBs, and metals disposed at the site have contaminated surface and subsurface soils, and groundwater. The site is listed as a Class 2 site in the State Registry of Inactive Hazardous Waste Disposal Sites. A Class 2 site represents a significant threat to public health or the environment; action is required.

The selected remedy is described in detail in a "Record of Decision" (ROD). The ROD presents the alternative selected by NYSDEC and NYSDOH and documents the information and rationale used to arrive at the decision. Included in the ROD is a summary of public participation activities, including the holding of a public meeting on February 11, 2004. *The ROD can be reviewed at the document repositories listed above.*

The March 2004 ROD remedy consisted of:

- 1) Excavation, preparation, and thermal treatment of PCB and metals contaminated wastes, soils and debris. Mobile low temperature thermal desorption units would be on the site to treat the materials.
- 2) Collection and treatment of contaminated light non-aqueous phase liquids (LNAPLs) and groundwater from the main contaminated area during the construction phase. LNAPLs are a floating petroleum based product, which would be separated from the groundwater by the treatment system and disposed off site.
- 3) All treated materials would be used as backfill to restore site grades. The site would be restored by grading, placement of topsoil, and seeding of filled areas.
- 4) Institutional controls, such as an environmental easement, would be imposed that would prevent the use of groundwater as a source of potable or process water without necessary water quality treatment. Due to the continued presence of volatile organic compounds in groundwater for some period of time after remediation, the potential for vapor intrusion to indoor air must be evaluated prior to any new construction on the site.
- 5) Since the remedy results in untreated groundwater remaining at the site, a monitoring program would be instituted. This would allow the effectiveness of the soil and waste removal to be evaluated and would be a component of the operation, maintenance, and monitoring program for the site. The small area of contaminated groundwater remaining outside the main contaminant source area to be excavated would be allowed to degrade naturally. With the source of the groundwater contamination removed, it is anticipated the groundwater plume would reach acceptable limits within five years.

3.0 CURRENT STATUS

In November 2006 as the contractor hired by the NYSDEC, D.A. Collins Environmental began implementing the selected remedy. At the end of April 2007, approximately 22,000 cubic yards of soil had been successfully treated on site. In April 2007 there were two on-site thermal treatment units in operation. The ESMI unit was successfully treating wastes with less than 50 parts per million (ppm) PCBs, and the TDX unit was completing performance testing on wastes with greater than 50 ppm PCBs. Performance testing of the TDX unit indicated it could not effectively treat contaminated soils with portions of the waste containing solid organic materials. It was clear there would be significant cost, operational and schedule impacts if the unit were to continue to treat the original contracted quantity of waste.

The NYSDEC has determined it would be more efficient and cost effective to dispose of the remaining soil containing greater than 50 ppm PCBs off site. The TDX unit will be decontaminated and removed from the site. The ESMI unit will continue to treat soils on site. Although there will be additional truck traffic generated at the site, it will be during the normal work day. Noise and vibration impacts to adjacent residences and businesses will be reduced with one less unit operating at the site. No waste above site-specific cleanup levels will remain on site. The contract is currently on schedule and the ESD decision will not impact the construction work currently on schedule to be completed in Fall 2007.

4.0 DESCRIPTION OF SIGNIFICANT DIFFERENCES

4.1 Comparison of Changes with Original Remedy

The March, 2004 Record of Decision specified the selected remedy included;

“Excavation, preparation, and thermal treatment of PCB and metals contaminated wastes, soils and debris. Mobil low temperature thermal desorption units would be on the site to treat the materials.”

The proposed change is that the portion of the waste containing PCBs greater than 50 ppm will now be excavated and disposed off-site instead of undergoing thermal treatment in on-site units. Wastes and soils containing less than 50 ppm PCBs will continue to be treated in on-site mobil low temperature thermal desorption units.

The remedy will remain protective of human health and the environment because all contaminated wastes, soil and debris will either be treated on-site or removed for off-site disposal. Although there will be an additional cost of approximately \$1,400,000 to dispose of the material off-site, that cost is significantly less than the estimated increased costs associated with continuing on-site thermal treatment of wastes greater than 50 ppm.

The remedy, as modified by this ESD is protective of human health and the environment and meets the goals originally included in the March 2004 ROD. The New York State Department of Health (NYSDOH) concurs with the modified remedy.

5.0 SCHEDULE AND MORE INFORMATION

It is the intention of the NYSDEC to complete construction activities in 2007. Initiation of groundwater monitoring is currently scheduled for Winter 2007. If you have questions or need additional information, you may contact any of the following:

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