EXPLANATION OF SIGNIFICANT DIFFERENCE
DOLLINGER CORPORATION SITE

Town of Brighton / Monroe County / Site No. 8-28-078 / February 2009
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 Dollinger Corporation Site and to provide information about a change in the Site remedy. The Dollinger site is located at 1 Townline Circle in the town of Brighton. On January 1993, the New York State Department of Environmental Conservation issued a decision document which selected a remedy to cleanup the Site. The selected remedy of excavation and off-site disposal of on-site soils and sediments impacted with volatile organic compounds (VOCs) and semivolatile organic compounds (SVOCs) and multiphase vapor extraction (MPVE) beneath a portion of the building was implemented from 1994 to 1998. Upon shutdown of the MPVE system hydrogen releasing compound (HRC) was injected in to the source area beneath and adjacent to the building. These remedies effectively addressed all sources of contamination except the remaining contamination in the former degreasing area beneath a small portion of the building. The proposed change in remedy will involve excavation and off-site disposal of contaminated soils beneath the building. Previous remedial activities in the portion of the site to be addressed by this Explanation of Significant Difference (ESD) involved in-situ technologies which were generally non-invasive remedial measures that did not impact the structural integrity of the building. The proposed excavation will involve significant engineering controls to maintain the integrity of the building during excavation activities. The technology will remove the remaining consequential amounts of volatile organic compound (VOC) contaminated soils to 6NCYRR Part 375-6.8(a) Soil Cleanup Objectives for Unrestricted Use. There is no off-site migration of contaminants at this site.

This 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:

Brighton Memorial Library
2300 Elmwood Avenue
Rochester, New York 14618
(585) 473-5420
Hours of Operation: Mon- Thurs 10-9, Fri 10-6,
Sat 10-4, Sun 1-4

NYSDEC Region 8 Office
6274 East Avon-Lima Road
Avon, New York 14414
Project Manager: Todd M. Caffoe, P.E.
(585) 226-5350
Office Hours: Mon - Fri 8:30 - 4:45
by appointment only

Although this is not a request for comments, interested persons are invited to contact the Department's Project Manager for this site to obtain more information or have questions answered.

2.0 SITE DESCRIPTION AND ORIGINAL REMEDY

2.1 Site History, Contamination, and Selected Remedy

Site Description
The former Dollinger Facility is an approximately 18.5 acre property which is roughly rectangular in shape, located at 1 Townline Circle in Brighton, New York. An approximately 140,000 square foot, 1-story, slab-on-grade building containing manufacturing, warehousing, and office space is centrally located on the Site.

The Site was the location of the manufacture and assembly of industrial filters between 1970 and 1987. A vapor degreasing operation using trichloroethene (TCE) was part of the manufacturing process. Degreasing operations took place in a subgrade pit located in a small portion of the northern part of the building (Degreaser Room). Operations at the facility ceased in approximately 1987 and the building was vacated of personnel, equipment, and operations prior to its sale in 1989. The Site is currently owned by Wilray, Inc. who is leasing all or part of the building to one or more tenants.

Nature and Extent of Contamination
Contamination at the site was caused by vapor degreaser activities that took place as part of historical site operations. The contamination at the site consists of impacted site soils and groundwater with chlorinated solvents. The nature and extent of contamination at the site was delineated through the previous remedial investigations and actions conducted under a Consent Order with the NYSDEC. The site compounds of concern (COCs) include trichloroethene (TCE) and its subsequent breakdown products (cis-1,2-dichloroethene (cis-DCE), and vinyl chloride (VC)). The areas that required remediation involved a surface water retention pond, a drum storage area, and the Degreaser Room. The selected remedy involved excavation and off-site disposal of sediments in a surface water retention pond and drainage ditch, excavation of soils adjacent to the building, and MPVE in the former drum storage area and beneath the Degreaser Room. These findings have been previously reported in the Final Engineering Report for the former Dollinger Site dated November 1994, The Final Engineering Report Addendum, dated May 1995, subsequent quarterly monitoring reports, the Remediation Site Closure Report dated January 1999, and the Report on Hydrogen Releasing Compound Pilot Test Summary dated March 1999.

The most recent groundwater analytical results obtained in 2000 indicate that total VOC concentrations beneath the Degreaser Room range from 0.035 ppm to 9.4 ppm, with the highest concentrations being detected within the proposed excavation area (see Section 4.2). Soil samples collected between 1997 and 1999 indicated that beneath the Degreaser Room area, total VOC concentrations ranged from 0.23 ppm to 66 ppm, a majority of which could be attributed to TCE. No sampling has been conducted since 2000.

An abbreviated time line of the events associated with completion of the requirements of the Order on Consent (Consent Order, July 1993) and Record of Decision (ROD, January 1993) appears as follows:

Consent Order - May 1991, July 1993 (revised)
ROD - January 1993
2-PHASE Extraction - 1994 to 1998
HRC Injection and monitoring - 1998 to 2000

3.0 CURRENT STATUS

The soil and sediment excavations successfully remediated contamination in the surface water retention pond and areas adjacent to the building. The multi-phase extraction was implemented and operated to the limits of the technology. A followup HRC injection further reduced the contaminant mass beneath the Degreaser Room by an additional 48%. The area of groundwater contamination is limited to the vicinity of the former Degreaser Room and contaminants are not migrating off-site. Soil contamination is limited to beneath the Degreaser Room. Currently, there is no operating remedial system or monitoring program in place. The last groundwater sampling event was in May 2000.

4.0 DESCRIPTION OF SIGNIFICANT DIFFERENCE

4.1 New Information

The remedies implemented to date have significantly reduced the magnitude of groundwater contamination at the site, and specifically in the Degreaser Room area from total VOC levels as high as 66 ppm total VOC to levels below 10 ppm; however, there is still approximately 300 cubic yards of residual soil contamination that exceed the cleanup criteria for unrestricted use. In 1993, the cleanup goal in the ROD was to remediate soils to TAGM 4046 levels and to remediate groundwater to the extent practical. These goals have been accomplished in all areas except beneath the Degreaser Room.

4.2 Comparison of Changes with Original Remedy

The previous remedial technologies relied upon in-situ techniques to remediate soil and groundwater beneath the Degreaser Room and soil excavation to remediate contaminated sediments in an on-site drainage ditch and surface water retention pond. Due to the inherent uncertainties with in-situ technologies (e.g. contact of contaminants with treatment media), contaminants remain beneath the Degreaser Room above the unrestricted cleanup levels in 6NYCRR Part 375-6.8(a) . Soil excavation will allow remaining contaminants to be removed. The details of the proposed changes in the remedy are specified below.

Soil Excavation Beneath the Site Building

1. Beneath the northwestern corner of the existing former Degreaser Room, contaminated soils exceeding unrestricted cleanup levels in 6NYCRR Part 375-6.8(a) will be excavated from an approximate area of 25 feet by 20 feet and to an approximate depth of 16 feet. In order to facilitate this, the north and west walls of the former Degreaser Room will be shored via an appropriate building support method.

2. The existing concrete slab in the northwestern corner of the Degreaser Room and monitoring wells within the excavation footprint will also be removed.

3. Concurrent with excavation, dewatering, tanking, and treatment of all encountered groundwater will take place in the excavation area. The treated water will be discharged to the sanitary sewer as per an approved sewer use permit.

4. Prior to backfilling the excavation, confirmatory samples will be collected from the excavation for evaluation. The samples will be submitted to a NYSDOH ELAP certified laboratory and analyzed

for Target compound List VOCs by EPA Method 8260B.

5. The excavated soils will be segregated based on their contaminant levels and either used as backfill, or disposed of off-site accordingly. The top four feet of soil do not contain soils with contaminant exceedances above unrestricted cleanup levels in 6NYCRR Part 375-6.8(a) ; this material will be reused as backfill. The concrete floor slab will be tested for reuse as backfill or, if required, managed for off-site disposal.

Soil Vapor/Indoor Investigation and Contingency Measures

In order to address potential soil vapor concerns beneath the Degreaser Room, the following investigations and contingency measures have been proposed:

1. Prior to the re-pouring of the building slab following excavation, two gravel/cobble suction pits connected by PVC piping will be installed into the gravel sub-base with one outlet on the outside of the building. The suction pits/piping will be designed to adequately vent the gravel layer beneath the building. The purpose of the pits and piping is for installation of a sub-slab depressurization system in the event that the soil vapor investigation results indicate that mitigation is required. The design and installation of the suction pits/piping and depressurization system will be consistent with the methods being implemented for radon mitigation.

2. After the installation of the floor slab and prior to the soil vapor investigation, the sub-surface will be allowed to stabilize for a period of at least four (4) weeks.

3. Temporary sub-slab vapor points will be installed in the Degreaser Room and in the main building immediately south of the Degreaser Room A sample will be collected from each location using batch certified 6-liter Summa canisters. A helium tracer gas test will be completed at each location to verify the integrity of the sub-slab vapor probe seal. The sub-slab vapor samples will be collected in accordance with the NYSDOH October 2006 guidance document.

4. The samples will be analyzed by a NYSDOH certified analytical laboratory for Target Compound List VOCs by EPA Method TO-15. The results will be compared against the sub-slab vapor concentration target values in the appropriate matrices provided within the NYSDOH October 2006 guidance document. Based on the analytical results, an appropriate approved action will occur (e.g. - no action, further monitoring/sampling, and/or mitigation). In the event that mitigation is required, the sub-slab depressurization system will be made active and expanded as necessary to address soil vapor intrusion from contaminants beneath the former Degreaser Room. The system will be monitored for negative pressure beneath the sub-slab periodically as required by a site-specific Site Management Plan.

Administrative Controls

A site-specific site management plan (SMP) will be developed that would include restrictions on groundwater use, and an operations, maintenance, and monitoring (OM&M) plan, which will focus primarily on the maintenance of the sub-slab depressurization system should one be required. Periodic certification would be a requirement to ensure the SMP is being implemented.

A new Order on Consent (Order) between the NYSDEC and the responsible party (Bunzl) will be executed for the implementation of the new remedy and to provide for long-term site management if

necessary. Additionally, the Site will be delisted from the Registry of Inactive Hazardous Waste Sites after the NYSDEC approves the final engineering report and SMP.

5.0 SCHEDULE AND MORE INFORMATION

Once the new Order on Consent is executed, the responsible party will submit a detailed work plan for review and approval by the Department. A fact sheet shall be prepared and distributed to the site-specific mailing list describing the proposed change in remedy and the details for finding out more information about the site. It is anticipated that this work shall be completed in 2009. A more detailed schedule will be available once the Order on Consent is executed.

If you have questions or need additional information you may contact any of the following:

Todd M. Caffoe, P.E. - Project Manager
NYSDEC - Region 8 Headquarters
6274 East Avon-Lima Road
Avon, New York 14414
(585) 226-5350

Lisa LoMaestro Silvestri, Citizen Participation Specialist
NYSDEC - Region 8 Headquarters
6274 East Avon-Lima Road
Avon, New York 14414
(585) 226-5326

Julia M. Kenney
NYS Department of Health
Bureau of Environmental Exposure Investigation
Flanigan Square
547 River Street, Room 300
Troy, New York 12180
(518) 402-7860

2/24/09
Date

Todd M. Caffoe, P.E., Project Manager
Division of Environmental Remediation, Region 8

2-24-09
Date

Bartholomew H. Putzig, P.E., RHWRE
Division of Environmental Remediation, Region 8

3-4-09
Date

Robert Knizek, P.E., Director
Remedial Bureau E

3-20-09
Date

Dale A. Desnoyers, Director
Division of Environmental Remediation