

Department of Environmental Conservation

Division of Environmental Remediation

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**Record of Decision**  
**Former APCO Property**  
**Environmental Restoration Site**  
**City of Rochester, Monroe County**  
**Site Number B-00001-8**

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**July 1998**

New York State Department of Environmental Conservation  
GEORGE E. PATAKI, *Governor*      JOHN P. CAHILL, *Commissioner*



# **DECLARATION STATEMENT ENVIRONMENTAL RESTORATION RECORD OF DECISION**

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## **Former APCO Property Environmental Restoration Site City of Rochester, Monroe County Site No. B-00001-8**

### **Statement of Purpose and Basis**

The Record of Decision (ROD) presents the selected remedial action for the former APCO property environmental restoration site which was chosen in accordance with the New York State Environmental Conservation Law (ECL).

This decision is based upon the Administrative Record of the New York State Department of Environmental Conservation (NYSDEC) for the former APCO property environmental restoration 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 substances and/or petroleum products, 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 Site Investigation/Remedial Alternatives Report (SI/RAR) for the former APCO property and the criteria identified for evaluation of alternatives the NYSDEC has selected excavation and on-site ex-situ treatment of soil and groundwater in the northern underground storage tank (NUST) and southern underground storage tank (SUST) areas; and excavation and off-site disposal of contaminated soil and C&D debris. The components of the remedy are as follows:

- Removal of all aboveground and underground storage tanks;
- Construction of an ex-situ soil treatment system;
- Construction of a groundwater collection and treatment system;
- An asbestos survey of existing buildings and asbestos abatement as necessary;

- Demolition of all existing structures on-site with off-site disposal of building debris;
- Excavation and off-site disposal of all C&D debris, solid waste, and contaminated soils above the site-specific background concentration of 5 ppm total PAHs.

**New York State Department of Health Acceptance**

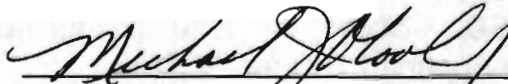
The New York State Department of Health concurs with the remedy selected for this site as being protective of human health.

**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.

\_\_\_\_\_  
Date

7/15/98

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

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**RECORD OF DECISION**  
**FORMER APCO PROPERTY ENVIRONMENTAL RESTORATION SITE**  
City of Rochester, Monroe County  
Site No. B-00001-8  
July 1998

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**SECTION 1: SITE LOCATION AND DESCRIPTION**

The former APCO property (the Site) is a 5.79-acre parcel located in a densely populated residential area on the eastern side of the City of Rochester in Monroe County. The Site is bounded by East Main Street on the north, Woodstock Road on the east, Atlantic Avenue on the south, and Akron Street on the west. Residential properties surround the Site and many homes are immediately adjacent to the Site. Area residences are served by public water and sewers, and most homes have basements. Please refer to *Figure 1* for the general site location.

**SECTION 2: SITE HISTORY**

**2.1: Operational/Disposal History**

The Site was formerly operated by a construction company. There are two dilapidated buildings in the central portion of the Site which were used for office space, warehouse storage, and equipment repair and maintenance. Other features include various above and below ground petroleum storage tanks, a raised berm, and a construction and demolition (C&D) debris landfill.

The construction and demolition debris landfill (landfill area) is located on the southern portion of the Site. The debris mainly consists of concrete rubble, soil, asphalt, tree stumps, wood, metal, and electrical conduit. A raised berm borders the western and northwestern portion of the site (berm area). The berm consists mainly of soil with varying amounts of C&D debris. Various above ground fuel oil, waste oil, and diesel fuel tanks are located adjacent to the two buildings (AST area). Also, there are six underground storage tanks (USTs) located at the northern and southeastern portions of the Site (NUST and SUST areas, respectively). Please refer to *Figure 2* for a general site layout.

**2.2: Environmental Restoration History**

A site investigation was performed at the Site in February 1997 by the City of Rochester. The results indicated soil and groundwater contamination with petroleum products in the vicinity of the USTs above acceptable cleanup guidelines. Based upon these results, further characterization of these source areas was recommended. A summary of VOCs detected in soil can be found in *Table 1*. For more details of these findings a report entitled Phase I Environmental Assessment and Phase II Environmental Investigation, February 1997 is available for review at the document repositories.

### **SECTION 3: CURRENT STATUS**

To determine the nature and extent of any hazardous substance contamination at this environmental restoration site, the City of Rochester performed a site investigation (SI) in November 1997 using funds from the 1996 Clean Air/Clean Water Bond Act.

#### **3.1: Summary of the Site Investigation**

The purpose of the site investigation (SI) was to define the nature and extent of contamination resulting from previous activities at the Site.

The SI was conducted from September to November 1997. A report entitled Site Investigation/Remedial Action Report, Former APCO Property, 79 Woodstock Road, Rochester, New York, January 1998 has been prepared describing the field activities and findings of the SI in detail. An addendum to the report was prepared in February 1998 summarizing the additional groundwater and soil sampling at the Site.

The SI included the following activities:

- Surface soil sampling to characterize any contamination in surficial soils;
- Installation of soil borings and monitoring wells for chemical analyses of soils and groundwater as well as physical properties of soil and hydrogeologic conditions;
- Excavation of test pits to characterize landfilled materials;
- Waste sampling to characterize the contents of various above and below ground storage tanks;
- Disposal of residual petroleum products from storage tanks; and
- Disposal of waste herbicides stored on-site.

To determine which media (soil, groundwater, etc.) contain contamination at levels of concern, the SI analytical data were compared to environmental Standards, Criteria, and Guidance (SCGs). Groundwater, drinking water and surface water SCGs identified for the former APCO site were based on NYSDEC Ambient Water Quality Standards and Guidance Values and Part V of the NYS Sanitary Code. NYSDEC technical administrative guidance memorandum (TAGM) 90-4046 (Soil Cleanup Guidelines for the Protection of Groundwater), background conditions and risk-based remediation criteria are all used as SCGs for soil.

Based upon the results of the SI in comparison to the SCGs and potential public health and environmental exposure routes, certain areas and media of the site require remediation. These are summarized below. More complete information can be found in the SI/RAR report.



### **3.1.1 Nature of Contamination:**

As described in the SI/RAR report, many soil and groundwater samples were collected at the Site to characterize the nature and extent of contamination. The investigation identified PAHs, arsenic, and mercury as the contaminants of concern in soils. PAHs (polycyclic aromatic hydrocarbons) are a group of semi-volatile organic compounds (SVOCs) that contain multiple benzene rings in their chemical structure. These chemicals are typically found in petroleum products, coal tar, and they are by-products of incomplete combustion. Volatile organic compounds (VOCs) were detected in groundwater. Benzene, toluene, ethylbenzene and xylene are the primary contaminants. These chemicals are commonly found in gasoline and diesel fuels. VOCs are chemicals that easily evaporate. Arsenic and mercury are heavy metals which were detected above typical background levels in soils.

### **3.1.2 Extent of Contamination**

*Table 1 and Table 2* summarize the extent of contamination for the contaminants of concern in soil and groundwater and compare the data with the remedial goals for the former APCO site. Chemical concentrations are reported in parts per billion (ppb) and/or parts per million (ppm). For comparison purposes, cleanup goals are given for each medium. The following media were investigated and summaries of the findings are presented below:

#### **Soil**

Fifteen surface soil and seventeen sub-surface soil samples were analyzed for VOCs, SVOCs, metals, cyanides, PCBs, and pesticides. The soil sampling program identified PAHs, mercury, and arsenic as the contaminants of concern in soil. The areas of elevated metals and PAHs coincide with areas of visually stained black soils. Concentrations of PAHs in soils range from <180 ppb to 42,300 ppb. Sample results from previous studies indicate high levels of VOCs in soils in the vicinity of the USTs. These levels ranged from 0.07 ppm to 8,260 ppm total VOCs. Please refer to *Table 1* for a list of compounds and number of exceedences. Data generated during the SI did not indicate VOC contamination above applicable guidance values beyond the NUST and SUST areas nor on neighboring properties. Very low levels of pesticide compounds were detected throughout the site; however, concentrations were well below applicable remedial guidance.

Supplemental surface soil sampling was conducted by the City of Rochester in February 1998. A total of five background samples were obtained and analyzed for PAHs. Total concentrations of PAHs ranged from 3.2 ppm to 40.6 ppm with an average concentration of 26 ppm. All sample locations were within 1/4 mile and upgradient of the APCO site. The results are presented in *Table 7*.

#### **Groundwater**

Nine groundwater monitoring wells were installed on-site during the month of November 1997. The wells were completed within the overburden or within the overburden/bedrock interface. Please refer to *Figure 3* for well locations and groundwater flow direction. The overburden consisted mainly of lacustrine sediments over water-sorted ablation and

subglacial lodgement tills. The depth to bedrock ranged from 5 to 22 feet below ground surface and the bedrock consisted of Rochester shale and DeCew dolomite formations.

The depth to groundwater is approximately ten feet below ground surface. All nine monitoring wells were sampled for VOCs, SVOCs, metals, cyanides, PCBs, and pesticides. In addition to the permanent groundwater monitoring wells, thirteen groundwater samples were obtained from Geoprobe® soil borings in the NUST, SUST and AST areas. These samples were analyzed for VOCs and the base/neutral SVOCs. Please refer to *Figure 4* for Geoprobe® locations.

The primary VOCs detected were benzene, toluene, xylene, and ethylbenzene. These contaminants can be attributed to petroleum products formerly used and stored on-site. Total VOC concentrations ranged from less than five (5) ppb to 12,100 ppb. Initial sample results from the SI indicated widespread groundwater contamination with numerous pesticide compounds and acetone. These data were questionable because they were not consistent with compounds detected in soils. Also, the acetone contaminant "plume" did not follow the known groundwater flow pathways. Two subsequent sampling rounds by NYSDEC and the City of Rochester did not detect acetone in groundwater, and low-level pesticides were only detected in well MW-4. These data were consistent with soil data and suggest some of the initial groundwater data generated during the SI were inaccurate. Groundwater contamination with benzene, toluene, ethylbenzene, and xylene was confirmed in off-site monitoring well MW-9. Please refer to *Tables 3, 4, 5 and 6* for a summary of groundwater sample results.

#### **Waste Materials**

Eight test trenches and seven test pits were excavated into the landfill and berm areas, respectively. These were analyzed for VOCs, SVOCs, metals, cyanides, PCBs, and pesticides.

Products stored in the ASTs and USTs were sampled and characterized for disposal. Sample results indicated the tanks contained various mixtures of water, diesel fuel, waste oil, and gasoline. Approximately 1500 gallons of wastes were pumped out of the tanks and disposed of off-site in December 1997.

A wooden box containing unused solid herbicides and fungicides was sampled and overpacked on-site. The materials in the box were characterized as Captan 50-W fungicide, Dactha W-75 turf herbicide, and Tordon 22K weed killer. The box and unused chemicals were disposed of as nonhazardous waste at High Acres Landfill in Perinton, NY.

### **3.2 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. A more detailed discussion of the health risks can be found in Section 6.0 of the SI/RAR report.

An exposure pathway is how an individual may come into contact with a contaminant. The five elements of an exposure pathway are 1) the source of contamination; 2) the environmental media and transport mechanisms; 3) the point of exposure; 4) the route of exposure; and 5) the receptor population. These elements of an exposure pathway may be based on past, present, or future events.

Completed pathways which are known to or may exist at the site include:

- Ingestion of on-site soils;
- Direct contact with on-site soils;
- Inhalation of dust from the site;
- Potential direct contact with groundwater; and
- Potential inhalation of VOCs from contaminated groundwater and soils.

It is expected that this property will be developed for unrestricted residential or recreational use. Therefore, remediation will be required to mitigate the known and potential future exposure pathways.

### **3.3 Summary of Environmental Exposure Pathways:**

This section summarizes the types of environmental exposures which may be presented by the site. Groundwater is the primary route of migration for contaminants off-site and no significant environmental resources (i.e., creeks, wetlands, habitats) were identified on-site. Please refer to section 3.8 of the SI/RAR report. There are no identified environmental resources within 1/4 mile of this site, and there are no known environmental exposure pathways.

## **SECTION 4: ENFORCEMENT STATUS**

Potentially Responsible Parties (PRPs) are those who may be legally liable for contamination at a site. This may include past owners and operators, waste generators, and haulers.

Since no viable PRPs have been identified, there are currently no ongoing enforcement actions. However, legal action may be initiated at a future date by the State to recover State response costs should viable PRPs be identified. The City of Rochester will assist the State in its efforts by providing all information to the State which identifies PRPs. The City of Rochester will also not enter into any agreement regarding response costs without the approval of the NYSDEC.

## **SECTION 5: SUMMARY OF THE REMEDIATION GOALS AND FUTURE USE OF THE SITE**

Goals for the remedial program have been established through the remedy selection process stated in 6 NYCRR Part 375-1.10. The overall remedial goal is to meet all Standards, Criteria, and Guidance (SCGs) and be protective of human health and the environment.

At a minimum, the remedy selected should eliminate or mitigate all significant threats to the public health and to the environment presented by the hazardous substances disposed at the site through the proper application of scientific and engineering principles.

The proposed future use for the former APCO site would be residential use. The goals selected for this site are:

- Reduce, control, or eliminate to the extent practicable the contamination present within the soils/waste on-site;
- Eliminate the potential for direct human or animal contact with the contaminated soils on-site;
- Mitigate the impacts of contaminated groundwater to the environment; and
- Provide for attainment of SCGs for groundwater quality to the extent practicable.

## **SECTION 6: SUMMARY OF THE EVALUATION OF ALTERNATIVES**

The selected remedy should be protective of human health and the environment, be cost-effective and comply with other statutory laws. Potential remedial alternatives for the former APCO site were identified, screened and evaluated in a Remedial Alternatives Report. This evaluation is presented in the report entitled Site Investigation/Remedial Action Report, Former APCO Property, 79 Woodstock Road, Rochester, New York, January 1998, and the SI/RAR Addendum Report, February 1998.

A summary of the detailed analysis follows. As used in the following text, the time to implement reflects only the time required to implement the remedy, and does not include the time required to design the remedy or procure contracts for design and construction.

### **6.1: Description of Alternatives**

The potential remedies are intended to address the contaminated soil and groundwater at the Site. The SI/RAR identified three areas of concern. Area of concern (AOC) #1 consisted of the NUST, SUST, and AST areas and petroleum contaminated soils and groundwater in the vicinity of the USTs. AOC #2 consisted of site-wide surficial soils, the landfill area, and the berm area. AOC #3 consisted of site-wide groundwater contamination with pesticides

and acetone. Subsequent sampling by NYSDEC and the City of Rochester have confirmed that pesticides and acetone are not a site-wide groundwater concern. Based upon these results, AOC #3 was eliminated from further analysis.

### **Area of Concern #1**

#### **NUST and SUST areas and aboveground storage tanks (NUST/SUST Area)**

##### ***Alternative 1.1***

###### **No Action**

The no action alternative is typically evaluated as a procedural requirement and as a basis for comparison. Long-term groundwater monitoring may be considered to monitor the continued spread of contamination from this area. This alternative would leave the site in its present condition and would not provide any additional protection to human health or the environment.

Present Worth:	\$ 0
Capital Cost:	\$ 0
Annual O&M:	\$ 0
Time to Implement:	Immediate

##### ***Alternative 1.2***

###### **Tank and Soil Removal**

This alternative would involve excavation and removal of all USTs, ASTs, and contaminated soils to SCG levels protective of groundwater quality. Please refer to *Table 1*. All excavations would be backfilled with clean soils. Because groundwater would not be actively remediated, long-term monitoring of groundwater and indoor (basement) air quality may be required.

Present Worth:	\$1,086,093
Capital Cost:	\$312,182
Annual O&M:	\$50,344
Time to Implement:	6 months - 1 year

##### ***Alternative 1.3***

###### **Tank Removal and In-Situ Soil and Groundwater Treatment**

This alternative would involve excavation and removal of all USTs and ASTs. The tank excavations would be backfilled with clean soils. On-site and off-site soils and groundwater in the vicinity of the tanks would be treated using in-situ vacuum extraction, air sparging, biological and/or chemical processes. Soils would be treated to SCG levels protective of groundwater quality. Groundwater would be recovered and treated until SCGs are achieved or until concentrations reach asymptotic levels for a sustained period indicating continued operation would not result in significant mass removal of contamination. A design-phase investigation would be conducted to refine the estimated extent of contamination, confirm that off-site properties have not been impacted, and select the appropriate in-situ

technology. Long-term groundwater monitoring would be required to monitor the effectiveness of the remedy.

Present Worth:	\$603,068
Capital Cost:	\$407,180
Annual O&M:	\$71,932
Time to Implement:	9 months - 1 year

*Alternative 1.4*

**Tank Removal and Ex-Situ Soil and Groundwater Treatment**

This alternative would involve excavation and removal of all USTs and ASTs. All excavations would be backfilled with clean soils. Contaminated soils would be excavated and treated on-site, and contaminated groundwater (on-site and off-site) would be collected and treated on-site and discharged to the sewer. Soils would be treated to SCG levels protective of groundwater quality. Groundwater would be recovered and treated until SCGs are achieved or until concentrations reach asymptotic levels for a sustained period indicating continued operation would not result in significant mass removal of contamination. A design-phase investigation would be conducted to further refine the estimated extent of contamination and confirm that off-site properties have not been impacted. Long-term groundwater monitoring would be required to monitor the effectiveness of the remedy.

Present Worth:	\$497,219
Capital Cost:	\$320,004
Annual O&M:	\$177,215
Time to Implement	9 months - 1 year

**Area of Concern #2**

**Landfill and Berm Areas and Surface Soils**

*Alternative 2.1*

**No Action**

The no action alternative is typically evaluated as a procedural requirement and as a basis for comparison. Long-term groundwater monitoring may be considered to monitor the continued spread of contamination from this area. This alternative would leave the site in its present condition and would not provide any additional protection to human health or the environment.

Present Worth:	\$ 0
Capital Cost:	\$ 0
Annual O&M:	\$ 0
Time to Implement:	Immediate



## *Alternative 2.2*

### **Institutional Controls**

This alternative would include restriction of on-site land usage and groundwater usage through deed restrictions. These controls would also include development of a soil management plan and erection of additional fencing. Long-term groundwater monitoring would be implemented to monitor the migration of groundwater contamination.

Present Worth:	\$263,191
Capital Cost:	\$6,656
Annual O&M:	\$16,688
Time to Implement:	<6 months

## *Alternative #2.3*

### **Excavation and Off-site Disposal of Contaminated Soils and Wastes**

This alternative would consist of excavation and off-site disposal of contaminated soils and wastes. The existing chain-link perimeter fence would be replaced. All visually stained soils and construction and demolition debris would be excavated and disposed of off-site. The landfill and berm materials would be excavated and sorted to remove all C&D, solid waste, and large concrete objects. Approximately every 150 cubic yards of remaining sorted material would be sampled to verify that PAH concentrations do not exceed the site-specific background concentration of 5 ppm. All soils exceeding the site-specific background for PAHs would be disposed of off-site as non-hazardous waste. Soils with PAH concentrations at or less than the site-specific background value would be used on-site for backfill and grading purposes. A design-phase investigation would be conducted to refine the estimated extent of contamination. All existing buildings would be razed and disposed of off-site. Building demolition would require an asbestos survey and abatement as necessary.

Present Worth:	\$1,594,326
Capital Cost:	\$1,587,326
Annual O&M:	\$7,000
Time to Implement:	9 - 18 months

## *Alternative 2.4*

### **On-site Disposal of Contaminated Soils and Wastes**

This alternative would involve the consolidation of visually stained soils and construction and demolition debris from the landfill and berm areas and site-wide surface soils. A two-foot soil cover would be placed over contaminated soils to prevent exposure and minimize contaminated surface water run-off. A design-phase investigation would be conducted to refine the estimated extent of contamination. All existing buildings would be razed. Building demolition would require an asbestos survey and abatement as necessary. To the extent practical, obvious contaminated sources such as waste containers would be removed and disposed of off-site. In addition, large and bulky C&D materials would be removed to facilitate grading and construction of a soil cover. Upon final site grading, verification samples would be taken to confirm that total PAH concentrations do not exceed the site-

specific background value of 5 ppm. Since wastes would still remain on-site, this alternative would require institutional controls and long-term groundwater monitoring.

Present Worth:	\$1,821,517
Capital Cost:	\$1,457,374
Annual O&M:	\$23,688
Time to Implement:	9 - 18 months

## **6.2 Evaluation of Remedial Alternatives**

### **6.2.1 Comparison Criteria**

The criteria used to compare the potential remedial alternatives are defined in the regulation that directs the remediation of environmental restoration project sites in New York State (6 NYCCR Part 375). For each of the criteria, a brief description is provided followed by an evaluation of the alternatives against that criterion. A detailed discussion of the evaluation criteria and comparative analysis is contained in the Remedial Alternatives Report.

*The first two evaluation criteria are termed threshold criteria and must be satisfied in order for an alternative to be considered for selection.*

1. Compliance with New York State Standards, Criteria, and Guidance (SCGs). Compliance with SCGs addresses whether or not a remedy will meet applicable environmental laws, regulations, standards, and guidance. The most significant SCGs identified for this site are NYSDEC TAGM 90-4046, and NYSDEC technical and operational guidance series (TOGS) 1.1.1. The documents identify soil and groundwater cleanup standards which are protective of human health and the environment.

2. Protection of Human Health and the Environment. This criterion is an overall evaluation of the health and environmental impacts to assess whether each alternative is protective.

*The next five "primary balancing criteria" are used to compare the positive and negative aspects of each of the remedial strategies.*

3. Short-term Effectiveness. The potential short-term adverse impacts of the remedial action upon the community, the workers, and the environment during the construction and/or implementation are evaluated. The length of time needed to achieve the remedial objectives is also estimated and compared against the other alternatives.

4. Long-term Effectiveness and Permanence. This criterion evaluates the long-term effectiveness of the remedial alternatives after implementation. If wastes or treated residuals remain on site after the selected remedy has been implemented, the following items are evaluated: 1) the magnitude of the remaining risks, 2) the adequacy of the controls intended to limit the risk, and 3) the reliability of these controls.



5. Reduction of Toxicity, Mobility or Volume. Preference is given to alternatives that permanently and significantly reduce the toxicity, mobility or volume of the wastes at the site.

6. Implementability. The technical and administrative feasibility of implementing each alternative is evaluated. Technical feasibility includes the difficulties associated with the construction and the ability to monitor the effectiveness of the remedy. For administrative feasibility, the availability of the necessary personnel and material is evaluated along with potential difficulties in obtaining specific operating approvals, access for construction, etc.

7. Cost. Capital and operation and maintenance costs are estimated for each alternative and compared on a present worth basis. Although cost is the last balancing criterion evaluated, where two or more alternatives have met the requirements of the remaining criteria, cost effectiveness can be used as the basis for the final decision. The costs for each alternative are presented in *Table 8*.

*This final criterion is considered a modifying criterion and is taken into account after evaluating those above. It is focused upon after public comments on the Proposed Remedial Action Plan have been received.*

8. **Community Acceptance** - Concerns of the community regarding the SI/RAR reports and the Proposed Remedial Action Plan have been evaluated. The "Responsiveness Summary" included as Appendix A presents the public comments received and the Department's response to the concerns raised. The public comments received were generally supportive of the selected remedy. The residents requested some portions of the remedy be implemented this year. These include: removal of all aboveground and underground tanks, replacement of fencing, removal of surficial debris, and demolition of the on-site buildings. The City of Rochester will propose an Interim Remedial Measure (IRM) to address some of these concerns. Another public meeting will be held prior to implementation of the IRM.

## **6.2.2 Comparison of Remedial Alternatives**

### **Alternatives 1.1 and 2.1**

These alternatives are no action alternatives for each of the previously defined areas of concern. These alternatives would not meet SCGs nor would they be protective of human health or the environment (criteria 1 & 2). These alternatives would not meet criteria 3, 4, and 5 because no cleanup would be performed. These remedies are easy to implement and they have the lowest associated costs (criteria 6 & 7).

### **Alternative 1.2 (NUST/SUST Area)**

Tank and soil removal would not meet SCGs because groundwater contamination would not be addressed. This alternative would reduce some of the threats to public health through removal of contaminated soils, but it would not mitigate the potential for contaminated groundwater to enter residential basements in the area. The remedy may be intrusive to existing residential properties with some short-term impacts to area residents. The remedy is permanent for soil SCGs and would eliminate a continuing source of groundwater

contamination. Since contaminants would be removed from the site, the volume of contaminants would be reduced.

***Alternative 1.3 (NUST/SUST Area)***

Tank removal and in-situ soil and groundwater treatment would meet SCGs and it would be protective of human health. Some residential properties may be affected during implementation causing some short-term intrusions on neighboring properties. Portions of the site would be restricted until SCGs are achieved. This alternative would provide long-term effectiveness and significantly reduce the volume and mobility of contaminants in groundwater and soil.

***Alternative 1.4 (NUST/SUST Area)***

Tank removal and ex-situ groundwater and soil treatment would meet SCGs and it would be protective of human health. Some residential properties may be affected during implementation causing some short-term intrusions on neighboring properties. Also, construction of an on-site treatment area for contaminated soils would limit development of the Site until treatment is complete. This alternative would be easy to implement and there is ample space to treat soils. This alternative would provide long-term effectiveness and significantly reduce the volume and mobility of contaminants in soil. Removal of contaminated soil would eliminate a continuing source of groundwater contamination.

***Alternative 2.2 (Landfill/Berm/Surface Soil)***

This alternative would provide institutional controls only. It would not meet SCGs and it would not be protective of human health. Institutional controls would be easy to implement and they would limit some potential exposures. There would be no reduction in contaminants nor would there be any permanence to this alternative. There would be minimal short-term impacts and costs.

***Alternative 2.3 (Landfill/Berm/Surface Soil)***

Excavation and off-site waste disposal would meet SCGs and be protective of human health. Short-term effects would be significant heavy equipment and truck traffic during the removal action. The remedy would be easy to implement and would provide long-term effectiveness. The volume of contaminants would be significantly reduced. This would be the most costly alternative to implement.

***Alternative 2.4 (Landfill/Berm/Surface Soil)***

Excavation and on-site disposal would meet SCGs and be protective of human health. Short-term effects would be significant heavy equipment and truck traffic during consolidation of fill material and soil cover placement. The remedy would be easy to implement and would provide long-term effectiveness. The volume of contaminants would not be reduced; however, the soil cover would reduce contaminant mobility.

## SECTION 7: SUMMARY OF THE PREFERRED REMEDY

Based upon the results of the SI/RAR, and the evaluation presented in Section 6, the NYSDEC has selected *excavation and on-site ex-situ treatment of soil and groundwater in the NUST and SUST areas (alternatives 1.4); and excavation and off-site disposal of contaminated soil and C&D debris (alternative 2.3)* as the remedies for this site. These selections are based upon the proposed future land use as unrestricted residential or recreational property. The no action alternatives (1.1 and 2.1) would not be protective of human health and would restrict the proposed land use.

### AOC#1

Tank and soil removal (*Alternative 1.2*) will not address groundwater contamination in the vicinity of the USTs. SCGs will not be achieved, nor will this alternative be protective of human health. *Alternatives 1.3 and 1.4* both meet SCGs, the proposed land usage, and are protective of human health. Tank removal and ex-situ soil and groundwater treatment (*alternative 1.4*) is more cost-effective than tank removal and in-situ treatment (*alternative 1.3*). Although *alternative 1.4* has greater short-term effects due to invasive off-site excavations, soil cleanup goals will be achieved immediately and a continuing source of groundwater contamination will be removed; therefore, redevelopment could proceed more quickly.

### AOC#2

*Alternative 2.2* will not allow the proposed land usage nor will it meet SCGs. *Alternative 2.4* will meet SCGs and it is protective of human health; however, a large portion of the site will require long-term maintenance and will require restricted land use. *Alternative 2.3* will meet all criteria and provide unrestricted land usage for residential or recreational development.

The estimated present worth to implement the selected remedy is approximately \$2.09 million. The cost to construct the selected remedy is estimated to be \$1.91 million and the estimated average annual operation and maintenance cost for 3 years is approximately \$185,000.

The elements of the selected remedy follows:

- A remedial design program will be conducted to verify the components of the conceptual design, and provide the details necessary for the construction, operation and maintenance, and monitoring of the remedial program. Any uncertainties identified during the SI/RAR will be resolved;
- A design-phase investigation to delineate the extent of soil removal and determine the extent of groundwater contamination will be required. Off-site soil sampling in the vicinity of the USTs will be included to verify that neighboring properties have not been impacted. Also, additional off-site monitoring wells will be necessary;
- Removal of all ASTs and USTs;

- Construction of an ex-situ soil treatment system to address on-site and off-site soil contamination in the NUST and SUST areas. All on-site and any off-site contaminated soils in the vicinity of the NUST and SUST areas will be excavated and treated on-site until remedial goals are achieved;
- Construction of a groundwater collection and treatment system to address both on-site and off-site groundwater contamination. Groundwater will be recovered and treated until SCGs are achieved or until concentrations reach asymptotic levels for a sustained period indicating continued operation will not result in significant mass removal of contamination;
- An asbestos survey of existing buildings and asbestos abatement as necessary;
- Demolition of all existing structures on-site with off-site disposal of C&D debris;
- Excavation and off-site disposal of all C&D debris, solid waste, and visually stained soils on-site. The berm and landfill areas will be excavated and sorted to remove all C&D, solid waste, and large concrete objects. Approximately every 150 cubic yards of processed soils will be sampled to verify that PAH concentrations do not exceed the site-specific background value of 5 ppm. All soils exceeding the site-specific background value will be disposed of off-site as non-hazardous waste. Soils with PAH concentrations at or less than the site-specific background value will be used on-site for backfill and grading purposes; and
- Since the remedy results in untreated hazardous substance remaining at the site, a long-term monitoring program will be instituted. This program would allow the effectiveness of the ex-situ soil and groundwater treatment system to be monitored and will be a component of the operation and maintenance for the site. Once remedial goals for groundwater and soils have been achieved, further monitoring will not be necessary.

## **SECTION 8: HIGHLIGHTS OF COMMUNITY PARTICIPATION**

As part of the Former APCO Property environmental restoration process, a number of citizen participation activities were undertaken in an effort to inform and educate the public about conditions at the site and the potential remedial alternatives. The following participation activities were conducted for the site:

- A local repository for documents pertaining to the site was established at the Winton Road Branch of the Rochester Public Library.
- A site mailing list was established which included nearby property owners, citizens' groups, local political officials, local media, and other interested parties.

- June 1997 - A fact sheet was distributed on announcing the signing of the state assistance contract.
- July 15, 1997 - Public meeting with the local citizens' group and interested residents to discuss the proposed site investigation.
- December 9, 1997- Public meeting with the local citizens' group and interested residents to discuss progress at the site.
- April 1998 - A fact sheet announcing the availability of the PRAP for public review.
- May 14, 1998 - Public meeting to discuss the PRAP.
- June 1998 - A responsiveness summary was prepared and made available to the public, to address the comments received during the public comment period for the PRAP.

**Table 1**  
**Nature and Extent of Contamination in Soils**

Contaminant of Concern and Contaminant Class	Standards, Criteria, and Guidance Values (SCGs)	Number of SCG Exceedances	Concentration Range
<b>**Volatile Organic Compounds</b>	(ppb)		(ppb)
benzene*	60	1/67	ND to 627*
toluene*	1,500	3/67	ND to 543,097*
ethylbenzene*	5,500	4/67	ND to 335,119*
total xylenes*	1,200	5/67	ND to 2,506,934*
isopropylbenzene*	8,100	2/7	ND to 38,526*
n-propylbenzene*	9,300	4/7	ND to 1,211,724*
1,3,5-trimethylbenzene*	10,000	4/7	ND to 1,873,690*
1,2,4-trimethylbenzene*	2,400	5/7	ND to 1,422,319*
sec-butylbenzene*	10,000	0/7	ND to 1,856*
p-isopropyltoluene*	10,000	2/7	ND to 50,196*
<b>Semi-volatile Organic Compounds (SVOCs)</b>	(ppb)		(ppb)
naphthalene*	13,000 or SB	4/67	ND to 277,549*
benzo(a)anthracene	224 or SB	19/60	ND to 12,000
benzo(a)pyrene	61 or SB	32/60	ND to 5,800
benzo(b)fluoranthene	1,100 or SB	11/60	ND to 7,500
benzo(k)fluoranthene	1,100 or SB	1/60	ND to 1,900
chrysene	400 or SB	17/60	ND to 14,000
dibenzo(a,h)anthracene	14 or SB	20/60	ND to 3,800
<b>Metals</b>	(ppm)		(ppm)
arsenic	7.5 or SB	9/46	ND to 65.4
mercury	0.2 or SB	4/46	ND to 14.6

\* Compounds were detected above cleanup goals during previous site investigations but not during SI/RAR

\*\*Total VOCs shall not exceed 10 ppm and the cleanup goal for compounds listed above shall not be exceeded

Cleanup goals are based upon NYSDEC TAGM 90-4046

ND - Not Detected

SB - Site Background

**Table 2**  
**Nature and Extent of Contamination in Groundwater**

Contaminant of Concern and Contaminant Class	Concentration Range	Number of SCG Exceedences	Standards, Criteria, and Guidance Values (SCGs)
<b>Volatile Organic Compounds (VOCs)</b>	(ppb)		(ppb)
benzene	ND to 1,700	8/34	0.7
toluene	ND to 2,000	2/34	5
total xylenes	ND to 6,000	7/34	5
ethylbenzene	ND to 2,400	3/34	5
1,2-dichlorobenzene	ND to 10	1/34	4.7
chlorobenzene	ND to 16	1/34	5
<b>Semivolatile Organic Compounds (SVOCs)</b>	(ppb)		(ppb)
naphthalene	ND to 150	2/22	10 *

ND - Not Detected

Cleanup goals are based upon NYSDEC TOGS 1.1.1

\* - Guidance Value



**Table 3**  
**Organic Compounds Detected in Groundwater**  
**Former APCO Site**  
 NYSDEC Sample Results (1/15/98)

Compound	Sample Location (ppb)					
	MW-4	MW-5A	MW-6A	MW-8	MW-9	*MW-9 DL
1,1-dichloroethane	-	-	-	2J	-	-
1,1,1-trichloroethane	-	2J	-	-	-	-
benzene	-	-	48	-	430	450
toluene	-	-	2J	-	51	52
chlorobenzene	-	1J	-	-	-	-
ethylbenzene	-	-	-	-	220	240
total xylenes	-	-	-	-	520	590
α-BHC	0.65	-	-	-	-	-
β-BHC	0.28P	-	-	-	-	-

Wells MW-3A, MW-2, MW-1, and MW-7 had non-detectable levels of VOCs and pesticides

**Table 4**  
**Organic Compounds Detected in Groundwater**  
**Former APCO Site**  
 City of Rochester Sample Results (1/23/98)

Compound	Sample Location (ppb)					
	MW-2	MW-3A	MW-4	MW-6A	MW-9	*MW-9 DL
benzene	-	-	-	52	360	390
toluene	-	-	-	3J	54	51
ethylbenzene	-	-	-	-	220	230
total xylenes	-	-	-	4J	570	610
α-BHC	-	-	1.2		-	-
β-BHC	-	-	0.28		-	-

\*Analyses performed by Columbia Analytical Services

- Compound Not Detected

J Estimated Value

DL Dilution

**PLEASE REFER TO FIGURE 3 FOR WELL LOCATIONS**

Wells MW-1, MW-5A, MW-7, and MW-8 were not sampled on 1/23/98

Results from SI/RAR report are not included



**Table 5**  
**Groundwater Sample Results**  
**Geoprobe® Borings Northern UST Area and AST Area**

Compound	Sampling Location (ppb)						
	AST-B1	AST-B2	NUST-B1	NUST-B3	NUST- B4	NUST-B5	NUST-B6A
benzene	2J	-	220	-	1,700	1,300	18J
ethylbenzene	-	-	82	-	2,400	320	-
toluene	-	-	7J	-	2,000	-	-
total xylenes	-	7J	54	-	6,000	130	-
naphthalene	-	-	2J	-	-	41	3J

No sample results for NUST-B2

**Table 6**  
**Groundwater Sample Results**  
**Geoprobe® Borings Southern UST Area**

Compound	Sampling Location (ppb)					
	SUST-B1	SUST-B2	SUST-B3	SUST-B4	SUST-B5	SUST-B6
benzene	-	-	100	-	-	-
ethylbenzene	-	-	4J	-	-	-
toluene	-	-	1J	-	-	-
total xylenes	-	-	15	-	-	-
naphthalene	-	-	1J	-	-	-

- Compound Not Detected  
J Estimated Value  
DL Dilution  
See Figure 4 for sample locations

**Table 7**  
**Selected PAHs in Background Surface Soils Samples**

Semi-volatile organic compound (SVOC)	Soils Sample Concentration (µg/kg)		
	Maximum	Minimum	Average
benzo(a)anthracene	2,900	240	1,688
benzo(a)pyrene	3,900	330	2,346
benzo(b)fluoranthene	4,400	340	2,628
benzo(k)fluoranthene	3,700	380	2,156
chrysene	3,600	300	2,080
dibenzo(a,h)anthracene	9,000	70	2,896

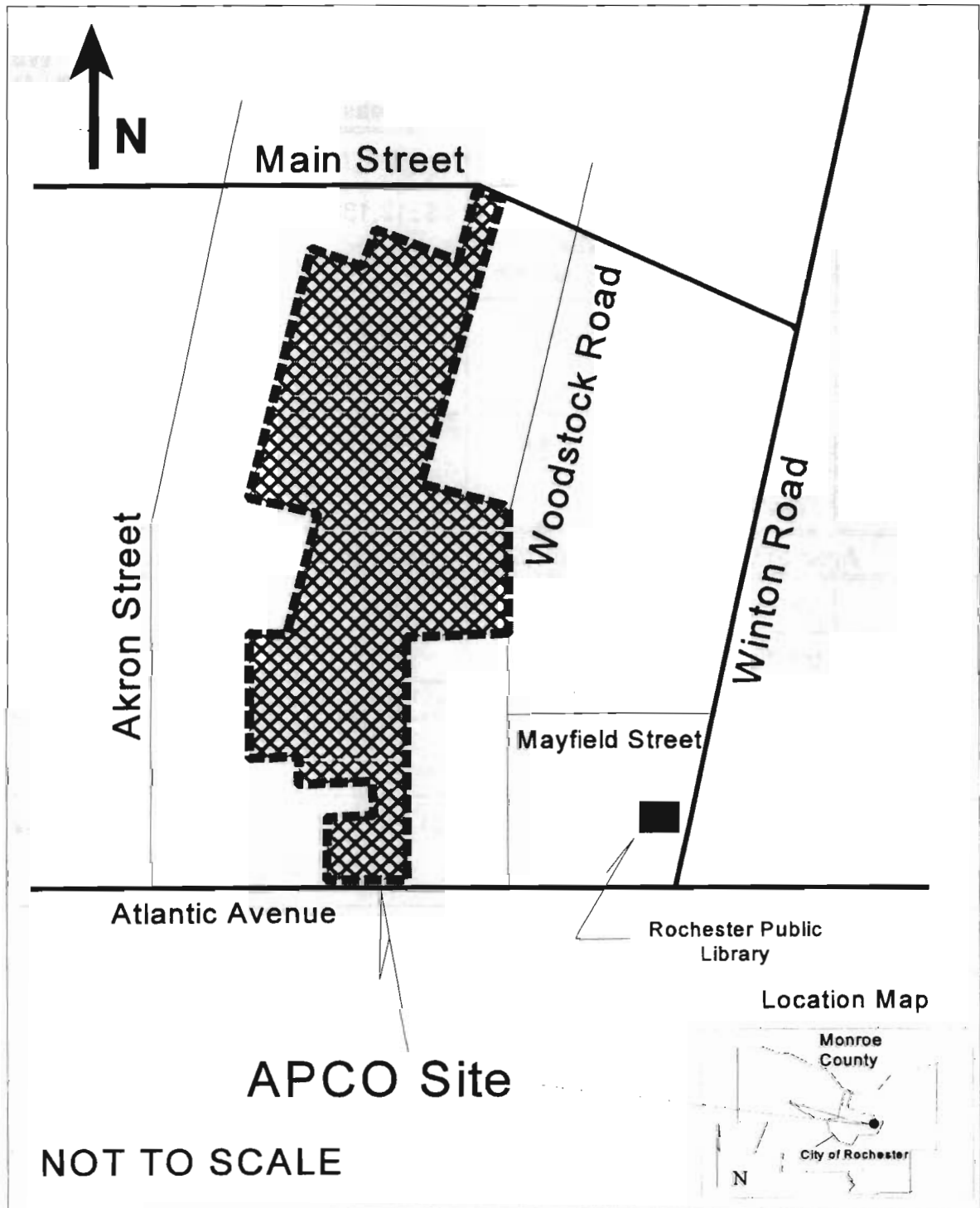
Total PAHs in five background samples ranged from 3.2 ppm to 40.6 ppm with an average concentration of 26 ppm.

**Table 8  
Remedial Alternative Costs**

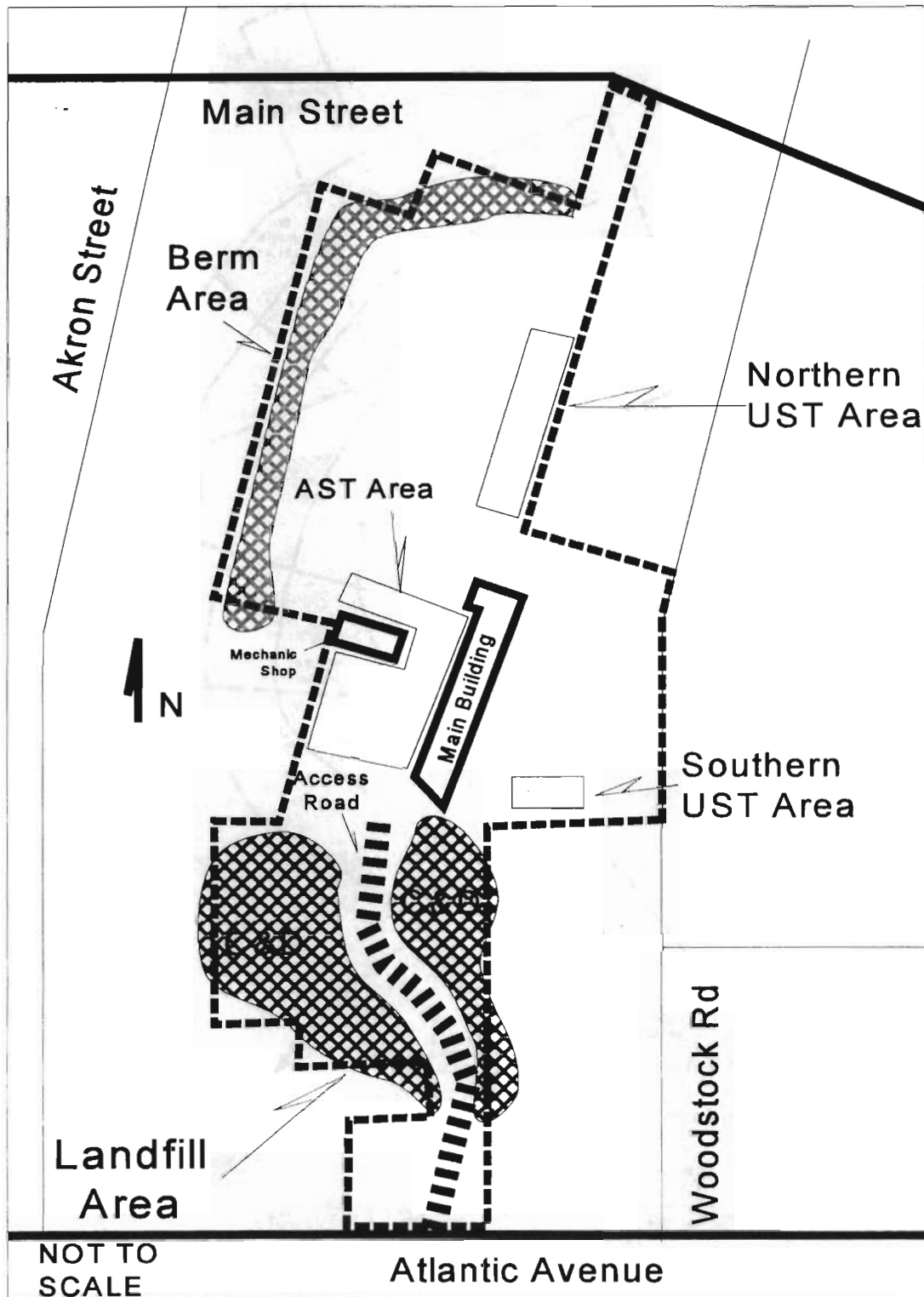
<b>Alternative Number</b>	<b>Remedial Alternative</b>	<b>Capital Cost</b>	<b>Annual O&amp;M</b>	<b>Total Present Worth</b>
<b>Area of Concern #1 - NUST and SUST Areas and Aboveground Tanks</b>				
1.1	No Action	\$ 0	\$ 0	\$ 0
1.2	Tank and Soil Removal with Long-term Groundwater and/or Indoor Air Monitoring	\$312,182	\$50,344	\$1,086,093
1.3	Tank Removal and In-situ Soil and Groundwater Treatment	\$407,180	\$71,932	\$603,068
1.4	Tank Removal and Ex-situ Soil and Groundwater Treatment	\$320,004	\$177,215	\$497,219
<b>Area of Concern #2 - Landfill and Berm Areas and Surface Soils</b>				
2.1	No Action	\$ 0	\$ 0	\$ 0
2.2	Institutional Controls	\$6,656	\$16,688	\$263,191
2.3	Excavation and Off-site Disposal of Contaminated Soil and Waste	\$1,587,326	\$7,000	\$1,594,326
2.4	On-site Disposal of Contaminated Soils and Wastes	\$1,457,374	\$23,688	\$1,821,517

Source: SI/RAR Report (1/98)  
Shaded boxes are the preferred alternatives

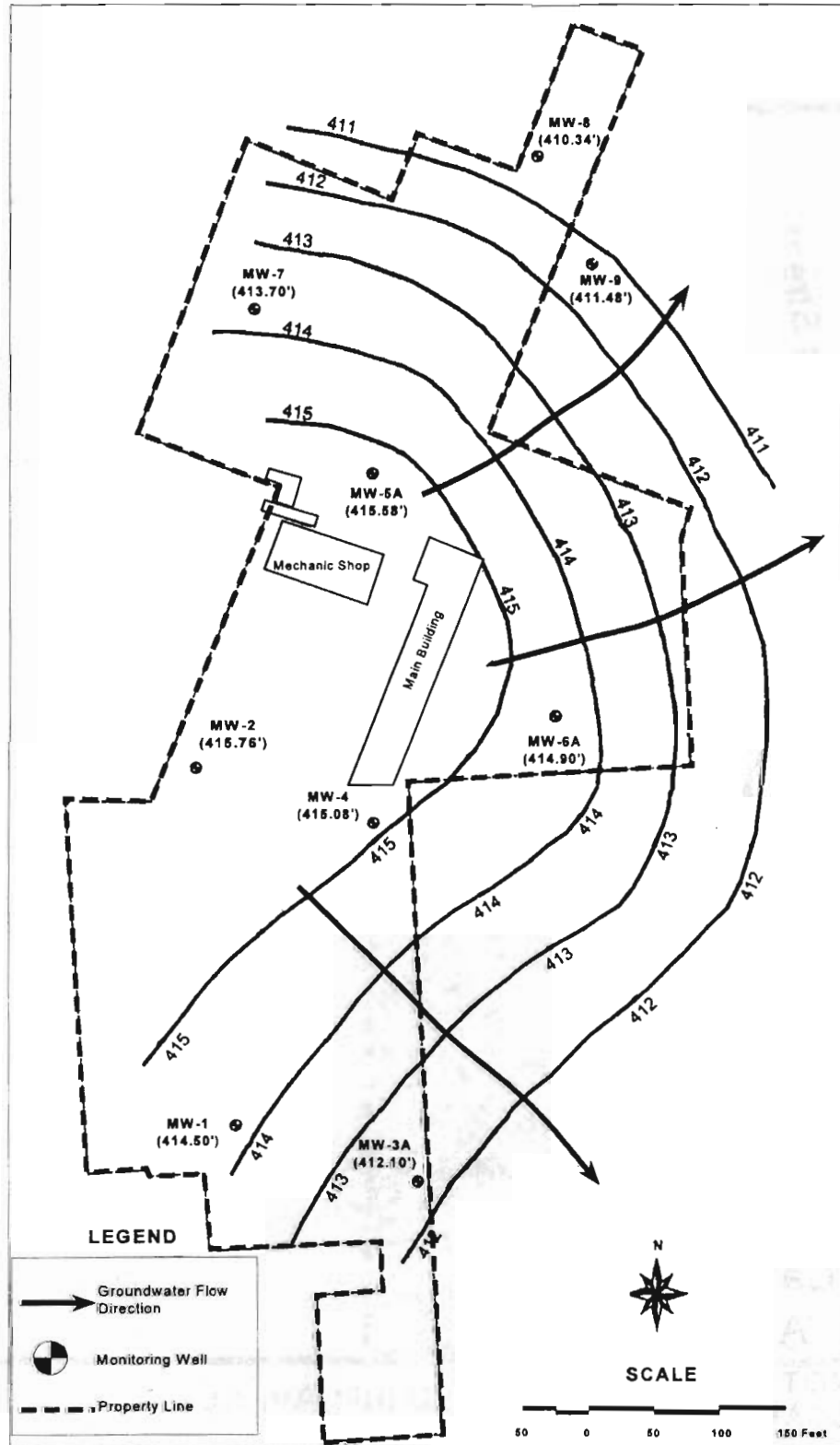
**Figure 1**  
**Site Location Map**



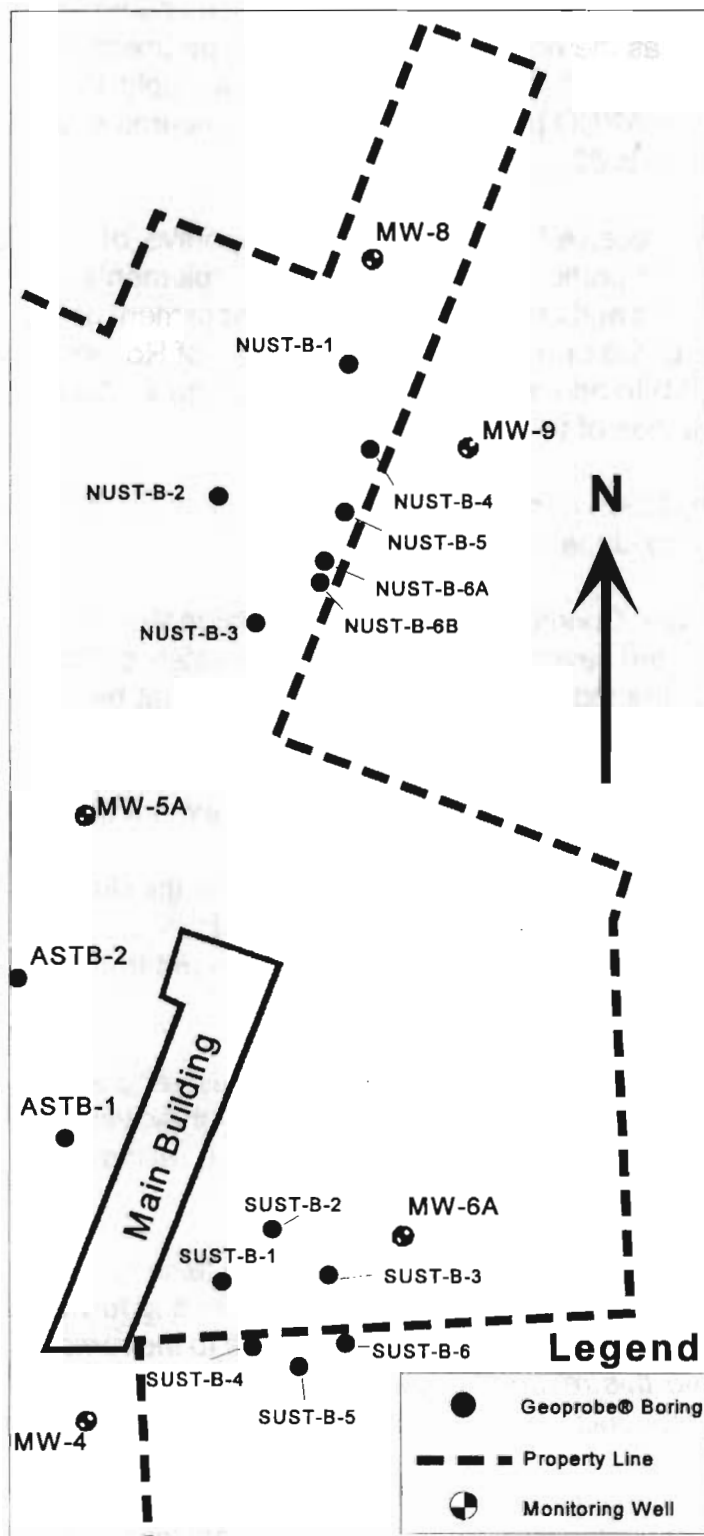
**Figure 2**  
**General Site Layout**



**Figure 3**  
**Groundwater Elevations**



**Figure 4**  
**NUST, SUST, and AST Geoprobe® Boring Locations**



## Appendix A - Responsiveness Summary

The Department received comments from a public meeting on held May 14, 1998 and received comments compiled by the City of Rochester. Many of the comments received concerned an adjacent property known as the Artuso property. The Department appreciates these concerns and considers them important; however, they do not apply to the selection process for remediation of the former APCO property. The major concerns regarding the Artuso property are addressed in comments #2 and #3 below.

The public comments received were generally supportive of the selected remedy. The residents requested some portions of the remedy be implemented this year. These include: removal of all aboveground and underground tanks, replacement of fencing, removal of surficial debris, and demolition of the on-site buildings. The City of Rochester will propose an Interim Remedial Measure (IRM) to address some of these concerns. Another public meeting will be held prior to implementation of the IRM.

The following is a compilation of comments received during the public comment period which ran from April 21, 1998 to June 5, 1998:

Comment #1) Current Site Conditions - Actual construction work is scheduled to begin in May 1999. Residents expressed several concerns about the safety of the site in its current condition and just want the site cleaned up now. They requested that before the main remedial work begins:

- the onsite garage that is caving in be torn down, even if the debris must remain on site until 1999;
- rye grass be placed on bare soil areas to eliminate the dust;
- the dumpsters and debris on the site be removed;
- something be done about fences falling down around the site; and
- brush on the site be cut down.

One resident requested the City to go from house to house and ask what the City can do right now to make things better. For example, if residents say they want the berm to be removed or the debris to be removed, then the City should work on taking care of those problems now (before the major cleanup project begins).

*Response #1: The City of Rochester conducted a telephone survey of all area residents. The results of this survey were compiled by the City and forwarded to the Department for consideration. All comments that were applicable to the remedial selection process were incorporated into this responsiveness summary. The City of Rochester has made a commitment to conduct an IRM to address many of the residents immediate concerns this fall.*

*Many of the comments received concerned an adjacent property known as the Artuso property. The Department appreciates these concerns and considers them important;*



*however, such concerns cannot be addressed by the cleanup selection process for the former APCO property. The Department could directly consider concerns about the Artuso property when the City acquires the property and applies for 1996 Clean Water/Clean Air Bond Act investigation and remediation funds.*

Comment #2) Residents wanted to know the current status of the eviction process at the adjacent Artuso property. Residents expressed their frustrations over activities on the Artuso property, such as bulldozing and dumping late at night. People expressed feelings of insecurity in their homes. Who will own the land when Artuso leaves? When Artuso dumps material on to the City's adjacent land, who is responsible? the City or Artuso? My fence was damaged when material was dumped on the City's property. Can Artuso be prosecuted?

*Response #2: The City of Rochester is currently in the process of acquiring the Artuso Property and would be the future owner of the property. It is currently the responsibility of the City of Rochester for maintenance and security of the former APCO property.*

Comment #3) Has the Artuso property been checked for contamination as much as the APCO property? Will there be more sampling to check for contamination on that property in the future? Will the Artuso property ever be cleaned up?

*Response #3: The City of Rochester has performed some investigation of this property. The City of Rochester has made a commitment to perform necessary investigation and cleanup of this property once it has been acquired. The City would have to make a separate application to receive funds from the 1996 Clean Air/Clean Water Bond Act.*

Comment #4) The plan calls for "long-term monitoring." What is considered long-term monitoring: one, two, five years?

*Response #4: The long-term monitoring portion of the selected remedy pertains to the groundwater collection and treatment system. The time frame for the long-term monitoring program is projected at five years, but it could last longer. The overall performance of the remediation will determine the actual monitoring requirements.*

Comment #5) When you take bids on the cleanup project, please make sure the contractor you select is not like APCO and Artuso. Please see if there have been complaints against the selected contractor.

*Response #5: The City does have some controls over contractor selection. For public works projects that must be publicly bid the City is required to accept the lowest bidder unless the City can show the bidder is not responsible. Rochester City Council has passed an ordinance that establishes standards for responsible bidders. These standards will apply to the remediation project if publicly bid.*

*If the City Law Department determines that the cleanup project involves specialized scientific or technical skills it may be possible for the City to pre-qualify contractors before*

*asking for bid proposals. The City could then select only those contractors or consultants that are experienced, and qualified to perform the work.*

Comment #6) We are having problems with animals from the site getting into our yards, especially woodchucks. Could the animals be trapped and removed before you start doing the major work? Please make sure any trapping is done in a humane manner.

*Response #6: Prior to the start of work, all reasonable efforts will be made to humanely trap wildlife for release at another location. We will work with the City of Rochester Animal Control, the Monroe County Health Department, and NYSDEC Wildlife staffs.*

Comment #7) Can you have another meeting before you start doing the Interim Remedial Measures?

*Response #7: The City anticipates holding monthly meetings with area residents during the design phase of the project and during the interim remedial measure work.*

Comment #8) I read the report on this site at the library. I was happy to find out this site is not a hazardous waste site. I have information about where the former site owner is in Florida and would be happy to share it with you to help with cost recovery efforts.

*Response #8: The Department appreciates any efforts to locate the former site owner for cost recovery efforts.*

Comment #9) Will the public be involved in deciding the future use of the site? How will future development affect property values?

*Response #9: It is the intention of the City of Rochester to involve the local residents in the decision process for the future use of this property once it has been remediated. Due to the nature of the real estate market, it can not be practically determined what affect future land use will have on property values.*

Comment #10) Could certain future uses of the site help reduce the cost of a cleanup? For example, if you find the construction and demolition debris on the site is clean, could some of it be left as a berm on site if the future use of the site would allow it?

(NOTE: Residents at the meeting expressed differing opinions on whether any material should be left at the site following the cleanup.)

*Response #10: The debris in the landfill and berm portions of the site will be sorted, and clean, usable material will be reused on site.*

Comment #11) Are you going to pursue the former site owner to recover the cost of the cleanup? The problems with this site were brought to the City's and County's attention years before there was a tax problem with the property. I gave the records on the complaints to Lois Geiss. This information should help you with your claim against him.

(NOTE: Several residents expressed their desire to see the former site owner pay for the cleanup.)

*Response #11: The Department is obligated by law to seek recovery of costs incurred during the cleanup and investigation of this site.*

Comment #12) Will you go after Mr. Abraham (the former site owner) on criminal charges?

*Response #12: The Department is obligated by law to seek recovery of costs incurred during the cleanup and investigation of this site. Any cost recovery action would likely be a civil court case.*

Comment #13) Can you give me an example within the City of Rochester where a site has been cleaned up and is now being used for a different purpose?

*Response #13: The largest example of such a project is the former Speedy Dry Cleaners site on Court Street. The City of Rochester spent in excess of \$1 million to cleanup the site for reuse as a parking garage. Other projects include: The 911 Center on Broad Street, BeeBee Park at the High Falls Center, and Frontier Field.*

Comment #14) What kinds of things should residents be worried about when the cleanup work starts? Dust? Noise? There will be dust monitoring, but it doesn't mean we will be dust-free, correct?

*Response #14: During the cleanup work, a detailed air monitoring program will be developed to address fugitive dust and volatile organic compound (VOC) emissions. If air monitoring results show dust or VOCs exceed the specified action levels, corrective measures will be taken to mitigate the problem.*

Comment #15) Has any thought been given to what entrance will be used for construction equipment coming onto and off of the site? I don't think Akron or Woodstock should be used due to the number of children and elderly people living there. Main Street and Atlantic Avenue should be used instead.

*Response #15: During the design-phase, entrance and egress routes will be specified. Road widths and load-bearing capacity will be considered in this specification. It is most likely that Akron Street or Woodstock Road are not wide enough to handle heavy equipment traffic.*

Comment #16) Who will be responsible for site security during the cleanup and after the cleanup?

*Response #16: As the site owner, the City of Rochester is responsible for site maintenance and security.*

Comment #17) The survey map appears different than what it should be.

*Response #17: The survey map was prepared using existing survey data and new data gathered during the investigation. Please bring any specific discrepancies to the attention of the City of Rochester.*

Comment #18) Will the site be leveled during the cleanup?

*Response 18: Upon completion of the cleanup, the site will be evenly graded to approximate the surrounding elevations.*

Comment #19) Will cleanup make the flooding in the backyards better or worse? Is the soil contaminated where yellow and blue colored runoff went?

*Response #19: The cleanup will involve removal of the berm, excavating the landfill, and regrading the site. The runoff from the site should not increase flooding in backyards. The City will be installing drainage improvements after the site is cleaned up which should eliminate backyard flooding.*

*The City could not obtain access to all properties that reportedly received yellow and blue colored runoff from the site. It is not known whether these soils are contaminated.*

Comment #20) The State has not checked backyards to see if water and/or land is contaminated. If contamination is found on my property who is responsible for cleanup? Some residents would like their backyards tested.

*Response #20: Some backyards in the vicinity of the underground storage tanks were sampled during the site investigation. Significant contamination was not detected in the backyards that were tested. The City was unable to gain access to some of the properties that could potentially be impacted by the APCO facility. Any off-site contamination attributed to the former APCO property will be remediated by the City of Rochester. Any residents adjacent to the site that would like their backyards tested should contact Mr. Todd Caffoe, P.E. at (716)226-2466.*

Comment #21) Will the cleanup hinder the use of my property? Will people be entering my property during the cleanup?

*Response #21: Cleanup efforts may temporarily impact the use of some properties (i.e. soil excavations). All reasonable efforts will be made to restore impacted properties to the original condition. These property owners will be contacted in advance of any cleanup or investigation activities on their properties. Private property will not be accessed without proper authorization.*

## **Appendix B - Administrative Record**

### **Citizen Participation, Contracts, and PRAP**

Preliminary Remedial Action Plan (PRAP), April 1998.

Public Meeting Announcement, April 1998.

Citizen Participation Plan, July 1997

Fact Sheet, June 1997.

### **Work Plans and Reports**

SI/RAR Addendum, Volume IA, Sear-Brown, February 1998.

Final SI/RAR Report, Volumes I - IV, Sear-Brown, February 1998.

NYSDEC Groundwater Sample Results, Columbia Analytical Services, February 1998.

SI/RAR Work Plan Addendum, Sear-Brown, August 13, 1997.

SI/RAR Work Plan, Sear-Brown, June 1997.

Phase I Environmental Site Assessment and Phase II Environmental Investigation, Sear-Brown, February 1997.

### **Correspondence**

Letter to M. Gregor (Rochester) from M. Storonsky (Sear-Brown), RE: Revised Opinion of Probable Costs, April 2, 1998.



