New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 8
6274 East Avon-Lima Road, Avon, New York 14414-9519
Phone: (716) 226-2466 FAX: (716) 226-8696

John P. Cahill
Commissioner

September 2, 1998

Mr. Thomas A. Rafferty, P.E.
City of Geneva - City Hall
47 Castle Street - P.O. Box 273
Geneva, NY 14456

Re: Geneva Brownfields (Geneva Foundry - Market Basket) Work Plans

Dear Mr. Rafferty:

The Department has not yet received a response to its 8/19/98 letter to you. The two main issues raised were the cost of work plan development and the exclusion of a former Geneva Foundry parcel with an unsafe building from the brownfield investigation. If the City decides to include the property north of Jackson Street, the work plan can be easily modified by a brief letter addendum to include it.

Review of the revised Geneva Brownfields work plans, received at this office on August 14, 1998, found a number of issues/questions, noted in the June 12, 1998 review letter, unaddressed or unresolved. This situation might have been avoided if each issue/question had been addressed in a response letter and specifically noted where relevant changes in the work plan were made. In addition, a meeting was offered to discuss the comments but without response. While this lack of interaction is disconcerting by itself, it is particularly troubling in view of the consultant hours tallied and the months that elapsed between submissions. In an effort to move this project forward, consider the following comments and your responses as an addendum to the work plans. Where a question is posed or information is requested, please respond directly and completely so that the review process may come to a close.

Geneva Foundry Work Plan

1) As noted previously, *"Storage tanks must be properly closed during the investigation stage. Vent pipes were evident at the northwest corner of the main Foundry building; please include provisions to locate and properly close all tanks in the work plans."* Please provide provisions to locate (e.g., metal detection, excavation, etc.) and properly close all tanks; the NW vent pipes are not mentioned in the work plan.

2) As noted previously, *"Is any information available which indicates the location and type of various processes, historic spills, and sampling data on and near Foundry property so as to locate potential release points and better optimize sampling locations?"*

3) As noted previously, *"A number of small containers of paints and possibly solvents are present in a paint (?) room on the north side of the building; any plan to dispose of these containers?"*

4) Regarding PCB analysis, any obviously oily soil/waste sample and 20% of the soil samples should be analyzed for PCBs (soil gas may help select samples).

5) As noted previously, *"Also, what process was associated with a sump (roughly 6'x6'x6') filled with liquid and sludge located at the east end of the building? Does the sump include any drains/piping; how will it be evaluated/sampled?"* The work plan notes that a Geoprobe boring will be located in the sump. If the sump contains liquid and sludge as was evident during a 1992 inspection, this may not

be practical or desirable. The contents of the sump should be characterized, removed, and disposed of appropriately. A location nearby may also suffice.

6) While the previous comment, *"It is stated that organic vapor monitoring will be conducted for ambient air to be used in evaluating potential exposure pathways. The only air monitoring described in the work plan is air monitoring with an organic vapor monitor (OVA) to be conducted as part of the Health and Safety Plan. Air data to be used in evaluating exposure pathways should be from ambient air samples which are collected for laboratory analysis"*, implied that air samples are necessary, a decision on the need for such data can be deferred until groundwater and soil data are available. Sorry for the confusion.

7) As noted previously, *"Consider adding at least 5 more passive soil gas locations focusing on the southern perimeter and storage tank locations (NW corner and adjacent to the office)."* The work plan mentions 15 total soil gas points but the site plan was apparently not updated, showing only 10. Given the suspected presence of at least two underground storage tanks, a historic spill on a neighbor's property, and the usefulness of the data, 20 probes should be employed. The work plan mentions GORESORBER or EMFLUX whereas the FSP mentions the EMFLUX procedure which is certainly acceptable. Provide a list of the analytes for EMFLUX. It should also be clarified that the soil gas probes will be located with Department input and that borings/wells will be located based on the results and input from the Department.

8) As noted previously, *"In addition to PID screening of the overall soil cores, head space screening of soil sub-samples should be specified. Portions of the core should be placed in sealed containers (e.g., resealable plastic bags), homogenized, and screened with the PID."* The FSP does not mention head space screening.

9) Regarding sediment samples, the work plan specifies 4 samples but the site plan shows 6 samples; 4 locations will be selected with Department input.

10) As noted previously, *"Given the suspected soil type, it may be possible to install the monitoring wells by Geoprobe (or equivalent) and thus avoid mobilizing two separate pieces of drilling equipment. Geoprobe allows collection of 3" x 4' soil cores; well casing diameters may be less than 2" to allow installation of sand packs and grout or 2" pre-packed screens can be utilized. Grab sampling of soil and groundwater is also facilitated to characterize in potential hot spots and help optimize permanent well locations."* The work plan ignored this potential cost-saving measure; reduced soil and groundwater generation is another benefit. Since two wells will likely be installed inside the foundry with Geoprobe, an assessment can then be made its usefulness for all wells.

11) As noted previously, *"It is proposed to "dump" development water on-site near the monitoring wells. Since, the nature and level of any contamination will not be known, this water should be drummed and disposed of after the water sample results are received."* The FSP seems to have ignored this comment.

12) Groundwater sampling procedures outlined in the work plan and the FSP are still inconsistent. The CAS protocol notes purging @ 3-5 GPM with a Fugi pump while elsewhere in FSP and the work plan specifies a < 0.5 GPM purging rate. The suggested EPA protocol specifies a <100 milliliter/minute rate to avoid excessive turbidity. To avoid further delay and confusion, the Department offers its equipment and staff for groundwater sampling; the consultant will arrange for sample bottles, preservation, analysis, and reporting.

<u>Market Basket Work Plan:</u> (Note: the comments above apply where appropriate)

13) Drum locations should be uniquely marked for possible future reference.

14) The location of all utilities should be determined and their potential to act as migration pathways evaluated.

15) It is not at all clear that a standard HSA drill rig is faster/more economical than a Geoprobe or similar rig under the presumed site conditions. With four-foot cores, less soil/groundwater waste, greater maneuverability, one mobilization, the advantages of direct-push should be carefully weighed.

FSP/QAPP:

16) As noted previously, *"The NYSDEC Analytical Services Protocols (ASP) that will be used for the analyses of all sample matrices on Table 2-1 must be designated by method number. The analytical data must be reported in a NYSDEC ASP Category B deliverables package."* Since the plan calls for TCL/TAL, acceptable analytical methods would be volatiles method NYSDEC analytical Service Protocol (ASP) 95-1, semivolatiles method ASP 95-2, PCBs/Pesticides method ASP 95-3, TAL metals method ASP CLP-M, and cyanide EPA method 335.2 and the analytical data will be reported in a NYSDEC ASP Category B deliverables package.

17) The analytical package should be evaluated according to the Data Usability Summary Report (DUSR) guidelines and the DUSR must be included in the project report. The QAPP must also designate who will prepare the DUSR.

18) Exhibit A - The project organization section needs to define the responsibilities of each position. The project must also have a Quality Assurance Officer (QAO).

HASP

19) The Community Health and Safety Plan previously provided specified: *"Volatile organic compounds must be monitored at the downwind perimeter of the work area on a **continuous** basis.",* yet the HASP specifies daily monitoring at 2 hour intervals. It is disheartening to see such significant changes made to provisions which are intended to protect the community; please ensure that continuous monitoring is provided.

20) Exclusion zones will be established around the drill rig during boring and/or drilling operations. Decontamination areas will also be established.

REFERENCES

21) Please provide a copy of the 1968 Sanborn map which includes the entire parcel located north of Jackson Street.

22) In the rear of the Sanborn map section, a map from the Ontario County Solid Waste Landfill Annual Monitoring Report (FAGAN Engineers, July 1992) is included. What is the purpose/relevance of this map? Please be specific.

Please respond to this letter within two weeks and call with any questions or to arrange a meeting, if desired.

Sincerely,

James Craft

James H. Craft
Project Manager

c: M.J. Peachey, R. Schick, D. Napier (NYSDOH), G. Passero

Engineering Department
City Hall, 47 Castle Street
Geneva, New York 14456

Phone: 315-789-3101

October 15, 1998

To Concerned Parties,

Subject: Geneva Brownfields Projects
(Market Basket and Geneva Foundry)

The City of Geneva is participating in the New York State Department of Environmental Conservation Municipal Assistance Environmental Projects "Brownfields Program". The Brownfields Program provides grants to municipalities for the investigation and/or remediation of municipally owned contaminated properties. These properties may then be marketed for redevelopment by the municipality or used by the municipality for a variety of activities including industrial, commercial or public use.

Two properties within the City have been selected for the Brownfield Program, the Market Basket and the Geneva Foundry. As part of the Brownfields Program the City wrote and the State approved a Citizen's Participation Plan for each property. As part of the Citizens Participation Plan you have been identified as a concerned party for one or both of the properties and are being sent the attached Fact Sheet(s). You will also be invited to a public information meeting at the conclusion of the investigation.

More information is available at the Document Repositories and from the Project Contacts listed in the Fact sheets.

Thank you for your interest in the Brownfield Program.

Very Truly Yours,

Thomas A. Rafferty, P.E.
Junior Engineer

Enclosure(s): Fact Sheet(s)

cc: John J. Johnson, Director of Public Works