

## NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Spill Prevention and Response Program, Region 8  
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August 6, 2018

Nancy Grosso  
Principal Technical Consultant  
DuPont Corporate Remediation Group  
Chestnut Run Plaza 730 / 3255-4  
P.O. Box 2915  
974 Centre Road  
Wilmington, DE 19805

Dear Ms. Grosso:

Re: NYSDEC Spill # 9970361  
DuPont Rochester – Seneca Site  
69 Seneca Avenue  
Rochester (C), Monroe County

The Department is in receipt of the July 31, 2018 Soil & Groundwater Management Plan (SGMP) for the property at 69 Seneca Ave and the July 26, 2018 SGMP for the two adjacent impacted properties, both which were prepared by Parsons. Upon review of the aforementioned SGMP's and previously submitted information, the residual impacts identified in the subsurface do not appear to pose a threat to human health and safety or the environment in their current location and state, and based on the current uses of the subject property and the two adjacent impacted properties. The Department requires no further remedial action at this time. The Site Management Plans must be followed.

This spill has been removed from the Department's active case files. However, be aware that this ruling does not preclude reactivation of this case should new information become available, an impact to a receptor be discovered and/or the residual ammonia impacts are encountered/unearthed in the future. Should the latter occur, the Department must be notified and the SGMP must be followed.

If there are any questions or comments, feel free to contact me at either the above address or by telephone at 585-226-5438.

Sincerely,



Michael F. Zamiarski, P.E.  
Environmental Engineer II  
Division of Environmental Remediation



CITY OF ROCHESTER, 60 Excel Drive  
MACAUTO USA Inc, 80 Excel Drive  
MONROE COUNTY  
ROCHESTER NEW YORK

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# SITE MANAGEMENT PLAN

NYSDEC Spill Number: 9970361

Prepared for:



DuPont Corporate Remediation Group  
Chestnut Run Plaza Bldg 730 / 3255  
974 Centre Road  
Wilmington, DE 19805

Prepared by:

**PARSONS**

301 Plainfield Road, Suite 350  
Syracuse, New York 13212  
Phone: (315) 451-9560  
Fax: (315) 451-9570

### Revisions to Final Approved Site Management Plan:

Revision No.	Date Submitted	Summary of Revision	NYSDEC Approval Date

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JULY 2018

CERTIFICATION STATEMENT

I, Craig F. Butler, certify that I am currently a NYS registered professional engineer and that this Site Management Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

Craig F. Butler

Craig F. Butler, P.E.



07/26/18

Date

TABLE OF CONTENTS

City of Rochester, 60 Excel Drive  
MACAUTO USA Inc, 80 Excel Drive  
MONROE COUNTY  
ROCHESTER NEW YORK

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SITE MANAGEMENT PLAN

ES	EXECUTIVE SUMMARY .....	6
1.0	Introduction.....	7
1.1	General .....	7
1.2	Revisions.....	8
1.3	Notifications .....	9
2.0	Summary of Previous Remedial Investigations and Remedial Actions.....	10
2.1	Site Location and Description .....	10
2.2	Physical Setting.....	11
2.2.1	Land Use .....	11
2.2.2	Geology.....	11
2.2.3	Hydrogeology .....	11
2.3	Investigation and Remedial History .....	12
2.4	Objectives.....	14
2.5	Remaining Contamination.....	14
2.5.1	Soil .....	14
2.5.2	Groundwater .....	14
2.5.3	Soil Vapor .....	15
3.0	Institutional Control Plan.....	17
3.1	General .....	17
3.2	Institutional Controls.....	17
4.0.	Reporting Requirements .....	18
4.1	Site Management Reports .....	18
4.3	Corrective Measures Work Plan .....	19
5.0	REFERENCES .....	20

**List of Tables**

---

Notifications.....	1
Groundwater Ammonia Analytical Results 2000-2017.....	2
Groundwater Ammonium Thiosulfate Levels 2000-2017.....	3
Schedule of Site Management Reports.....	4

## **List of Figures**

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Site Location Map.....	1
Site Layout Map.....	2

## **List of Appendices**

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List of Site Contacts.....	A
Excavation Work Plan.....	B

## **List of Acronyms**

CAMP	Community Air Monitoring Plan
CFR	Code of Federal Regulation
DER	Division of Environmental Remediation
ELAP	Environmental Laboratory Approval Program
ERP	Environmental Restoration Program
EWP	Excavation Work Plan
HASP	Health and Safety Plan
IC	Institutional Control
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
NYSDOT	New York State Department of Transportation
NYCRR	New York Codes, Rules and Regulations
OSHA	Occupational Safety and Health Administration
PRR	Periodic Review Report
QA/QC	Quality Assurance/Quality Control
RCRA	Resource Conservation and Recovery Act
RfC	Reference Concentration
SCG	Standards, Criteria and Guidelines
SCO	Soil Cleanup Objective
SGMP	Soil and Groundwater Management Plan
SMP	Site Management Plan
SPDES	State Pollutant Discharge Elimination System
TCLP	Toxicity Characteristic Leachate Procedure
USEPA	United States Environmental Protection Agency
VCP	Voluntary Cleanup Program

**ES EXECUTIVE SUMMARY**

The following provides a brief summary of the controls implemented for the Site, as well as the inspections, monitoring and reporting activities required by this Site Management Plan:

Site Identification: Spill No. 9970361  
 City of Rochester, 60 Excel Drive  
 MACAUTO, 80 Excel Drive  
 Rochester, NY 14621

Institutional Controls:	1. Excavation Work Plan for Remaining Contamination
	2. The use of groundwater underlying the properties is prohibited without necessary water quality treatment as determined by the NYSDOH or the Monroe County Department of Health to render it safe.
Evaluations	
Soil Vapor Intrusion Evaluation	Upon change in site use
Reporting and Notifications:	
Revised Site Management Plan	Upon change in site use. Upon change in site ownership. Upon intention to perform subsurface excavation in the area of remaining ammonia contamination.

Further descriptions of the above requirements are provided in detail in the subsequent sections of this Site Management Plan.



## 1.0 INTRODUCTION

### 1.1 General

This Site Management Plan (SMP) is a required element of the management program for the two properties adjacent to 69 Seneca Avenue that have some remaining contamination from an ammonia spill on the former Dupont Rochester Seneca Plant property. This SMP applies to the properties owned by the City of Rochester and MACAUTO located in Rochester, Monroe County, New York (hereinafter referred to as the “Sites”, Figure 1). The Spill is currently in the New York State Spill Prevention and Response Program (Region 8), which is administered by New York State Department of Environmental Conservation (NYSDEC). A separate Site Management Plan was prepared for the Dupont property at 69 Seneca Avenue. A figure showing the site location and boundaries of the sites is provided in Figure 2.

Two spills have occurred at the Dupont Facility at 69 Seneca Avenue. In 1999, during the decommissioning of an ammonium thiosulfate tank, a release occurred (Spill # 9970361). DuPont responded by reporting the spill to the NYSDEC and conducting soil sampling and installing a well monitoring network. Groundwater concentrations have been monitoring since 2000 and have generally declined with time. A risk evaluation was conducted in 2017 indicating that no unacceptable risk exists at the sites under current use. More information on this spill is provided in Section 2 and Section 3 of this Site Management Plan.

In August 2008, DuPont reported a release of dilute wastewater from the Site (Spill # 0805980). Impacted water and soil were pumped or removed and properly disposed. As a result of this remediation, a No Further Action letter was issued by NYSDEC on September 21, 2016. More detail concerning this spill and the remediation are provided in Section 2 of this Site Management Plan.

Because some ammonia remains at these sites, hereafter referred to as “remaining contamination” (Spill # 9970361), institutional controls (ICs) have been incorporated into the site management plan to ensure protection of public health and the environment.

This SMP was prepared to manage remaining ammonia contamination at the sites. This plan has been approved by the NYSDEC, and responsibility for implementation of the SMP belongs to the both the owners of the Sites and to the parties conducting subsurface work. DuPont is responsible for costs associated with management of impacted soils and groundwater within the remaining contamination area due to the presence of ammonia and the owner will notify DuPont if disturbance of the remaining contamination is planned. This SMP may only be revised with the approval of the NYSDEC. Failure to comply with this SMP is also a violation of Environmental Conservation Law, 6NYCRR Part 375, and thereby subject to applicable penalties.

All reports associated with the sites can be viewed by contacting the NYSDEC or its successor agency managing environmental issues in New York State. A list of contacts for persons involved with the sites is provided in Appendix A of this SMP.

This SMP was prepared by Parsons, on behalf of DuPont, in accordance with the requirements of the NYSDEC’s DER-10 (Technical Guidance for Site Investigation and Remediation, May 3, 2010), the guidelines provided by the NYSDEC in CP-51 / Soil Cleanup Guidance (October 10, 2010) and the Soil and Groundwater Management Plan (SGMP) Criteria and Guidance NYSDEC Region 8 Spills Unit – Avon, NY (June 8, 2016).

## **1.2 Revisions**

Revisions to this plan will be proposed in writing to the NYSDEC’s project manager. Revisions will be necessary upon significant changes to the site environmental conditions. The NYSDEC will provide a notice of any approved changes to the SMP and append these notices to the SMP that is retained in its files.

### 1.3 Notifications

Notifications will be submitted by the property owners to the NYSDEC Spills Unit, as needed, in accordance with NYSDEC's DER – 10 for the following reasons:

- Written 60-day advance notice of any proposed changes in site use that are required under the terms of 6NYCRR Part 375 and/or Environmental Conservation Law.
- At least 7-day advance notice of any field activity associated with the remaining contamination including any proposed ground-intrusive activity in the area of remaining contamination.

Any change in the ownership of the sites or the responsibility for implementing this SMP will include the following notifications:

- At least 15 days prior to the change, the NYSDEC will be notified in writing of the proposed change. This will include a certification that the prospective purchaser has been provided with a copy of all approved work plans and reports, including this SMP.
- Within 15 days after the transfer of all or part of the site, the new owner's name, contact representative, and contact information will be confirmed in writing to the NYSDEC.

Notifications will be submitted by the property owners to DuPont for the following reasons:

- At least 7-day advance notice of intrusive field activity within the area of remaining ammonia contamination.

Table 1 includes contact information for the above notifications. The information on this table will be updated as necessary to provide accurate contact information. A full listing of site-related contact information is provided in Appendix A.

**Table 1: Notifications\***

Name	Contact Information
Mike Zamiarski, P.E, Professional Engineer I in NYSDEC Spill Prevention and Response	(585) 226-5438 mike.zamiarski@dec.ny.gov
DuPont Environmental Counsel	(302) 996-8276

\* Note: Contacts are subject to change and will be updated as necessary.

## **2.0 Summary of Previous Remedial Investigations and Remedial Actions**

### **2.1 Site Location and Description**

These sites are in Rochester, Monroe County, New York. The City of Rochester property, located at 60 Excel Drive, is identified as Section 091.55 Block 1 and Lot 36 on the City of Rochester Tax Map (see Figure 2). The site is an approximately 1.21-acre area and is bounded by MACAUTO USA Corporation to the north, another city parcel to the south, Excel Drive to the west, and the former Dupont facility to the east (see Figure 2 – Site Layout Map). The owner of the site parcel at the time of issuance of this SMP is the City of Rochester.

The second site is the MACAUTO property, located at 80 Excel Drive. It is identified as Section 091.55 Block 1 and Lot 37. The site is approximately 1.33 acres and is bounded by Bastion Street to the North, the City of Rochester property to the south, Excel Service and Towing and the DuPont property to the east, and Excel Drive to the west (see Figure 2 – Site Layout Map). The owner of the site at the time of issuance of this SMP is MACAUTO USA Corporation.

The former DuPont Rochester Seneca Plant was an Electronics and Imaging Business site where water-based inks were produced. Manufacturing operations at the site ceased in August 2017.

## 2.2 Physical Setting

### 2.2.1 Land Use

The City of Rochester property is an empty lot with no structures. It is zoned U-R, Norton Street Urban Renewal District, use code 330 Vacant Commercial Land, and is not occupied. The MACAUTO property is also zoned U-R, Norton Street Urban Renewal District, with a use code of 710 Manufacturing.

The properties adjoining these Sites, and in the neighborhood surrounding the Sites, primarily include commercial/industrial properties. The properties immediately south of the Site include commercial and religious properties; the properties immediately north of the Site include commercial properties; the properties immediately east of the Site include commercial properties; and the properties to the west of the Site include commercial properties.

### 2.2.2 Geology

Native soils consist of silty clay and clayey silt overlain by one to two feet of fill material consisting predominantly of reworked silty clay with trace amounts of gravel, coal, and glass. Weathered shale bedrock (Rochester Formation) was encountered at a depth of six feet at the three boring locations. The shale becomes competent at a depth of approximately eight feet. The weathered shale and overburden contained little to no moisture. The bedrock was broken, with a Rock-Quality Designation of < 10%. Some vertical fracturing was observed at well location DMW-1. Water loss to the formation during rock coring was minimal with the greatest loss (25 gallons) recorded at DMW-2 (Figure 2).

### 2.2.3 Hydrogeology

Depth to groundwater ranges from 6 to 13.5 ft below ground surface. Groundwater elevation data from former DuPont site wells and former offsite wells (DMW-1, DMW-2,

DMW-3 DMW-4, DMW-5, and DMW-6) collected in September 2016 and June 2017 were used to determine groundwater flow direction at the site. Groundwater flow direction from the 69 Seneca Avenue site is generally to the west northwest. Regional groundwater flow is to the west towards the Genesee River. No water bodies are located within 0.75 miles of the site.

### **2.3 Investigation and Remedial History**

The following narrative provides a remedial history timeline and a brief summary of the available project records to document key investigative and remedial milestones for the Site. Full titles for each of the reports referenced below are provided in Section 5.0 - References.

#### **Spill #9970361**

In 1999, during the decommissioning of an ammonium thiosulfate tank by Dupont, a release occurred. In response to the ammonium spill, soil sampling was conducted at DuPont, Macauto and the City properties, indicating that ammonia was present in soils at the parcels at concentrations above background. The New York State Department of Environmental Conservation (NYSDEC) does not have established soil cleanup criteria for ammonia. NYSDEC requested that DuPont determine whether the ammonia in the soil had impacted groundwater. Six groundwater monitoring wells were installed.

Groundwater was monitored for ammonia (as nitrogen by laboratory analytical method SM4500-NH3) from June 2000 to June 2017. Refer to Table 2 for a summary of ammonia concentrations in groundwater. Ammonium thiosulfate was also analyzed during the groundwater monitoring events and the parameter was not detected during all monitoring events. Refer to Table 3 for ammonium thiosulfate analytical data summary.

In addition, three groundwater monitoring wells (MW-1, MW-2, and MW-3), which were installed by the City of Rochester in 2000, were sampled in June of 2000 and 2001 and did not exceed the NYSDEC groundwater criteria for ammonia. The wells were

installed either down-gradient and/or cross-gradient of the ammonia groundwater plume area located at the DuPont facility.

Groundwater data indicate that groundwater quality is generally improving over time, and that ammonia is not migrating. Concentrations of ammonia exceeded the NYSDEC groundwater standard of 2.0 mg/L at DMW-1, DMW-2, DMW-3, and DMW-4. Significant decreases in concentrations with time are evident in DMW-1 and DMW-2. The ammonia concentration at downgradient well DMW-1 during the June 2017 sampling event was 9.9 mg/L, which was a decrease from the 2008 sampling event of 34.0 mg/L. The concentration of ammonia at downgradient well DMW-2 was 27.7 mg/L in June 2017 which was a decrease from the 2008 sampling event concentration of 76.3 mg/L.

The groundwater monitoring data indicate that the ammonia plume is not advancing, and that, in general, ammonia concentrations are declining over time. Concentrations are expected to continue to decline. DuPont decommissioned the monitoring wells in February 2018.

#### **Spill #0805980**

In August 2008, DuPont reported a release of dilute wastewater from a leaking sump in the dye preparation area of the site. This release resulted in ponded water at the City of Rochester Site. Remedial actions were implemented in response to the release. These remedial activities included excavation of a trench approximately 80 feet long, 10 to 30 feet wide and 3 to 4 feet deep on the property (Figure 2), pumping of water that accumulated in the trench and excavation of approximately 15 cubic yards of impacted soils. Both the impacted water and excavated soils were characterized and properly disposed. A No Further Action letter for this spill (Spill # 0805980) was issued by NYSDEC on September 21, 2016.

## 2.4 Objectives

The main objective of this SMP is to protect human health with respect to the area of remaining ammonia contamination. Excavated soils will be managed as described below.

## 2.5 Remaining Contamination

### 2.5.1 Soil

Soil sampling at the City of Rochester property, and the Dupont property to the east, indicated that ammonia was present in soils at both parcels at concentrations above background. The New York State Department of Conservation (NYSDEC) does not have established soil cleanup criteria for ammonia. There is very low potential for direct contact to ammonia from soil, based on a risk evaluation considering several scenarios based on a range of ammonia concentrations from previous sampling events at the site (DuPont, 2017). Therefore, residual ammonia in soil at the site may be considered a nuisance condition (NYSDEC, 2010. CP-51 Soil Cleanup Guidance, p.12 {part V, section G}) due to the low potential for unpleasant odors, for example, during excavation. No ammonia odors currently exist at the properties.

### 2.5.2 Groundwater

Groundwater monitoring data are included in Table 2. Data indicate that groundwater quality at this site is improving over time, and that ammonia is not migrating. Concentrations of ammonia exceeded the NYSDEC groundwater standard of 2.0 mg/L at DMW-1, DMW-2, DMW-3, and DMW-4. Significant decreases in concentrations are evident in DMW-1 and DMW-2 with time. Groundwater monitoring wells were abandoned in place following guidelines specified in the New York State Department of Environmental Conservation document entitled, "NYSDEC Groundwater Monitoring Well Decommission Procedures", dated August 2009.



Groundwater at the site is not used as a potable water supply. Therefore, there is no complete exposure pathway associated with direct contact with groundwater; and thus there is no potential risk associated with groundwater use at this site. Additionally, USEPA does not provide toxicity values for ingestion or dermal contact with ammonia. Exposure to ammonia in air would most likely occur through vapor intrusion into existing or future buildings. This exposure pathway is addressed in the next section.

### 2.5.3 Soil Vapor

The USEPA's Vapor Intrusion Screening Level calculator (updated to reflect the current ammonia RfC) was used to estimate exposure and risk associated with vapor intrusion of ammonia using default exposure and attenuation factors (DuPont, 2017).

In summary, based on the hazard indices presented in "DuPont Rochester Seneca Plant NYSDEC Spill # 9970361 Groundwater Monitoring Results and Risk Evaluation, October 13, 2017", it is concluded that there are no unacceptable risks expected as a result of exposure to ammonia in indoor air for a future resident or commercial/industrial worker.

Since more time is generally spent indoors than outdoors, and there is less dispersion of volatilized contamination through wind dispersion in the indoor environment, the indoor air evaluation would represent a greater exposure than exposure to ambient air. Therefore, only the indoor air pathway was quantitatively evaluated, because the ambient air pathway represents a less significant risk.

A construction worker may be exposed to ammonia in groundwater through inhalation of volatilized ammonia in trench air during intrusive activities. However, the exposure duration for a construction worker would be expected to be much less than the indoor exposure duration for either the resident or commercial/industrial worker. Thus, the hazard index for trench exposure is also be expected to be less than that for indoor exposure.

Therefore, based on the risk evaluation conducted, it is concluded that there are no unacceptable risks expected as a result of exposure to soil vapor at the site.

### **3.0 Institutional Control Plan**

#### **3.1 General**

Even though the risk evaluation concluded that there are no unacceptable risks expected as a result of exposure to soil vapor at the site, because remaining ammonia contamination exists at the sites, Institutional Controls (ICs) are required to protect human health and the environment. This IC Plan describes the procedures for the implementation and management of all ICs at the Sites. The IC Plan is one component of the SMP and is subject to revision by the NYSDEC.

This plan provides:

- A description of ICs on the Site;
- A description of plans and procedures to be followed for implementation of ICs, such as the implementation of the Excavation Work Plan (EWP) (as provided in Appendix B) for the proper handling of remaining contamination (shown on Figure 2) that may be disturbed during maintenance or redevelopment work on the site; and,
- Any other provisions necessary to identify or establish methods for implementing the ICs required by the site remedy, as determined by the NYSDEC.

#### **3.2 Institutional Controls**

A series of ICs is required to limit the use and development of the Sites. Adherence to these ICs on the Sites is required by the NYSDEC and will be implemented under this SMP. ICs identified in this SMP may not be discontinued without an amendment to or extinguishment of the SMP. These ICs are:

- The properties may be used for industrial or commercial uses only unless approval to change this is granted by the NYSDEC;
- The use of groundwater underlying the properties is prohibited without necessary water quality treatment as determined by the NYSDOH or the Monroe County Department of Health to render it safe for use as drinking water

or for industrial purposes, and the user must first notify and obtain written approval to do so from the Department;

- Information pertinent to site management must be reported at the frequency and in a manner as defined in this SMP;
- Future activities that will disturb remaining contaminated material within the remaining contamination area shown in Figure 2 must be conducted in accordance with this SMP and the Excavation Work Plan (Appendix B);
- Access to the Site must be provided to agents, employees or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by the SMP; and,
- The potential for vapor intrusion must be evaluated by DuPont for any new buildings developed in the area within the area of remaining ammonia contamination boundaries noted on Figure 2, and appropriate actions to address exposures must be implemented, as necessary.

#### 4.0. Reporting Requirements

##### 4.1 Site Management Reports

A Site management report will be completed and submitted to NYSDEC following completion of intrusive activity within the area of remaining ammonia contamination.

Within the area of remaining ammonia contamination, all applicable inspection forms and other records, including media sampling data that may be generated for the Sites will be provided in electronic format to the NYSDEC in accordance with the requirements of Table 4 and summarized in the Site Management Report.

**Table 4: Schedule of Site Management Reports**

Task/Report	Reporting Frequency*
Site Management Report	Upon disturbance of soil where there is remaining ammonia contamination

A report is to be submitted to the NYSDEC within 90 days of completion of the subsurface activities performed. This report shall contain a summary of the activities performed; a summary of all data gathered and results; information about any media that was removed from the site: volume, contamination levels, area from which removed; and any other information that may indicate a change to the “remaining contamination” that is at the site. Such changes may require revision of the SMP.

#### **4.3 Corrective Measures Work Plan**

If site conditions change (e.g. new building construction), the remedy for the remaining ammonia contamination must be reevaluated by DuPont based on future site usage. If potential exposure is unacceptable, engineering controls may be warranted as part of the future redevelopment conducted in the vicinity of the NYSDEC Spill #9970361 area (i.e. remaining ammonia contamination area). These controls may include measures to mitigate the potential for ammonia impacted soil vapor intrusion into future buildings such as incorporation of vapor barriers or depressurization system into the building design. Other remedial actions may be proposed. In this case, a Corrective Measures Work Plan will be submitted to the appropriate regulatory agencies (i.e. NYSDEC or NYSDOH) for approval. This plan will provide the details and schedule for performing the corrective measures. Upon completion of the Corrective Measure, a signed certification form will be submitted to the Department.

## 5.0 REFERENCES

6NYCRR Part 375, Environmental Remediation Programs. December 14, 2006.

DuPont, 2014. Response Action and Closure of Spill Number 0805980, DuPont Seneca Facility, February 13, 2014.

DuPont, 2017. DuPont Rochester Seneca Plant NYSDEC Spill # 9970361 Groundwater Monitoring Results and Risk Evaluation, October 13, 2017.

NYSDEC DER-10 – “Technical Guidance for Site Investigation and Remediation”.

NYSDEC, 1998. Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1. June 1998 (April 2000 addendum).

NYSDEC, 2000. NYSDEC Spill # 9970361 DuPont Imaging Systems, March 14, 2000.

NYSDEC, 2009. NYSDEC Groundwater Monitoring Well Decommission Procedures, August 2009.

NYSDEC, 2010. CP-51 / Soil Cleanup Guidance Policy.

NYSDEC, 2016. Soil and Groundwater Management Plan (SGMP) Criteria and Guidance. NYSDEC Spills Unit – Avon, NY. Created 1/27/2011. Last Modified 6/8/2016.

NYSDEC, 2016. NYSDEC Spill # 0805980 DuPont Seneca Facility. Correspondence September 21, 2016.

<https://www.cdc.gov/niosh/pe188/7664-41.html>

**APPENDIX A – LIST OF SITE CONTACTS\***

<b>Name</b>	<b>Phone/Email Address</b>
Joe Biondolillo, City of Rochester	(585) 428-6649
MACAUTO USA	(585) 272-7700
Glenn Murphy, DuPont	(585) 339-4203 <a href="mailto:R-Glen.Murphy@dupont.com">R-Glen.Murphy@dupont.com</a>
Heather Philip, Parsons	(315) 418-0048 <a href="mailto:heather.philip@parsons.com">heather.philip@parsons.com</a>
Mike Zamiarski, NYSDEC Professional Engineer I, Spill Prevention & Response	(585) 226-5438 <a href="mailto:mike.zamiarski@dec.ny.gov">mike.zamiarski@dec.ny.gov</a>
NYSDOH Rochester Office	(585) 423-8100

\*Contacts are subject to change

## APPENDIX B – EXCAVATION WORK PLAN (EWP)

### [B]-1 NOTIFICATION

At least seven days prior to the start of any activity that is anticipated to encounter remaining contamination (see Figure 2 for site area of remaining contamination), the site owner or their representative will notify the NYSDEC and DuPont. DuPont will be responsible for activities directly linked to remaining ammonia contamination such as health and safety monitoring and proper soil and groundwater management due to ammonia. Table 1 includes contact information for the above notification. The information on this table will be updated as necessary to provide accurate contact information. A full listing of site-related contact information is provided in Appendix A.

**Table 1: Notifications\***

Mike Zamiarski, Professional Engineer I Spill Prevention and Response, NYSDEC Site Control	(585) 226-5438 mike.zamiarski@dec.ny.gov
NYSDOH Rochester Office	(585) 423-8100
DuPont Environmental Counsel	(302) 996-8276

\* Note: Notifications are subject to change and will be updated as necessary.



This notification will include:

- A detailed description of the work to be performed, including the location and areal extent of excavation, plans/drawings for site re-grading, intrusive elements or utilities to be installed below the soil cover, estimated volumes of contaminated soil to be excavated and any work that may impact an engineering control;
- A summary of environmental conditions anticipated to be encountered in the work areas, including the nature and concentration levels of contaminants of concern, potential presence of grossly contaminated media, and plans for any pre-construction sampling;
- A schedule for the work, detailing the start and completion of all intrusive work;
- An electronic copy of the health and safety plan (HASP) for any excavation / dewatering activities conducted in the suspected areas of contamination to protect worker safety. The responsibility of the HASP exists with the party or parties conducting the excavation / dewatering activities.
- Identification of disposal facilities for potential waste streams; and,
- Identification of sources of any anticipated backfill, along with all required chemical testing results.

#### **[B]-2 SOIL SCREENING METHODS**

Soil screening for nuisance odors may be conducted prior to or during excavation. When NYSDEC determines that soil represents a nuisance, even though concentrations may be below NYSDEC-approved soil cleanup levels, NYSDEC may require that additional remedial measures be evaluated, and may require that additional actions be taken to address the nuisance conditions.

#### **[B]-3 SOIL MANAGEMENT ONSITE**

If soil needs to be segregated for further evaluation due to the presence of ammonia, soil stockpiles will be continuously encircled with a berm and/or silt fence. Stockpiles will be kept covered at all times with appropriately anchored tarps. A qualified designated person will oversee all invasive work and the excavation and load-out of all excavated

material within the area of remaining ammonia contamination as shown in Figure 2 of the Site Management Plan.

The owner of the property and its contractors are responsible for safe execution of all invasive and other work performed under this Plan. The presence of utilities and easements on the site will be investigated by the owner and its contractor. It will be determined by the owner whether a risk or impediment to the planned work under this SMP is posed by utilities or easements on the site.

#### **[B]-4 MATERIALS DISPOSAL OFF-SITE**

All material excavated that is to be removed from the site will be transported and disposed in accordance with all local, State (including 6NYCRR Part 360) and Federal regulations. If disposal of material from this site is proposed for unregulated off-site disposal (i.e. clean soil removed for development purposes), a formal request with an associated plan will be made to the NYSDEC. Unregulated off-site management of materials from this site will not occur without formal NYSDEC approval.

Non-hazardous historic fill and ammonia impacted soils taken off-site will be handled, at minimum, as a Municipal Solid Waste per 6NYCRR Part 360-1.2. Material that does not meet Unrestricted Soil Cleanup Objectives (SCOs) is prohibited from being taken to a New York State recycling facility (6NYCRR Part 360-16 Registration Facility).

#### **[B]-5 ODOR CONTROL PLAN**

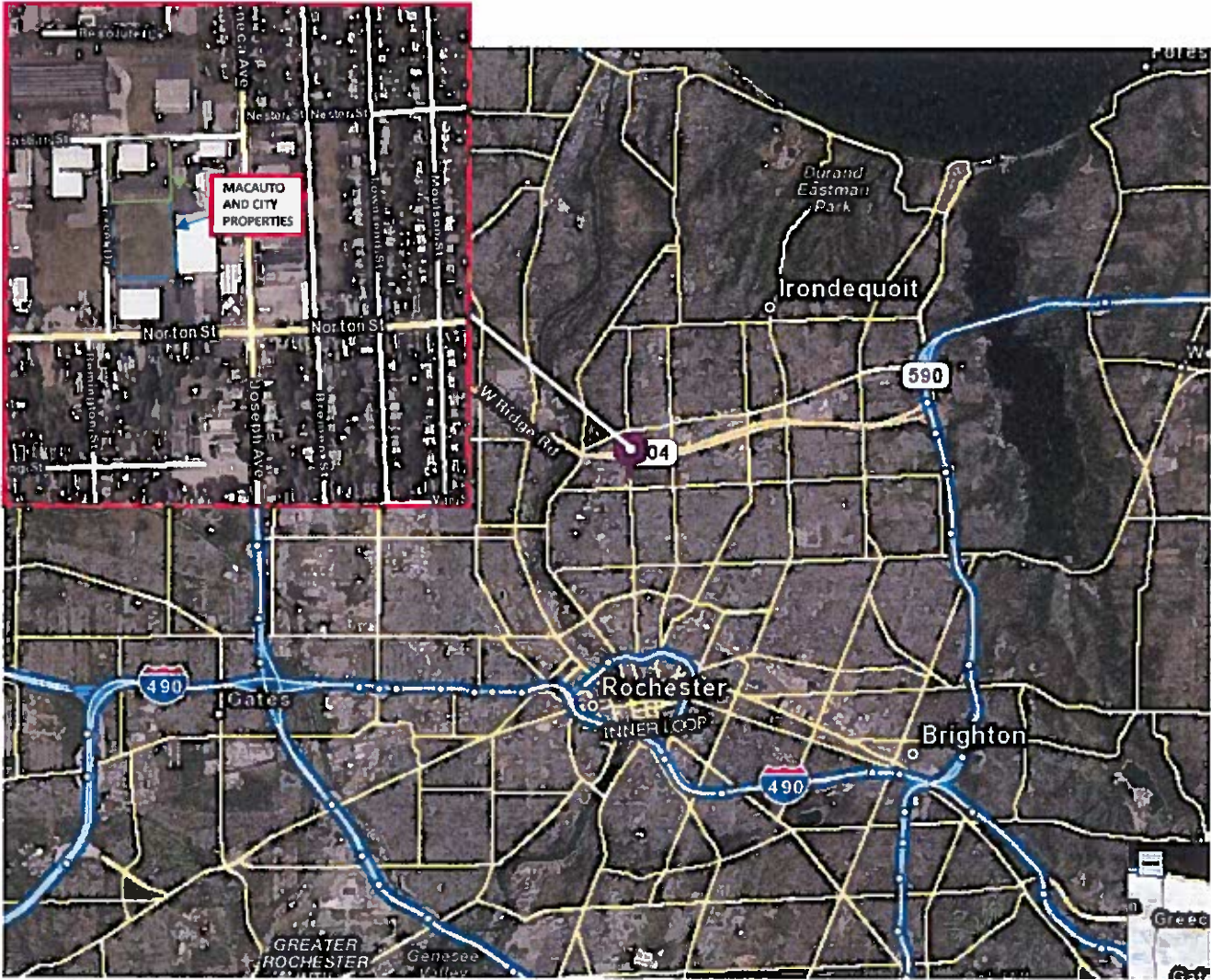
If nuisance odors are identified at the site boundary, or if odor complaints are received, work will be halted and the source of odors will be identified and corrected. Work will not resume until all nuisance odors have been abated. NYSDEC and NYSDOH will be notified of all odor events within one day of the odor event and notified of any other complaints about the project. Implementation of all odor controls, including the halt of work, is the responsibility of a qualified designated person, and any measures that are implemented will be discussed in the Excavation Activities Report.

### **[B]-5 REPORTING**

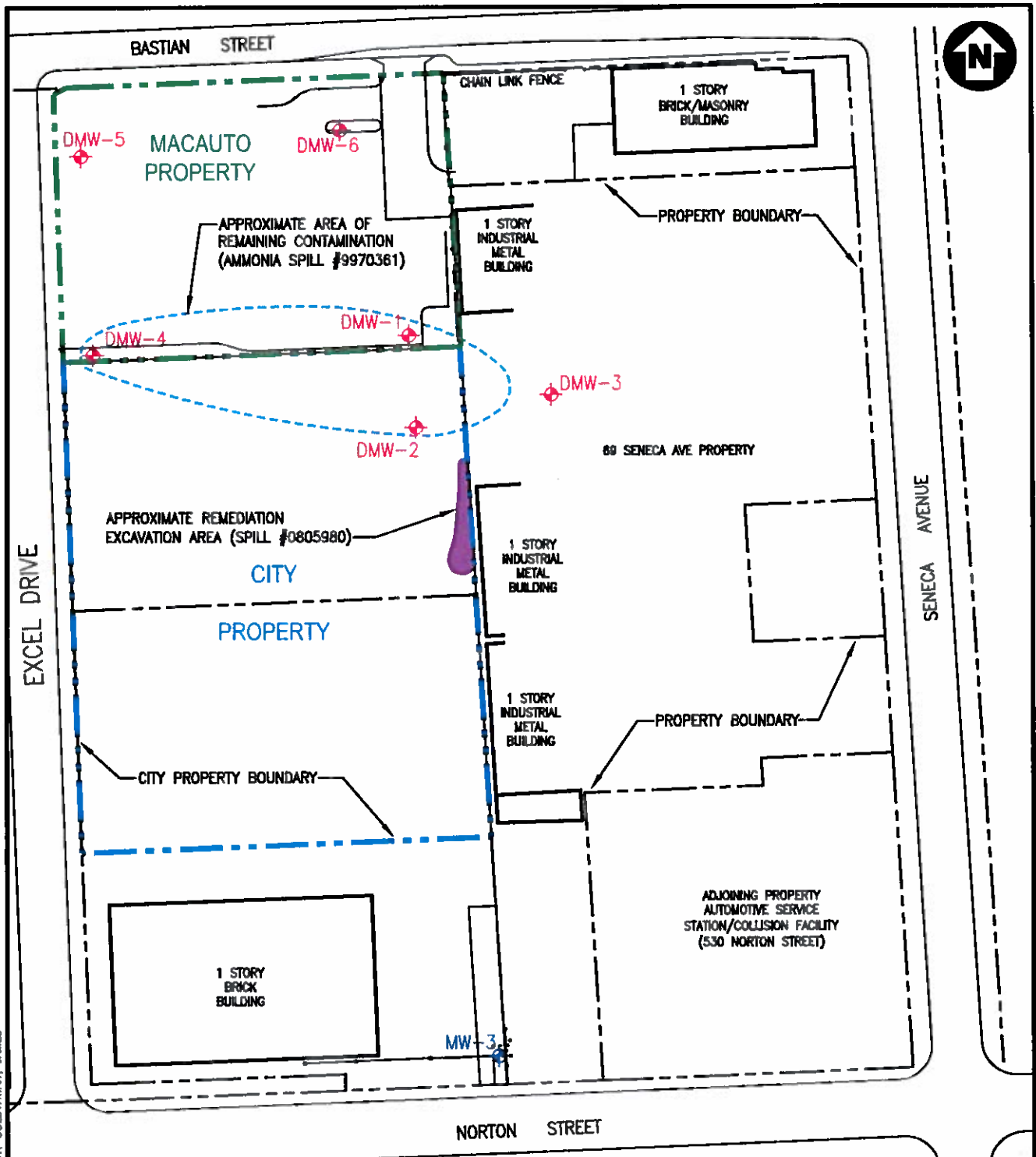
A report is to be submitted to the NYSDEC within 90 days of completion of the activities performed under this EWP. This report shall contain a summary of the activities performed; a summary of all data gathered and results; information about any media that was removed from the site: volume, contamination levels, area from which removed; and any other information that may indicate a change to the "remaining contamination" that is at the site. Such changes may require revision of the SMP.

# FIGURES

**Figure 1**  
CITY OF ROCHESTER, 60 Excel Drive  
MACAUTO USA Inc, 80 Excel Drive  
Rochester, NY 14621



FILE NAME: P:\DUPONT - ROCHESTER SENECA\2017 GW SAMPLING & 2018 SMP\CAD\450677-MACAUTO.DWG  
 PLOT DATE: 4/2/2018 11:34 AM PLOTTED BY: GOLDENHAT, JAMES



- LEGEND:**
- MW-3 GROUNDWATER MONITORING WELL INSTALLED BY CITY OF ROCHESTER
  - DMW-2 FORMER GROUNDWATER MONITORING WELL INSTALLED BY DUPONT (2000 & 2001)



**FIGURE 2**

CITY OF ROCHESTER, 60 EXCEL DRIVE  
 MACAUTO USA INC. 80 EXCEL DRIVE  
 ROCHESTER, NEW YORK

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SITE LAYOUT MAP

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**PARSONS**  
301 PLAINFIELD ROAD, SUITE 350, SYRACUSE, N.Y. 13212, PHONE 315-451-9560

**Table 2**  
**Summary of Ammonia in Groundwater Analytical Results**  
**DuPont Rochester Seneca Plant**  
**Rochester, NY**

Well ID	Sample Date	Result (mg/l)	Above NYS Standard	Job Name
DMW-1	6/19/2000	18	YES	LIMITED GW ASSESSMENT
	6/6/2001	37.1	YES	SAMPLING 6/01
	5/29/2002	37.2	YES	2Q02 SAMPLING
	8/27/2002	47.7	YES	3Q02 SAMPLING
	11/14/2002	35.7	YES	4Q02 SAMPLING
	1/28/2003	17.6	YES	1Q03 SAMPLING
	10/3/2003	30.6 J	YES	4Q03 SAMPLING
	1/30/2004	18.8	YES	1Q04 SAMPLING
	6/3/2008	34	YES	2008 Sampling
	11/4/2011	16.3	YES	2011 Sampling
	9/8/2016	27.6	YES	2016 Sampling
6/26/2017	9.9	YES	2017 Sampling	
DMW-2	6/19/2000	58.9	YES	LIMITED GW ASSESSMENT
	6/6/2001	107.0	YES	SAMPLING 6/01
	5/29/2002	66.5	YES	2Q02 SAMPLING
	8/27/2002	119	YES	3Q02 SAMPLING
	11/14/2002	45.5	YES	4Q02 SAMPLING
	1/28/2003	79.8	YES	1Q03 SAMPLING
	10/3/2003	105 J	YES	3Q03 SAMPLING
	1/30/2004	84.1	YES	1Q04 SAMPLING
	6/3/2008	76.3	YES	2008 Sampling
	11/4/2011	24.9/26.4	YES	2011 Sampling
	9/8/2016	35.4/34.8	YES	2016 Sampling
6/26/2017	27.7	YES	2017 Sampling	
DMW-3	6/19/2000	8.7	YES	LIMITED GW ASSESSMENT
	6/19/2000	6	YES	LIMITED GW ASSESSMENT (DUP)
	6/6/2001	12.9	YES	SAMPLING 6/01
	5/29/2002	5.3	YES	2Q02 SAMPLING
	8/27/2002	18.4	YES	3Q02 SAMPLING
	11/14/2002	5.5	YES	4Q02 SAMPLING
	1/28/2003	10	YES	1Q03 SAMPLING
	10/3/2003	11.9 J	YES	3Q03 SAMPLING
	1/30/2004	3.3	YES	1Q04 SAMPLING
	6/3/2008	3.3	YES	2008 Sampling
	11/4/2011	1.3	NO	2011 Sampling
9/7/2016	14.7	YES	2016 Sampling	
6/26/2017	3.4	YES	2017 Sampling	
DMW-4	6/7/2001	3.5	YES	SAMPLING 6/01
	5/29/2002	3.3	YES	2Q02 SAMPLING
	8/27/2002	11.6	YES	3Q02 SAMPLING
	11/14/2002	11.1	YES	4Q02 SAMPLING
	1/28/2003	7.9	YES	1Q03 SAMPLING
	10/3/2003	5.8 J	YES	3Q03 SAMPLING
	1/30/2004	16	YES	1Q04 SAMPLING
	6/3/2008	8.3	YES	2008 Sampling
	11/4/2011	9.4	YES	2011 Sampling
	9/8/2016	14.1	YES	2016 Sampling
6/26/2017	8.4	YES	2017 Sampling	

**Table 2, continued**  
**Summary of Ammonia in Groundwater Analytical Results**  
**DuPont Rochester Seneca Plant**  
**Rochester, NY**

Well ID	Sample Date	Result (mg/l)	Above NYS Standard	Job Name
DMW-5	6/6/2001	0.17 J	NO	SAMPLING 6/01
	5/29/2002	ND	NO	2Q02 SAMPLING
	8/27/2002	ND (0.46)	NO	3Q02 SAMPLING
	11/14/2002	ND	NO	4Q02 SAMPLING
	1/28/2003	ND (0.11)	NO	1Q03 SAMPLING
	10/3/2003	<0.11U	NO	3Q03 SAMPLING
	1/30/2004	0.21 J	NO	1Q04 SAMPLING
	6/3/2008	ND	NO	2008 Sampling
	11/4/2011	<0.20	NO	2011 Sampling
	9/8/2016	NS	NS	2016 Sampling
	6/26/2017	0.20 U	NO	2017 Sampling
DMW-6	6/7/2001	0.38 J	NO	SAMPLING 6/01
	5/29/2002	ND	NO	2Q02 SAMPLING
	8/27/2002	ND (0.46)	NO	3Q02 SAMPLING
	11/14/2002	ND	NO	4Q02 SAMPLING
	1/28/2003	0.30 J	NO	1Q03 SAMPLING
	10/3/2003	0.25 J	NO	3Q03 SAMPLING
	1/30/2004	1.5	NO	1Q04 SAMPLING
	6/3/2008	ND	NO	2008 Sampling
	11/4/2011	<0.20	NO	2011 Sampling
	9/8/2016	NS	NS	2016 Sampling
	6/26/2017	0.20 U	NO	2017 Sampling
DMW-7*	6/7/2001	ND (0.16)	NO	SAMPLING 6/01
	6/7/2001	ND (0.16)	NO	SAMPLING 6/01
	5/29/2002	ND	NO	2Q02 SAMPLING
	8/27/2002	ND (0.46)	NO	3Q02 SAMPLING
	11/14/2002	ND	NO	4Q02 SAMPLING
	1/28/2003	ND (0.11)	NO	1Q03 SAMPLING
**MW-1	6/7/2001	ND (0.16)	NO	SAMPLING 6/01
MW-2	6/7/2001	ND (0.16)	NO	SAMPLING 6/01
MW-1	6/19/2000	<1	NO	LIMITED GW ASSESSMENT
MW-2	6/19/2000	<1	NO	LIMITED GW ASSESSMENT
MW-3	6/19/2000	<1	NO	LIMITED GW ASSESSMENT

Notes:

New York State Groundwater Standard (Class GA) for ammonia is 2.0 mg/L.

Quarterly sampling was initiated in 2Q02 and includes well DMW-1 thru DMW-7

ND - Not Detected

NS - Not Sampled

U - Parameter not detected at the value given.

J - Estimated Values

(0.16) - Value in parentheses represents method detection limit.

\* Well DMW-7 abandoned in January 2003.

\*\* "MW" series wells installed by the City of Rochester.



Table 3  
 Summary of Ammonia Thiosulfate Analytical Results  
 Second Quarter of 2000 (2Q00) through June 2017  
 DuPont Rochester - Seneca Plant  
 Rochester, New York

Well ID	Quarter	Ammonia Thiosulfate
DMW-1	2Q00	NS
	2Q01	ND (0.2)
	2Q02	ND (0.2)
	3Q02	ND (0.2)
	4Q02	ND (0.2)
	1Q03	ND (0.2)
	4Q03	ND (0.2)
	1Q04	ND (0.2)
	2Q08	<0.3
	4Q11	<0.3
	3Q16	NS
	2Q17	NS
DMW-2	2Q00	NS
	2Q01	ND (0.2)
	2Q02	ND (0.2)
	3Q02	ND (0.2)
	4Q02	ND (0.2)
	1Q03	ND (0.2)
	4Q03	ND (0.2)
	1Q04	ND (0.2)
	2Q08	<0.3
	4Q11	<0.3
	3Q16	NS
	2Q17	NS
DMW-3	2Q00	NS
	2Q01	ND (0.2)
	2Q02	ND (0.2)
	3Q02	ND (0.2)
	4Q02	ND (0.2)
	1Q03	ND (0.2)
	4Q03	ND (0.2)
	1Q04	ND (0.2)
	2Q08	<0.3
	4Q11	<0.3
	3Q16	NS
	2Q17	NS

Table 3  
 Summary of Ammonia Thiosulfate Analytical Results  
 Second Quarter of 2000 (2Q00) through June 2017  
 DuPont Rochester - Seneca Plant  
 Rochester, New York

Well ID	Quarter	Ammonia Thiosulfate
DMW-4	2Q00	NS
	2Q01	ND (0.2)
	2Q02	ND (0.2)
	3Q02	ND (0.2)
	4Q02	ND (0.2)
	1Q03	ND (0.2)
	4Q03	ND (0.2)
	1Q04	ND (0.2)
	2Q08	<0.3
	4Q11	<0.3
	3Q16	NS
	2Q17	NS
DMW-5	2Q00	NS
	2Q01	ND (0.2)
	2Q02	ND (0.2)
	3Q02	ND (0.2)
	4Q02	ND (0.2)
	1Q03	ND (0.2)
	4Q03	ND (0.2)
	1Q04	ND (0.2)
	2Q08	<0.3
	4Q11	<0.3
	3Q16	NS
	2Q17	NS
DMW-6	2Q00	NS
	2Q01	ND (0.2)
	2Q02	ND (0.2)
	3Q02	ND (0.2)
	4Q02	ND (0.2)
	1Q03	ND (0.2)
	4Q03	ND (0.2)
	1Q04	ND (0.2)
	2Q08	<0.3
	4Q11	<0.3
	3Q16	NS
	2Q17	NS
DMW-7	2Q00	NS
	2Q01	ND (0.2)
	2Q02	ND (0.2)
	3Q02	ND (0.2)
	4Q02	ND (0.2)
	1Q03	ND (0.2)

**Notes:**

All parameters in mg/l unless otherwise noted.  
 < or ND - Non-detect at stated reporting limit  
 NS - Not Sampled



DuPont Digital Printing  
69 Seneca Ave.  
Rochester, New York 14621  
585-339-4200 Tel  
585-339-4249 Fax

September 5, 2018

Mr. Joseph Biondolillo,  
Sr. Environmental Specialist  
City of Rochester – Monroe County  
30 Church Street  
Rochester, NY 14614-1295

Mr. Biondolillo,

The enclosed package houses the documents showing the New York State Department of Environmental Conservation's decision of No Further Action on NYSDEC Spill #9970361 and The Site Management Plan which includes the City's property located on Excel Drive, Rochester, which was required by NYDEC.

The DuPont facility had a release of ammonium thiosulfate in 1998 that entered the soil and shallow groundwater. This material was also found on two other properties, 60 Excel Drive and 80 Excel Drive, Rochester, NY. DuPont has been actively working with NYSDEC since that time to determine that the levels of ammonia in the groundwater are decreasing.

The sampling results of 2017 show some groundwater concentrations still exceed NYSDEC standards. It has been determined that there is no unacceptable onsite or offsite risk as the groundwater is not used as a drinking water source and there is no potential inhalation exposure. The ground water wells that were located on the three (3) properties identified in the site management plan, have been removed with the "No Further Remedial Action" letter from NYSDEC.

DuPont was required to develop a Site Management Plan for all three (3) properties, since the concentration levels are still above the NYSDEC standards. We are contacting the property owners, the City of Rochester and MACAUTO, to provide a copy of the plan and relay the following requirements of the plan.

- In the event of a change in site use, a change in property ownership, or if you anticipate intrusive activity within the area of "remaining contamination", you are asked to contact NYSDEC and/or DuPont.
- Information for contacting NYSDEC and DuPont are included in the Site Management Plan, which is part of this packet.
- DuPont will assume responsibility if a new risk evaluation is needed due to a change in the site use. If management of soil or groundwater within the area of remaining contamination is required, or if corrective action is required within the area of remaining contamination due to the presence of ammonia.

Sincerely,

R. Glenn Murphy, DuPont E.H.S. Manager  
1700 Lexington Avenue  
Rochester, NY 14606

