

DRAFT SITE INVESTIGATION REPORT



**Former Rome-Turney Site
NYSDEC Petroleum Spill No. 8802056
City of Rome, New York**

Prepared for: City of Rome

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1.0 Background

The former Rome-Turney Site located at 109 Canal Street in the City of Rome, New York (Site), see Figure 1 – Site Location Plan) was issued a NYSDEC Petroleum Spill No. 8802056 in June 1988 when a release of petroleum from fuel storage tanks was discovered and reported to NYSDEC. The Site Investigation was completed during October and November 2015 by Bergmann Associates and was based on the recommendations in the Phase I Environmental Site Assessment Report (Bergmann, August 24, 2015). The Phase I Environmental Site Assessment Report recommended a Site Investigation to evaluate the known petroleum contamination associated with leaking underground storage fuel oil tanks and other recognized environmental conditions.

The Site Investigation has revealed petroleum impacted soil at levels that exceed NYSDEC CP-51 Soil Cleanup Objectives (SCOs) and NYSDEC 6 NYCRR Part 375-6.6 Soil cleanup objectives. These petroleum impacted soils require remediation under the supervision of NYSDEC. The source of the petroleum contamination is from former on-site bulk petroleum storage and leaking underground storage tanks.

The Phase I Environmental Site Assessment, dated August 24, 2015 prepared by Bergmann Associates (Bergmann) of Rochester, New York, recommended a subsurface investigation to evaluate the Recognized Environmental Conditions (RECs) and the petroleum spill at the Site.

The Site Investigation was performed in accordance with the scope of work detailed in the Planning Feasibility Study for NYSDEC Petroleum Spill No. 8802056, dated September 22, 2015, that was reviewed by NYSDEC Region 6 petroleum spill manager. The Site Investigation included a geophysical survey, excavation of test pits, installation of soil borings and monitoring wells. Soil and groundwater samples were collected and analyzed for petroleum chemical compounds, solvents, metals, pesticides, and PCBs. Bergmann performed the environmental monitoring of subsurface explorations completed by SJB Services, Inc. of Hamburg, New York. The geophysical survey was performed by AMEC Foster Wheeler Environment and Infrastructure, Inc. (AMEC) of Amherst, New York.

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2.0 Soil Borings, Monitoring Well, and Test Pit Installations

Soil borings, monitoring wells and test pits were installed at the suspected underground storage tank locations, at other REC locations, and at up-gradient and down-gradient locations outside the Site building. Excavation of test pits explorations was completed at the metallic anomalies identified in the geophysical report. Test pit were also excavated at suspected underground fuel storage tank locations or at former UST locations. The soil boring and monitoring well program included the installation of soil borings completed as overburden monitoring wells. The test pits, soil borings and monitoring wells (subsurface explorations) allowed for collection of soil and groundwater samples for laboratory analysis to evaluate subsurface soil and groundwater quality.



Subsurface explorations were also used to observe subsurface soil conditions, field screen soils for organic vapors and measure depth to groundwater. The locations of the subsurface explorations are presented on Figure 2 – Test pits and Soil Boring Locations.

Geophysical Survey

The geophysical EM-61 survey was performed by AMEC on October 16, 2015 to geophysically characterize the subsurface at the Site. Two grid areas were established to facilitate data acquisition along lines spaced three feet apart. The main grid encompassed the majority of the area accessible from Canal Street. A second grid was installed north of the Site building adjacent to Route 26. Three metallic (metal) anomalies were detected that represent buried metal. The AMEC report states that, “There were no anomalies observed that are interpreted to represent USTs.” Bergmann used the results from the geophysical survey to locate test pits at the locations of the anomalies identified in the AMEC report. The AMEC geophysical survey report is presented in Appendix A – Geophysical Report.

Test Pit Excavations

Subsurface conditions were observed and monitored for environmental purposes from 8 test pit explorations, named TP-1 through TP-8, on October 28, 2015. Each test pit was excavated with a Komatsu PC40R excavator to depths ranging from approximately 2 ft. to 12 ft. below ground surface. The NYSDEC petroleum spill manager was on Site during excavation of the initial test pits to observe the test pit activities. The soils encountered in the test pits were logged on the Environmental Test Pit logs that are presented in Appendix B – Subsurface Exploration Logs. One soil sample was collected from 5 test pits TP-3 through TP-7 locations near the bottom of the test pit from approximately 11.0 – 12.0 ft. depth. The soils excavated during the test pit explorations were field screened with a photoionization detector (PID) for total organic vapors from head space in glass jars. The results from field soil screen PID measurements and visual observations were recorded on the Environmental Test Pit logs. The PID measurements ranged from 0.1 parts per million (ppm) to 239.2 ppm (TP-6). Petroleum impacted soils were encountered in TP-3 through TP-8 that were located in the former UST and suspected UST areas. Test Pits TP-1 and TP-2 were excavated to 2 feet below the ground surface at refusal on a concrete slab. A summary of soil sample field screen PID measurements is presented in Attachment 1 – Soil Sample Headspace Measurement Summary. Each test pit was photographed prior to backfilling with excavated soils. Site Investigation photographs are presented in Appendix C – Photographs.

Soil Borings

A total of 8 soil borings named SB-1 through SB-8 were installed to depths of approximately 12 feet below ground surface. Each soil boring was installed for environmental data collection purposes using conventional rotary drilling in accordance with ASTM D1586 methods and continuously sampled from the ground surface to the bottom depth of each soil boring. A representative portion of each soil sample was collected for headspace field screening for total volatile organic vapors using a photoionization detector (PID). The subsurface conditions encountered were recorded on the test boring logs for each soil boring location, see Appendix B. The soil screen PID measurements ranged from 0.1 ppm to 730.6 ppm (SB-2 / MW-2), see Attachment 1. Elevated PID measurements and visual /olfactory observations indicated that petroleum impacted soil were detected in SB-1 through SB-5 with less impacts at SB-6 through SB-8.



The augers and down hole drill tools were stream cleaned between soil boring locations on a temporary decontamination pad. The soil cuttings and wash water were drummed and staged for disposal on Site.

Overburden Monitoring Well Installation

Overburden groundwater monitoring wells, named MW-1 through MW-8, and were installed for environmental data collection in completed soil borings. Each monitoring well was screened approximately two feet above the groundwater table with the screen interval extending approximately eight feet below the groundwater table. The monitoring wells were constructed with approximately five feet of two-inch inside diameter, Schedule 40 PVC well screen with a 0.010-inch slot size and solid casing that extends to the ground surface. The monitoring wells were used to measure the depth to groundwater, observe for the presence or absence of floating and sinking non-aqueous phase liquids, evaluate groundwater elevations and allow for collection of overburden groundwater samples.

Each monitoring well was completed with a flush mounted steel road way box and cap at the ground surface. The actual design of these wells was determined based on field conditions encountered with recommendations from the Bergmann Geologist. Well completion details are presented on each test boring log, see Appendix B. The locations of the monitoring wells are shown on Figure 2. Each monitoring well was developed to remove sediments from the well water prior to collection of ground water samples.

Regional Geology

The regional geology of the Site was most recently deposited by post-glacial lakes approximately 10,000 years ago. The stagnating remains of the valley glaciers blocked off the outlets of some meltwater streams and thus created lakes. The lakes lasted until the dams of ice melted. The melting often took many years. Proglacial lakes formed in several valleys where meltwater was trapped between valley-blocking moraines and the ice front. Lacustrine (lake-laid) deposits of clay, silt, and sand are in many of the valleys and these Soil) deposits underlie the City of Rome. The Bedrock units of Middle Silurian to Middle

Devonian age are approximately 450 million years old and underlie the region. The younger Devonian bedrock formations are in the southernmost part of the county.

Site Geology

Two overburden soil deposits were encountered in the subsurface explorations that include: a Fill deposit and a Lacustrine deposit.

The Fill deposit was described as Dark brown SAND, some gravel, trace concrete to Gray CLAY, some gravel, trace concrete. The Fill deposit is approximately 4 feet in thickness at the soil boring locations and overlies the native Lacustrine deposit. The Lacustrine deposit was described as Gray CLAY, trace brown silt to Dark brown SILT, trace clay. The bottom of each subsurface exploration was terminated in the Lacustrine deposit. The soil descriptions are noted on the Environmental Test Pit and soil boring logs, see Appendix B.



3.0 Subsurface Soil Sampling and Analysis Summary

Subsurface Soil Sampling

Soil samples were collected continuously in two foot intervals using a two-inch diameter split-spoon sampler during the installation of soil borings. A stainless steel trowel was used to collect soil samples from the excavator bucket during test pit excavations. A representative portion of each soil sample was placed into a glass jar and allowed to equilibrate to approximately room temperature for headspace screening. Another representative portion was placed into a glass jar and stored on ice for possible laboratory analysis. A photoionization detector (PID) equipped with a 10.2 eV lamp was used to screen headspace soil vapor from each soil sample container for total organic vapors.

In general, one soil samples from each soil boring was submitted for laboratory analysis from sample depth interval as selected to represent the elevated PID measurements and sample depth intervals are noted on each test pit and soil boring log. Soil samples were collected and submitted for laboratory analysis under chain-of custody documentation. The PID measurements are presented on each test boring log for each sample depth interval encountered and summarized in Attachment 1.

The split-spoon soil sampler, stainless steel trowel and other non-dedicated sample equipment were decontaminated prior to collection of each soil sample following a three step wash withalconox, tap water rinse. Sample collection and field screening for test pit soil samples was completed in the same manor as described for samples from soil borings.

Laboratory Analytical Test Methods

Soil samples were analyzed in accordance with methods: U.S. EPA 8260 (solvents and gasoline chemical compounds), U.S. EPA 8270 (diesel, heating oils and grease), TAL Metals 6010/7471, U.S. EPA 8081 (Pesticides) and U.S. EPA 8082 (Polychlorinated Biphenyls-PCBs). The analytical test methods target petroleum chemical compounds, chlorinated solvents, metals, pesticides and PCB's. These compounds are the suspected

Chemicals of Concern (COCs) for this investigation. The test tip soil samples were analyzed by Paradigm Environmental Services, Inc. of Rochester, New York. The soil boring and groundwater samples were analyzed by Chemtech of Mountainside, New Jersey.

Soils - SVOCs

The SVOC characterization data for subsurface soil samples are presented in Table 2 – Soil Analysis Summary SVOC. The distribution of SVOCs detected in subsurface soil samples is shown on Figure 3. The SVOC soil sample results indicate that 4 out of the 31 soil samples exceed NYSDEC CP-51 soil cleanup objectives (SCOs) levels for fuel oil contaminated sites and or unrestricted residential SCOs for one to five SVOCs. It appears that the detected Ployaromatic hydrocarbons (PAH) SVOC compounds were limited to detection in soil boring SB-8. 2-Methylnaphthalene, a petroleum fuel compound, was detected above the CP-51 SCOs and unrestricted residential SCOs in is a petroleum fuel compound. Other petroleum SVOCs were detected at concentrations below SCOs. The SVOC chemical compounds detected that exceed NYSDEC CP-51 SCOs and unrestricted residential SCOs are summarized below from test pit and soil boring locations with concentration ranges in parts per million (ppm):



<u>SVOC Chemical Compound</u>	<u>Range of Concentrations That Exceed SCOs (ppm)</u>	<u>TP or SB Location</u>	<u>Samples That Exceed/Number of Samples</u>
• Benzo (a) Pyrene	1.166	SB-8	1/12
• Benzo (b) Fluoranthene	1.366	SB-8	1/12
• Indeno (1,2,3-cd) Pyrene	0.546	SB-8	1/12
• Chrysene	1.666	SB-8	1/12
• Naphthalene	13.70E	SB-5	1/12
• 2-Methylnaphthalene	0.988 to 36.80E	3,4,5,3,5	5/12

The soil sample locations with the highest total detected levels of SVOCs were collected from TP-4 and SB-5 as noted below.

- TP-4 (11-12 ft.) at 27.08 ppm
- SB-5 (3-4 ft.) at 65.80 ppm

The locations of the soil borings and test pits are presented on Figure 2. The SVOC soil sample results are presented on Table 3. The SVOC laboratory reports are presented in Appendix D – Laboratory Reports.

Soils Quality - Metals

The metals characterization data for subsurface soil samples are presented in Table 3 – Soil Analysis Summary Metals. The distribution of metals detected in subsurface soil samples are shown on Figure 4. The metals soil sample results indicate that 10 out of the 10 soil samples exceed the Unrestricted Residential Soil cleanup Objectives (SCO) and mercury exceeds the commercial SCOs in the sample from SB-2. Six heavy metals that exceed unrestricted residential SCOs. Other metals were detected at concentrations below SCOs. The metals detected that exceed the Unrestricted Residential and Commercial SCOs are listed below from test pit and test boring locations with concentration ranges in parts per million (ppm):

<u>Metal</u>	<u>Range of Concentrations That Exceed SCOs (ppm)</u>	<u>Test Pit / Test Boring</u>	<u>Samples That Exceed/Number of Samples</u>
• Cadmium	3.79 to 4.89	SB-2 & SB-4	2/31
• Chromium	5.79 to 19.2	TP34567 & SB-2345	9/31
• Copper	54.9 to 146	TP-5,TP-7,&,SB-2,SB-5	4/10
• Lead	82.6 to 636	TP-5,TP-7 & SB-2	3/10
• Mercury	0.924 to 6.79	SB-2 & SB-4	2/10
• Nickel	30.1 to 36.1	TP3,4,7 & SB-1	4/10
• Zinc	128 to 1,750	TP5,7 and SB-1,2,3,4	6/10
• Silver	2.51	SB-2	1/10
• Iron	8,900 to 109,900	All TP and SB	10/10



The soil sample locations with the highest detected heavy metal concentration for Mercury was SB-2 (3.0-4.0 ft.). The highest detected Lead concentration was 636 ppm in soil sample SB-2 (3.0-4.0 ft.). Metals are a COC with several metals that exceed Part 375 SCOs. See Summary Tables and Figures that present the distribution of metals that exceed standards. The laboratory reports for metals are presented in Appendix D.

Soils Quality – Volatile Organic Compounds

The VOC characterization data for subsurface soil samples are presented in Table 4 – Soil Analysis Summary VOC. Volatile organic compounds (VOCs) were detected in the low parts per billion (ppb) range in several soil samples at levels below the NYSDEC CP-51 SCOs for gasoline contaminated sites and Unrestricted Residential SCO. The majority of VOCs compounds detected were low level gasoline chemical compounds, fuel additives, and non-chlorinated solvents such as Acetone.

The low levels of petroleum VOCs that are gasoline chemical compounds do not appear to be COC and were detected in the following ranges: Naphthalene in the 0.445 to 5 ppm range, 1,2,4-Trimethylbenzene 0.0895 ppm (TP-5), 1,3,5 –Trimethylbenzene 0.0322 ppm, n-Butylbenzene 0.0327, n-Propylbenzene 0.035 ppm, sec-Butylbenzene 0.0247, Methylcyclohexane 0.0474 ppm to 1.3 ppm, m,p, Xylenes 0.0228 ppm and other low level gasoline VOCs. Low levels of Acetone detected (0.0509 ppm to 0.115 ppm range)

Low levels of chlorinated solvents 1,1,2 – Trichloroethene and Trichloroethene were detected as estimated concentrations of 0.00063J ppm and 0.0012J ppm, respectively. The locations of the soil borings and test pits are presented on Figure 2. The VOC soil sample results are presented on Table 3. The VOC laboratory reports are presented in Appendix D.

Soils - Pesticides

The pesticides were not detected above the method detection limits in the soil samples. Laboratory reports for pesticides are presented in Appendix D.

Soils - PCBs

The polychlorinated biphenyls were not detected above the method detection limits in the soil sample. Laboratory reports for PCBs are presented in Appendix D.

4.0 Monitoring Well Development and Survey

The monitoring wells were developed until the discharged groundwater was relatively sediment-free. Approximately three to five well volumes of groundwater was removed during the well development process and placed in drums for disposal. Guidelines in NYSDEC DER-10 indicate that monitoring wells be designed, constructed, and developed to yield a water sample that has a turbidity measurement of less than 50 NTU. Therefore, the goal of the monitoring well development is to achieve this level by using good design and sufficient well development effort. The turbidity measurements ranged from approximately 11.58 NTU to 44 NTU.



Well Survey

At each monitoring well location, the ground surface and top of casing elevations were surveyed by a Bergmann NYS Licensed Surveyor to within 0.01 ft. so that groundwater elevations can be calculated. This survey provides xyz coordinate data for each monitoring well. Elevation data shall be expressed using the NGVD 1988 coordinate system and the horizontal measurements using the NAD 1983 UTM Zone 18 coordinate system.

5.0 Groundwater Sampling and Analysis Summary

Measurements of total organic vapor concentrations, using a Photoionization Detector (PID), were performed by removing the well cap slightly and placing the instrument probe beneath the cap. After the PID reading was recorded, the well cap was completely removed and the well was allowed to ventilate for a period of approximately three minutes. After the well was ventilated, a measurement in the breathing zone was made. A depth to water measurement was recorded from the top of the PVC well casing to the top of the water surface to the nearest 0.01 ft. during sampling. The elevation of groundwater in feet was calculated and recorded with the surveyed reference elevation of the top of the PVC well casing and depth to water measurement. The depth to groundwater measured on November 11, 2015 is noted below:

MW-1 = 2.84 ft., MW-2 = 7.34 ft., MW-3 = 7.34 ft., MW-4 = 7.60 ft., MW-5 = 1.10 ft.,

MW-6 = 7.94 ft., MW-7 = 7.31 ft., and MW-8 was dry.

The groundwater elevations were calculated and a groundwater contour map was created as presented in Figure 8 – Groundwater contour map.

Groundwater samples were collected approximately one week after the development of each monitoring well was completed. Monitoring wells were purged until dry and then sampled. One round of groundwater sampling was conducted during this investigation. Groundwater samples were generally collected first from monitoring wells considered least impacted, followed by those considered most impacted. The order of sample collection was VOC, SVOC, Metals, Pesticides and PCBs. A disposable translucent bailer was lowered across the top of the water surface and removed to check for the presence of light non-aqueous phase liquids (LNAPL) prior to collection of groundwater samples. After completion of the sampling, the bailer was lowered to the bottom of the well to check for dense non-aqueous phase liquids (DNAPL). Floating petroleum product was not observed on the well water and a DNAPL was not observed in the wells.

Groundwater samples were collected from 7 monitoring wells with one QA/QC sample submitted to Chemtech for laboratory analysis in accordance with methods: U.S. EPA 8260, U.S. EPA 8270 base neutrals, TAL Metals, U.S. EPA 8080 and 8081.

Groundwater — Metals

Groundwater samples for metals were collected from 7 overburden monitoring wells to evaluate groundwater quality for metals. There is no results for sample MW-6, due to Laboratory issues with recording the results. All of the groundwater samples for metals were very turbid due to poor recovery of water in the wells. Therefore the results may be elevated above the true concentrations in the groundwater. NYSDEC has requested that the wells be resampled in the



future to collect filtered samples for metals. The overburden groundwater samples results for metals are presented in Table 6 - Groundwater Sample Analysis Summary Metals. The locations of the monitoring wells are shown on Figure 2. The metals results for groundwater samples indicate that 12 metals were detected that exceed Class GA groundwater standards. The metals that exceed the Class GA groundwater standards are: Arsenic, Barium, Cadmium, Chromium, Copper, Iron, Lead, Manganese, Mercury, Nickel, Selenium and Sodium. The concentration ranges that exceeded the GA standards are summarized in Table 5. The laboratory reports for metals are presented in Appendix D.

Groundwater-SVOCs

The SVOC Diethyl Phthalate was detected in the groundwater sample from several monitoring well locations with concentration ranging from 4.7J to 9.8J. ppb that is below the groundwater standard of 50 ppb. The levels of SVOCs detected in the groundwater sample from MW-5 exceed the groundwater standards. Concentrations of Naphthalene 43.3 ppb, 2-Methylnaphthalene 69.1 ppb, and carbazole 13.3 ppb exceeds the groundwater standard of 5 ppb. Other SVOCs were detected above the method detection limits in the groundwater samples. Several TICs were detected in each groundwater samples. The SVOCs are a COC in the groundwater. The laboratory reports for SVOCs are presented in Appendix D.

Groundwater-Pesticides

Groundwater samples were collected from 6 overburden monitoring wells to evaluate groundwater quality for pesticides. The overburden groundwater samples results for

Groundwater-PCBs

PCBs were not detected above the method detection limits in the groundwater samples. The laboratory reports for PCBs are presented in Appendix F.

Groundwater-VOCs

VOCs low levels of Gasoline Chemical Compounds do not appear to be COC and were detected in the following ranges less than 5 ppb:

1,2,4- Trimethylbenzene, 1,3,5 –Trimethylbenzene, n-Butylbenzene, n-Propylbenzene, sec-Butylbenzene, Methylcyclohexane, m,p, Xylenes and other low level gasoline VOCs.

Low levels of Acetone detected (38.4 ppb to 0.115 ppm range)

6.0 Disposal of Investigation Derived Waste

The soil cuttings from installation of soil borings / monitoring wells and rinse water generated through the equipment decontamination activities were collected in DOT-approved 55-gallon drums for characterization and disposal at the conclusion of the field investigation program. Drums are staged for future disposal on Site.



7.0 Summary and Conclusions

The following summary and conclusions are based on the Site Investigation field sample screening, observations and laboratory sample results.

Soil Sample Summary

- PCBs are not a chemical of concern (COC) - Non-detection for PCBs
- Pesticides are not a COC - Non-detection of Pesticides
- VOCs low levels of Gasoline Chemical Compounds do not appear to be COC and were detected in the following ranges: Naphthalene in the 0.445 to 5 ppm range, 1,2,4-Trimethylbenzene 0.0895 ppm (TP-5), 1,3,5-Trimethylbenzene 0.0322 ppm, n-Butylbenzene 0.0327, n-Propylbenzene 0.035 ppm, sec-Butylbenzene 0.0247, Methylcyclohexane 0.0474 ppm to 1.3 ppm, m,p, Xylenes 0.0228 ppm and other low level gasoline VOCs.
- Low levels of Acetone detected (0.0509 ppm to 0.115 ppm range)
- Chlorinated VOCs non-detection are not a COC.
- SVOCs are a COC with petroleum chemical compounds that exceed NYSDEC CP-51 SCO for fuel oil / diesel compounds. See Summary Tables and Figures that present the SVOCs that exceed standards.
- Limited SVOC – PAH compounds detected that exceed NYSDEC CP-51 SCOs. See Summary Tables and Figures that present the distribution of SVOCs that exceed standards.
- Metals are a COC with several metals that exceed Part 375 SCOs. See Summary Tables and Figures that present the distribution of metals that exceed standards.

The suspected sources of petroleum COCs is the former underground storage tanks that released to the subsurface and former bulk storage of petroleum products on Site. The source of Metals COC is likely from the use of these metals on the Site. Although Background concentrations of metals should be evaluated to confirm the elevated detections.

Groundwater Sample Summary

- PCBs are not a chemical of concern (COC) - Non-detection for PCBs
- Pesticides are not a COC - Non-detection of Pesticides



- VOCs low levels of Gasoline Chemical Compounds do not appear to be COC and were detected in the following ranges less than 5 ppb: 1,2,4- Trimethylbenzene, 1,3,5 – Trimethylbenzene, n-Butylbenzene, n-Propylbenzene, sec-Butylbenzene, Methylcyclohexane, m,p, Xylenes and other low level gasoline VOCs.
- Low levels of Acetone detected (38.4 ppb to 0.115 ppm range)
- 2-Butanone 5.5 ppb, Chloroform 4.8 ppb
- Chlorinated VOCs are not a COC
- SVOCs low ppb levels but higher levels when TICs added into values and maybe a COC
- Metals are a COC, See Summary Tables and Figures that present the distribution of metals that exceed standards.

Conclusion

The suspected sources of petroleum impacted soils is the former underground storage tanks and suspected UST that released to the subsurface and former bulk storage of petroleum products on Site. Two petroleum source areas have been identified as Areas of Concern (AOC). Petroleum AOC #1 is a suspected UST area located in the vicinity of SB-1/MW-1 and TP-6. Petroleum AOC #2 is the former fuel oil UST area near TP-1, TP-2, and SB-5/MW-5.

The source of Metals impacts is likely form the use of metals on the Site. Background concentrations of metals should be evaluated to confirm the elevated detections.

The suspected sources of petroleum impacted groundwater is the former underground fuel oil storage tanks (AOC#2) that released to the subsurface and suspected former bulk storage of petroleum products in USTs on Site (AOC#1).

The source of Metals is likely form the use of these metals on the Site. Monitoring wells should be resampled due to very turbid samples that were analyzed during the site Investigation. Background concentrations of metals should also be evaluated to confirm the elevated detections.



8.0 Recommendations

Remediation of petroleum impacted soil and groundwater associated with the release of petroleum from the underground storage tanks is required. Other investigations maybe required to address other impacts to the sub-surface. All future investigation and remediation work should be coordinated with NYSDEC.

Bergmann also recommends another groundwater sampling event to continue to evaluate groundwater levels.

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