

**Andrews Street Site
NYSDEC Site #E828144 & USEPA ID #BF-97207900-0
300, 304, 320 Andrews Street, 25 Evans Street, Rochester, NY**

**Analysis of Brownfields Cleanup Alternatives (ABCA)
Comments and Response to Comments**

August 8, 2012

Analysis of Brownfields Cleanup Alternatives (ABCA) was prepared on behalf of the City of Rochester (City) for 300, 304-308, 320 Andrews Street and 25 Evans Street, Rochester, New York 14604 dated June, 2012. A public comment period of thirty (30) days began on June 29th, 2012 upon the placement of the ABCA in the document repository in Rundel Library located in downtown Rochester, and the uploading of the ABCA to the City website. The following comments regarding the Draft ABCA were provided by the New York State Department of Environmental Conservation (NYSDEC) Region 8. These were the only comments provided. The City responses to the NYSDEC comments are also listed below.

Comment 1: Page 28 Groundwater Monitoring- NYSDEC will require a total of five (5) years of groundwater monitoring.

Response 1: The City concurs. Groundwater monitoring on page 28 will be revised to read *“This alternative presumes that groundwater monitoring would be performed on a quarterly basis for a period of two years, and on an annual basis for up to three additional years.”*

Comment 2: Page 29 Alternative #2 Short Term Impacts and Effectiveness. The NYSDEC indicated that this alternative will likely result in some short term impacts to the public (e.g., increased noise, increased traffic, etc.).

Response 2: The City concurs. This section in the ABCA for Alternative #2 will be revised to indicate that some short term impacts such as increased traffic, increased noise, etc. will likely occur during certain phase of implementation of Alternative #2.

Comment 3: Page 32 Alternative #3 Groundwater Monitoring- NYSDEC will require a total of five (5) years of groundwater monitoring.

Response 3: The City concurs. This section of the ABCA will be revised to state that quarterly groundwater monitoring will be performed for the first two years, and annually for up to three additional years.

Comment 4: Page 33 Implementability- The NYSDEC recognizes that Alternative #3, which includes the complete removal of impacted soil and fill materials from the Site, may require engineering controls to prevent potential damage to public sidewalks and utilities in the public Right-of-Way (ROW); however, this alternative is technically feasible to implement.

Response 4: The City concurs. A revision will be made to this section of the ABCA to indicate that Alternative #3 can be implemented, contingent upon the implementation of certain safety precautions and additional engineering controls (e.g., sheet pile wall installation) which may be required for excavation in close proximity to public sidewalks or other public right-of-ways in order to prevent potential for damage to off-site infrastructure and utilities.

Comment 5: Page 35 Comparative Analysis of Alternatives- A total of five (5) years of groundwater monitoring will be required by the NYSDEC.

Response 5: The City concurs. This section of the ABCA will be revised to indicate that state that quarterly groundwater monitoring will be performed for the first two years, and annually for up to three additional years.