JERICHO UNION FREE SCHOOL DISTRICT
99 CEDAR SWAMP ROAD
JERICHO, NEW YORK 11753-1202
516-203-3600

HENRY L. GRISHMAN
SUPERINTENDENT OF SCHOOLS

April 14, 2016

Mr. Robert DeCandia
New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, New York 12233

Re: Comments to the Proposed Remedial Action Plan
Solvent Finishers – 13172
601 Cantiague Rock Road
Jericho, New York

Dear Mr. DeCandia:

The proposed Remedial Action Plan, dated February 2016 and presented at the public meeting held on March 15, 2016 at the Cantiague Elementary School detailed six (6) possible remedial alternatives, one (1) No Action Plan and five (5) engineering controls (ECs) to remedy the identified contamination at the Solvent Finishers BCP site.

Inasmuch as taking no action would be unacceptable, of the five (5) action alternatives, the NYSDEC selected Remedial Alternative 6 – Air Sparge/Soil Vapor Extraction and In-Situ Chemical Oxidation on-site with Enhanced Bioremediation off-site.

The Jericho Union Free School District urges the NYSDEC to change the preferred remedial method from Alternative 6 to a more aggressive remediation plan which includes In-Situ Thermal Remediation as contained in Alternative 3 and Alternative 5.

The NYSDEC's basis for selection of a remedy considered nine (9) factors:

1. Protection of Human Health and the Environment: "Alternative 3, 5, and 6 provide additional protection by removing or destroying the on-site groundwater contamination at a significantly faster rate which will prevent the further migration of contaminated groundwater."

2. Compliance with New York State Standards, Criteria, and Guidance (SCGs): "Alternative 3, 5, and 6 are expected to achieve on-site groundwater SCGs in much shorter time frames when compared to achievement of SCGs for Alternatives 2 and 4."

3. Long-term Effectiveness and Permanence: "Long-term effectiveness is best accomplished by Alternatives 3, 5, and 6, involving quick reduction of the source area contamination which will in turn reduce both the potential for soil vapor intrusion and off-site migration of the plume." "Alternatives 3 and 5 will use heat to effectively volatize contamination from the subsurface on-site which can be beneficial to the downgradient biological aspects of these alternatives."

4. Reduction of Toxicity, Mobility of Volume: "Alternatives 3, 5, and 6 will quickly and permanently remove on-site contamination and provide a reduction in toxicity, mobility, and volume."

5. Short-term Impacts and Effectiveness: "Overall, the time necessary to achieve the remediation goals is the shortest for Alternative 5, followed by Alternatives 3 and 6..."

6. Implementability: "Alternatives 3 and 5 are less implementable in that they require both additional electric power sources and complete access to a large portion of the on-site parking lot." This may not be the case if steam-enhanced extraction is utilized for the thermal remediation system.

7. Cost-Effectiveness: Capital cost for Alternative 3 and Alternative 5 is higher than Alternative 6, this may be overstated.

8. Land Use: "Alternatives 3, 5, and 6 would be more desirable since they will remove or permanently treat the on-site source area."

9. Community Acceptance: A responsiveness summary will be prepared that describes public comments received and the manner in which the Department will address the concerns raised."

Reviewing this summary for the basis of selecting a remedy, it appears that the remedies that utilize Thermal Remediation, Alternative 3 and 5 would be more effective in implementing the short and long term goals of the NYSDEC then the selected remedy, Alternative 6.

The suggested disadvantages of alternatives 3 and 5 appears to be cost and need for equipment space. It is believed the cost to implement alternative 3 or 5 is overstated and that once Thermal Remediation is selected, the actual cost would be similar to Alternative 6.

Therefore, based on the NYDEC's own selection criteria, the delay to investigate and remediate the contamination, and the proximity of the Cantiague Elementary School and the local community to the contamination, Jericho UFSD strongly supports the more aggressive and comprehensive remediation plans contained in Alternative 3 and Alternative 5, which will prevent further contamination, environmental, and public health impacts.

Sincerely,

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Henry L. Grishman
Superintendent of Schools