

**NEW YORK STATE  
PUBLIC SERVICE COMMISSION**

Case 11-M-0034 – Proceeding on Motion of the Commission to Commence a Review and  
Evaluation of the Treatment of the State’s Regulated Utilities’ Site  
Investigation and Remediation (SIR) Costs

2015  
ANNUAL REPORT CONCERNING THE STATUS OF SITE INVESTIGATION AND  
REMEDATION COSTS, SCHEDULES AND REGULATORY COMPLIANCE

Rochester Gas and Electric Corporation  
(RG&E)

Prepared By:  
Christopher Keipper, PMP  
Electric Capital Delivery

Dated: March 28, 2016

## **EXECUTIVE SUMMARY**

- **Provide a summary of the major issues and findings discussed in the report.**

RG&E has a robust and mature Site Investigation and Remediation (“SIR”) program. Significant progress was made in 2015. RG&E had 9 MGP sites in various stages of investigation, remedy selection or remedial action (not including sites that require periodic monitoring). RG&E expects this level of activity to continue over the next six years and then begin to decline at the end of its active remedial program in 2022.

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## **1. SITE INVESTIGATION AND REMEDIATION (SIR) PROGRAM OVERVIEW**

### **1.1. Historical Background**

- **Provide a general discussion of the SIR program and requirements.**

RG&E entered into a Voluntary Cleanup Agreement (“VCA”) with the New York State Department of Environmental Conservation (“NYSDEC”) in April 2003 to investigate and, where necessary, remediate seven MGP sites. The agreement was amended in December 2014 to include two additional sites in Geneseo, NY. Two other MGP sites are covered by separate agreements with the NYSDEC. RG&E has a comprehensive program utilizing company staff and contractors to meet the obligations of the VCA under the review and approval of NYSDEC.

RG&E has also been identified as a Potentially Responsible Party (“PRP”) at eight State and Federal Superfund sites as a result of off-site disposal of waste or property ownership. RG&E has participated in PRP groups to limit the overall cost and the specific share allocated to RG&E.

The RG&E SIR program has also included investigation and remediation of seven other company owned non-MGP sites with “legacy” environmental impacts that required action to meet NYSDEC requirements.

### **1.2. Responsibilities of the Company**

- **Briefly describe the company’s understanding of its role and responsibilities in planning and implementing the SIR program required by New York State Department of Environmental Conservation (NYSDEC).**

The VCA referenced above requires RG&E to complete the following steps:

- Initial identification based upon records that indicate the presence of a former MGP.
- Site Characterization (“SC”) to make an initial evaluation of the presence of contamination that would constitute a “significant threat to human health or the environment.”
- Remedial Investigation (“RI”) to determine the full nature and extent of contamination.
- Alternatives Analysis Report (“AAR”) to evaluate the alternatives to remediate the site.
- Remedial Action Work Plan (“RAWP”) to recommend the actual remedy.
- Decision Document, issued by NYSDEC, to approve the RAWP and/or AAR. A public meeting is held at this point to solicit input from local community members and other interested parties.
- Remedial Design (“RD”) to establish the means and methods to implement the remedy. As required, a Pre Design Investigation (“PDI”) conducted to gather more information about site conditions.
- Remedial Action (“RA”) to implement the selected remedy.

- Post Remedial Monitoring to verify the RA met its objective. Operation of a remedial system is sometimes performed to mitigate and/or control residual impacts. The duration of system operation varies and can last as long as 30 years.
- An Interim Remedial Measure (“IRM”) can also be implemented at any point in the process to address contamination with an obvious solution. At MGP sites, this may include removal of gas holder foundations, tar tanks and other sources of coal tar.

### 1.3. Number and Location of Sites

- **Indicate the number of SIR sites for which the company is wholly or partially responsible and describe the general locations of these sites.**

RG&E is wholly or partially responsible for 12 sites impacted by former MGP operations, 8 PRP sites and 7 other non-MGP sites. The sites are primarily located throughout RG&E's service territory, but the PRP sites are also located in other areas of New York and as far away as Kentucky (Table 1).

## 2. OVERALL SIR COSTS

### 2.1. Costs Incurred By Utility to Date

- **Briefly summarize the total costs incurred by the company for its SIR projects.**

RG&E has total external cost through 2014, excluding legal, for the MGP sites of approximately \$57,329,090. RG&E has total external cost through 2015, excluding legal, for the non-MGP sites of approximately \$3,647,118.

- **Describe the estimated liability for the Company's overall SIR program and explain any changes or significant issues that have arisen since the previous reporting period.**

RG&E's estimated liability for the overall SIR program as of the end of 2015 ranged from \$95,721,600 to \$212,960,200 with a “best estimate” of \$151,509,400. Of the sites shown on Table 1, three sites show an increase in the liability estimate, nine sites showed a decrease and the remaining sites did not change.

The Liability estimate increases are a result of refined estimates based on currently available engineering inputs and site conditions considering the phase of the project level of definition. In this case the only liability estimate increases were resulting from Liability Updates of Brooks Avenue and Russell Station with respect to long term inflation expectations and Brockport due to additional volumes of contaminated soil excavated and disposed of site during the Remedial Action Phase.

The sites that showed an estimate decrease were Clark Street, East Station, Front Street, Canal Street, Main Street, 6 Park Street Geneseo and 112 Riverside Drive Geneseo. Most site decreases in liability were as a result of completed work in accordance with the ongoing site investigations and remediations.

**Complete Table 1 showing total estimated liability, total SIR costs to date, anticipated costs for reporting period, actual costs for reporting period and total project costs for upcoming reporting period for specific details.**

See Table 1 at the end of this Report.

## **2.2. Impacts on Ratepayers**

- **Provide amount of SIR expense the company is currently recovering from its ratepayers, including base rates and surcharges.**

RG&E is currently recovering (annually) \$7,394,000 in electric rates and \$3,717,000 in gas rates.

- **Describe the projected impacts to the company's ratepayers, including base rates and surcharges, the company requests in any pending rate filings.**

Under pending rate filing case # 15-E-0285 and 15-G-0286, currently under review with the PSC, it is anticipated that RG&E will be recovering \$4,340,000 in electric rates and \$2,023,000 in gas rates. RG&E will continue to utilize reserve accounting for Environmental Remediation costs.

## **2.3. General Cost Management and Mitigation Strategies**

- **Describe the Company's standard best management practices for SIR cost management/mitigation strategies.**

RG&E utilizes the following best practices inventory, which was filed in this proceeding on March 28, 2013:

1. Operate the SIR program with knowledgeable staff, including site-specific project managers;
2. Operate the SIR program using experienced, company-approved SIR program consultants and remediation contractors, and update approved contractor lists, as needed;
3. Operate the SIR program using competitive bidding for individual projects or to establish competitive rates for qualified remedial consultants and contractors except in unique situations such as time sensitive projects, which would not allow sufficient time for implementation of a competitive bidding process, or projects involving specialized services, such as expert legal or technical contractors with specialized expertise or contractors that specialize in a particular technology;

4. Operate the SIR program using procurement procedures for construction contracts that include detailed design and contract terms that help bidders understand the scope of work;
5. Solicit bids from qualified contractors and evaluate whether the low bidder understands the requirements of the project and the bid specification and that the low bid is reasonable compared with other bids;
6. Operate the SIR program using contract management and oversight processes that include change order and invoice review and approval processes;
7. Pursue cost-effective remedies based on the current use and contemplated use or re-use of properties and their zoning;
8. Use cost-effective waste management practices at remedial sites that minimize overall costs and liabilities, such as the re-use of excavated soils on site, to the extent feasible, and subject to government, property owner and facility requirements and environment, health and safety considerations;
9. Work with other utilities to share the costs of research evaluating remedial technologies and risks from MGP contamination and other contaminants;
10. Monitor and comment on proposed regulations that would significantly affect the SIR program;
11. Evaluate the use of innovative and cost-effective techniques to investigate and remediate sites where appropriate;
12. Only use waste disposal facilities that have been pre-approved by the utility to minimize the potential for creating new liabilities;
13. Conduct environmental due diligence reviews prior to purchasing or selling property;
14. Perform on-going review of long-term post-construction monitoring programs to identify possible scope reduction and, where possible, site closure and cessation of monitoring;
15. Pursue third party cost sharing opportunities, either as shared liability or by coordinating construction and remedial construction activities with property developers, where possible and appropriate;
16. Pursue opportunities for insurance reimbursement of SIR costs, where appropriate; and
17. Maintain on-going communication and coordination with applicable regulatory agencies to ensure compliance with all permits and orders to avoid potential additional costs resulting from non-compliance.

## **2.4. Procurement Processes Overview**

- **Describe the company's policies and practices for procuring services required for SIR projects.**

In addition to the practices 3, 4 and 5 stated above in response to question 2.3, RG&E follows the Iberdrola USA Management Corporation Procurement Services Policy Manual.

## **3. ADHERENCE TO ESTABLISHED REMEDIATION SCHEDULES**

### **3.1. SIR Program Schedule Summary**

- **Briefly describe the overall schedule of the company's SIR program.**

RG&E has established a comprehensive target schedule with NYSDEC to bring its MGP sites through the investigation and remediation process. The schedule is updated annually to reflect new information gained from the previous year's activities. The active portion of the remediation program is scheduled to continue until 2022, which will be followed by any required long-term operation, monitoring, and maintenance.

- **Provide an overview of the number of sites adhering to the anticipated schedule, the number of sites ahead of schedule and the number of sites experiencing schedule slippage.**

Of the 14 sites, six sites are on schedule, none are ahead of schedule, and eight sites have experienced schedule slippage. The explanations for the eight sites with schedule slippage are included in Table 6 at the end of this report.

- **Indicate any schedule milestones achieved since the previous reporting date.**

The requested information is included in Table 5 at the end of this report.

### **3.2. SIR Program Schedule Changes**

- **Describe any changes in the anticipated schedule of the company's SIR program and provide an explanation for any scheduling delays resulting from non site-specific causes.**

The MGP program schedule is reviewed and updated with the NYSDEC at the beginning of each year. The schedule is continually developed as new information is generated throughout the course of each project. Looking forward, other than minor schedule adjustments, RG&E does not expect any changes in the anticipated schedule of the company's SIR program due to non-site specific causes.



For 2015, delays in the anticipated schedule for the Canal Street Site occurred as a result of continued negotiation with the site property owner regarding future use and access for any possible remedial activities.

#### **4. COMPLIANCE WITH NYSDEC AND OTHER REGULATORY ORDERS AND AGREEMENTS**

##### **4.1. Non-compliance Sites**

- **Indicate all sites that are not in compliance and provide an explanation for the non-compliance.**

RG&E does not have any SIR sites that are not in compliance.

##### **4.2. Regulatory Requirements Changes**

- **Summarize any changes to the regulatory requirements for sites under the SIR program. Indicate the regulatory agency responsible for the change, describe the change, and indicate any anticipated effects such change will have on the program's overall schedule and cost.**

RG&E is not aware of any changes to the regulatory requirements for sites under the SIR program.

#### **5. SITE SPECIFIC REPORTS**

##### **5.1. General Site Information**

Provide the following information for all of the Company's SIR sites:

- **Site name**
- **Site location**
- **NYSDEC (or other regulatory agency) remediation program and site identification number**

The requested information is included in Table 4 at the end of this Report.

## 5.2. Site Background

**For each of the Company's non-Potentially Responsible Party (non-PRP) sites provide:**

- **A brief description of the requirements of the Company under the Record of Decision (ROD) or Decision Document.**
- **The scope of SIR work for the site.**
- **Statement indicating the status of the Company's compliance with the ROD or Decision Document.**

The requested information is included in Table 4 at the end of this Report.

## 5.3. Status of Site Investigation and Remediation

### 5.3.1. Status of NYSDEC Remediation Program

- **Briefly summarize the status of the investigation, remediation, and operation, maintenance and monitoring (OM&M) efforts for the non-PRP SIR sites and complete Table 2.**

The requested information is included in Tables 2 and 4 at the end of this Report.

### 5.3.2. Scope of Work

- **For any site where deviations from the approved remediation plan have occurred or are anticipated, provide justification for all such changes.**

RG&E is not aware of any deviations from the approved remediation plans for sites under the SIR program.

### 5.3.3. Schedule

- **For any site in which a variation from the previously projected status is indicated in Table 2, provide a description and explanation for the variation.**

The requested information is included in Table 6 at the end of this report.

## 5.4. Project Procurement Exceptions

- **Indicate any contracts for project services awarded without following the company's standard procurement process described in Section 2.4 and provide justification for the exception.**

RG&E did not award any contracts without following its standard procurement process described in Section 2.4.

## 5.5. Project Costs

### 5.5.1. Project Costs Summary

- **Briefly summarize the anticipated and actual SIR costs for the reporting period and the projected costs for the upcoming reporting period for the non-PRP sites and complete Table 3.**

The actual SIR costs for 2015 non-PRP sites, including internal cost but excluding legal cost, were \$4,162,737. The projected cost for 2016 totals \$2,042,595. See Table 3 at the end of this Report for site specific details.

### 5.5.2. Changes in Cost

- **Explain and justify all material deviations (10% or \$100,000, whichever is greater) from prior cost forecasts for the reporting period for each project.**

The requested information is included in Table 7 at the end of this Report.

### 5.5.3. Cost Management and Mitigation Strategies

- **Describe the measures taken by the company to minimize its SIR costs for any individual site which deviates from the standard practices described in Section 2.3.**

RG&E managed all SIR activities in a cost effective manner and does not have any individual site measures to report.

<b>Table 1 - Total SIR Cost Incurred By RG&amp;E</b>				
<b>Site Name</b>	<b>Cost to Date (through 12/15)</b>	<b>Total Projected Cost for 2015</b>	<b>Actual Total Cost for 2015</b>	<b>Total Projected Cost for 2016</b>
<b>MGP SITES</b>				
Brockport	\$5,621,271	\$2,200,000	\$2,841,044	\$50,000
Canal St. Rochester	\$355,267	\$50,000	\$20,384	\$512,595
Clark St. Canandaigua	\$8,320,984	\$8,500	\$21,448	\$12,500
S. Main St. Canandaigua	\$5,291,399	\$40,000	\$35,233	\$40,000
East Station	\$12,282,006	\$274,000	\$104,186	\$234,000
Front Street	\$6,700,971	\$105,600	\$62,533	\$183,000
6 Park St, Geneseo	\$499,891	\$131,000	\$189,792	\$299,000
112 Riverside Dr, Geneseo	\$77,501	\$145,000	\$58,285	\$209,000
Pavilion	\$145,473	\$176,000	\$83,655	\$176,000
Station 5 Tunnel	\$11,973,168	\$0	\$0	\$0
West Station	\$5,626,107	\$105,000	\$9,187	\$123,500
Genesee River Sediment	\$435,052	\$200,000	\$0	\$203,000
<b>General MGP (regulatory, R&amp;D, misc. expenses)</b>	<b>\$752,137</b>	<b>\$232,173</b>	<b>\$218,911</b>	<b>\$264,104</b>
<b>Internal cost (recovered in base rates)</b>		<b>\$193,238</b>	<b>\$278,763</b>	<b>\$278,763</b>
<b>NON-MGP Sites</b>				
Brewer Street	\$1,889,708	\$0	\$0	\$3,500
Brooks Avenue TSDF	\$5,667,484	\$219,500	\$77,118	\$157,600
89 East Ave	\$21,830	\$0	\$0	\$0
Fillmore Tank Removal	\$149,847	\$0	\$0	\$0
Frontier/Pendleton Superfund (PRP)	\$250,961	\$0	\$0	\$0
Frontier Royal Ave. Superfund (PRP)	\$2,000	\$0	\$0	\$0
Fulton Terminals Superfund (PRP)	\$33,899	\$0	\$0	\$0
Heinrich/VOA litigation (PRP)	\$2,837,106	\$0	-\$14,209 (Credit)	\$0
Maxey Flats, Kentucky (PRP)	\$308,077	\$0	\$0	\$0
Mercury Refining Superfund (PRP)	\$167,295	\$0	\$0	\$0
PAS of Oswego Superfund (PRP)	\$26,415	\$0	\$0	\$0
Quanta, Syracuse Superfund	\$66,329	\$0	\$0	\$0

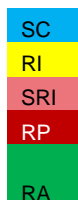
<b>Table 1 - Total SIR Cost Incurred By RG&amp;E</b>				
<b>Site Name</b>	<b>Cost to Date (through 12/15)</b>	<b>Total Projected Cost for 2015</b>	<b>Actual Total Cost for 2015</b>	<b>Total Projected Cost for 2016</b>
(PRP)				
Former Station 15 Area	\$44,304	\$0	\$0	\$0
Station 7 No. 2 Fuel Oil Spill	\$55,197	\$0	\$0	\$0
Slater Creek/Russell Station	\$1,508,687	\$160,000	\$186,011	\$192,000

**Table 2 - Status of SIR Program (non-PRP Sites)**

Name of the Site	Current Status	Reporting Year (2015)				Variation From Projection * Y/N	Projected Year (2016)			
MGP SITES		Q1	Q2	Q3	Q4		Q1	Q2	Q3	Q4
Brockport	Remedy selection/design	RA	RA	OMM	OMM	N	OMM	OMM	OMM	OMM
Canal St. Rochester	Site Characterization pending DEC's review, Discussions ongoing with NYSDEC regarding potential path forward	Negotiating with NYSDEC				Y	Possible RA			
Clark St. Canandaigua	Remediation complete				OMM	N				OMM
Main St. Canandaigua	Remediation complete	OMM	OMM	OMM	OMM	N				OMM
East Station	Remedial Investigation Report pending DEC review/NAPL barrier monitoring	RI	RI	RI	RI	N	RI	RP	RP	RP
Front Street	Remedial design	RP	RP	RP	RP	N	RP	RP	RP	RP
6 Park St, Geneseo	Site Characterization Underway	SC	SC	SC	SC	N	SC	SC	SC	OMM
112 Riverside Dr, Geneseo	Site Characterization Underway	SC	SC	SC	SC	N	SC	SC	SC	RI
Pavilion	(Investigate in 2015)	RI	RI	RI	RI	N	RI	RI	RI	RI
Station 5 Tunnel	NAPL water treatment during construction	OMM	OMM	OMM	OMM	N	OMM	OMM	OMM	OMM
West Station	Completed On-site investigation; off-site Investigation and RP on-going	RP	RP	RP	RP	N	RP	RP	RP	RP
Genesee River Sediment	Phased investigation	RI	RI	RI	RI	N	RI	RI	RI	RI
<b>Non MGP Sites</b>										
Brooks Ave	Groundwater Monitoring	OMM	OMM	OMM	OMM	N	OMM	OMM	OMM	OMM
	AOC 5 Canal Sediment Investigation-TBD					N				
Slater Creek/Russell Sta.	Treat leachate from former coal pile	OMM	OMM	OMM	OMM	N	OMM	OMM	OMM	OMM

\* If variation is yes, provide a description and explanation in Section 5.3.3 of report

Site Characterization  
Remedial Investigation  
Supplemental RI  
Remedial Planning  
  
Remedial Action



Operation, Maintenance & Monitoring  
No Further Action Required



<b>Table 3 - Site Specific SIR Cost Incurred by RG&amp;E (non-PRP sites)</b>								
<b>Site Name</b>	<b>Site Investigation</b>	<b>Remediation &amp; Restoration</b>	<b>OM&amp;M</b>	<b>Total SIR Cost</b>	<b>Site Investigation</b>	<b>Remediation &amp; Restoration</b>	<b>OM&amp;M</b>	<b>Total SIR Cost</b>
<b>MGP SITE Consultant and Contractor Cost unless otherwise defined</b>	<b>Actual 2015</b>	<b>Actual 2015</b>	<b>Actual 2015</b>	<b>Actual 2015</b>	<b>Projected 2016</b>	<b>Projected 2016</b>	<b>Projected 2016</b>	<b>Projected 2016</b>
Brockport		\$2,841,044		\$2,841,044			\$50,000	\$50,000
Canal St. Rochester				\$0		\$512,595		\$512,595
Clark St. Canandaigua			\$21,448	\$21,448			\$12,500	\$12,500
Main St. Canandaigua			\$35,233	\$35,233			\$40,000	\$40,000
East Station	\$101,658		\$2,528	\$104,186	\$234,000			\$234,000
Front Street	\$62,533			\$62,533		\$183,000		\$183,000
6 Park St, Geneseo	\$189,792			\$189,792	\$299,000			\$299,000
112 Riverside Dr, Geneseo	\$58,285			\$58,285	\$209,000			\$209,000
Pavilion	\$83,655			\$83,655	\$176,000			\$176,000
Station 5 Tunnel				\$ 0				\$0
West Station	\$9,187			\$9,187	\$123,500			\$123,500
Genesee River Sediment	\$0			\$0	\$203,000			\$203,000
Subtotal MGP project costs				\$3,405,363				\$2,042,595
NON-MGP Sites								
Brooks Avenue TSDF		\$78,689		\$78,689	\$157,600			\$157,600
Slater Creek/Russell Station			\$186,011	\$186,011			\$192,000	\$192,000
Fillmore Tank Removal				\$0				\$0
89 East Ave				\$0				\$0

<b>Table 3 - Site Specific SIR Cost Incurred by RG&amp;E (non-PRP sites)</b>								
Site Name	Site Investigation	Remediation & Restoration	OM&M	Total SIR Cost	Site Investigation	Remediation & Restoration	OM&M	Total SIR Cost
<b>MGP SITE Consultant and Contractor Cost unless otherwise defined</b>	<b>Actual 2015</b>	<b>Actual 2015</b>	<b>Actual 2015</b>	<b>Actual 2015</b>	<b>Projected 2016</b>	<b>Projected 2016</b>	<b>Projected 2016</b>	<b>Projected 2016</b>
Brewer Street				\$0				\$3,500
Subtotal Non-MGP costs				\$264,700				\$353,100
OTHER COSTS*								
Regulatory Cost-General**				\$213,911				\$264,104
Internal Costs (recoverable in base rates)				\$278,763				\$278,763
Total SIR Costs				\$4,162,737				\$2,935,062
Notes: *Other Costs are generally not tracked by site or phase. If >\$1K will report separately. ** Unbilled regulatory costs are accrued to a common SIR account Misc. charges include employee expenses and material Remediation and Restoration Cost include Remedial Planning Cost								



**Table 4- RG&E Response to Section 5. Site Specific Reports**

<b>Table 4- RG&amp;E Response to Section 5. Site Specific Reports</b>				
<b>MGP Sites</b>	<b>Location</b>	<b>NYSDEC ID No.</b>	<b>If Decision Document issued, in compliance?</b>	<b>5.2 (Site Background) and 5.3.1 (Status of SIR)</b>
Brockport	Erie Street and N. Perry St.	V300301-8	Y	[Completed site remediation in May 2015 in accordance with NYSDEC Decision Document] Scheduled to complete two post remedial groundwater sampling events in 2015
Canal Street	Canal Street Rochester	V00594-8	NA	[Submitted Site Characterization report 12/09] 2014 – DEC to determine if Site Characterization is complete or if it will require Remedial Investigation, Remedial Action Work Plan/ Remedial Design, Remediation
Clark St.	79 Clark St. Canandaigua	V00591-8	Y	[Completed Investigation 12/06, DEC accepts proposed remedial action 10/07] [Completed most of on-site excavation remediation 1/08] [Complete Sucker Brook sediment and remainder of on-site remedial action 8/10-11/11.] [Final Engineering Report was submitted March 19, 2014. NYSDEC approves FER 3/31/2014] On-going – O&M (annual groundwater monitoring through 2018)
East Station	Suntru St. Rochester	V00358-8	NA	[Completed Holder/tar well removal 2004/05 and purifier waste removal 1/08 and soil stabilization along river bank w/tar collection 9/08] [Fall 2009 – Summer 2014 - Conduct Remedial Investigation] [Completed Onsite and Offsite Investigations with RIR submitted; June 2015] 2016/17 - Remedial Selection Options 2017-19 - Remedial Design phase and Remedial Action Bidding. 2020 – Begin to implement Selected Remedial Action

<b>Table 4- RG&amp;E Response to Section 5. Site Specific Reports</b>				
<b>MGP Sites</b>	<b>Location</b>	<b>NYSDEC ID No.</b>	<b>If Decision Document issued, in compliance?</b>	<b>5.2 (Site Background) and 5.3.1 (Status of SIR)</b>
Front St.	Front and Andrews St. Rochester	V00073-8	Y	[Applied Gunite along building foundation / river wall 1998, Removed gasoline impacted soil 2000, Completed Remedial Investigation 1/06, DEC accepts proposed remedial option 6/10.] [2013 – Implemented selected remedial action (targeted excavation, however, additional impacts identified on site. Supplemental Design Investigation (SDI) and Remedial Planning (RP), Interim site cover completed 2014] 2015/16 – Complete Supplemental Remedial Design and bid of supplemental remedial construction Implement remaining Remedial Action (RA) in 2017.
Pavilion	Ellicott St. Pavilion	V00592-8	NA	[2002 – Preliminary Environmental Site Assessment (detected very little contamination) [3/2015 Submitted Remedial Investigation Work Plan for NYSDEC Review] 2015/16 – Remedial Investigation to fill data gaps 2016/17 – If required, Remedial Action Work Plan/ Remedial Design 2018/2019 Remediation
South Main St.	699 S. Main St. Canandaigua	V00595-8	Y	[Completed Site Investigation 5/10, DEC accepts proposed remedial action 3/11] [Completed site wide excavation remedy 1/12-6/12] Final Engineering report in progress, Draft Final Engineering Report submitted 9/30/14. [4/2015 Final Engineering Report approved by NYSDEC] On-going – O&M (groundwater monitoring through 2018)
West Station (Plant area)	Falls St. Rochester	V00593-8	NA	[Conducted preliminary Site Investigations 1992-93, Completed investigation of Oil-Tar Separator 11/06, Completed on-site Remedial Investigation and begin to evaluate remedial options 2009-12.] [Received approval of 2014 Alternative's Analysis; January 2016] 2016-2019 - Remedial Design Phase for selected remedial action 2019 - Begin implementation of Selected Remedial Action

<b>Table 4- RG&amp;E Response to Section 5. Site Specific Reports</b>				
<b>MGP Sites</b>	<b>Location</b>	<b>NYSDEC ID No.</b>	<b>If Decision Document issued, in compliance?</b>	<b>5.2 (Site Background) and 5.3.1 (Status of SIR)</b>
West Station (Beebee Park area)]	Falls St. Rochester		Y	[1996/97 – Site capped (pursuant to VCA index #D8-0001-95-10)] [Completed report documenting Implementation of Soil Management Plan & Monitoring performed during the construction of New Station 2 Hydro-unit switch gear in the 4 <sup>th</sup> quarter 2013.]
Park St. Geneseo	6 Park St. Geneseo (SUNY parking lot)	Pending	NA	[SUNY contractor encountered coal tar when excavating property to install a parking lot and removed and disposed of some impacted soil] [December 2014 - Added site to VCA] Completed Site Characterization Field Work February 2016, currently completing data compilation and recommendation to move into SMP phase. 2016 – Begin O&M Phase; Pending NYSDEC concurrence with SC Report recommendations
Riverside Dr. Geneseo	112 Riverside Dr. Geneseo	Pending	NA	[December 2014 - Added site to VCA] 2016 – Site Characterization investigation phase 2017 – Remedial Investigation 2017-18 - Propose Remedial Options 2018-19 – Begin Remedial Design Phase for selected remedial action 2020 – Begin Remedial Action
Brewer St	125 Brewer St Rochester	V00214-8	Y	[1997/98 – Conducted Site Investigations 2001/02 – Supplemental Remedial Investigation 2003 – Conducted remediation w/ County 2003-05 – Site ground water monitoring 1/2007 – Completed jet grouting and capping of bedrock. 2009 – 2012 Monitored effectiveness of remedy, NFA determination 3/12] 2013 going Forward – Complete Annual Certification and Site Management Plan requirements.

<b>Table 4- RG&amp;E Response to Section 5. Site Specific Reports</b>				
<b>MGP Sites</b>	<b>Location</b>	<b>NYSDEC ID No.</b>	<b>If Decision Document issued, in compliance?</b>	<b>5.2 (Site Background) and 5.3.1 (Status of SIR)</b>
Station 5 Tunnel	Seth Green Drive, Rochester		NA	Coal tar has been observed infiltrating into hydro tunnel during maintenance inspection. Residual water must be treated and discharged to sanitary sewer. [Tunnel has been lined with concrete. Work completed in 2012] If coal tar is present during future tunnel maintenance, RG&E will have to treat the water. Anticipated Hydro schedule for maintenance in 2018.
Genesee River Sediment	River downstream of MGPs		NA	Comprehensive, phased investigation of coal tar impacts downstream of MGPs. [Completed Phase 1 and part of Phase 2] [2013 - Completed Phase 2 Field work] [March 2014 - Submitted Phase 2 Report] DEC evaluating when and if Phase 3 will be required and implemented.
<b>Non-MGP Sites</b>	Location			
Brooks Ave	755 Brooks Ave. Rochester	NYD00818781	NA	[Former bulk petroleum terminal purchased in 1970s and used as a Hazardous Waste storage facility (TSDF) permitted under 6 NYCRR Part 373. TSDF closure approved by DEC 12/2009. Corrective Action program required to address petroleum contamination.] [7/2009-Completed Interim Corrective Measures (ICM) by excavation impacted soil] [2013 - Groundwater Monitoring and reporting ongoing] [2015-2016 – Submitted Corrective Measures Studies for AOC's 4&7; 11/2015] 2016-2017 Begin investigation of petroleum impacts in AOC 5 through sediment sampling in the adjacent canal, and on-going O&M groundwater monitoring

<b>Table 4- RG&amp;E Response to Section 5. Site Specific Reports</b>				
<b>MGP Sites</b>	<b>Location</b>	<b>NYSDEC ID No.</b>	<b>If Decision Document issued, in compliance?</b>	<b>5.2 (Site Background) and 5.3.1 (Status of SIR)</b>
Slater Creek/Russell Station	1101 Beach Ave, Rochester	SPDES Special Permit Condition	NA	[Leachate from former coal pile at Russell Station was impacting Slater Creek. A groundwater collection and treatment system was installed in 2003 to collect the leachate and pre-treat it prior to discharge& the sanitary sewer. In 2012, Monroe County Pure Waters required further treatment of iron concentration to allow continued discharge to the sewer system. Initial design and engineering of the treatment system, was completed in 2012.] [2013 – Completed installation and start-up of new groundwater pre-treatment system.] 2014 & forward – O&M of groundwater collection and pre-treatment system until no longer needed.
East Ave	89 East Ave, Rochester	Spill No. 9802157	NA	Former Bulk Petroleum Storage. Monitoring Well was closed. No Further Action required.

**Table 5 - RG&E SIR 2014 Section 3.1 Project Milestones achieved in Reporting Year**

<b>Table 5 - RG&amp;E SIR 2014 Section 3.1 Project Milestones achieved in Reporting Year</b>	
<b>Site</b>	<b>Milestone</b>
East Station	Completed submittal of the Remedial Investigation Report to NSYDEC
Front Street	Submitted Final Supplemental Design Investigation Report and Draft Construction Completion Report for phase I of remediation to the NYSDEC.
6 Park Street	Completed Site Characterization field activities, currently compiling Site Characterization Report and working with NYSDEC to submit a recommendation to move directly to Site Management; Pending NSYDEC review
112 Riverside Drive	Completed submittal of the Site Characterization Work Plan to NSYDEC for review; December 2015
Brooks Avenue	Completed submittal of Corrective Measures Studies for AOC's 4&7
Pavilion	Completed Remedial Investigation Field Activities
Brockport	Completed Remedial Action

**Table 6 –RG&E SIR 2014 Section 5.5.3 Sites with Schedule Variance**

<b>Table 6 –RG&amp;E SIR 2014 Section 5.5.3 Sites with Schedule Variance</b>	
<b>Site</b>	<b>Explanation of Schedule Variance</b>
Brockport	The planned RA activities were not completed consistent with the project schedule due to change in scheduled NYS Canal closing and draining. RA work was completed in 2015).
Front Street	The 2013 RA activities took longer than the targeted schedule due the removal of additional impacts encountered during the performance of RA. As a result a supplemental design investigation was completed in 2014 to define the nature and extent of remaining impacts /contaminants at the site. Interim site cover was installed / completed in October 2014 as per the RAWP.
Canal Street	Planned activities were not completed consistent with the project schedule due to delays in securing feedback and regulatory approval of the SC Report.
S. Main St. Canandaigua	The Final Engineering Report was not reviewed/approved consistent with target schedule due to delay in securing regulatory approval
112 Riverside Drive, Geneseo	Planned activities were not completed consistent with the project schedule due to time frames required to obtain property access necessary for the project. Property access has been obtained and the SCWP is under review with NSYDEC
East Station	Planned activities were not completed consistent with the project schedule due to delays in securing feedback and regulatory approval of the Remedial Investigation Report.
West Station	Planned activities were not completed consistent with the project schedule due to delays in securing feedback and regulatory approval of the Alternatives Analysis Report.
Brooks Ave	Planned investigation activities were not completed consistent with the target schedule due not receiving feedback from NYSDEC on the need to perform potential bedrock investigations.

**Table 7 –RG&E SIR Section 5.5.2 Sites with Cost Variance**

<b>Table 7 –RG&amp;E SIR Section 5.5.2 Sites with Cost Variance</b>	
<b>Site</b>	<b>Explanation for Cost Variance</b>
Brockport	The cost was higher than anticipated due to additional volume of contaminated soil excavated and disposed off-site.
Front Street	The cost was higher than anticipated due to work scope changes to address additional impacts discovered during the field Remedial Action and costs associated with the supplemental remedial investigation to delineate nature and extent of additional impacts and the supplemental remedial design
Canal Street	The cost was lower than anticipated due to schedule delays in obtaining regulatory feedback or approval of Site Characterization Report. This in turn delayed the start of the succeeding planned activity.
6 Park Street, Geneseo	The cost was higher than anticipated due to additional site investigation required to potentially move the site from Site Characterization Phase to Site Management.
112 Riverside Dr., Geneseo	The cost was lower than anticipated due to extended negotiations with the property owner for site access.
Genesee River Sediment	The cost was lower than anticipated due to schedule delays in obtaining regulatory feedback with respect to the need for the next phase of work. This in turn delayed the start of the succeeding planned activity.
East Station	The cost was lower than anticipated due slight delays completing the anticipated work as targeted when the schedule was prepared.
West Station	The cost was lower than anticipated due to schedule delays in obtaining regulatory feedback or approval of Site Alternatives Analysis Report. This in turn has delayed the start of the succeeding planned activity.
Slater Creek / Russell Station	The cost was higher than anticipated due to a scope increase caused by equipment maintenance costs.
Brooks Ave	The cost was lower than anticipated due to the scope of work being less than anticipated, due to pending regulatory submittal feedback and approvals, related to potential canal sediment investigations to be determined.