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Subject:

Revised Supplemental Final Engineering Report
Former Roehlen Engraving (NYSDEC Site #828077)
Henrietta, New York

Dear Mr. Caffoe:

Per your request, please find enclosed the *Revised Supplemental Final Engineering Report* (Revised SFE Report), prepared by Arcadis on behalf of Standex International Corporation (Standex), which summarizes the supplemental remedial action activities that were completed at the former Roehlen Engraving Site located in Henrietta, New York (site). The supplemental remedial action activities were performed at the site in accordance with the Administrative Order on Consent (AOC) (Index # B8-0247-94-04), the *Supplemental Remedial Design Work Plan* (Arcadis, September 2008) (including the New York State Department of Environmental Conservation [NYSDEC] August 26, 2008 comment letter, and Arcadis' September 23, 2008 response letter, which was collectively approved by the NYSDEC in a letter dated October 16, 2008), and the *Supplemental Remedial Design Work Plan Addendum (Revised July 2009)* (Arcadis, 2009) (which was approved by the NYSDEC in letter dated July 30, 2009).

Date:

November 16, 2015

Contact:

William B. Popham

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Our ref:

B0083317.0000

As indicated in the NYSDEC's April 16, 2012 e-mail correspondence, a work plan was not required for the vapor intrusion investigation activities, which are also described within the enclosed Revised SFE Report. Based on the satisfactory results (as approved in Justin Demming's April 24, 2015 e-mail), as well as the successful completion of the supplemental remedial activities documented in the Revised SFE Report, Arcadis recommends that no further action be conducted at the site. As a result, because all of the AOC requirements executed between the NYSDEC and Standex (Index #B8-0247-94-04) have been met, Arcadis, on behalf of Standex, requests that the AOC be terminated and that the site, which is presently listed as a Class 4 site under the New York State Inactive Hazardous

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Waste Site Registry (defined as a site that has been properly closed, but requires continual site management, consisting of operation, maintenance, and monitoring), be formally “delisted” from the Registry.

If you have any questions, please contact me at 585.662.4022.

Sincerely,

Arcadis



William B. Popham
Senior Vice President

Copies:

Ms. Stacey Constas, Standex International Corporation
Mr. Aaron Richardson, Arcadis

Standex International Corporation

REVISED SUPPLEMENTAL FINAL ENGINEERING REPORT

Former Roehlen Engraving Site
Henrietta, New York

November 2015



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- B. Photograph Log
- C. Confirmatory Sampling Analytical Data and Validation Report
- D. Waste Characterization Analytical Data
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- F. Backfill Qualification Analytical Data and Validation Report
- G. Summary of Waste Shipments and Manifests
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- K. Soil Vapor Sampling Logs
- L. NYSDOH Vapor Intrusion Decision Matrix

ACRONYMS AND ABBREVIATIONS

BASE	Building Assessment and Survey Evaluation
BBL	Blasland, Bouck & Lee, Inc.
CAMP	Community Air Monitoring Plan
CFC-11	trichlorofluoromethane
Consent Order	Administrative Order on Consent
FS	feasibility study
FS Report	<i>Feasibility Study Report</i>
HALRC	High Acres Landfill and Recycling Center
HASP	Health and Safety Plan
LNAPL	light non-aqueous phase liquid
LSL	Life Science Laboratories, Inc.
µg/L	micrograms per liter
mg/kg	milligrams per kilogram
mg/L	milligrams per liter
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
PCE	tetrachloroethene
PID	photoionization detector
ppm	parts per million
RCRA	Resource Conservation and Recovery Act
Revised SFE Report	Revised Supplemental Final Engineering Report
Revised SRD Work Plan	Supplemental Remedial Design Work Plan Addendum
RI	remedial investigation
RI Report	<i>Remedial Investigation Report</i>
ROD	Record of Decision
Roehlen	Roehlen Engraving
RSL	Regional Screening Level
site	former Roehlen Engraving site located at 701 Jefferson Road, Rochester, New York
SMP	Site Management Plan

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SRD Work Plan	Supplemental Remedial Design Work Plan
Standex	Standex International Corporation
TCE	trichloroethene
TOGS	Technical and Operational Guidance Series
TWA	time-weighted average
$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
USEPA	United States Environmental Protection Agency
VI	vapor intrusion
VOC	volatile organic compound
WM	Waste Management

CERTIFICATION STATEMENT

I certify that this document has been prepared in general conformance with the requirements of the Administrative Order on Consent (Index #B8-0247-94-04) entered into between the New York State Department of Environmental Conservation and Standex International Corporation (March 1995) for the development of this *Revised Supplemental Final Engineering Report* for the former Roehlen Engraving site located in Henrietta, New York. Furthermore, I certify that this *Revised Supplemental Final Engineering Report* was prepared by Arcadis under my signature and stamp as a Professional Engineer registered in the State of New York.



Joseph Molina III, P.E.

New York State P.E. No. 072644

11/13/15

Date

1 INTRODUCTION

On behalf of Standex International Corporation (Standex), Arcadis has prepared this *Revised Supplemental Final Engineering Report* (Revised SFE Report) to describe supplemental remedial activities conducted at the former Roehlen Engraving (Roehlen) site located at 701 Jefferson Road in Rochester, New York (site) (Figure 1). This Revised SFE Report has been prepared in accordance with the executed Administrative Order on Consent (Consent Order) between the New York State Department of Environmental Conservation (NYSDEC) and Standex (Index #B8-0247-94-04) (NYSDEC 1995) for the site (Site # 8-28-077), as well as the following documents and correspondence:

- Approved *Supplemental Remedial Design Work Plan* (SRD Work Plan) (Arcadis 2008a)
- NYSDEC letter dated August 26, 2008 and Arcadis' September 23, 2008 response letter (NYSDEC 2008a, 2008b, respectively) (Appendix A)
- Approved *Supplemental Remedial Design Work Plan Addendum* (Revised July 2009) (Revised SRD Work Plan) (Arcadis 2009)
- *Vapor Intrusion Sampling Work Plan* (Arcadis 2013)
- Subsequent correspondence between Arcadis and the NYSDEC

This Revised SFE Report summarizes the remedial activities completed at the site to:

1. Complete the excavation and offsite disposal of chromium-contaminated soils, as required by the Record of Decision (ROD) (NYSDEC 1994).
2. Complete excavation and disposal of the concrete slab and concrete containment pit wall and floor within and in close proximity to the former chrome plating room.
3. Conduct confirmatory soil sampling and analysis activities, as required by the NYSDEC.
4. Conduct confirmatory groundwater sampling and analysis activities, as required by the NYSDEC, as well as groundwater injection activities.
5. Conduct confirmatory soil vapor intrusion (VI) sampling and analysis activities, as required by the NYSDEC and New York State Department of Health (NYSDOH).

Appendix A includes NYSDEC approval of the above-referenced documents. Remedial activities that were presented in the approved work plans included the following:

- Removal of concrete and chromium-impacted soil beneath the former chrome plating room, with offsite disposal at approved facilities, with the objective of achieving the site-specific cleanup criteria of 35 milligrams per kilogram (mg/kg) established in the ROD (NYSDEC 1994).
- Collection and analysis of confirmatory soil samples to confirm that chromium concentrations remaining in the soil at the excavation limits are within acceptable limits.
- Backfilling the excavated areas and restoring the area to the pre-existing grade or, if desired, to a lower grade specified by the site owner that may lend itself to the future development of the site.

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- Installation of one new groundwater monitoring well within the restored, former chrome plating room excavation area and collecting groundwater samples and analyzing for chromium and volatile organic compounds (VOCs).
- Installation of a soil vapor sampling probes area after completion of the excavation activities, and collecting soil vapor samples and analyzing for VOCs.
- Preparing reports documenting completion of each of the work plans, summarizing soil excavation activities, groundwater and soil vapor sampling and analysis activities, and soil VI sampling activities at the site.

1.1 Site Description and History

The site is located on the northern 4 acres of the 12.8-acre former Roehlen facility, and is bordered by several businesses. Figure 1 presents the location of the former Roehlen facility, and Figure 2 presents the pre-excavation site plan for the facility.

The former Roehlen facility was used in the manufacturing of embossing rolls (used for texturizing a wide variety of materials). The rolls were mill-engraved and, if necessary, electroplated with chrome to create a surface resistant to corrosion. The plate-cleaning, rinse, and chrome tanks associated with this process were previously located in the plating room at the southwestern corner of the manufacturing building. These tanks were contained inside a secondary containment area (plating pit) with a collection sump in the southwestern corner of the containment area. The plating procedure required using chromium plating solutions and muriatic acid. On occasion during past facility operations, carryover of these fluids, as a result of moving plates and rolls into and out of the plating area occurred in the containment area, as well as on the plating room floor. The containment area, which is approximately 15 feet long by 35 feet wide and approximately 11.5 feet deep, is constructed of filled concrete block walls with a parged surface and poured concrete floor. When the containment area was installed, there may have been a joint between the upper lip of the pit and the floor of the plating room. In 1992, the floor and curbing were sealed with a polymeric quartz containment system.

In 1988, Roehlen discovered a possible release of chromium from the plating room after installation of a hand-dug, shallow groundwater monitoring well (MW-1) located in the floor of the facility's plating pit. Roehlen voluntarily conducted a Phase I Assessment to evaluate soil and groundwater conditions at the facility. The Phase I Assessment revealed the presence of hexavalent chromium in groundwater and soils beneath the plating room floor and containment area. Hexavalent chromium concentrations detected in the groundwater ranged from 0.01 to 210 parts per million (ppm). Extraction procedure toxicity levels of hexavalent chromium measured in the soils outside the plating room floor and containment area ranged from 0.087 to 0.062 ppm (NYSDEC 1991).

Based on these findings, Roehlen negotiated a Consent Order with the NYSDEC, which was executed in March 1995. Prior to this, Roehlen retained Blasland, Bouck & Lee, Inc. (BBL) to conduct a remedial investigation/feasibility study (RI/FS) for the site. In 1993, BBL conducted the RI and FS in accordance with an NYSDEC-approved RI/FS Work Plan (Law Environmental 1991), with revised RI and FS documents being completed in 1994 (Remedial Investigation Report [RI Report] and Feasibility Study Report [FS Report]) (BBL 1994a, 1994b, respectively). Based on the recommendations contained in the

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- Follow-up groundwater sampling in the affected area will be conducted 3 months after the excavation is backfilled.

The NYSDEC provided the following possible outcomes:

1. If the soil remedial activities meet the cleanup goal and the residual groundwater contamination is below the NYSDEC's Technical and Operational Guidance Series (TOGS) 1.1.1 (NYSDEC 1998) standard for chromium and VOCs in groundwater, no further action is required and the site can be delisted without deed restrictions.
2. If the soil remedial activities achieve the site-specific cleanup criteria of 35 mg/kg for chromium and the residual VOC concentrations in groundwater are above the NYSDEC's TOGS 1.1.1 standards, the following two options would be available:
 - a. "Any structure built over the affected area would require post-construction evaluation for VI and may require that buildings be constructed with a sub-slab mitigation system. A Site Management Plan (SMP) would be required to specify design requirements and operation of a sub-slab mitigation system and management of contaminated groundwater during future excavations in the affected area. Additionally, a deed restriction would be required prohibiting groundwater usage, incorporating the SMP, and requiring periodic certifications that the deed restrictions are in place and being implemented. The site can be delisted after these restrictions are in place."
 - b. "Construction of occupied buildings would be prohibited within the affected area. An SMP would be required to address management of contaminated groundwater during future excavations in the affected areas. A deed restriction would be required, which incorporates the SMP, prohibits the use of groundwater, prohibits construction of occupied buildings in the affected area, and specifies periodic certifications that the deed restrictions are in place and being implemented. The site can be delisted after these restrictions are in place."
3. If the soil remedial activities achieve the site-specific cleanup criteria of 35 mg/kg for chromium and the residual chromium concentrations in groundwater are above the NYSDEC's TOGS 1.1.1 standards, but VOC concentrations in groundwater are below the NYSDEC's TOGS 1.1.1 standards, the following option would be available:
 - a. "An SMP would be required for the affected area. The SMP would specify requirements for management of contaminated groundwater during future excavations in the affected area. A deed restriction would be required, which incorporates the SMP, prohibits the use of groundwater, and provides for periodic certifications that the deed restriction is in place. The site can be delisted after these restrictions are in place."

In addition to these remedial requirements, the NYSDEC also requested in their correspondence, dated August 26, 2008, that five soil vapor sampling probes be installed within the general location of the former chrome plating room area and sampled for VOCs.

1.2 Report Organization

Following this section (Section 1), this Revised SFE Report is organized into the following sections:

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- *Section 2 – Project Organization and Responsibilities:* Provides a description of the parties involved with implementation of the supplemental remedial activities.
- *Section 3 – Supplemental Soil Remedial Activities:* Describes the supplemental remedial construction activities (i.e., soil removal) completed in 2008.
- *Section 4 – Groundwater Remedial Activities:* Describes the remedial activities completed following the 2008 excavation to address site groundwater.
- *Section 5 – Soil Vapor Monitoring:* Describes the sampling and analysis activities completed in 2010 to investigate soil vapor concerns.
- *Section 6 – Indoor Air and Soil Vapor Intrusion Monitoring Activities:* Describes the three rounds of indoor air and sub-slab soil vapor sampling conducted inside the restaurant that has been constructed at the site.
- *Section 7 – Site Closure:* Describes Arcadis' recommendation that no further action be conducted at the site.
- *Section 8 – References:* Lists references cited throughout this Revised SFE Report.

2 PROJECT ORGANIZATION AND RESPONSIBILITIES

This section describes the project organization and responsibilities of those who participated in the supplemental remedial activities for the site.

2.1 Responsible Party

In accordance with the Consent Order (NYSDEC 1995), Standex is responsible for implementation of the supplemental remedial activities for the site to achieve the remedial objectives.

2.2 Arcadis

Standex retained Arcadis to provide design/build services associated with this project, which includes the following responsibilities:

- Preparing work plans
- Interacting and communicating with the NYSDEC, as necessary, to obtain the NYSDEC's approval of work plans
- Implementing the approved work plans
- Providing construction management and obtaining the necessary documentation during the performance of the remedial action activities to confirm compliance with the approved work plans
- Interacting and communicating with the NYSDEC and Standex during the supplemental remedial action activities
- Preparing this Revised SFE Report

During implementation of the remedial action activities, Arcadis used various subcontractors to assist with specific site activities, which included the following:

- *Remedial Subcontractor* – Royal Environmental, Inc. provided labor and equipment to implement soil removal, backfilling, and restoration activities.
- *Offsite Analytical Laboratory* – Life Science Laboratories, Inc. (LSL) provided laboratory analysis of waste characterization soil and water samples, imported backfill soil samples, and confirmatory soil samples from the excavation. Columbia Analytical Services, Inc. provided laboratory analysis of the pre-excavation groundwater samples. TestAmerica, Inc. provided laboratory analysis of the soil vapor and indoor air samples.
- *Waste Management Subcontractor(s)* – Waste Technology Services, Inc. provided offsite transportation and disposal services for the impacted soil, concrete, and contaminated water generated at the site during the supplemental removal action activities.
- *Well Driller* – Nothnagle Drilling, Inc. provided groundwater monitoring well abandonment services.

2.3 New York State Department of Environmental Conservation

NYSDEC Region 8 served as the primary regulatory agency for this project and interacted and communicated with Standex and Arcadis to confirm compliance with the approved SRD Work Plan (Arcadis 2008a), as well as the ROD (NYSDEC 1994) and Consent Order (NYSDEC 1995).

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Bottom samples B-01 through B-05 were collected at the locations shown on Figure 4 to confirm that the vertical limits of the shallow excavation had been achieved. Bottom samples B-2 through B-4 were below the cleanup objective of 35 mg/kg. Because the chromium concentration for bottom sample B-01 (51 mg/kg) exceeded the site-specific cleanup criteria, this area was excavated an additional 1 foot vertically and resampled (B-06). The analytical results for bottom sample B-06 was 20 mg/kg, which is below the cleanup objective. Laboratory analytical results for bottom sample B-05 reported a chromium concentration of 37.0 mg/kg. However, after discussing these results with the NYSDEC, it was determined by the NYSDEC that the soil removal in this location was adequate to satisfy the intentions of the cleanup objective for the site.

3.7.2 Former Chrome Room Containment Area Excavation

Soil samples SW-22 through SW-27 were collected from the sidewalls of the deep (i.e., containment area) excavation, at the locations indicated on Figure 4, to confirm that the horizontal limits of the deep excavation had been achieved. Analysis of sidewall soil samples SW-23 (60 mg/kg) and SW-25 (47 mg/kg) for chromium exceeded the site-specific cleanup criteria. Therefore, excavation of the eastern sidewall and the southern sidewall continued to the east (approximately 2 feet) and the south (approximately 6 feet) to remove the additional soil (SW-23 and SW-25 locations). Sidewall soil samples SW-26 and SW-27 were then collected from the eastern and southern sidewalls, respectively, and analyzed for chromium for confirmation purposes. Post-excavation sidewall soil samples SW-22 (21 mg/kg), SW-24 (21 mg/kg), SW-26 (21 mg/kg), and SW-27 (22 mg/kg) represent the final excavation limits of the deep containment pit excavation confirming that the cleanup objective for chromium (35 mg/kg) was achieved.

Bottom samples B-07 and B-08 were collected from the base of the northern and southern halves, respectively, of the containment area excavation. The analytical result for bottom sample B-07 (19 mg/kg) indicated that the northern half of the containment area excavation had been vertically delineated at approximately 13 feet below existing grade. The analytical result for bottom sample B-08 (64 mg/kg) exceeded the site-specific cleanup criteria; therefore, an additional 1 foot of soil was excavated and removed from the southern half of the containment area excavation, and an additional bottom sample (B-09) was collected. Because the analytical result for bottom sample B-09 (190 mg/kg) also failed to meet the cleanup criteria, an additional 1 foot of soil was excavated, and bottom sample B-10 was collected. The analytical result for bottom sample B-10 (160 mg/kg) also exceeded the site-specific cleanup criteria; therefore, further excavation was required. After removing an additional 1 foot of soil, bottom sample B-11 (56 mg/kg) was collected. The analytical result for bottom sample B-11 again failed to meet the site-specific cleanup criteria. As a result, an additional 2 feet of soil was then excavated and removed, with the bottom of the excavation now at approximately 18 feet below existing grade. At this point, a bottom sample (B-12) was collected and a test pit was excavated an additional 3 feet within the bottom and another soil bottom sample (assessment) (B-13) was collected. The analytical results for bottom samples B-12 (17 mg/kg) and B-13 (26 mg/kg) confirmed that the cleanup criteria was achieved at approximately 18 feet below grade, and therefore, excavation activities were complete and no further excavation was conducted.

The locations of all confirmatory soil samples are shown on Figure 4. Analytical results for confirmatory sidewall and bottom samples are summarized in Tables 1 and 2, respectively. Each of these tables

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Locations of the three PIDs were established each day, prior to commencing site activities, depending on the predominant wind direction at the start of the day's activities, and relocated, as necessary, to maintain their respective positions (i.e., upwind or downwind).

No exceedances of the action levels presented in the HASP or CAMP were observed.

3.9 Backfilling and Restoration

After the final limits of excavation had been reached and the cleanup objectives achieved, the excavation area was backfilled. Backfill material was supplied by a commercial gravel pit. The backfill material was placed and compacted in lifts of approximately 12 inches. Approximately 1,760 tons of backfill was imported and placed at the site.

4 GROUNDWATER REMEDIAL ACTIVITIES

Groundwater remedial actions were conducted at the site in accordance with the SRD Work Plan (Arcadis 2008a) and the Revised SRD Work Plan (Arcadis 2009). Following the 2008 excavation, groundwater monitoring activities (including installation and sampling of new monitoring wells) were conducted. Results of these monitoring activities necessitated groundwater remedial action activities, which consisted of injection of an organic carbon solution to facilitate bioprecipitation of hexavalent chromium in groundwater. Detailed information related to the groundwater remedial action activities is presented below.

4.1 Post-2008 Excavation Groundwater Monitoring

Arcadis mobilized to the site in February 2009 to install a new groundwater monitoring well (MW-26) within the footprint of the deepest portion of the 2008 excavation area (Figure 5). Following development of MW-26, groundwater samples were collected from MW-26, as well as from existing monitoring wells MW-4 and MW-18. All samples were submitted to LSL, located in Syracuse, New York, for total chromium and VOC analysis.

Analytical results of the groundwater samples (Table 8 and Figure 6) indicated that chromium (16,000 $\mu\text{g/L}$) and trichloroethene (TCE) (5.31 $\mu\text{g/L}$) impacts were present at monitoring well MW-26 above their respective NYSDEC TOGS Ambient Water Quality Standards and Guidance Values (chromium = 50 $\mu\text{g/L}$; TCE = 5 $\mu\text{g/L}$). At monitoring wells MW-4 and MW-18, chromium and VOCs were not present above the NYSDEC TOGS Guidance Values.

In April 2009, Arcadis re-mobilized to the site to collect additional groundwater samples from monitoring well MW-26 to determine if the chromium present was hexavalent or trivalent chromium. At the same time, additional samples were collected from monitoring wells MW-4 and MW-18, and temporary wells were installed to allow groundwater samples to be collected from the area surrounding the 2008 excavation. All samples were analyzed for both hexavalent and total chromium.

Analytical results of this investigation (Table 9 and Figure 7) indicated that both total chromium and hexavalent chromium concentrations were above their respective NYSDEC TOGS standard (50 $\mu\text{g/L}$ for both compounds) at monitoring well MW-26 and test well TW-4. Appendix I provides the complete laboratory results for each sampling event.

The combined results of the February and April 2009 groundwater sampling events indicated that, following the 2008 excavation activities, hexavalent chromium was present in concentrations exceeding the NYSDEC TOGS value of 50 $\mu\text{g/L}$. The concentration of hexavalent chromium observed at monitoring well MW-26 ranged from 12,000 $\mu\text{g/L}$ (March 2009) to 2,400 $\mu\text{g/L}$ (April 2009), and the concentration observed at test well TW-4 was 3,500 $\mu\text{g/L}$ (April 2009). In addition, a low-level concentration of TCE (5.32 $\mu\text{g/L}$) was also detected at MW-26, in excess of the NYSDEC TOGS value of 5 $\mu\text{g/L}$.

4.2 In-Situ Anaerobic Bioprecipitation

Based on the groundwater monitoring results presented above, as proposed in the NYSDEC-approved Revised SRD Work Plan (Arcadis 2009), Arcadis implemented an in-situ anaerobic bioprecipitation via

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injection of a dilute organic carbon solution to facilitate remediation of hexavalent chromium in groundwater.

In August 2009, two injection wells (IW-1 and IW-2) and one new monitoring well (MW-27) were installed at the site (Figure 5). New monitoring well MW-27 was located in the approximate location of test well TW-4, and the injection wells (IW-1 and IW-2) were located adjacent to monitoring wells MW-26 and MW-27, respectively.

Following well development, Arcadis began gravity injection of a dilute organic carbon (5% molasses) solution at injection wells IW-1 and IW-2. After observing that the gravity injection process was not achieving the desired injection rate, 11 temporary injection points were installed around the treatment area (i.e., the area surrounding monitoring wells MW-26 and MW-27) (Figure 5). The organic carbon solution was then injected via a pump at each injection point location. Using the pump injection, 5,800 gallons of organic carbon solution was injected into the treatment area, with all injection activities being completed on September 5, 2009.

4.3 Post-Injection Monitoring

As detailed in the Revised SRD Work Plan (Arcadis 2009), groundwater samples were scheduled to be collected at a frequency of 1, 4, 8, and 12 months after the injection activities had been completed. As discussed in Arcadis' April 2, 2010 letter to the NYSDEC, the 8-month sampling event was moved up by 1 month to coincide with a soil vapor sampling event, which is discussed later herein. During each of these groundwater sampling events, groundwater samples were collected, in accordance with the NYSDEC-approved SRD Work Plan (Arcadis 2009), from monitoring wells MW-26 and MW-27 and analyzed for VOCs, hexavalent chromium, and total chromium.

As indicated by the September 2010 sampling event, following the organic carbon injection activities, hexavalent chromium has decreased to a non-detectable concentration at monitoring wells MW-26 and MW-27 (same location as the former TW-4 location). The concentration of TCE at MW-26 initially increased to a concentration of 10.4 µg/L (October 2009) immediately following the organic carbon injection, then steadily decreased to a concentration of 1.30 µg/L observed during the September 2010 sampling event. Increased concentrations of other VOCs, including cis-1,2-dichloroethene, acetone, 2-butanone, and toluene, were observed at MW-26, which are further discussed below:

- The increase of cis-1,2-dichloroethene is not unexpected given that this is a daughter product generated through the degradation of TCE, which has been enhanced by the organic carbon injection activities.
- The one-time increase of acetone (95.4 µg/L detected in January 2010) is an anomaly and is a common laboratory contaminant.
- The increase of 2-butanone and toluene concentrations (which are not site constituents of concern) coincided with the installation of a roadway around monitoring well MW-26. During the installation of the roadway, the protective surface cover for MW-26 was pushed downward onto the "J-plug" that seals the well, causing the "J-plug" to be crushed. Without the protective seal of the "J-plug" in place, contaminants may have been allowed to enter the well via surface-water infiltration from an unknown

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source. After discovery of the crushed “J-plug,” the polyvinyl chloride riser was cut down to a lower elevation and a new seal cap was installed.

No NYSDEC TOGS values were exceeded for VOCs either before or after the injection activities at monitoring well MW-27.

4.4 Groundwater Monitoring Conclusions and Recommendations

Results of the groundwater sampling conducted following the 2008 excavation activities indicate that the organic carbon injection activities were effective in reducing the concentration of hexavalent chromium to below NYSDEC TOGS values.

The only pre-injection VOC exceeding guidance values was TCE, which has also been reduced to below NYSDEC TOGS values following the injection activities.

The subsequent increase in other VOCs observed during the groundwater sampling is believed to be either an anomaly (acetone), the result of surface-water infiltration (2-butanone and toluene), or the direct result of the enhanced degradation of TCE (cis-1,2-dichloroethene). The concentrations of acetone, 2-butanone, and toluene observed during the last round of groundwater sampling are below their respective NYSDEC TOGS values; therefore, no further sampling is recommended.

The increasing concentrations of cis-1,2-dichloroethene, in combination with the decreasing concentrations of TCE observed following the injection activities, are likely the result of TCE degradation, which is expected to continue until complete degradation of TCE, as well as cis-1,2-dichloroethene, is achieved. Therefore, no further groundwater sampling is recommended.

5 SOIL VAPOR MONITORING

During the February 2009 groundwater sampling event, as requested by the NYSDEC, Arcadis attempted to collect five soil vapor samples. However, soil vapor samples could not be collected at that time due to a high groundwater table (less than 2 feet below ground surface). As discussed with the NYSDEC at that time, it was determined that soil vapor sampling would be re-attempted when the water table was lower and after the organic carbon injections were implemented.

After the organic carbon injection activities were completed, a site meeting was conducted with representatives of Arcadis, the NYSDEC, and NYSDOH to discuss the schedule and location for the collection of soil vapor samples. As described in Arcadis' April 2, 2010 letter to the NYSDEC, a sampling schedule was agreed to and included the collection of two samples, one north and one south of the 2008 excavation area.

5.1 Soil Vapor Sampling

On April 16, 2010, Arcadis collected two soil vapor samples, one collected north (SV-N-1) and one collected south (SV-S-1) of the 2008 excavation area (Figure 5) and submitted to TestAmerica, Inc.'s Burlington, Vermont laboratory for VOC analysis.

The preliminary analytical results were presented to the NYSDEC in an e-mail dated May 19, 2010. Based on their review of these results, the NYSDEC responded with a letter dated June 3, 2010, requesting additional soil vapor sampling at the onsite restaurant that had been constructed at the site due to the detection of site-related VOCs in the soil vapor samples collected in April 2010.

As described in a letter dated June 23, 2010, Arcadis proposed to collect a sample at a point closer to, but not inside of, the onsite restaurant, as well as re-sampling near the SV-S-1 sample location. As a result, in September 2010, Arcadis collected a second set of soil vapor samples (SV-N-2 and SV-S-2) at the locations shown on Figure 5. All of the soil vapor sampling was conducted in accordance with the procedures detailed in the NYSDEC-approved SRD Work Plan (Arcadis 2008a). The samples were submitted to TestAmerica, Inc.'s Burlington, Vermont laboratory for VOC analysis.

5.2 Soil Vapor Sampling Results

Soil vapor analytical data (Table 10 and Figure 8) for both sampling events has been compared to United States Environmental Protection Agency (USEPA) Regional Screening Levels (RSLs) for Industrial Air (http://www.epa.gov/reg3hwmd/risk/human/rb-concentration_table/index.htm) adjusted for comparison to soil gas values. Consistent with the USEPA (2002) guidance, indoor air screening levels were converted to soil vapor screening levels using a conservative attenuation factor of 0.1:

1. The only compound detected at the soil vapor sampling location immediately adjacent to the building (SV-N-2) above the calculated USEPA soil vapor RSL was chloroform ($10 \mu\text{g}/\text{m}^3$), which was only slightly above the RSL of $5 \mu\text{g}/\text{m}^3$. It should be noted that chloroform is often detected in soil vapor related to the public water supply, and the results are not related to any historical site uses and is not a site constituent of concern. All of the other compounds in this sample were detected below the calculated USEPA soil vapor RSLs, indicating that all soil vapor results are below levels that are of a potential concern for indoor air.

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2. At SV-N-2, TCE was the only VOC detected that is addressed in the NYSDOH's Guidance for Evaluating Soil VI in New York State (i.e., Matrix 1 and 2). However, the concentration of TCE (2.9 $\mu\text{g}/\text{m}^3$) detected in sample SV-N-2 was below the 5 $\mu\text{g}/\text{m}^3$ threshold concentration listed in Soil Vapor/Indoor Air Matrix 1 of the NYSDOH guidance, indicating VI is not of concern.
3. For the SV-S-2 sample collected on the southern side of the 2008 excavation area, the only compounds detected above the calculated USEPA soil vapor RSLs were benzene (31 $\mu\text{g}/\text{m}^3$) and chloroform (30 $\mu\text{g}/\text{m}^3$). Both benzene and chloroform are associated with many common household products and are not related to site activities and/or are not site constituents of concern. In addition, the results are not significantly greater than their screening levels of 16 $\mu\text{g}/\text{m}^3$ and 5 $\mu\text{g}/\text{m}^3$, respectively.
4. The concentrations of trichlorofluoromethane (CFC-11) detected in sample SV-S-1 (67,000 $\mu\text{g}/\text{m}^3$) and SV-S-2 (10,000 $\mu\text{g}/\text{m}^3$) indicate that this compound is present near the sample locations. However, CFC-11 is not a site constituent of concern and is not related to any historical site activities. Additionally, the lack of a current or planned building structure in this area would indicate that the screening levels used here may be overly conservative for this location.

Appendix J provides the complete laboratory results for each sampling event.

5.3 Soil Vapor Monitoring Conclusions and Recommendations

The soil vapor monitoring results represent worst-case conditions because the samples were collected approximately 1 foot above the groundwater table. Studies have shown that samples collected directly above the water table are expected to be most representative of sub-slab soil gas results (DiGiulio and Cody 2006).

There is no existing or historical evidence of contaminants of concern or source areas under the footprint of the existing building. The source of VOCs at the site was removed during the 2008 excavation activities at the site, and any low-levels of contaminants remaining were treated by the organic carbon injection activities that were completed in 2009, as evidenced by the declining concentration of TCE observed in the groundwater analytical results.

When viewing multiple lines of evidence as a whole, the soil vapor assessment conducted at the site indicates that site-related contaminants are not present in soil vapor immediately adjacent to the current building foundation.

The soil vapor assessment conducted on the southern side of the property also indicates that site-related contaminants are not present at concentrations that would require further investigation. Therefore, no further soil vapor sampling is warranted.

7 SITE CLOSURE

Based on the successful implementation of the SRD Work Plan and Revised SRD Work Plan (Arcadis 2008a, 2009, respectively), as well as the satisfactory results (as approved in the NYSDOH's e-mail of April 24, 2015) of the VI investigation, Arcadis recommends that no further action be conducted at this site. As a result, because all of the Consent Order requirements executed between the NYSDEC and Standex (Index #B8-0247-94-04) have been met, Arcadis, on behalf of Standex, requests that the Consent Order be terminated and that this site, which is presently listed as a Class 4 site under the New York State Inactive Hazardous Waste Site Registry (defined as a site that has been properly closed, but requires continual site management, consisting of operation, maintenance, and monitoring), be formally "delisted" from the Registry. With your approval, Arcadis will initiate "field" closure activities by formally abandoning the two groundwater monitoring wells that remain onsite.

REVISED SUPPLEMENTAL FINAL ENGINEERING REPORT

8 REFERENCES

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TABLES



**Table 3
Analytical Summary of Waste Characterization Samples - Water**

**Revised Supplemental Final Engineering Report
Former Roehlen Engraving Site
Henrietta, New York**

Sample ID: Date Collected:	Units	Containment Pit-01 06/02/08	Frac Tank 11/18/08
Barium	mg/L	ND	ND
Cadmium	mg/L	ND	ND
Chromium	mg/L	74	63
Lead	mg/L	ND	ND
Mercury	mg/L	ND	ND
Selenium	mg/L	ND	ND
Silver	mg/L	ND	ND
Miscellaneous			
Flashpoint	deg C	>60	>60
Reactive Cyanide	mg/kg	ND	ND
Reactive Sulfide	mg/kg	ND	ND
pH	SU	7.63	8.31

Notes:

> = greater than

deg C = degrees Celsius

mg/kg = milligrams per kilogram

mg/L = milligrams per liter

ND = not detected

SU = standard units

μg/L - micrograms per liter

**Table 6
Analytical Summary of Imported Backfill Sample**

**Revised Supplemental Final Engineering Report
Former Roehlen Engraving Site
Henrietta, New York**

Location ID: Date Collected:	Units	NYSDEC TAGM 4046 Recommended Soil Cleanup Objectives	GenFill 10/22/08
Heptachlor	mg/kg	0.1	0.0020 U [0.0020 U]
Heptachlor Epoxide	mg/kg	0.02	0.0020 U [0.0020 U]
Methoxychlor	mg/kg	NA	0.020 U [0.020 U]
Toxaphene	mg/kg	NA	0.020 U [0.020 U]

Notes:

[] = results of field duplicate

% = percent

2,4-D = 2,4-dichlorophenoxyacetic acid

2,4,5-TP = 2,4,5-trichlorophenoxyacetic acid

BHC = benzene hexachloride

DDD = dichlorodiphenyldichloroethane

DDE = dichlorodiphenyldichloroethylene

DDT = dichlorodiphenyltrichloroethane

J = Indicates an estimated value.

MDL = method detection limit

mg/kg = milligrams per kilogram

NA = not applicable

NYSDEC = New York State Department of Environmental Conservation

PCB = polychlorinated biphenyl

SB = site background

TAGM = Technical and Administrative Guidance Memorandum

U = The compound was analyzed for but not detected. The associated value is the compound quantitation limit.

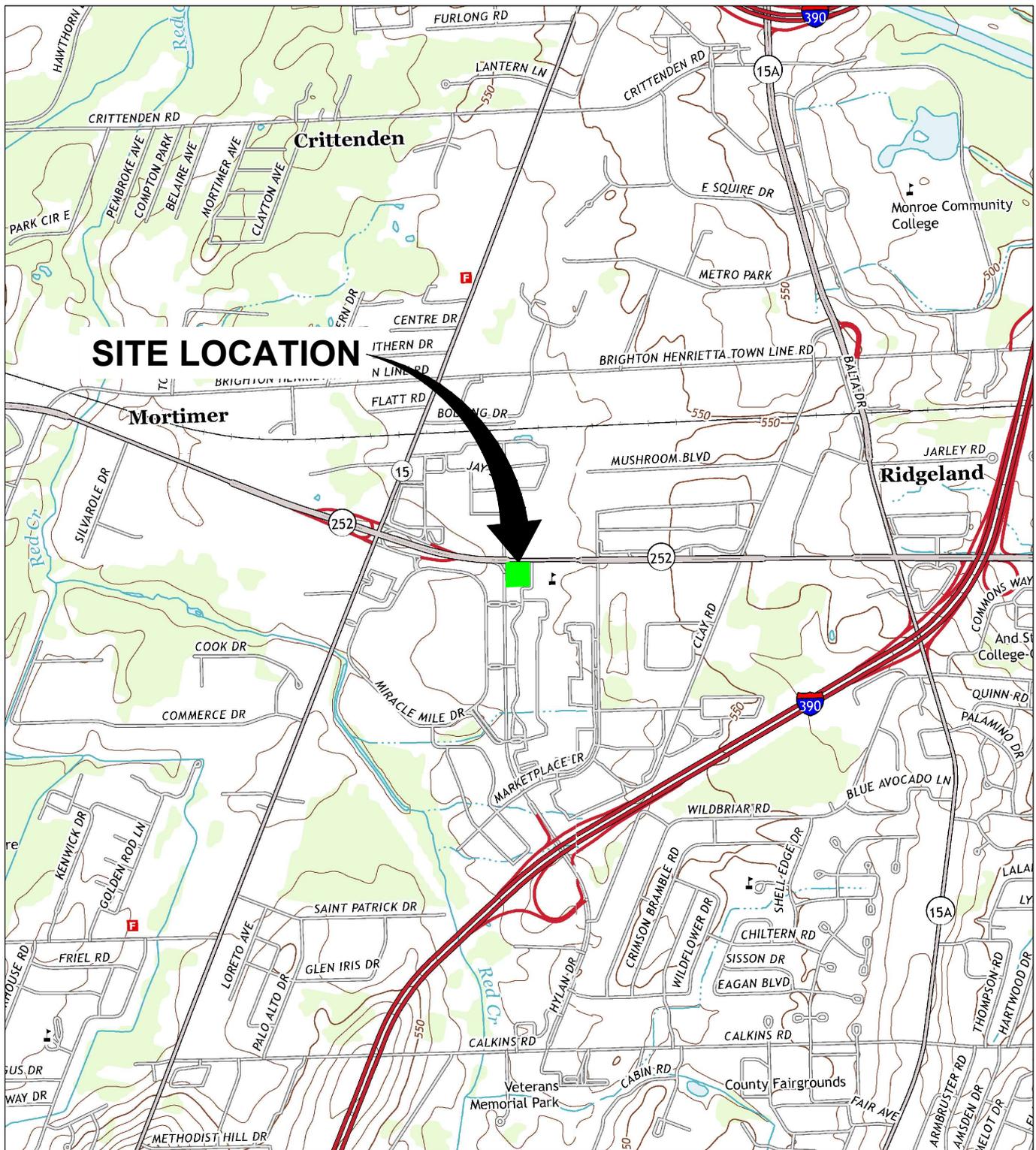
UJ = The compound was not detected above the reported quantitation limit. However, the reported quantitation limit is approximate.

μg/kg = micrograms per kilogram

FIGURES



CITY: SYRACUSE NY DIV: GROUP: ENVCAD DB: ENVCAD LD: (01) PIC: W. POPHAM PM: W. POPHAM TM: (01) TR: A. RICHARDSON LYT: (01) ON: OFF=REF
 G: ENVCAD STRACUSE: ENVCAD 19.15 (LMS TECH) PAGES: 1 PLOT: 10/21/2011 1:07 PM BY: KRAHMER, ERIC
 XREFS: IMAGES: PROJECTNAME: NY_Pittsford_20130308_TM.geo.png NY_West_Henrietta_20130301_TM.geo.png 88317XLB



REFERENCE: BASE MAP USGS 7.5 MIN. TOPO. WEST HENRIETTA, NY, 2013 PITTSFORD, NY, 2013.



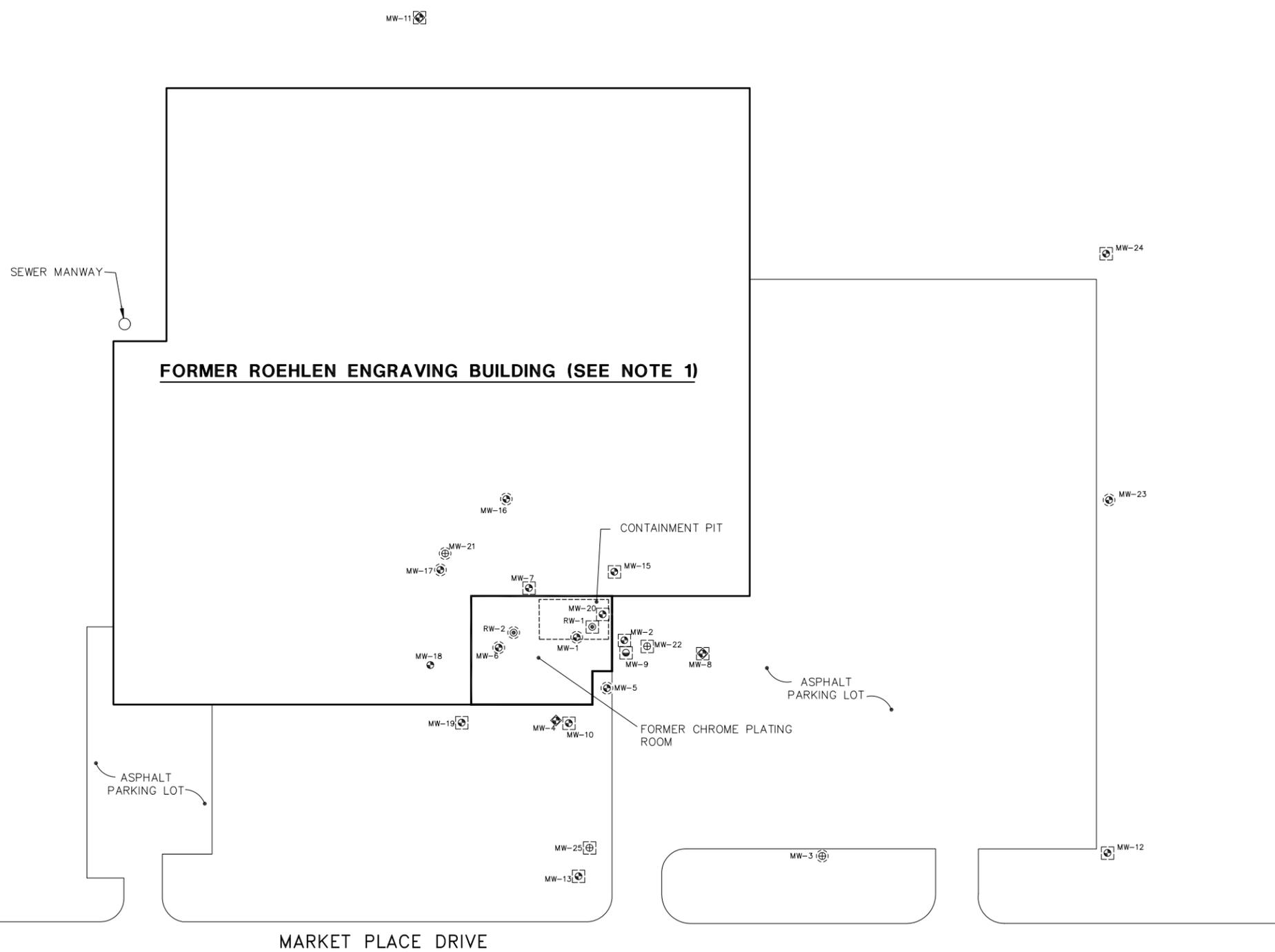
NEW YORK

STANDEX INTERNATIONAL CORPORATION
 FORMER ROEHLER ENGRAVING SITE
 HENRIETTA, NEW YORK
 REVISED SFE REPORT

SITE LOCATION MAP

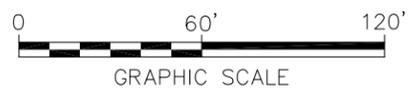
CITY: SYRACUSE NY DM\GROUP: ENV\CAD DB: E. KRAHMER LD:(Ort) PIC: W. POPHAM PM: W. POPHAM TM:(Ort) TR: A. RICHARDSON LYR:(Ort)ON=OFF=REF
 G:\ENVCAD\SYRACUSE\ACT\B008337\000\000\DWG\B008337B02.dwg LAYOUT: 2_SAVED: 10/21/2015 1:10 PM ACADVER: 19.1 S (LMS TECH) PAGES: 4 PLOTSTYLETABLE: PLT\FULL.CTB PLOTTED: 10/21/2015 1:16 PM BY: KRAHMER, ERIC
 XREFS: 88317XLD
 IMAGES: PROJECTNAME: 1

JEFFERSON ROAD



- LEGEND:**
- ◉ LACUSTRINE MONITORING WELL LOCATION
 - ⊕ TILL MONITORING WELL LOCATION
 - BEDROCK MONITORING WELL LOCATION
 - ⊙ GROUND-WATER RECOVERY WELL LOCATION
 - ◊ MONITORING WELL INSTALLED BY OTHERS
 - ⊘ DESTROYED MONITORING WELL
 - DECOMMISSIONED MONITORING WELL

- NOTE:**
1. FORMER ROEHLLEN ENGRAVING BUILDING DEMOLISHED IN APRIL/MAY 2008
 2. ABANDONED MONITORING WELLS INDICATES WELLS THAT WERE DAMAGED DURING THE DEMOLITION ACTIVITIES, AND COULD NOT BE RELOCATED.
 3. DECOMMISSIONED MONITORING WELLS INDICATES WELLS THAT WERE DECOMMISSIONED IN ACCORDANCE WITH THE NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION'S GROUNDWATER MONITORING WELL DECOMMISSIONING PROCEDURES.

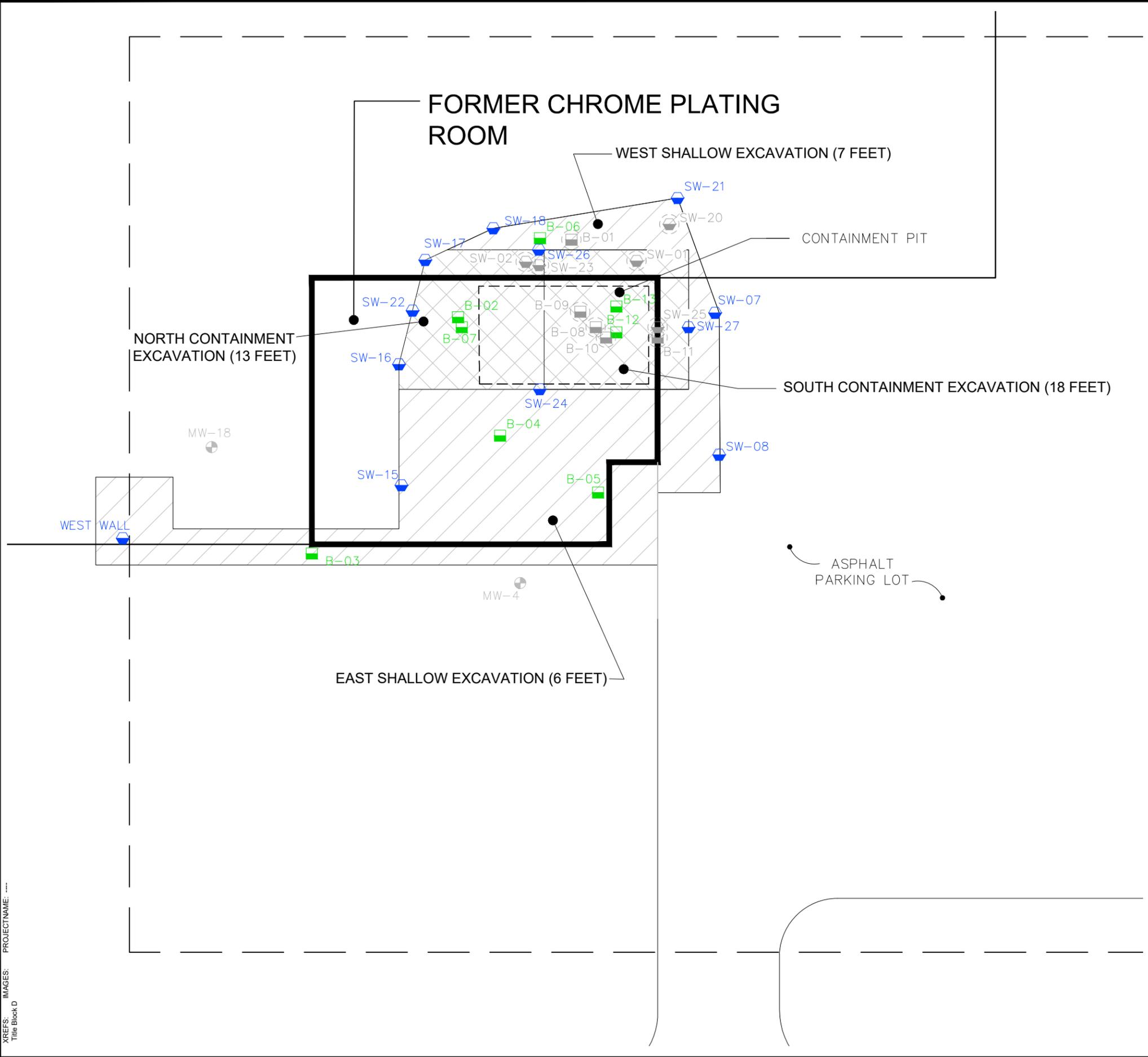


STANDEX INTERNATIONAL CORPORATION
 FORMER ROEHLLEN ENVGRAVING SITE
 HENRIETTA, NEW YORK
REVISED SFE REPORT

PRE-EXCAVATION SITE PLAN



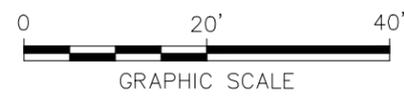
FIGURE
2



- LEGEND:**
- [Dashed box] FORMER CONTAINMENT PIT
 - [Diagonal lines /] WEST SHALLOW EXCAVATION (6 FEET)
 - [Diagonal lines \] EAST SHALLOW EXCAVATION (7 FEET)
 - [X pattern] NORTH CONTAINMENT PIT EXCAVATION (13 FEET)
 - [X pattern] SOUTH CONTAINMENT PIT EXCAVATION (18 FEET)
 - APPROXIMATE LIMIT OF WORK
 - [Blue pentagon] FINAL CONFIRMATORY SIDEWALL SAMPLE LOCATION
 - [Green square] FINAL CONFIRMATORY BOTTOM SAMPLE LOCATION
 - [Circle with dot] CONFIRMATORY SIDEWALL SAMPLE LOCATION (LATER REMOVED)
 - [Circle with dot] CONFIRMATORY BOTTOM SAMPLE LOCATION (LATER REMOVED)

NOTE:

FORMER ROEHLEN ENGRAVING BUILDING DEMOLISHED IN APRIL/MAY 2008.



STANDEX INTERNATIONAL CORPORATION
 FORMER ROEHLEN ENGRAVING SITE
 HENRIETTA, NEW YORK
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**CONFIRMATORY
 SAMPLING LOCATIONS**



FIGURE
4

