day
DAY ENVIRONMENTAL, INC.

ENVIRONMENTAL CONSULTANTS
AN AFFILIATE OF DAY ENGINEERING, P.C.

March 16, 2017

Frank Sowers, P.E.
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414-8519

RE: Supplemental Remedial Investigation Work Plan
OBI, LLC Site
245-265 & 271 Hollenbeck Street and 50 Balfour Drive, Rochester, New York
NYSDEC Site #828188
Site Index #B8-0815-13-10

Dear Mr. Sowers:

Day Environmental, Inc. (DAY) is in the process of completing a Remedial Investigation/Feasibility Study (RI/FS) of the above referenced property (Site) on behalf of OBI, LLC. This work is being completed in accordance with the provisions outlined in the RI/FS work plan dated August 13, 2015 that was approved by the New York State Department of Environmental Conservation (NYSDEC) in a letter dated December 21, 2015 (2015 RI Work Plan). Due to operational reasons, a decision was recently made to remove the Barrel Plating Line that is located in the Main Building at the Site. This plating line is located in an area within the Main Building that potentially contains a source of the chlorinated volatile organic compounds (VOCs) that have been detected in the groundwater at the Site. As shown on Figure 1, the removal of the plating line will create an area in the building approximately 25 feet (ft.) by 90 ft. in size that is now generally accessible and which was not accessible for investigative studies in the past. It is possible that such studies could potentially identify a source area, the remediation of which could expedite future clean-up of the Site. This Supplemental Remedial Investigation Work Plan (Work Plan) describes the scope of work that will be conducted in the area of the former Barrel Plating Line.

Background

The RI work completed to date included the advancement of test borings, soil/historic fill material sampling, the installation of overburden and bedrock groundwater monitoring wells, an initial round of groundwater sampling completed in May/June 2016, and a second round of groundwater sampling completed in September/October 2016. As part of the RI work, samples of surface soil, historic fill material, subsurface soil, and groundwater were analyzed for Target Compound List (TCL) Volatile Organic Compounds (VOCs) plus Tentatively Identified Compounds (TICs), TCL Semi-Volatile Organic Compounds (SVOCs) plus TICs, Target Analyte List (TAL) Metals, Cyanide, Polychlorinated Biphenyls (PCBs), and Pesticides. The locations of the RI test borings, monitoring wells, and surface soil samples completed to date on the portion of the Site that is the focus of this Work Plan are depicted on Figure 1.

The RI analytical laboratory test results to date have not identified concentrations of VOCs, metals, cyanide, PCBs, and pesticides in surface soil, historic fill material, and subsurface soil samples that exceeded Restricted Industrial Soil Cleanup Objectives (ISCOs). The RI analytical laboratory test results detected some occurrences of SVOC concentrations in surface soils and historic fill material that exceeded the ISCOs. However, these exceedances were in localized and sporadic locations, and SVOC impact to the groundwater was not identified.

The RI analytical laboratory test results detected chlorinated VOCs in the groundwater at the Site at concentrations exceeding NYSDEC Division of Water Technical and Operational Guidance Series 1.1.1 (TOGS) groundwater standards or guidance values. The highest concentrations of VOCs in groundwater in the first and second round of groundwater sampling were detected in groundwater monitoring wells located in proximity of the Barrel Plating Line [i.e., the maximum VOC concentration in the first round of groundwater sampling was identified at MW-5, and the maximum VOC concentration in the second round of groundwater sampling was identified at MW-8 (refer to Figure 1)]. Some metals, and cyanide in one sample, were also measured at concentrations exceeding TOGS groundwater standards or guidance values. However, many of the metals exceeding the TOGS groundwater standards or guidance values appear attributable to naturally occurring conditions. The remaining metals that were detected at concentrations exceeding the TOGS groundwater standards or guidance values were detected in sporadic locations not indicative of a groundwater plume. Cyanide was detected at concentrations exceeding the TOGS groundwater standard in the groundwater samples (both first and second groundwater sampling events) collected from well MW-Q. MW-Q is located immediately south of the Barrel Plating Line (refer to Figure 1). The detected concentrations of SVOCs, PCBs, and pesticides were below the TOGS groundwater standards or guidance values.

Supplemental Remedial Investigation Scope of Work

The work proposed to characterize soil and groundwater in the location of the former Barrel Plating Line is presented below.

1.0 Geophysical Survey

DAY will retain a subcontractor to complete a ground penetrating radar (GPR) survey in the area of the former Barrel Plating Line in an attempt to locate former pits, subsurface utilities and/or other anomalies. The former Barrel Plating Line area will be scanned in a grid pattern with scans spaced approximately 3 to 5 feet apart. Based on the results of the GPR survey, the tentative locations of the test borings and monitoring wells described below may be adjusted. Additional studies may also be warranted (e.g., advancement of test pits, advancing additional test borings, and/or installing additional groundwater monitoring wells). The NYSDEC will be contacted if changes to the scope of work are proposed.

2.0 Barrel Plating Line Soil Characterization Work

Six test borings (designated TB-FF through TB-KK) will be advanced in the tentative locations depicted on Figure 1. Initially, the concrete floor will be cored in the test boring locations, and a track-mounted Geoprobe rig will be used to collect soil samples in consecutive 4-foot long intervals to equipment refusal, which is anticipated to be at a depth of about 12 ft. below ground surface (bgs). A DAY representative will screen the Macrocore and associated headspace soil samples in the field with a photoionization detector (PID) and observe the samples for evidence of apparent contamination (e.g., odors, staining, and free product). DAY will prepare test boring logs describing pertinent information (e.g., PID measurements, evidence of contamination, lithology, sample moisture, sample depth intervals, boring depths, evidence of water table, etc.). This work will be conducted as described in the Quality Assurance Project Plan (QAPP) of the 2015 RI Work Plan.

Select soil and/or historic fill material samples collected from test borings TB-FF through TB-KK will be submitted for analytical laboratory testing (refer to Table 1).

Depending on the field conditions observed and analytical laboratory test results received, additional work may be recommended as part of an Interim Remedial Measure (IRM) to further delineate and remediate soil contamination in the location of the former Barrel Plating Line.

3.0 Barrel Plating Line Groundwater Characterization Work

It is anticipated that overburden monitoring wells will be installed in two test borings (TB-FF and TB-II). These monitoring wells (designated MW-FF and MW-II) will be constructed of five to ten feet of pre-cleaned, two-inch diameter Schedule 40 PVC screen attached to solid two-inch diameter Schedule 40 PVC riser with an end cap at the bottom and a j-plug at the top. The annulus around each well screen will be filled with a washed and graded silica sand pack that will be placed at least two feet above the top of the screened interval. A minimum two-foot thick bentonite seal will be placed above each sand pack and hydrated with potable water, and any remaining annulus in each boring will be backfilled with a 96% Portland cement/4% bentonite powder grout. The wells will be completed with flush-mounted curb boxes. The two new wells will be installed and developed as described in the QAPP of the 2015 RI Work Plan.

Following the development of MW-FF and MW-II, groundwater samples will be collected from these locations, as well as from existing overburden monitoring wells MW-Q, MW-5, MW-6, MW-8, and MW-18 (refer to Figure 1). Wells where only VOC testing is conducted will be sampled using passive diffusion bags (PDBs). PDBs will be filled with deionized water obtained from the analytical laboratory, deployed into the water column of the monitoring well, and retrieved a minimum of 14 days following deployment. To the extent possible for the existing monitoring wells (MW-5, MW-6, MW-8, and MW-18), the center of the PDB will be located at a similar depth as the intake of the bladder pump established at each well during the low-flow sampling completed in May/June 2016. Wells where cyanide testing is conducted will be sampled using low-flow sampling techniques, as described in the QAPP of the 2015 RI work plan. Note: if an insufficient water

column is present in a monitoring well to fully submerge the PDB, the NYSDEC Project Manager will be contacted to discuss possible alternate sampling methods.

The groundwater samples collected will be submitted for analytical laboratory testing (refer to Table 1).

4.0 Quality Assurance/Quality Control

Soil and groundwater samples will be submitted to Spectrum Eurofins Analytical for laboratory testing. Results will be provided as NYSDEC Analytical Services Protocol (ASP) Category B data deliverables. As outlined in the RI Work plan, a Data Usability Report (DUSR) will be completed on the results, and validated results will be submitted to the NYSDEC in Equis Format.

Schedule

The Barrel Plating Line has already been removed, and it is expected that field work can begin within about two weeks of approval of this Work Plan. Assuming the NYSDEC approves the Work Plan by March 20, 2017, it is anticipated that field work can be completed by about April 28, 2017. Preliminary laboratory results are anticipated to be received before May 12, 2017, and the ASP Category B data should be received by about May 26, 2017. The validated laboratory results should be received by about June 23, 2017. Therefore, it is requested that an extension be granted for submission of the RI/FS report (including the results of the Supplemental RI studies described herein) until August 25, 2017. [Note: A previous schedule was approved by the NYSDEC in an email dated December 28, 2016. The previous approved schedule indicated that the RI/FS report would be submitted to the NYSDEC by June 30, 2017.]

Certification of this Supplemental RI Work Plan

I, David D. Day, P.E., certify that I am currently a NYS registered professional engineer as defined in 6 NYCRR Part 375 and that this Supplemental Remedial Investigation Work Plan was prepared in accordance with applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

David D. Day, Pres.

David D. Day, P.E.
President
Day Environmental, Inc.

Please contact DAY if there are questions regarding this Supplemental Remedial Investigation Work Plan.

Very truly,
Day Environmental, Inc.

Heather M. McLennan
Scientist

ec: Jacqueline E. Nealon (NYSDOH)
Justin Deming (NYSDOH)
James Mahoney, Esq. (NYSDEC)
Mike McAlpin (OBI, LLC)
David Day (DAY)

Figure 1: Partial Site Plan with Existing and Tentative Sample Locations

Table 1: Sampling and Analysis Plan for Supplemental RI Work Plan

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8
6274 East Avon-Lima Road, Avon, NY 14414-9516
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March 17, 2017

Mr. Mike McAlpin
OBI, LLC
255 Hollenbeck Street
Rochester, New York 14621

Dear Mr. McAlpin;

Re: OBI, LLC Site #828188
Supplemental Remedial Investigation Work Plan;
March 16, 2017
245-265 & 271 Hollenbeck Street and 50 Balfour Drive
City of Rochester, Monroe County

The New York State Departments of Environmental Conservation (NYSDEC) and Health (NYSDOH), collectively referred to as the Departments, have completed their review of the document entitled *"Supplemental Remedial Investigation Work Plan"* (the Work Plan) dated March 16, 2017 and prepared by Day Environmental, Inc for the OBI, LLC site in the City of Rochester, Monroe County. Based on the information and representations provided in the Work Plan, and in accordance with 6 NYCRR 375-1.6, the Departments have determined that the Work Plan substantially addresses the requirements of the Order-on-Consent. The Work Plan, including the revised schedule to submit the RI/FS Report on or before August 25, 2017, is hereby approved.

Thank you for your cooperation in this matter and please contact me at (585) 226-5357 if you have any questions.

Sincerely,

Frank Sowers

Frank Sowers, P.E.
Environmental Engineer 2

ec:
B. Schilling
J. Nealon
H. McLennan
W. Silkworth
J. Frazer
D. Loew

FIGURE

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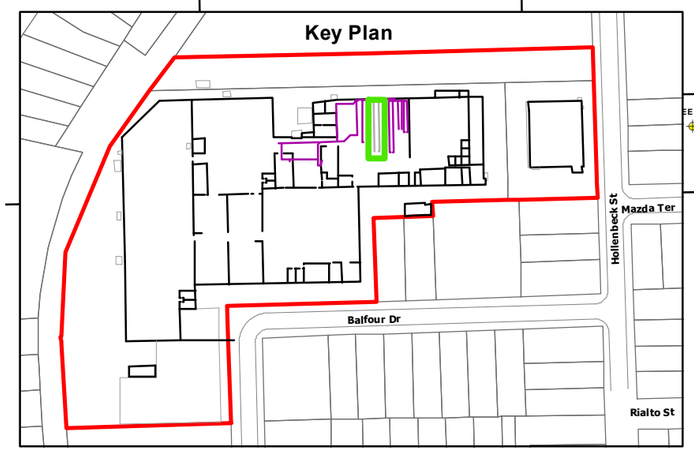
TB-O
TB-112
TB-214
TB-6
MW-8
MW-7R
MW-7
TB-11
TB-4
TB-12
TB-120
TB-113
TB-213
TB-211
MW-5
BH-09
MW-6
BH-10
SS-7
TB-I
TB-DD
TB-W
TB-X
TB-Z
TB-Y
TP-1
MW-M (TB-M)
TB-121
TB-101
TB-118
TP-2
TB-BB
BH-01
SSV-02
TB-202
TB-304
TB-FF/MW-FF
MW-18
BH-14
TP-4
TB-122
TP-3
TB-N
TB-GG
SSV-09
IB-100
TB-201
TB-200
TB-102
TB-HH
TB-114
TB-II/MW-II
TB-215
TB-210
MW-11
MW-14
TB-CC
TB-AA
TB-203
TB-103
TB-117
BH-05
BH-13
TB-JJ
SSV-01
TB-306
TB-105
TB-U
TB-KK
TB-402
BH-15
MW-17
TB-204
TB-107
TB-T
TB-J
TB-104
MW-Q (TB-Q)
TB-115
SSV-05
TB-K
BH-06

See Key Plan

Key Plan



Legend

- Tentative monitoring well locations
- Tentative test boring locations
- Geoprobe test boring advanced during RI
- Geoprobe test boring completed as an overburden monitoring well during RI
- Surface soil sample location - Human Exposure Assessment conducted during RI
- Surface soil sample location - Historic Fill Evaluation conducted during RI
- Test pit excavatated in 1997
- Test boring advanced between 1997 and 2011
- Existing monitoring well installed between 1997 and 2011
- Existing bedrock well installed in 2007
- Sub slab vapor location installed in 2014
- Process piping for Plating Lines
- Removed barrel plating line
- Gas line
- Building wall
- Site boundary
- Generally accesible area following Barrel Plating Line Removal

NOTES:

Previous sample study test boring and test pit locations produced from a CAD drawing entitled 1997-2014 Soil and Groundwater Sampling Locations, by Day Environmental, dated July 23, 2015. These locations are to be considered approximate.

Building plan produced from a map of a survey by Deluck - O'Neil, P.C., entitled "Map of a survey of part of the 1,000 acre tract, City of Rochester, Monroe County, New York", dated December 2, 1997 and from a drawing by: Mcalpin Industries, entitled "Facilities Layout", dated April 1, 1985, and from site observations made by representatives of Day Environmental, Inc.

0 10 20 40 Feet

DESIGNED BY	DRAWN BY	SCALE	DATE
RLK	CPS	AS NOTED	01-2017

DATE	DATE ISSUED
01-2017	01-18-2017

DAY ENVIRONMENTAL, INC.
Environmental Consultants
Rochester, New York 14606
New York, New York 10170

Project Title
OBI, LLC SITE
245 - 265 AND 271 HOLLENBECK ST,
AND 50 BALFOUR DR
ROCHESTER, NEW YORK
NYSDEC SITE NO. 828188

Drawing Title
Partial Site Plan with Existing and Tentative Sample Locations

Project No.
5211S-16

FIGURE 1

Last Date Saved: 16 Mar 2017 Document Path: E:\GIS Mapping\Mcalpin\5211S-16\Obi\SRI\5211S-02-SRI - Proposed Sample Plan.mxd

TABLE

Table 1: Sampling and Analysis Plan for Supplemental RI Work Plan

Matrix	Sampling Location	Analytical Group	No. of Samples	Sampling Method
Soil/Historic Fill Material	TB-FF, TB-GG, TB-HH, TB-II, TB-JJ, TB-KK	VOCs	6 + 1 field duplicate + 1 MS/MSD + 1 rinsate blank	Direct Push Geoprobe
Overburden Groundwater	MW-5, MW-6, MW-8, MW-18	VOCs	4	PDBs
	MW-FF, MW-II, MW-Q	VOCs, cyanide	3 + 1 field duplicate + 1 MS/MSD + 1 rinsate blank	Low-flow