May 18, 2020

Mr. Frank Sowers
New York State Department of Environmental Conservation (NYSDEC), Region 8
6274 East Avon-Lima Road
Avon, NY 14414-9516

Re: Remedial Investigation Work Plan Addendum #2
Former Luster-Coate Site, Site #C828113
32 East Buffalo Street
Churchville, New York 14428
LaBella Project No. 2171500

Dear Mr. Sowers,

LaBella Associates, D.P.C. ("LaBella") is pleased to submit this Supplemental Remedial Investigation (RI) Work Plan for the Former Luster-Coate Site (NYSDEC Site #C828113) located at 32 East Buffalo Street in the Village of Churchville, Monroe County, New York, herein referred to as the "Site." LaBella is submitting this Supplemental RI Work Plan on behalf of Alantic Funding & Real Estate, LLC (Alantic) to further define the nature and extent of contamination at the Site.

The work outlined in this RI Work Plan Addendum #2 will be performed in accordance with the NYSDEC-approved Remedial Investigation Work Plan for the Site, dated August 2017. It should be noted that the scope of work for this addendum is focused on defining the nature and extent of impacts on the southern portion of the current Site boundary and does not include the portion of the Site to the north.

SCOPE OF WORK

The following scope of work will be conducted:

Overburden Soil Sampling

This task will involve collection of overburden soil samples to further delineate the horizontal and vertical extent of soil contamination in the southern portion of the Site. This work will be completed in accordance with NYSDEC DER-10 as well as Sections 5 and 6 of the Quality Control Plan (QCP) provided in the August 2017 RI Work Plan.

Based on the previous testing completed at the Site, this addendum includes two primary goals for the sampling: 1) confirm additional surficial soil locations in the top 0-1 ft. are consistent with other Polychlorinated Biphenyls (PCB) data collected in the southern portion of the Site and, 2) confirm subsurface conditions (fill, soil type, etc.) are consistent with previous testing locations and collect select samples from borings to confirm consistency with other analytical testing results. In order to accomplish these goals, a total of ten (10) overburden soil borings will be advanced and two (2) surface soil samples will be collected. The proposed locations are shown on Figure 1.

In order to evaluate/confirm PCBs in the top four feet of soil, four (4) soil samples will be collected from each boring in 1-ft. intervals (i.e., 0-1 ft., 1-2 ft., 2-3 ft. and 3-4 ft.) for a total of forty (40) samples that will be will be analyzed for PCBs using USEPA Method 8082.

In addition to the PCB sampling in the top four feet of soil from the borings, this addendum includes collecting three (3) samples for "full suite" parameters, which consist of:

- United States Environmental Protection Agency (USEPA) Target Compound List (TCL) volatile organic compounds (VOCs) including tentatively identified compounds (TICs) using USEPA Method 8260;
- USEPA TCL Semi-volatile organic compounds (SVOCs) including TICs using USEPA Method 8270;
- Polychlorinated biphenyls (PCBs) using USEPA Method 8082A;
- Target Analyte List (TAL) metals using USEPA Methods 6010/7470/7471; and
- Pesticides using USEPA Method 8081.

These three (3) samples will be collected from the location of worst-case impacts or in the event there are a lack of impacts the sample will be collected from the top of the groundwater table.

The following methods will be followed to complete this task:

1. A *Dig Safely New York* stakeout will be conducted at the Site to locate subsurface utilities in the areas where the subsurface investigation will take place.
2. Borings will be advanced with a "Geoprobe" direct push sampling system. The use of direct push technology allows for rapid sampling, observation, and characterization of relatively shallow overburden soils. The Geoprobe utilizes a four-foot macrocore sampler, with disposable polyethylene sleeves. Soil cores will be retrieved in 4-ft. sections, and can be easily cut from the polyethylene sleeves for observation and sampling.
3. Each boring implemented at the Site will be advanced until equipment refusal is encountered, although attempts will be made to reach bedrock. Typically, refusal was reached between 9-ft. and 16.8-ft. below ground surface (bgs) at the Site. Approximate proposed soil borings are depicted on Figure 1. These locations may vary slightly based on field conditions.
4. Drilling equipment will be decontaminated prior to use and between soil boring locations, using an Alconox and potable water solution followed by a citrus degreaser. Refer to Section 12 of the QCP and Appendix 3, both located in the August 2017 RIWP, for additional details regarding decontamination procedures.
5. Soils from the borings will be continuously screened in the field for visible impairment, olfactory indications of impairment, evidence of NAPLs, and/or indication of detectable VOCs with a photoionization detector (PID) collectively referred to as "evidence of impairment." Field screening findings will be recorded in the soil boring logs and included in a letter report.
6. Soil generated during soil sampling activities will be containerized in 55-gallon drums, characterized, and disposed of off-Site in accordance with applicable regulations. Refer to Section 11 of the QCP included as Appendix 3 of the August 2017 RIWP for additional details regarding the management of investigation-derived waste.
7. Exploration locations will be located with a global positioning system or tape measured from existing site features.

In addition to the above samples, two (2) surface soil samples will be collected to further evaluate the surface soil at the Site. The surface soil samples will be collected from 0-2 inches below the sod layer and consist of 5:1 composite samples (i.e., five discrete locations composited into a single sample). One surface soil sample will be collected from the eastern side of the Site and one sample from the western side of the Site. The locations of the surface soil samples are shown on the attached Figure 2. The surface soil samples will be analyzed for the "full-suite" of parameters as defined above. In addition, the

western surface soil sample (closest to Black Creek) will also include testing for the following additional parameters:

- 1,4-dioxane using USEPA Method 8270 (for soil/sediment samples) with a reporting limit no higher than 0.1 mg/kg.
- Poly- and perfluorinated compounds (PFAS) using USEPA Method 537.1 with a reporting limit no higher (for PFOA and PFOS) than 0.5 µg/kg.

Analysis of PFAS will be performed by a laboratory that holds ELAP certification for PFOA and PFOS in drinking water by USEPA Method 537.1 or ISO 25101.

Health and Safety Plan

The HASP included as Appendix 2 in the August 2017 RIWP will be followed for all work at the Site.

Community Air Monitoring

During all ground intrusive work conducted at the Site, air monitoring will be conducted in accordance with the NYSDOH Generic Community Air Monitoring Plan (CAMP). A copy of this plan is included as Appendix 1 in the August 2017 RIWP.

Quality Assurance/Quality Control

The QA/QC requirements outlined in the August 2017 RIWP will be implemented for this work including duplicate sampling, Matrix Spike/Matrix Spike Duplicate sampling, ASP Category B Deliverables, Data Usability Summary Report, etc. In addition to these requirements, the following will also be implemented for the emerging contaminant samples (PFAS and 1,4-dioxane).

Sampling for PFAS in soil will be conducted in accordance with NYSDEC's "Guidelines for Sampling and Analysis of PFAS," dated January 2020, Appendix B, "Sampling Protocols for PFAS in Soils, Sediments and Solids."

RI Addendum Letter Report

At the conclusion of the investigation, an RI Addendum letter report will be prepared for the Site. The report will summarize the investigation conducted at the Site, including a comparison of all site-specific analytical data to the appropriate NYSDEC Guidance Values. The report will also contain mapping that depicts all investigative points, site features and areas of impacted soil and/or groundwater at the Site. All laboratory data will also be submitted to NYSDEC via an Electronic Data Deliverable.

SCHEDULE

LaBella is prepared to begin RI Addendum #2 work within three (3) weeks of receipt of approval of this plan from the NYSDEC. It is anticipated that this work will take approximately three (3) weeks to complete.

If you have any questions please do not hesitate to contact me at (585) 295-6611.

Respectfully submitted,

LABELLA ASSOCIATES, D.P.C.

Project Manager

Attachment

I:\Alantic Funding & Real Estate LLC\2171500 - 32 E Buffalo St RI Implementation\Reports\Supplemental RI Testing\LTR.2020.05.18 - RIWP Addendum #2 Luster Coate.Churchville.docx

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8
6274 East Avon-Lima Road, Avon, NY 14414-9516
P: (585) 226-5353 I F: (585) 226-8139
www.dec.ny.gov

May 21, 2020

Mr. S. Ram Shrivastava, PE
Lotus Green Development, LLC
700 West Metro Park
Rochester, New York 14623

Dear Mr. Shrivastava;

Re: Luster-Coate, Site #C828113
Remedial Investigation Work Plan Addendum #2; May 18, 2020
Churchville (V), Monroe County

The New York State Departments of Environmental Conservation (NYSDEC) and Health (collectively "the Departments"), have completed their review of the document entitled *Remedial Investigation Work Plan Addendum #2* (the Work Plan) dated May 18, 2020 for the Luster-Coate site located in the Village of Churchville. In accordance with 6 NYCRR Part 375-1.6, the Departments have determined that the Work Plan, with modifications, substantially address the requirements of the Brownfield Cleanup Agreement. The modifications are outlined as follows:

1. Depending on the results, additional investigation may be needed to define the nature and extent of contamination in the southern portion of the site.

2. The preliminary results will be included in the monthly progress reports and the RI Addendum Report will be submitted by **October 31, 2020**, unless an alternate date is approved by NYSDEC. The RI Addendum Report will not be formally reviewed by the Departments unless it is also intended to be the final Remedial Investigation Report for the southern portion of the site.

With the understanding that the above noted modifications are agreed to, the Work Plan is hereby approved. If you choose not to accept these modifications, you are required to notify this office within 20 days after receipt of this letter and prior to the start of field activities. In this event, I suggest a meeting be scheduled to discuss your concerns prior to the end of this 20-day period.

Please attach a copy of this letter to the work plan and place of copy of the Work Plan in the document repositories established for this site.

Please notify me at least 7 days in advance of the start of field activities.

We look forward to working together to bring this site back into productive use. If you have questions or concerns on this matter, please contact me at 585-226-5357 or email at frank.sowers@dec.ny.gov.

Sincerely,

Frank Sowers, P.E.
Professional Engineer 1

ec:

Al Spaziano	Melissa Doroski
Megan Denner	Patrick Fitzgerald
Dan Noll	Dudley Loew
David Pratt	Michael Cruden
Justin Deming	

Legend

- Proposed Supplemental Soil Borings
- Previous Soil Borings
- Surface Soil (SHAW 2005)
- Monitoring Well (LaBella 2017)
- Soil Boring (LaBella 2017)
- Soil Gas & Collocated Monitoring Well LaBella 2017)
- 32 E Buffalo St
- BCP Site

Sample ID: SB-118
PCB
0-1' - 0.017 ppm
1-2' - 0.0148 ppm
2-3' - ND

Sample ID: SB-119
PCB
0-1' - 0.0381 ppm
1-2' - ND
2-3' - ND

Sample ID: SB-113
PCB
0-1' - ND
1-2' - ND
2-3' - 0.100 ppm

Sample ID: SB-106
PCB
0-1' - 0.0274 ppm
1-2' - ND
2-3' - 0.194 ppm

Sample ID: LBA-GP6 (1.5'-2.3')
Sample Date: 8/29/2017
Pesticides
4,4'-DDD **0.0074 ppm**
4,4'-DDE **0.011 ppm**
PCBs
Total PCBs **0.80 ppm**

Sample ID: SB-107
PCB
0-1' - 0.204 ppm
1-2' - 0.302 ppm
2-3' - 0.253 ppm

Sample ID: LBA-SG1 (4'-8')
Sample Date: 9/29/2017
VOCs
Benzene **1.2 ppb**

BLACK CREEK

SS-15

LBA-GP6

LBA-SG1

LBA-MW1

LBA-GP7

Sample ID: SS-15 (0"-2")
Sample Date: 4/19/2005
SVOCs
Benzo(a)anthracene **2.7 ppm**
Benzo(a)pyrene **3.3 ppm**
Benzo(b)fluoranthene **5.6 ppm**
Benzo(k)fluoranthene **2 ppm**
Chrysene **4.2 ppm**
Dibenz(a,h)anthracene **0.58 ppm**
Indeo(1,2,3-cd)pyrene **2.6 ppm**
PCBs
Total PCBs **0.21ppm**
Metals
Zinc **146 ppm**

Sample ID: LBA-GP7D (0.5'-2.5')
Sample Date: 8/29/2017
Metals
Lead **63.9 ppm**

Sample ID: LBA-MW1 (6.5'-16.5')
Sample Date: 10/2/2017
Metals
Magnesium **37,000 ppb**
Sodium **21,600 ppb**

Orange Hatched Area Denotes Composite Surface Soil Sample for Full Suite Parameters

Red Hatched Area Indicates Composite Surface Soil Sample for Full Suite Parameters and Emerging Contaminants (PFAS/1,4-Dioxane)

State Hwy 36

E Buffalo St

State Hwy 33

NOTES:
(1) Aerial image obtained from Pictometry 2016 and may not represent current site conditions.
(2) Site boundaries obtained from McIntosh & McIntosh, P.C. Survey Map dated August 22, 2017.
(3) Soil concentrations in milligrams per kilogram (mg/kg) or parts per million (ppm).
(4) Groundwater concentrations in micrograms per liter (ug/L) or parts per billion (ppb).
(5) "ND" = Non-Detect.
(6) Green text boxes = sediment. Orange text boxes = soil. Blue text boxes = groundwater.
(7) Concentrations shown exceed NYCRR Part 375 Unrestricted Use Soil Cleanup Objectives (SCOs) (soil), TOGS 1.1.1 Water Quality Standards and Guidance Values (groundwater), and NYSDEC Screening and Assessment of Contaminated Sediment (sediment).
Concentrations in red exceed NYCRR Part 375 Restricted Residential Use SCOs.
Concentrations underlined exceed NYCRR Part 375 Protection of Groundwater SCOs.
(8) LaBella testing locations collected using a Carlson S320 GPS.
(9) SHAW sample locations georeferenced from previous reports and are considered approximate.

LaBella
Powered by partnership.

N
W E
S

0 40
Feet
1 inch = 40 feet

INTENDED TO PRINT AS: 11" X 17"

CLIENT:
Alantic Funding & Real Estate Company, LLC

PROJECT:

Former Luster-Coate
Remedial Investigation
32 East Buffalo St.
Churchville, NY
BCP Site C828133

DRAWING:
Summary of Detected Compounds & Proposed Supplemental Testing

PROJECT/DRAWING NUMBER:
2171500
FIGURE 1
4/30/2020

Path: I:\Alantic Funding & Real Estate LLC\2171500 - 32 E Buffalo St RI Implementation\Drawings\Figure 1 - Supplimental Testing.mxd