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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www.dec.ny.gov

March 18, 2020

Joseph M. Lobozzo II
690 Portland Avenue Company
135 Orchard Park Boulevard
Rochester, New York 14609-3352

Re: 2020 Groundwater Sampling Event
Former JML Optical Site
Site No. C828151
Rochester (C), Monroe (C)

Dear Mr. Lobozzo:

The New York State Department of Environmental Conservation (the Department) has reviewed the March 10, 2020 Groundwater Sampling Work Plan (Work Plan) for the Former JML Optical Inc. Brownfield Cleanup Program (BCP) site (Site) located at 678-690 Portland Avenue in the City of Rochester, Monroe County. Based on the information presented in the Work Plan, the Department is conditionally approving the Work Plan with the following modifications and clarifications.

1. The Department understands the groundwater water sampling event is being conducted to obtain a current assessment of the groundwater conditions on the Site as well as migrating from the Site. The 2020 groundwater data, along with all historical groundwater data, will be used to evaluate remedial technologies to address the Site's groundwater contamination and will be protective of human health and the environment on-site and off-site.

2. For clarification purposes, the Department understands that following groundwater monitoring wells as presented on Figure #1 will be sampled as part of the 2020 sampling event: OB-2, MW-13, MW-5, MW-108, BR-3, MW-8, MW-101, MW-107, DEC MW-5, MW-103, MW-14, MW-7, MW-15, MW-16, and DBR-1.

3. The Department understands that the low flow sampling will be conducted in accordance with ASTM D6771-18.

4. The Department understands that all groundwater monitoring wells sampled will be screen for non-aqueous phase liquid (NAPL) and the results of the screening will be presented on the groundwater sampling log.

5. The Work Plan indicates that a dilute solution of Alconox and portable water will be used to decontaminate the sampling equipment. The Department understands that the decontamination solution will be of sufficient concentration to mitigate any potential of cross-contamination.

6. The Department is requesting that all groundwater monitoring wells with missing or damaged caps will have new caps installed as well as all groundwater monitoring wells with damaged risers are repaired accordingly.

7. The Department is requesting that RW-1 and groundwater monitoring wells MW-3 and MW-9 will be included in the 2020 groundwater sampling event.

8. The Department is requesting that an attempt will be made to locate PZ-2 that was installed as part of the Preferred Electric Motors Site (Site ID. HW828106). See attached figure for location of PZ-2. Historical groundwater data from HW828106 groundwater sampling events has indicated chlorinated VOC contamination in PZ-2. If PZ-2 is located, the Department is requesting that PZ-2 will be sampled as part of this 2020 groundwater sampling event.

9. The Department understands that the decontamination liquids will be containerized with the purge water and will be disposed as presented in the Work Plan. All other non-liquid waste generated as part of the groundwater water sampling event will be containerized and disposed off-site in accordance with all applicable local, State, and Federal regulations.

10. Figure 1 of the Work Plan show 2 locations for MW-103. The Department understands that MW-103 with the boring identifier B-45 is the correct location for MW-103.

11. As per the Brownfield Cleanup Agreement and 6 NYCRR Part 375, seven (7) days advance notice of any fieldwork activities so that Department oversight can be provided.

Within fifteen (15) days of the date of this letter and prior to any fieldwork activities associated with the 2020 Groundwater Sampling Event, the Applicant must elect in writing (electronic notification is acceptable) one of the following options:

- Option A: Accept the modified work plan;
- Option B: Invoke dispute resolution as set forth in 6 NYCRR Part 35-1.5(b)(2); or
- Option C: Terminate the Brownfield Cleanup Agreement in accordance with 6 NYCRR Part 375-3.5.

If the Applicant chooses to accept Option A then this letter becomes part of the approved 2020 Groundwater Sampling Work Plan. Also, if Option A is chosen then a copy of the approved 2020 Groundwater Sampling Work Plan with this letter attached must be placed in the document repository within 1 week of accepting Option A and prior to all fieldwork activities associated with the 2020 Groundwater Sampling Work Plan. Please provide notification to the Department that the 2020 Groundwater Sampling Work Plan and a copy of this letter attached have been placed in the document repository (electronic notification is acceptable).

The Department seeks to resolve the outstanding differences in a mutually agreeable manner, which addresses the requirements of the Brownfield Cleanup Agreement and associated work plans. If you have any questions, concerns, or need further assistance with the Site, please feel free to contact me at 585-226-5354 or via e-mail at charlotte.theobald@dec.ny.gov.

Sincerely,

Charlotte B. Theobald

Charlotte B. Theobald
Assistant Engineer

ec:
Pete Morton (Ravi)
Nancy Styles Van Dussen (Ravi)
Lynn Zicari (Ravi)
Linda Shaw (Knauf Shaw)
Rev. Wright (Community Mutual, Inc.)
Eamonn O'Neil (NYS Dept. of Health - Albany)
Jacquelyn Nealon (NYS. Dept. of Health – Albany)
Wade Silkworth (Monroe County Health Department)
Dudley Loew (NYSDEC)
David Pratt (NYSDEC)
Todd Caffoe (NYSDEC)

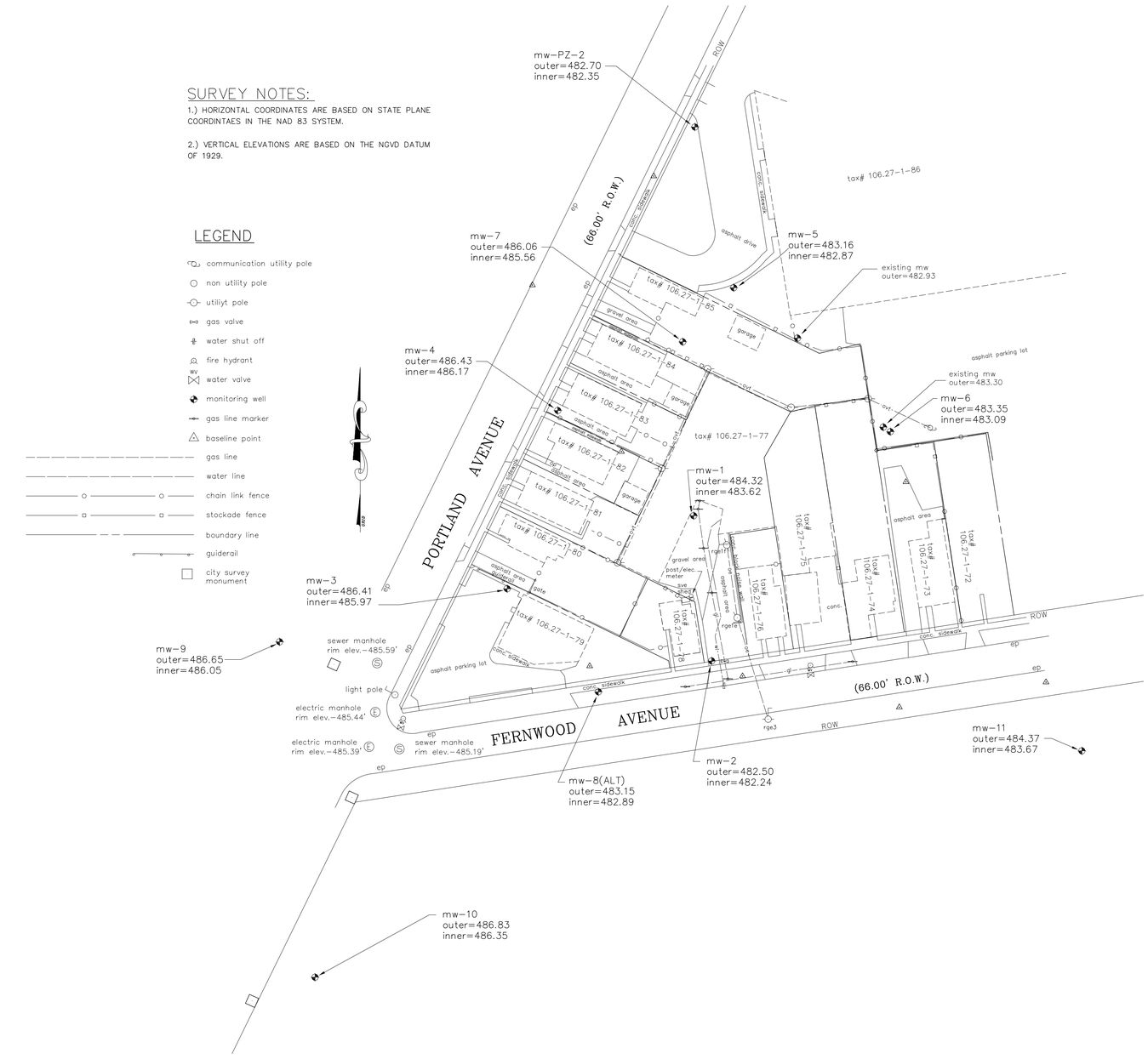
SURVEY NOTES:

1.) HORIZONTAL COORDINATES ARE BASED ON STATE PLANE COORDINTAES IN THE NAD 83 SYSTEM.

2.) VERTICAL ELEVATIONS ARE BASED ON THE NGVD DATUM OF 1929.

LEGEND

- communication utility pole
- non utility pole
- utiliyt pole
- gas valve
- water shut off
- fire hydrant
- water valve
- monitoring well
- gas line marker
- baseline point
- gas line
- water line
- chain link fence
- stockade fence
- boundary line
- guiderail
- city survey monument



DATE	REVISIONS	BY
09-21-06	ADDED MW-PZ-1 & MW-PZ-2	CR
09-21-06	ADDED MANHOLE RIM ELEV.	CR
09-21-06	CHECKED ELEV. ON MW-8	CR
11-23-05	FIXED MON. WELL SYMBOLS	CR
11-23-05	CHANGED ELEV. ON MW-9	CR
10-13	ADDED MW 7, 8(ALT), 9, 10, 11	

DRAWING ALTERATION

WARNING: It is a violation of the New York State Education Law, Article 145, Section 7209, Special Provision 2, for any person unless he is acting under the direction of a Licensed Professional Engineer or Land Surveyor to alter an item in any way. If an item bearing the seal of an engineer or land surveyor is altered, the altering engineer or land surveyor shall affix to the item his seal and notation "altered by" followed by his signature and date of such alteration, and a specific description of the alteration.

BY: _____

DATE: _____

LU ENGINEERS
Civil and Environmental

JOSEPH C. LU ENGINEERING AND LAND SURVEYING, P.C.
2230 Penfield Road
Penfield, New York 14526
(585) 377-1450
FAX: (585) 377-1266

PROJECT:

PREFERRED ELECTRIC MOTORS

CLIENT:

MACTEC

DRAWING TITLE:

SITE SURVEY

DESIGNED BY:	SCALE: 1"=50'
DRAWN BY: JH	DATE: 5-05-05
CHECKED BY: CP,CR	PROJECT No. 36401

SHEET	DRAWING No.
1 OF	S-1

J:\PROJECTS\36400 MACTEC\36401 PEM SITE\CAD\OVERALL BOUNDARY.DWG

March 10, 2020

Charlotte Theobald, P.E.
NYS Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414

Re: 2020 Groundwater Sampling Work Plan
Former JML Optical
690 Portland Ave., Rochester, NY
BCP Site ID #C828151
Ravi Engineering Project No. 45-14-003-0B

Dear Ms. Theobald:

Ravi Engineering & Land Surveying, P.C. (RE&LS) proposes this Groundwater Sampling Work Plan to collect groundwater samples at the Former JML Optical site (JML) at 690 Portland Avenue in the City of Rochester, New York (the "Site").

Background

RE&LS completed a round of groundwater sampling in May of 2016. During that event, eight overburden wells and two bedrock wells were sampled for Target Compound List (TCL) volatile organic compounds (VOCs). This round of sampling represented a second round of samples for several wells, and a third round of sampling for others. Historical data are available from each event for comparison. RE&LS proposes to complete another round of sampling to evaluate current groundwater conditions.

RE&LS completed a well inspection on March 9, 2020 to determine the presence and condition of the remaining wells. A total of 31 monitor wells are reported to have been installed; however, only seventeen wells were located using a Trimble GeoExplorer hand held GPS unit (Figure 1). Of the seventeen wells located:

- fifteen are overburden wells and two are bedrock wells;
- several of the overburden wells historically have had little water or poor recovery;
- there are two overburden wells (MW-3 and MW-9) with some degree of light non-aqueous phase liquid (LNAPL) present;
- the remainder of the wells were not located, and are either no longer present due to vandalism, or may be buried by debris.

In addition, RE&LS observed approximately two feet of water in the interior sump that was cleaned out as an Interim Remedial Measure (IRM) in 2016.

The following Work Plan outlines the methodologies and details of the proposed work.

Groundwater Sampling Methodologies

Thirteen existing overburden monitoring wells and two bedrock wells will be sampled (Figure 1). Groundwater samples will be collected with a peristaltic pump equipped with a flow-through-cell utilizing low-flow purging and sampling procedures. The pump intake depth will be between the middle of the screened interval and approximately 2 feet above the bottom of the well.

Indicator field parameters will be monitored in five minute intervals or greater during purging to determine when purging operations are sufficient and when sample collection may begin. Stabilization will be considered to be achieved when three consecutive readings are within the following limits:

- Drawdown: <0.3 feet of stabilized drawdown value
- Turbidity: 10% for values >5 NTU
- Dissolved Oxygen : 10% for values >0.5 mg/L
- Specific Conductance: 3%
- Temperature: 3%
- pH: ±0.1 unit
- Oxidation/Reduction potential: ± 10 mV

A groundwater sampling log will be generated for each monitoring well sampled. The logs will include indicator field parameter readings, purging volumes, pump intake depth, and field observations. Samples will be collected after 2 hours from the start of purging if field parameters have not stabilized within that time.

Deep Bedrock Well

Bedrock well DBR-1 was installed 35.6 feet into bedrock. It was sampled in May 2016 using a series of passive diffusion bags (PDB) to evaluate groundwater conditions at discrete intervals. Results indicated that trichloroethene (TCE) concentrations were relatively consistent throughout the entire depth of the water column; with the highest concentration at a depth of 20 feet beneath bedrock surface (BBS). This depth is approximately 35 feet beneath ground surface (BGS).

One groundwater sample will be collected from DBR-1 using a PDB. The PDB will be deployed at a depth of 20 feet BBS and left in place for at least two weeks. After the PDB is retrieved, the sample will be collected by transferring the appropriate amount of sample volume into a laboratory supplied glass vial. The sample will be handled and analyzed in accordance with the protocols outlined in this work plan.

Sump Sample

One aqueous sample will be collected from the sump using a hand-held bailer; the sample will be handled and analyzed in accordance with the protocols outlined in this work plan.

Laboratory Analysis

All samples will be analyzed for TCL VOCs plus Tentatively Identified Compounds (TICs). Results will be compared to 6 NYCRR Part 703 Technical & Operational Guidance Series (TOGS) 1.1.1 Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations.

Quality Assurance

Decontamination

Dedicated tubing will used for sample collection. Non-dedicated equipment that comes in contact with groundwater will be decontaminated after sampling of each well using the following procedure:

- The equipment will be rinsed with potable water
- The equipment will be washed with a dilute solution of Alconox and potable water.
- The equipment will be rinsed with potable water to remove the detergent solution.
- The rinseate will be containerized for disposal.

Quality Control Samples

Field quality control samples will be prepared in the same manner as the other investigation samples. The following quality control samples will be collected:

- One matrix spike/matrix spike duplicate (one per 20 samples)
- One trip blank (one per cooler or sampling event)
- One duplicate (one per 20 samples)

Laboratory analyses will be performed by Paradigm Environmental Services, Inc. (Paradigm), which is accredited pursuant to the New York State Department of Health (NYSDOH) Environmental Laboratory Accreditation Program (ELAP) for the category of parameters analyzed. Samples will be analyzed using Analytical Services Protocol (ASP) methodologies with Category B deliverables.

The data will be submitted for third party Data Usability Summary Report (DUSR) evaluation, and will be submitted to the NYSDEC in Electronic Data Deliverable (EDD) format. The EDD will be submitted within 30 days of receipt of the DUSR.

Management of Derived Wastewater

All purged groundwater will be containerized and ultimately characterized and disposed off-site within 90 days of the sampling event.

Sincerely,

Peter S. Morton, P.G., C.P.G.
Project Manager

Figure 1: Proposed Groundwater Samples

- Groundwater Sample Locations
- Well not found, may be present under debris
- LNAPL present
- Historic Monitor Wells (no longer present)

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585-223-3660 p
585-698-1764 f
An MBE/DBE Firm
www.raviveng.com

PROJECT MANAGER: P.M.

MAPPING BY: A.A.

MAP SCALE: 1" = 50'

PROJECT NAME: FORMER JML OPTICAL, INC.
690 PORTLAND AVENUE, ROCHESTER, NEW YORK
BROWNFIELD CLEANUP PROGRAM
NYSDEC SITE #C828151

TITLE: Proposed Groundwater Samples

PROJECT NO: 45-14-003-0B

DATE: March 2020

DRAWING NO: FIGURE 1