

Transmitted via email and U.S. Mail

November 13, 2016

Ms. Charlotte Theobald
Environmental Engineer 1
New York State Department of Environmental Conservation
Department of Environmental Remediation
6274 East Avon Road
Avon, NY 14414

Mr. Mark Sergott
Public Health Specialist II
New York State Department of Health
Bureau of Environmental Exposure Investigation
Empire State Plaza - Corning Tower
Room 1787
Albany, NY 12237

RE: RI Phase IV Work Plan Amendment
Qualitrol Company LLC
BCP Site No.: C828185
Perinton (T), Monroe (C), New York

Dear Ms. Theobald and Mr. Sergott:

With this letter, FPM Remediations, Inc. wishes to amend the Remedial Investigation (RI) Phase IV Work Plan (RI Phase I, II, and III Groundwater Technical Memorandum and Phase IV Work Plan, FPM, November 2017) submitted on November 1, 2017 for Qualitrol Company LLC Brownfields Site No. C828185, with the following additional scopes of work. These activities were proposed during our September 27, 2017 meeting in Avon, New York, and were originally intended to be included in the Phase IV Work Plan.

Groundwater Sampling at Phase III Monitoring Well Installations – Second Event

A second round of groundwater sampling is proposed at the six recently (RI Phase III) installed monitoring wells located along or near Jefferson Avenue. The samples will be collected following the methods in the project Qualitrol Assurance Project Plan (FPM, November 2013) at monitoring wells MW-23, MW-24, MW-25, MW-30, MW-33, and MW-34. The purpose of the sampling is to confirm the presence and/or absence of certain volatile organic compounds (VOCs) in groundwater. These wells have only been sampled once as part of the RI during Phase III activities. As you may recall, monitoring well MW-29 was sampled a second time in July 2017, and does not need to be sampled again as part of the RI.

The samples will be placed in a cooler packed with ice, and transported under chain-of-custody to Paradigm Environmental Services, Inc., Rochester, NY (New York State Department of Health (NELAC) Environmental Analysis/Non-Potable Water #10958). The samples will be analyzed for volatile organic compounds (VOCs) in accordance with USEPA SW-846 Method 8360C. The data will be validated by our project chemist in accordance with the project QAPP, and a Data Usability Summary Report (DUSR, as defined in NYSDEC DER-10) will be prepared and submitted to the NYSDEC and NYSDOH with the laboratory analytical results report.

Natural Attenuation Testing at Monitoring Well MW-29

Groundwater sampling and analysis for natural attenuation parameters is proposed at monitoring well MW-29, located along Jefferson Avenue. The purpose of collecting natural attenuation information at this location is to augment the data sets previously developed for on-site at monitoring wells MW-9, MW-11, MW-12, MW-13 and MW-23 (summarized in the RI Groundwater Technical Memorandum and Phase IV Work Plan). Both sets of data will be used to evaluate the efficacy of natural attenuation as a potential part of the site remedy during the remedial alternatives evaluation. The natural attenuation analyses proposed are:

- Laboratory analysis of total iron (by USEPA Method 6010/3015), total manganese (by USEPA Method 6020/3015), Total Organic Carbon (by USEPA Method 415.1), alkalinity, as CaCO₃ (by USEPA Method 310.2), sulfide (by USEPA Method 378.1), ferrous iron (by Method SM3500), and anions (chloride, nitrate, and sulfate) (by USEPA Method 9056A). The samples will be collected in accordance with the project QAPP, and transported to Paradigm Environmental Services, Inc., Rochester, NY under chain-of-custody.
- Field geochemical parameter testing for dissolved oxygen, temperature, conductivity, pH, and turbidity using a flow-thru cell and using instrumentation specified in the project QAPP.
- Methane, ethene, and ethane (MEE) gas sampling and analysis using summa canisters (carbon dioxide, ethane, ethene, and methane (Method RSK 175/6021) will be conducted by Centek Laboratories, Inc., Syracuse, NY. The summa canisters will be transported to Centek under chain-of-custody for the analysis.
- Microbial Testing by CENSUS (qPCR - CENSUS quantification of *Dehalococcoides*, a key group of dechlorinating bacteria). Groundwater samples will be shipped by overnight courier to Microbial Insights, Inc., Oakridge, TN, for the analysis.

Groundwater samples will be collected in accordance with the project QAPP, and transported to Paradigm Environmental Services, Inc., Rochester, NY and Microbial Insights under chain-of-custodies for the laboratory analyses.

Letter to NYSDEC and NYSDOH
Re: Amendment to the RI Phase IV Work Plan
November 13, 2017
Page 3

The laboratory analytical data will be validated, and the results will be presented in DUSRs which will be forwarded to NYSDEC and NYSDOH with the laboratory results.

Installations of Two Monitoring Wells at Jefferson Park Senior Apartments Property

Once an access agreement has been granted by the property owner, FPM will undertake a modified scope of work that was called for in Phase III of the RI, and install two monitoring wells (identified as MW-26 and MW-27, and depicted on Figures 6 and 7 of the Remedial Investigation (RI) Phase IV Work Plan. Originally, FPM had proposed three wells to be installed at this property, but, as discussed with NYSDEC and NYSDOH, the third well originally proposed to be installed near Jefferson Avenue was replaced with monitoring well MW-33, which was installed along Jefferson Avenue during RI Phase III activities.

The two Jefferson Park monitoring wells will be installed following the methods specified in the project QAPP, using similar materials used for the other site wells. The 10-foot well screens will be set at the same elevations as on-site monitoring well MW-16 (409.05 to 419.05 feet above sea level).

Groundwater samples from the two wells will be sampled for VOCs (USEPA Method 8260C), SVOCs (USEPA Method 8270D), polychlorinated biphenyls (PCBs) and pesticides (USEPA Methods 8012A/8010), and TAL Metals (USEPA Methods 6010C and 7471B).

Groundwater samples will be collected in accordance with the project QAPP, and transported to Paradigm Environmental Services, Inc., Rochester, NY for the analysis under chain-of-custody.

The data will be validated, and the results will be presented in the DUSR which will be forwarded to NYSDEC and NYSDOH with the laboratory results.

Schedule for the Additional Scope of Work

The additional scope of work will be conducted within 60 days of NYSDEC approval.

If you have any questions, please contact Ms. Virginia (Ginny) Murn at Qualitrol (vmurn@qualitrolcorp.com, 585-643-3659) or me (s.saroff@fpm-remediations.com, Inc., 315-336-7721, Ext. 251).

Sincerely,
FPM Remediations, Inc.



Scott Saroff, CPG, PG (NY #329)
Project Manager/Principal Hydrogeologist

Letter to NYSDEC and NYSDOH
Re: Amendment to the RI Phase IV Work Plan
November 13, 2017
Page 4

Cc: Justin Deming, NYSDOH Region Chief
Jim Niederst, Qualitrol Company LLC
Virginia Murn, Qualitrol Company LLC
Jeff Kiggins, FPM Remediations, Inc.
Margaret Milman-Barris, FPM Remediations, Inc.
Ellie Cook, FPM Remediations, Inc.