January 14, 2019

Ms. Charlotte Theobald
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414

RE: Remedial Investigation Work Plan Amendment
Former Sherwood Shoe Company: C828201
625 South Goodman Street
Rochester, New York

Dear Ms. Theobald:

LaBella Associates, D.P.C. (LaBella) is submitting this amendment letter to the New York State Department of Environmental Conservation (NYSDEC) on behalf of Highland Grove, LLC. This letter describes a proposed amendment to the Remedial Investigation Work Plan (RIWP) approved by the NYSDEC on May 20, 2018, for the Former Sherwood Shoe Company Brownfield Cleanup Program facility (C828201) located at 625 South Goodman Street, Rochester, New York.

The remedial investigation has been completed in accordance with the RIWP. However, based on the recent discovery of elevated concentrations of tetrachloroethene (PCE) in soil, an additional Remedial Investigation (RI) task is proposed as described below.

Supplemental Subsurface Evaluation: As part of the ongoing development of the Site, soils were excavated to approximately 5-feet (ft) below ground surface (bgs) in the northwestern portion of the Site within the vicinity of monitoring well MW-04 to create a space to install footers for the foundation of the future parking garage. This work is being completed in accordance with the NYSDEC-approved Interim Site Management Plan (ISMP). In addition, MW-04 was decommissioned and removed during soil excavation in this area. The excavated soil was stockpiled and sampled. The pile was between 100-200 cubic yards (cy). In accordance with DER-10, three discrete samples were collected from the stockpile for VOC analysis designated as 625-1-11, 625-2-11 and 625-3-11 and a composite sample designated as 625-4-11 was collected for analysis of SVOCs, metals, PCBS, and pesticides. PCE was detected above NYCRR Part 375-6.8(a) Unrestricted Use SCOs, Part 375-6.8(b) Protection of Groundwater SCOs and NYSDEC DER-10 Appendix 5: Allowable Constituent Levels for Imported Fill or Soil – Restricted Residential Use. The concentration of PCE (6.2 ppm) remained below the NYCRR Part 375-6.8(b) Restricted Residential Use SCO of 19 ppm. Results of samples collected from the stockpile of soils excavated in the northwestern portion of the Site are provided on the attachment Table A.

Soil and groundwater samples were collected and analyzed for VOCs within the footprint and in the vicinity of the soil that was excavated on December 11, 2018. These samples were collected during the RI fieldwork in the summer of 2018 or during the pre-BCP Phase II ESA in 2016. The following samples were collected from this area:

- SS-07 (soil; 2-6-inches bgs) – CVOCs were not detected above laboratory method detection limits (MDLs).
- SS-07 (soil; 12-24-inches bgs) – CVOCs were not detected above laboratory method detection limits (MDLs).
- RIGP-08 (soil; 18-ft bgs) – PCE was detected at a concentration of 0.045 mg/kg, below the NYCRR Part 375 Unrestricted Use and Protection of Groundwater SCOs of 1.3 mg/kg. No other CVOCs detected above laboratory MDLs.
- TP-C* (soil; 3.5-ft bgs) – PCE was detected at a laboratory estimated value of 0.00081 mg/kg. No other CVOCs were detected above laboratory MDLs.
- B-8-S1* (soil; 5-6-ft bgs) – No CVOCs were detected above laboratory MDLs.
- B-8-S2* (soil; 14-14.5-ft bgs) – No CVOCs were detected above laboratory MDLs.
- MW-04 (overburden groundwater) – PCE was detected at a concentration of 17 µg/L, above the NYCRR Part 703 Groundwater standard of 5 µg/L. No other CVOCs were detected above groundwater standards.
- RIBW-01 (bedrock groundwater) – No CVOCs detected above NYCRR Part 703 Groundwater standards.

As a result of the elevated concentration of PCE in soil excavated in the northwestern portion of the Site, LaBella proposes the completion of five (5) additional soil borings in this area to assess for chlorinated solvents and whether higher concentrations or a source exist in the area. At least one (1) VOC sample will be collected from each of the (5) five soil borings. In addition, one (1) MS/MSD and duplicate sample will also be collected for quality assurance/quality control (QA/QC). Samples will be selected based on evidence of impairment including odors, staining, and photoionization detector (PID) readings. A PID capable of measuring volatilization in the parts per billion (PPB) range will be utilized. Attached Figure A depicts the approximate location of where soils containing the elevated concentrations of CVOCs were excavated as well as the proposed boring locations. Borings will be advanced until equipment refusal or at the discretion of the project geologist/engineer.

Reinstallation of well MW-04: Well MW-04 was located within the footprint of the new parking garage and therefore was decommissioned and removed during Site development as previously discussed with the NYSDEC. Sample results from this well prior to decommissioning and removal indicated the presence of PCE in groundwater at a concentration of 17 ppb. As such, LaBella proposes reinstalling well MW-04 to the northwest of the original location just outside of the building footprint as depicted in Figure A. The well construction log for MW-04 is also attached. The well is proposed to be installed to the top of bedrock which is approximately 18.4-ft bgs and to be constructed of 2-inch diameter well screen 5-ft in length connected to an appropriate length of solid 2-inch diameter PVC well riser to complete the well. The annulus will be sand packed with quartz sand to a nominal depth of 1 to 2-ft above the screened section. A bentonite seal will be placed above the sand pack to several inches below the ground surface. The well will be completed with a flush-mounted curb box or protective steel standpipe with cap.

During completion of borings and the well installation, LaBella personnel will be on-Site to screen soils for evidence of impairment, log soils and complete the Community Air Monitoring Program (CAMP) in accordance with the RIWP.

As always, please do not hesitate to contact me with any question, comments or concerns.

Respectfully submitted,

LaBella Associates

Jennifer M. Gillen
Brownfield Remediation Program Manager

LaBella
Powered by partnership.

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W E
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0 20 40
Feet
1 inch = 20 feet

INTENDED TO PRINT AS: ANSI D

PROJECT:

RIWP Amendment
Former Sherwood Shoe Company
625 South Goodman Street
Rochester, New York

DRAWING NAME:

Supplemental Investigation Locations

PROJECT/DRAWING NUMBER:

2172056

FIGURE A

Path: I:\Highland Grove LLC\2172056 - Karges & Uhlen Place BCP App\Drawings\RIWP Ammendment Figure A.mxd

Table A
Remedial Investigation Work Plan Amendment
Former Sherwood Shoe Factory, NYSDEC BCP #828201
625 South Goodman Street, Rochester, New York
Summary of Detected Compounds in Soil - Discrete Samples
LaBella Project #2172056

Sample ID	NYCRR Part 375-6.8(a) Unrestricted Use Soil Cleanup Objectives	NYCRR Part 375-6.8(a) Restricted Residential Use Soil Cleanup Objectives	NYSDEC DER-10 Appendix 5: Allowable Constituent Levels for Imported Fill or Soil - Restricted Residential Use	625-1-11		625-2-11		625-3-11	
Sample Type				Discrete		Discrete		Discrete	
Sample Date				12/11/2018		12/11/2018		12/11/2018	
Volatile Organic Compounds				Result	Qualifier	Result	Qualifier	Result	Qualifier
1,1,1-Trichloroethane	0.68	100	0.68	0.0006	U	0.036	U	0.00096	U
1,1,2,2-Tetrachloroethane	NL	NL	NL	0.0006	U	0.036	U	0.00096	U
1,1,2-Trichloroethane	NL	NL	NL	0.0012	U	0.072	U	0.0019	U
1,1-Dichloroethane	0.27	26	0.27	0.0012	U	0.072	U	0.0019	U
1,1-Dichloroethene	0.33	100	0.33	0.0012	U	0.072	U	0.0019	U
1,2,3-Trichlorobenzene	NL	NL	NL	0.0024	U	0.14	U	0.0038	U
1,2,4-Trichlorobenzene	NL	NL	NL	0.0024	U	0.14	U	0.0038	U
1,2-Dibromo-3-chloropropane	NL	NL	NL	0.0036	U	0.22	U	0.0058	U
1,2-Dibromoethane	NL	NL	NL	0.0012	U	0.072	U	0.0019	U
1,2-Dichlorobenzene	1.1	100	1.1	0.0024	U	0.14	U	0.0038	U
1,2-Dichloroethane	0.02	3.1	0.02	0.0012	U	0.072	U	0.0019	U
1,2-Dichloropropane	NL	NL	NL	0.0012	U	0.072	U	0.0019	U
1,3-Dichlorobenzene	2.4	49	2.4	0.0024	U	0.14	U	0.0038	U
1,4-Dichlorobenzene	1.8	13	1.8	0.0024	U	0.14	U	0.0038	U
1,4-Dioxane	0.1	13	0.1	0.12	U	7.2	U	0.19	U
2-Butanone	0.12	100	0.12	0.003	J	0.72	U	0.019	U
2-Hexanone	NL	NL	NL	0.012	U	0.72	U	0.019	U
4-Methyl-2-pentanone	1.0[(A)]	1.0[(A)]	1.0[(A)]	0.012	U	0.72	U	0.019	U
Acetone	0.05	100	0.05	0.037		0.72	U	0.02	
Benzene	0.06	4.8	0.06	0.0006	U	0.036	U	0.00096	U
Bromochloromethane	NL	NL	NL	0.0024	U	0.14	U	0.0038	U
Bromodichloromethane	NL	NL	NL	0.0006	U	0.036	U	0.00096	U
Bromoform	NL	NL	NL	0.0048	U	0.29	U	0.0077	U
Bromomethane	NL	NL	NL	0.0024	U	0.14	U	0.0038	U
Carbon disulfide	NL	NL	NL	0.012	U	0.72	U	0.019	U
Carbon tetrachloride	0.76	2.4	0.76	0.0012	U	0.072	U	0.0019	U
Chlorobenzene	1.1	100	1.1	0.0006	U	0.036	U	0.00096	U
Chloroethane	1.9[(A)]	1.9[(A)]	1.9[(A)]	0.0024	U	0.14	U	0.0038	U
Chloroform	0.37	49	0.37	0.0018	U	0.11	U	0.0029	U
Chloromethane	NL	NL	NL	0.0048	U	0.29	U	0.0077	U
cis-1,2-Dichloroethene	0.25	100	0.25	0.0012	U	0.072	U	0.0019	U
cis-1,3-Dichloropropene	NL	NL	NL	0.0006	U	0.036	U	0.00096	U
Cyclohexane	NL	NL	NL	0.012	U	0.05	J	0.019	U
Dibromochloromethane	NL	NL	NL	0.0012	U	0.072	U	0.0019	U
Dichlorodifluoromethane	NL	NL	NL	0.012	U	0.72	U	0.019	U
Ethylbenzene	1	41	1	0.0012	U	0.072	U	0.0019	U
Freon-113	NL	NL	NL	0.0048	U	0.29	U	0.0077	U
Isopropylbenzene	2.3[(A)]	100[(A)]	100[(A)]	0.0012	U	0.072	U	0.0019	U
Methyl Acetate	NL	NL	NL	0.0048	U	0.12	J	0.0077	U
Methyl cyclohexane	NL	NL	NL	0.0048	U	0.11	J	0.0077	U
Methyl tert butyl ether	0.93	100	0.93	0.0024	U	0.14	U	0.0038	U
Methylene chloride	0.05	100	0.05	0.006	U	0.36	U	0.0096	U
o-Xylene	0.26	100	1.6	0.0012	U	0.072	U	0.0019	U
p/m-Xylene				0.0024	U	0.14	U	0.0038	U
Styrene	300[(A)]	300[(A)]	300[(A)]	0.0012	U	0.072	U	0.0019	U
Tetrachloroethene	1.3	19	1.3	0.028		**6.2**		0.027	
Toluene	0.7	100	0.7	0.0012	U	0.072	U	0.0019	U
trans-1,2-Dichloroethene	0.19	100	0.19	0.0018	U	0.11	U	0.0029	U
trans-1,3-Dichloropropene	NL	NL	NL	0.0012	U	0.072	U	0.0019	U
Trichloroethene	0.47	21	0.47	0.00026	J	0.042		0.00037	J
Trichlorofluoromethane	NL	NL	NL	0.0048	U	0.29	U	0.0077	U
Vinyl chloride	0.02	0.9	0.02	0.0012	U	0.072	U	0.0019	U

NOTES:

All values displayed in milligrams per kilograms (mg/kg) or parts per million (ppm)

"U" - Indicates compound was not detected above the listed laboratory method detection limit (MDL).

Bold value indicates that the compound was detected at a concentration above NYCRR Part 375-6.8(a) Unrestricted Use SCOs

Yellow highlight indicates that the compound was detected at a concentration above its respective NYSDEC DER-10 value.

<u>Underlined</u> value indicates that the compound was detected at a concentration above NYCRR Part 375-6.8(b) Restricted Residential Use SCOs

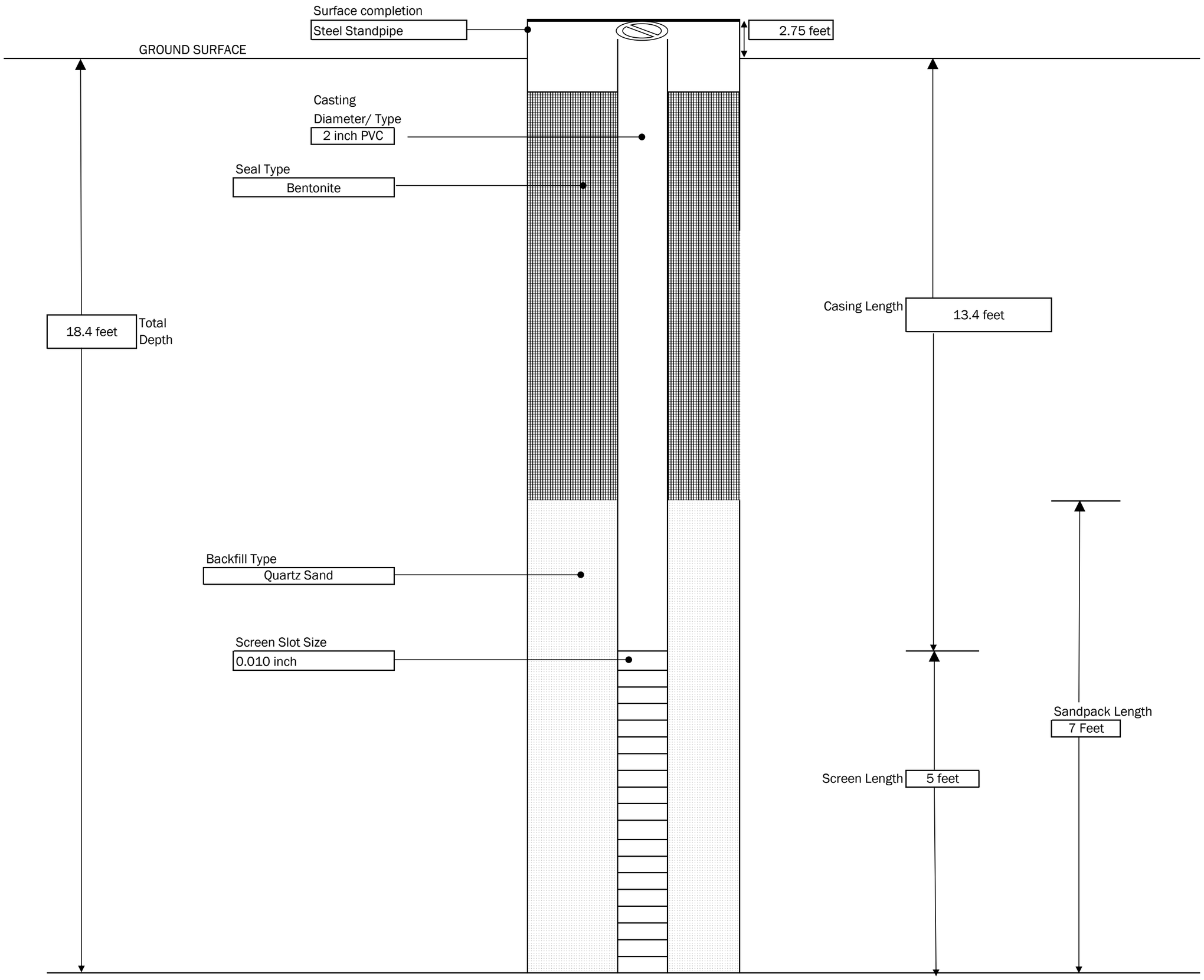
VOCs analyzed by USEPA Method 8260

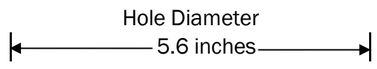
[(A)]indicates no NYCRR Part 375 or NYSDEC DER-10 value for this compound. NYSDEC CP-51 SSCO used.

NL indicates not listed

LaBella Powered by partnership. 300 STATE STREET, ROCHESTER, NEW YORK ENVIRONMENTAL ENGINEERING CONSULTANTS	**PROJECT** Remedial Investigation Former Sherwood Shoe Company 625 South Goodman, Rochester, New York Client: Highland Grove LLC	**MONITORING WELL :** MW-04 **SHEET** 1 OF 1 **JOB #** 2172056

CONTRACTOR:	LaBella Environmental LLC	BORING LOCATION:	RIGP-08		TYPE OF DRILL RIG:	Geoprobe 6610
DRILLER:	M.Pepe	GROUND SURFACE ELEVATION:	510.24	DATUM: North American 1983	AUGER SIZE AND TYPE:	2.25-in Hollow Stem
LABELLA REPRESENTATIVE: J. Lanz		START DATE:	6/5/18	END DATE: 6/5/18	OVERBURDEN SAMPLING METHOD:	Split spoon





GENERAL NOTES:

1) NOT TO SCALE
2) DEPTHS ARE APPROXIMATE