NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8
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October 14, 2020

Steve DiMarzo
Highland Grove LLC
301 Exchange Street
Rochester, New York 14608

Re: SPLP PFAS Sampling Work Plan
Former Sherwood Shoe Company
Site No.: C828201
City of Rochester, Monroe (C)

Dear Mr. DiMarzo:

The New York State Department of Environmental Conservation (Department) in conjunction with the New York State Department of Health (NYSDOH) (collectively known as the State) have completed a review of the August 5, 2020 SPLP PFAS Sampling Work Plan (Work Plan) submitted for the Former Sherwood Shoe Company site (Site) located at 625 South Goodman Street, City of Rochester.

The August 2020 SPLP sampling completed was not conducted under a State approved work plan as detailed in the Applicant's Brownfield Cleanup Agreement (BCA). This is a violation of the BCA and can be viewed as grounds for the Department to terminate the BCA[1]. With that said, the Department is looking to ensure that the cover system material located at the Brownfield Cleanup Program site protective of human health and the environment. In order for the State to make a determination, the additional sampling presented below will provide sufficient data to evaluate and make a determination that the cover system is protective.

Based on the information presented in the Work Plan, the Department is conditionally approving the Work Plan with the following modifications and clarifications.

1. It is stated in the Work Plan that during the RI and redevelopment work that PFAS guidance for acceptable soil concentrations were not available. The Department's position on PFOA and PFOS in site cover was clearly stated in an e-mail dated November 5, 2018 *"If sampling indicates PFOA and PFOS impacts in the soil/fill material and is not deemed grossly contaminated as per Part 375, then that soil/fill material can either be disposed off-site at a permitted landfill facility or placed under site cover."* See attached document.

2. The Work Plan indicates that guidance on acceptable soil concentrations was not available. This is not accurate. There was emergent contaminant guidance at the start of the site in the BCP, though the Department acknowledges that the guidance has evolved during the course of the site in the BCP.

[1] *BCA, App. A (II)(B)(2)(i)(emphasis added)*

3. The Work Plan does not contain the certification language as per DER-10 1.5(a), 1.5(b) and DER-10 Table 1.5. The certification language with appropriate signatory must be submitted to the Department prior to conducting any fieldwork activities associated with the SPLP sampling. NOTE: All work plans submitted to the Department must contain the appropriate certification language in order to be deemed complete by the Department.

4. Section 2.0: It is indicated in this section that DER-10 Table 5.4(e)10 is being used for the basis of SPLP sampling at the Site. DER-10 Table 5.4(e)10 is not applicable guidance for sampling material that has already been placed at a site.

   The reason that this table does not apply is because the previous site cover assessment using the August 2017 Soil Screening Guidance was conducted during the remedial investigation and prior to the redevelopment of the Site. During Site redevelopment, a significant amount of disturbance in the 0 - 2 foot occurred and large volumes of soil/fill material were excavated, stockpiled, and relocated on the Site.

   In reviewing the Soil Screening Guidance document and taking into consideration the sampling completed during August 2020, the Department is requiring the following additional soil samples be collected for SPLP sampling:
   - Greenspace A: 1 composite sample collected from 16 to 24-inch interval. The composite sample will be a soil collected from 4 to 5 locations within Greenspace A.
   - Greenspace B: 3 composite samples collected. 1 composite will be from the 8 to 12-inch interval. 2 composites will be from the 12 to 24-inch interval. Each composite sample will be soil that is collected from 4 to 5 locations within that depth interval.

   The SPLP testing must show that the Site soils does not exceed 70 ppt for either PFOA or PFOS (individually). If sampling indicates an exceedance of 70 ppt then additional remedial measures will need to be taken to address the contamination.

5. Section 3.0: It is stated in the Work Plan that it is assumed that all other greenspace areas at the Site which received 2 feet of clean imported cover material and areas with impervious surfaces are exempt from additional SPLP sampling. All areas of the Site where on-site native soil/fill material and imported fill material that has been used within the 0 to 2-foot interval of the cover system will be exempt from any additional SPLP sampling as long as the validated analytical data for that soil/fill material does not have PFOS concentrations above 1 ppb.

   In addition, SPLP sampling will not need to be completed if the impervious areas remain as impervious areas. The Department understands that if the impervious cover system areas are removed and not replaced in kind then 2 feet of Department approved cover material is placed to maintain the Site's cover system.

6. The sampling procedures and protocols will be conducted in accordance with the Department's current PFAS titled "Guidelines for Sampling and Analysis of PFAS Under NYSDEC's Part 375 Remedial Programs, dated January 2020" and any subsequent updates.

7. The Department understands that as long as hand tools are being used as described in the approved Work Plan then the Special CAMP will not be implemented. If the sampling tools/methodology is changed from what is presented in the approved Work Plan, then the Special CAMP will be implemented at the Site as the apartment complex building is occupied with tenants.

8. The environmental data generated at the Site will be submitted in an electronic data deliverable that complies with the Department's current electronic document standards.

9. The Site's Final Engineering Report will document all remedial actions undertaken at the Site and documents the implementation of the completed remedial program. The State understands that the Final Engineering Report will document all remedy implementation activities completed at the Site including all SPLP sampling with all supporting documentation including data usability summary reports.

   The Department requests that a revised Final Engineering Report be submitted to the Department so that review can begin on document. The Final Engineering Report must be developed in accordance with DER-10 Section 5.8 and must developed using the current version of the Final Engineering Report template located on the Department's public website. Any additional environmental sampling data or changes to the Site prior to issuance of the Certificate of Completion will need to be addressed in future updates to the Final Engineering Report.

10. Please note that 7 days advance notice must be provided to the Department so that appropriate oversight of the sampling activities and fieldwork activities can be arranged.

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

- Option A: Accept the Department 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 accepted SPLP Sampling Work Plan. Also, if Option A is chosen then a copy of the accepted SPLP Sampling Work Plan along with this letter attached must be placed in the document repository. A copy of the accepted SPLP Sampling Work Plan along with this letter attached must be placed in the document repository within 1 week of the date of this letter. Please provide notification to the Department that the SPLP Sampling Work Plan and a copy of this letter have been placed in the document repository (electronic notification is acceptable).

If you have any questions or concerns regarding this letter, the BCP requirements, 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:
Jennifer Gillen (LaBella)
Alexander Brett (LaBella)
Dan Noll (LaBella)
Ron Hull (Heisman Nunes & Hull LLP)

Justin Deming (NYS. Dept. of Health – Albany)
Daniel Tucholski (NYS Dept. of Health - Albany)
Wendy Kuehner (NYS Dept. of Health - Albany)
John Frazer (Monroe County Health Department)
Dusty Tinsley (NYSDEC)
David Pratt (NYSDEC)
Todd Caffoe (NYSDEC)

Subject: RE: C828201 - Former Sherwood Shoe - Well Decommissioning
Date: Monday, November 5, 2018 at 3:55:21 PM Eastern Standard Time
From: Theobald, Charlotte B (DEC)
To: Gillen, Jennifer
CC: sdimarzo@MARKIVENTERPRISES.com, Marrash, Mike, Caffoe, Todd (DEC)
Attachments: image001.png

Jen:

I have reviewed your November 2, 2018 submittal for the decommissioning of groundwater monitoring wells at the Former Sherwood Shoe Company (C828201) site. The decommissioning of the groundwater monitoring wells can proceed with the following modification/clarification:

1. If upon review and evaluation of the site's Remedial Investigation Report the Department concludes that any of the proposed decommissioned groundwater monitoring well(s) are to be a component of the groundwater monitoring network the groundwater monitoring well(s) will be re-installed at the site in a location that accommodates the proposed development of the site.

With respect to the re-use of on-site soil/fill material for cover and to establish grade, the Department has the following points will need to be addressed at the site:

1. With the known impacts of PFOAs and PFOS at the site in the soil/fill material, any soil/fill material will need to be sampled for PFOAs and PFOS along with the full suite of analytical parameters. The sampling frequency will be in accordance with DER-10.
2. If sampling indicates PFOA and PFOS impacts in the soil/fill material and is not deemed grossly contaminated as per Part 375, then that soil/fill material can either be disposed off-site at a permitted landfill facility or placed under site cover. The Department understands that the site is attempting a Track 4 Restricted Residential use; therefore, cover at the site will be as follows:
   - A site cover will be required to allow for restricted residential use of the site in areas where the upper two feet of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). Where a soil cover is to be used it will be a minimum of two feet of soil placed over a demarcation layer, with the upper six inches of soil of sufficient quality to maintain a vegetative layer. Soil cover material, including any fill material brought to the site, will meet the SCOs for cover material for the use of the site as set forth in 6 NYCRR Part 375-6.7(d). Substitution of other materials and components may be allowed where such components already exist or are a component of the tangible property to be placed as part of site redevelopment. Such components may include, but are not necessarily limited to: pavement, concrete, paved surface parking areas, sidewalks, building foundations and building slabs.
3. All placement of PFOA and PFOS impacted soil/fill material must be documented on site figures and in appropriate site documents.
4. The soil/fill material analytical data will be submitted to the Department for evaluation and approval prior to final placement at the site.
5. All soil/fill material management will be in accordance with site's ISMP and Department regulations and guidance documents.

If you have any questions or concerns or need further assistance with the site, please feel free to contact me at 585-226-5354 or via e-mail.

Best Regards,

Charlotte

From: Gillen, Jennifer <jgillen@LaBellaPC.com>
Sent: Friday, November 02, 2018 10:02 AM
To: Theobald, Charlotte B (DEC) <charlotte.theobald@dec.ny.gov>
Cc: sdimarzo@MARKIVENTERPRISES.com; Marrash, Mike <MMarrash@LaBellaPC.com>
Subject: C828201 - Former Sherwood Shoe - Well Decommissioning

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Hi Charlotte,

Please find attached a brief plan describing proposed well decommissioning at the Former Sherwood Shoe BCP Site. This is the plan I referenced in the VMs I left you earlier this week. Based on the construction work that is ramping up at the Site, at this time we'd like to decommission wells that were previously dry and could not be sampled. The work plan describes this in more detail.

Will you also please give me a call when you have a chance? We did receive official approval from Seneca Meadows for the soil disposal and will start shipping that soil on Monday. I wanted to talk that through with you and also discuss potential topsoil placement on the northeastern portion of the Site in the near future to both create an adequate cover system and also for redevelopment purposes.

I'll be out of the office this afternoon and Monday but you can reach me on my cell phone at 315-402-6480.

Thanks,
Jen

Jennifer Gillen, PG
LaBella Associates | Brownfield & Phase II Program Manager

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300 State Street, Suite 201
Rochester, NY 14614
labellapc.com

August 5, 2020

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

RE: SPLP PFAS Sampling Work Plan
Former Sherwood Shoe Company: C828201
625 South Goodman Street
Rochester, New York

Dear Ms. Theobald:

LaBella Associates, D.P.C. (LaBella) is submitting this letter work plan to the New York State Department of Environmental Conservation (NYSDEC) on behalf of Highland Grove, LLC. This letter describes the proposed work plan for collection of soil samples for Synthetic Precipitation Leaching Procedure (SPLP) per-and polyfluoroalkyl substances (PFAS) analysis for the Former Sherwood Shoe Company Brownfield Cleanup Program facility (C828201) located at 625 South Goodman Street, Rochester, New York hereinafter referred to as the "Site". NYSDEC requested this sampling in a June 8, 2020 conditional approval letter commenting on the November 2019 Remedial Action Work Plan (RAWP).

1.0 PROJECT BACKGROUND

The Site is located in the City of Rochester, County of Monroe, New York and is comprised of one parcel totaling approximately 1.798 acres. The Site was redeveloped under an Interim Site Management Plan (ISMP) and the redevelopment included placing asphalt pavement and a building which act as a cover material at the Site; however, there are some greenspace areas that are also present at the Site. At the time of the Remedial Investigation (RI) some surface soil sampling was conducted that identified PFAS above 1 part per billion (ppb). At the time of the RI and the redevelopment work, PFAS guidance on acceptable soil concentrations was not available. In January 2020 (after redevelopment), NYSDEC issued a PFAS guidance document that indicated a requirement for imported soils to contain less than 1 ppb of PFOA or PFOS. Based on soil sampling of the top 2-ft of soils completed during the RI, a portion of the greenspace, located just north of the Site building, may contain some PFOA and/or PFOS at concentrations greater than 1 ppb. Based on the NYSDEC January 2020 PFAS guidance, NYSDEC requested that additional samples be completed for PFAS subsequent to a SPLP to determine if the soil leaches PFOA or PFOS at concentrations of concern.

Northern Greenspace A

No PFAS soil testing was completed in the general area of Northern Greenspace A during the RI given that PFAS testing at the time was focused on areas that appeared to be potentially associated with Rochester Fire Department training activities that may have included the use of alchohol resistant aqueous film forming foam (AR-AFFF). The specific materials sprayed on the Site on July 12, 2018 are indicated in the RI. Based on the lack of testing in Northern Greenspace A and that existing soils are anticipated to a component of the final cover system SPLP testing in this greenspace was

requested by the NSYDEC. One foot (i.e., 12-inches) of soil in Northern Greenspace A was removed during Site development and documented in the March 2020 Construction Completion Report (CCR). As part of the Site remedy at least 12-inches of clean imported soil and 4-inches of crushed stone (CR-2) was placed on Northern Greenspace A. As such, approximately 8-inches of the existing soil remains in the top 2-ft in Northern Greenspace A following the addition of at least 16-inches of clean imported materials (i.e., the 18 to 24-in depth interval from the current grade includes the soil existing following remedial work).

Northern Greenspace B

During the RI, PFOA was detected in TP-01 (0-1 ft bgs) and TP-02 (0-1-ft bgs) at concentrations of 3.4 ppb and 1.6 ppb, respectively. Both TP-01 and TP-02 were located in the general Northern Greenspace B area; however the locations are currently covered with impervious surfaces. TP-03 is also located in Northern Greenspace B but did not exhibit concentrations of PFOA or PFOS over 1 ppb. Two inches of soil in Northern Greenspace B was removed during Site development and documented in the CCR. As part of the Site remedy at least 6-inches of soil and 2-inches of CR-2 was placed on Northern Greenspace B. As such, 16-inches of existing soil remain in the top 2-ft (i.e., the 8 to 24-in depth interval from current grade includes the soil existing following remedial work).

Refer to Figure 1 for locations of greenspace areas and nearby PFAS analytical data described above. Note that PFAS data from RI display depths prior to any soil removal related to Site development activities and prior to addition of any imported clean cover. Refer to Figure 2 for soil removal depths during Site development in greenspace areas. Additionally, refer to Figure 3 for soil cover placed that is to be considered part of the Site cover system.

It should be noted that during Site development 2-ft of soil were removed from Northern Greenspace C and over 2-ft of clean imported materials were placed in this area as part of the final cover system. Considering that no existing soil remains in the top 2-ft of Northern Greenspace C, it has been excluded from additional testing. The below sampling and analysis plan describes procedures to address the NYSDECs request for SPLP PFAS analysis of existing soils in greenspace areas.

2.0 SAMPLING AND ANALYTICAL PLAN

Soil samples for SPLP PFAS testing will be collected in accordance with the NYSDEC Guidelines for Sampling and Analysis of PFAS as required by the June 8, 2020 conditional approval letter for the Former Sherwood Shoe Company November 2019 RAWP. The soil samples will be collected from greenspace areas designated as Northern Green Space A and Northern Green Space B. Based on the total clean imported cover material placed in the greenspace areas, 8-inches and 16-inches of existing soil remain in the top 2-ft in Northern Greenspace A and B, respectively. Northern Greenspace A is approximately 3,039 square feet (sq-ft) excluding impervious surfaces and Northern Greenspace B is approximately 4,054 sq-ft excluding impervious surfaces. The total volume of soil in these areas that is considered existing soil (excluding clean imported soil) in the top 2-ft is approximately 275 cubic yards (cy).

Based on the total volume of existing soil, one (1) composite soil consisting of three (3) to five (5) discrete sample locations is required for sampling based on DER-10 Table 5.4(e)10 which shows the recommended number of soil samples for soil imported to or exported from a Site. The following describes the method that will be used to collect the soil samples.

- The sod/vegetative material will be removed with a clean steel shovel/trowel. Care will be taken to separate clean cover material from existing soil and the hole will be restored by placing the clean cover soil and sod/vegitative cover back on the surface. The soil sample will be collected using pre-cleaned sampling spoons, a steel shovel without any coatings or a

steel hand auger that is decontaminated between locations to prevent cross-contamination of the samples. Discrete samples will be collected from 3 to 5 locations total. Discrete sample locations will be collected at a depth of 14 to 24-inches below the sod/vegetative material in Northern Greenspace A and a depth of 8 to 24-inches below the sod/vegetative material in Northern Greenspace B

- Discrete samples from each location will be composited in a clean stainless steel bowl by mixing soils with a clean stainless steel spoon. Soils will be mixed until they are homogenized and samples will be collected in clean laboratory supplied sample jars.
- Each soil sample collected for laboratory analysis will be labeled and preserved with regular ice in accordance with the Quality Assurance Project Plan (QAPP) Guidelines for PFAS included as Appendix A in the NYSDEC PFAS Guidance.
- One (1) composite soil will be submitted to a NYSDOH ELAP-certified laboratory and tested for the following parameters:
    - SPLP PFAS using modified EPA method 537.1.
- Laboratory Quality Assurance/Quality Control (QA/QC) sampling will be performed in accordance with Sample Protocols for PFAS in Soils, Sediments and Solids included as Appendix B of the NYSDEC PFAS Guidance. This will include the collection of one (1) duplicate sample and one (1) matrix spike and matrix spike duplicate (MS/MSD). QA/QC sampling is described further below in Section 2.2.
- The analytical test results of the soil samples will be provided in a NYSDEC ASP Category B Deliverables package.
- Due to the limited soil disturbances expected with the sample procedures described, it is assumed that no CAMP monitoring will be required during sampling activities and there will be no investigation derived waste generated.
- A DUSR for the surface soil data will be prepared in accordance with DER-10 Appendix 2B
- Notes/logs will be completed during sampling to document general information and sample specific notes such as visual descriptions/observations, odors, sample equipment, duplicate samples, procedures, sampling time, and any other notes deemed significant

Refer to Figure 4 for proposed sample locations.

2.1 Sample Equipment/Bottleware

Samples will be collected in 8oz high density polyethylene (HDPE) containers with caps that do not include a polytetrafluoroethylene (i.e., Teflon) line. Sampling equipment/bottleware will not come into contact with materials including aluminum foil, low density polyethylene (LPDE), glass or Teflon.

2.3 Field Quality Control

Field quality control samples will be used to assess sample variability and evaluate potential sources of contamination. The types of quality control samples that will be collected during the proposed sampling event are described in this section. There are five (5) wells proposed for emerging contaminant sampling and all these wells will be sampled and shipped in the same day and thus the quality control samples will include: one (1) field duplicate (blind duplicate), and one (1) matrix spike / matrix spike duplicates (MS/MSD). The procedures and rationale for collecting these samples are described below.

- **Field duplicate** – Sample will be used to assess the variability in concentrations of samples

from the same location to the combined effects of sample processing in the field and laboratory as well as chemical analysis. One (1) field duplicate will be collected using laboratory provided bottleware (see above).

- **Matrix spike/matrix spike duplicate** – Sample will be used to provide information about the effect of the sample matrix on the design and measurement methodology used by the laboratory. One (1) MS/MSD sample will be collected using laboratory provided bottleware (see above).

2.3 Sample Packaging and Transport

Sample coolers and packing materials will be supplied by the analytical laboratory. Individual sample jars will be labeled and sealed. Samples will then be packed in a cooler with ice to maintain a temperature of approximately 4°C (±2°C). A chain of custody (COC) will be sent with each shipment. Each cooler will also be sealed with a COC seal. Coolers containing samples for chemical analyses will be transported to the laboratory by courier or overnight shipping service.

2.4 Laboratory Analyses

All soil samples will be submitted to an Environmental Laboratory Accreditation Program (ELAP) certified laboratory via a modified USEPA Method 537 for analysis of SPLP PFAS Analysis. The following twenty-one (21) PFAS listed below will be analyzed for by the laboratory:

Analyte	CAS #
PFOA Perfluorooctanoic acid ($C_8HF_{15}O_2$)	335-67-1
PFOS: Perfluorooctanesulfonic acid ($C_8HF_{17}O_3S$)	1763-23-1
PFNA: Perfluorononanoic acid ($C_9HF_{17}O_2$)	375-95-1
PFHxS: Perfluorohexane sulfonate ($C_6HF_{13}O_3S$)	355-46-4
PFHpA: Perfluoroheptanoic acid ($C_7HF_{13}O_2$)	375-85-9
PFBS: Perfluorobutanesulfonic acid ($C_4HF_9O_3S$)	375-73-5
PFBA: Perfluorobutanoic acid ($C_4HF_7O_2$)	375-22-4
PFPeA: Perfluoropentanoic acid ($C_5HF_9O_2$)	2706-90-3
PFHxA: Perfluorohexanoic acid ($C_6HF_{11}O_2$)	307-24-4
PFDA: Perfluorodecanoic acid ($C_{10}HF_{19}O_2$)	335-76-2
PFUnA: Perfluoroundecanoic acid ($C_{11}HF_{21}O_2$)	2058-94-8
PFDoA: Perfluorododecanoic acid ($C_{12}HF_{23}$)	307-55-1
PFTriA: Perfluorotridecanoic acid ($C_{13}HF_{25}O_2$)	72629-94-8

Analyte	CAS #
PFTeA: Perfluorotetradecanoic acid ($C_{14}HF_{27}O_2$)	376-06-7
PFHps: Perfluoroheptanesulfonic acid ($C_7HF_{15}O_3S$)	375-92-8
PFDS: Perfluoroheptanesulfonic ($C_{10}HF_{21}O_3S$)	335-77-3
PFOSA: Perfluorooctanesulfonamide ($C_8H_2F_{17}NO_2S$)	754-91-6
6:2 FTS: 6:2 Fluorotelomer sulfonate	27619-97-2
8:2 FTS: 8:2 Fluorotelomer sulfonate	39108-34-4
N-MeFOSAA: N-methyl perfluorooctanesulfonamidoacetic acid	2355-31-9
N-EtFOSAA: N-ethyl perfluorooctanesulfonamidoacetic acid	2991-50-6

The laboratory detection limits will be a minimum of 0.002 µg/L (i.e., 2 ng/L) or 2 parts per trillion (2 ppt).

The laboratory will provide an Analytical Services Protocol (ASP) Category B data package and a Data Usability Summary Report (DUSR) will be completed by a third party. Electronic Data deliverables (EDDs) will also be generated by the laboratory in EQUIS™ format for submission to the NSYDEC.

2.5 Decontamination

Decontamination of equipment between samples will be achieved using an Alconox and PFAS-free water solution to initially clean sampling equipment followed by a PFAS-free water rinse. Certified PFAS-free water for decontamination will be obtained from the laboratory.

2.6 Special Sampling Considerations

Because emerging contaminants are found in numerous everyday items, the following special precautions will be taken during all sampling activities:

- No use of Teflon®-containing materials (e.g., Teflon® tubing, bailers, tape, sample jar lid liners, plumbing paste)
- No Tyvek® clothing will be worn onsite
- Clothes treated with stain-resistant or rain-resistant coatings (e.g., Gortex®) will be not be worn on-Site.
- All clothing worn by sampling personnel must have been laundered multiple times. Clothing must not be laundered with fabric softener.
- No Post-It® notes will be brought onsite
- No fast food wrappers, disposable cups or microwave popcorn will be brought on-Site.
- No use of chemical (blue) ice packs will be allowed.
- No use of aluminum foil will be allowed.
- No use of Sharpies®, rather ball point pens will be utilized.

- No use of sunscreen, insect repellants, cosmetic, lotions or moisturizers will be allowed by sampling personnel the day of sampling.
- If any of the above items are handled by the field personnel prior to sampling activities, field personnel will wash their hands thoroughly with soap and water prior to sampling activities.
- Powder-free nitrile gloves will be worn during all sample collection activities.

3.0 ASSUMPTIONS

The following assumptions are made for the proposed scope of work:

- It is assumed that no CAMP activities/monitoring will be required for soil sampling that will be completed as described above due to the limited soil disturbance resulting from hand digging/augering to be utilized for sampling collection.
-
- It is assumed that all other greenspace areas at the Site which received 2-ft of clean imported cover material and areas with impervious surfaces are exempt from additional SPLP Testing.

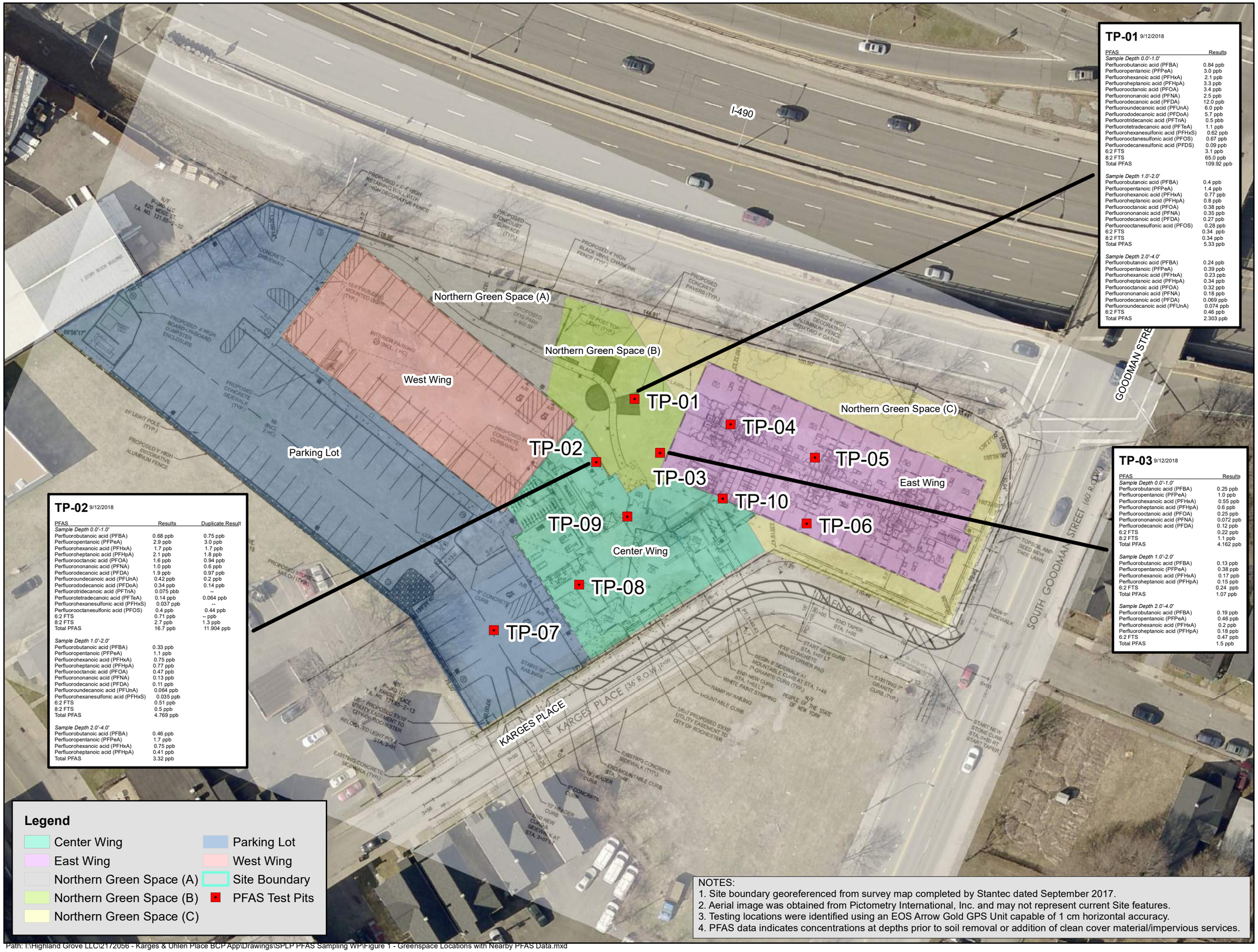
If you have any question regarding this work plan please do not hesitate to contact me at (585) 295-6611.

Respectfully submitted,

LABELLA ASSOCIATES, D.P.C

Daniel P. Noll, P.E.
Project Manager

Attachments
-Figure 1: Greenspace Locations With Nearby PFAS Data
-Figure 2: Soil Removal Depths
-Figure 3: Cover System
-Figure 4: Proposed SPLP PFAS Composite Sampling



TP-01 9/12/2018

PFAS	Results
Sample Depth 0.0'-1.0'	
Perfluorobutanoic acid (PFBA)	0.84 ppb
Perfluoropentanoic (PFPeA)	3.0 ppb
Perfluorohexanoic acid (PFHxA)	2.1 ppb
Perfluoroheptanoic acid (PFHpA)	3.3 ppb
Perfluorooctanoic acid (PFOA)	3.4 ppb
Perfluorononanoic acid (PFNA)	2.5 ppb
Perfluorodecanoic acid (PFDA)	12.0 ppb
Perfluoroundecanoic acid (PFUnA)	6.0 ppb
Perfluorododecanoic acid (PFDoA)	5.7 ppb
Perfluorotridecanoic acid (PFTriA)	0.5 pbb
Perfluorotetradecanoic acid (PFTeA)	1.1 ppb
Perfluorohexanesulfonic acid (PFHxS)	0.62 ppb
Perfluorooctanesulfonic acid (PFOS)	0.67 ppb
Perfluorodecanesulfonic acid (PFDS)	0.09 ppb
6:2 FTS	3.1 ppb
8:2 FTS	65.0 ppb
Total PFAS	109.92 ppb
Sample Depth 1.0'-2.0'	
Perfluorobutanoic acid (PFBA)	0.4 ppb
Perfluoropentanoic (PFPeA)	1.4 ppb
Perfluorohexanoic acid (PFHxA)	0.77 ppb
Perfluoroheptanoic acid (PFHpA)	0.8 ppb
Perfluorooctanoic acid (PFOA)	0.38 ppb
Perfluorononanoic acid (PFNA)	0.35 ppb
Perfluorodecanoic acid (PFDA)	0.27 ppb
Perfluorooctanesulfonic acid (PFOS)	0.28 ppb
6:2 FTS	0.34 ppb
8:2 FTS	0.34 ppb
Total PFAS	5.33 ppb
Sample Depth 2.0'-4.0'	
Perfluorobutanoic acid (PFBA)	0.24 ppb
Perfluoropentanoic (PFPeA)	0.39 ppb
Perfluorohexanoic acid (PFHxA)	0.23 ppb
Perfluoroheptanoic acid (PFHpA)	0.34 ppb
Perfluorooctanoic acid (PFOA)	0.32 ppb
Perfluorononanoic acid (PFNA)	0.18 ppb
Perfluorodecanoic acid (PFDA)	0.069 ppb
Perfluoroundecanoic acid (PFUnA)	0.074 ppb
6:2 FTS	0.46 ppb
Total PFAS	2.303 ppb

TP-02 9/12/2018

PFAS	Results	Duplicate Result
Sample Depth 0.0'-1.0'		
Perfluorobutanoic acid (PFBA)	0.68 ppb	0.75 ppb
Perfluoropentanoic (PFPeA)	2.9 ppb	3.0 ppb
Perfluorohexanoic acid (PFHxA)	1.7 ppb	1.7 ppb
Perfluoroheptanoic acid (PFHpA)	2.1 ppb	1.8 ppb
Perfluorooctanoic acid (PFOA)	1.6 ppb	0.94 ppb
Perfluorononanoic acid (PFNA)	1.0 ppb	0.6 ppb
Perfluorodecanoic acid (PFDA)	1.9 ppb	0.97 ppb
Perfluoroundecanoic acid (PFUnA)	0.42 ppb	0.2 ppb
Perfluorododecanoic acid (PFDoA)	0.34 ppb	0.14 ppb
Perfluorotridecanoic acid (PFTriA)	0.075 ppb	--
Perfluorotetradecanoic acid (PFTeA)	0.14 ppb	0.064 ppb
Perfluorohexanesulfonic acid (PFHxS)	0.037 ppb	--
Perfluorooctanesulfonic acid (PFOS)	0.4 ppb	0.44 ppb
6:2 FTS	0.71 ppb	-- ppb
8:2 FTS	2.7 ppb	1.3 ppb
Total PFAS	16.7 ppb	11.904 ppb
Sample Depth 1.0'-2.0'		
Perfluorobutanoic acid (PFBA)	0.33 ppb	
Perfluoropentanoic (PFPeA)	1.1 ppb	
Perfluorohexanoic acid (PFHxA)	0.75 ppb	
Perfluoroheptanoic acid (PFHpA)	0.77 ppb	
Perfluorooctanoic acid (PFOA)	0.47 ppb	
Perfluorononanoic acid (PFNA)	0.13 ppb	
Perfluorodecanoic acid (PFDA)	0.11 ppb	
Perfluoroundecanoic acid (PFUnA)	0.064 ppb	
Perfluorohexanesulfonic acid (PFHxS)	0.035 ppb	
6:2 FTS	0.51 ppb	
8:2 FTS	0.5 ppb	
Total PFAS	4.769 ppb	
Sample Depth 2.0'-4.0'		
Perfluorobutanoic acid (PFBA)	0.46 ppb	
Perfluoropentanoic (PFPeA)	1.7 ppb	
Perfluorohexanoic acid (PFHxA)	0.75 ppb	
Perfluoroheptanoic acid (PFHpA)	0.41 ppb	
Total PFAS	3.32 ppb	

TP-03 9/12/2018

PFAS	Results
Sample Depth 0.0'-1.0'	
Perfluorobutanoic acid (PFBA)	0.25 ppb
Perfluoropentanoic (PFPeA)	1.0 ppb
Perfluorohexanoic acid (PFHxA)	0.55 ppb
Perfluoroheptanoic acid (PFHpA)	0.6 ppb
Perfluorooctanoic acid (PFOA)	0.25 ppb
Perfluorononanoic acid (PFNA)	0.072 ppb
Perfluorodecanoic acid (PFDA)	0.12 ppb
6:2 FTS	0.22 ppb
8:2 FTS	1.1 ppb
Total PFAS	4.162 ppb
Sample Depth 1.0'-2.0'	
Perfluorobutanoic acid (PFBA)	0.13 ppb
Perfluoropentanoic (PFPeA)	0.38 ppb
Perfluorohexanoic acid (PFHxA)	0.17 ppb
Perfluoroheptanoic acid (PFHpA)	0.15 ppb
6:2 FTS	0.24 ppb
Total PFAS	1.07 ppb
Sample Depth 2.0'-4.0'	
Perfluorobutanoic acid (PFBA)	0.19 ppb
Perfluoropentanoic (PFPeA)	0.46 ppb
Perfluorohexanoic acid (PFHxA)	0.2 ppb
Perfluoroheptanoic acid (PFHpA)	0.18 ppb
6:2 FTS	0.47 ppb
Total PFAS	1.5 ppb

Legend

- Center Wing
- East Wing
- Northern Green Space (A)
- Northern Green Space (B)
- Northern Green Space (C)
- Parking Lot
- West Wing
- Site Boundary
- PFAS Test Pits

NOTES:
1. Site boundary georeferenced from survey map completed by Stantec dated September 2017.
2. Aerial image was obtained from Pictometry International, Inc. and may not represent current Site features.
3. Testing locations were identified using an EOS Arrow Gold GPS Unit capable of 1 cm horizontal accuracy.
4. PFAS data indicates concentrations at depths prior to soil removal or addition of clean cover material/impervious services.

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Feet
1 inch = 50 feet

INTENDED TO PRINT AS: 11" X 17"

PROJECT:
Former Sherwood Shoe Company
625 South Goodman Street
Rochester, New York
C828201

SPLP PFAS SAMPLING WORK PLAN

DRAWING NAME:

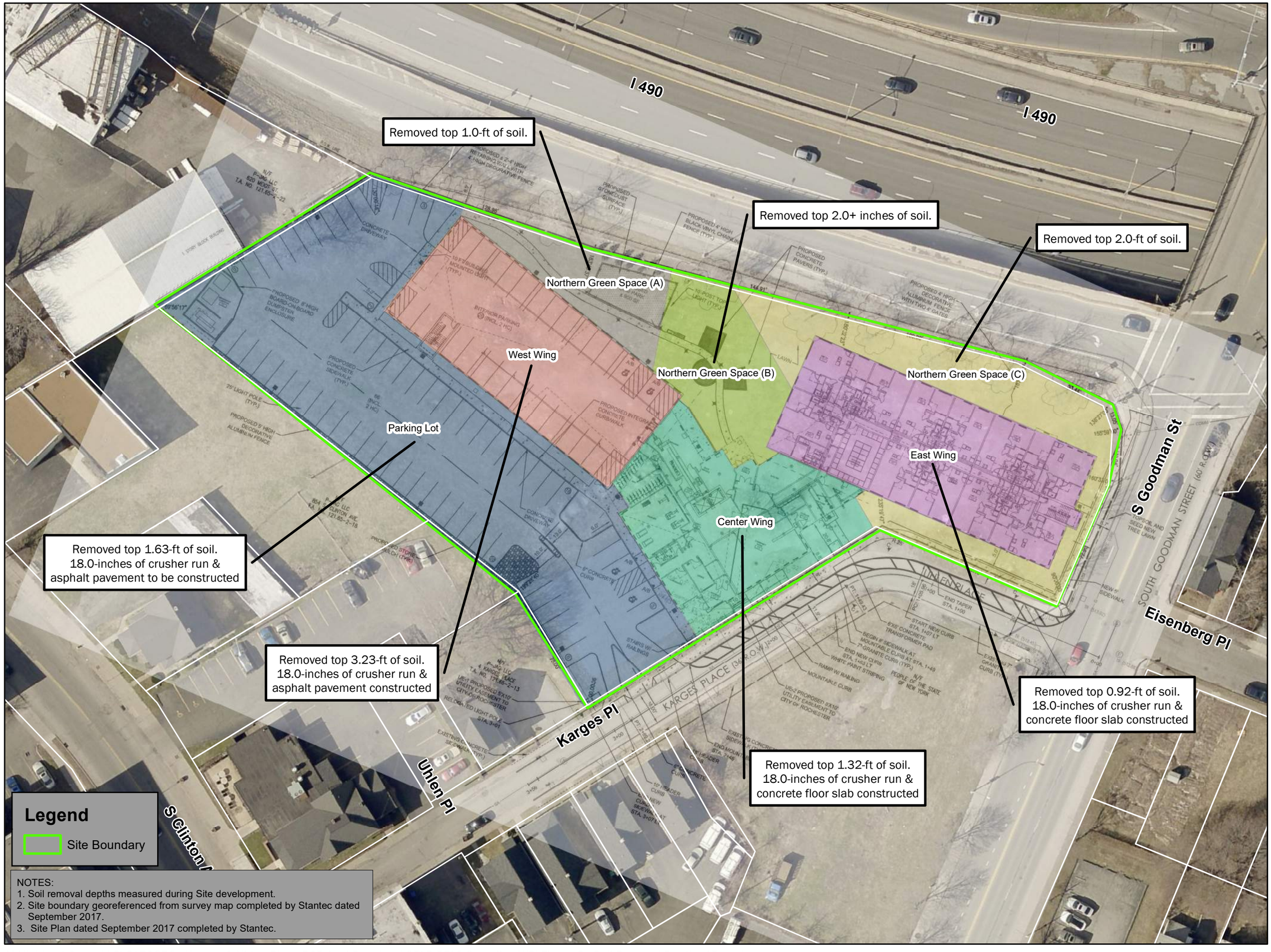
GREENSPACE LOCATIONS WITH NEARBY PFAS DATA

PROJECT/DRAWING NUMBER:

2172056

FIGURE 1

Path: I:\Highland Grove LLC\2172056 - Karges & Uhlen Place BCP App\Drawings\SPLP PFAS Sampling WP\Figure 1 - Greenspace Locations with Nearby PFAS Data.mxd



I:\Highland Grove LLC\2172056 - Karges & Uhlen Place BCP App\Drawings\SPLP PFAS Sampling WP\Figure 2 - Soil Removal Depths AB.mxd

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1 inch = 50 feet
INTENDED TO PRINT AS: 11" X 17"

CLIENT:

HIGHLAND GROVE LLC

PROJECT:

SPLP PFAS SAMPLING
WORK PLAN

FORMER SHERWOOD
SHOE COMPANY
625 SOUTH GOODMAN ST
ROCHESTER, NEW YORK

NYSDEC BCP #C828201

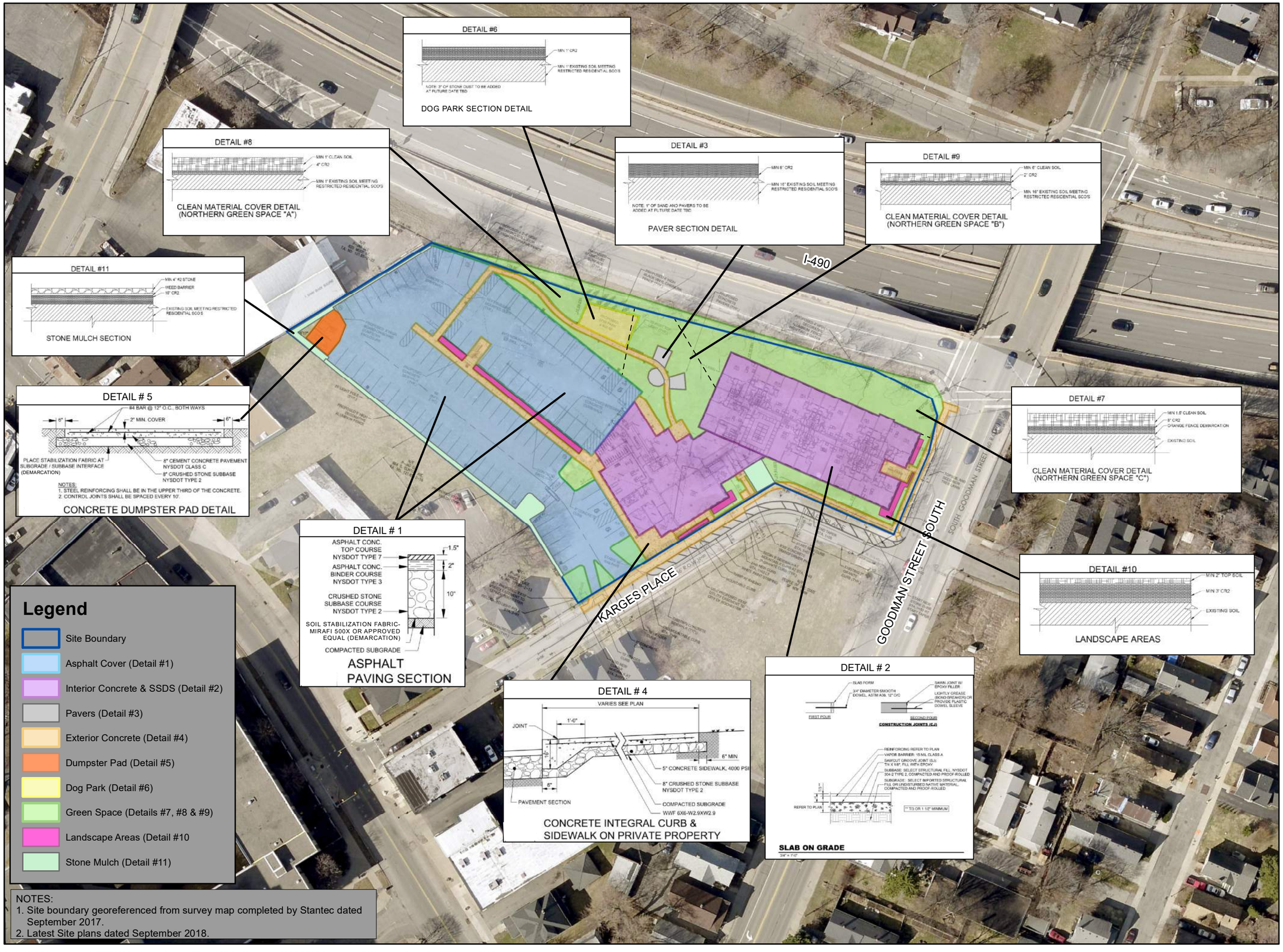
DRAWING NAME:

SOIL REMOVAL DEPTHS

PROJECT/DRAWING NUMBER:

2172056

FIGURE 2



LaBella
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1 inch = 80 feet
INTENDED TO PRINT AS: 11" X 17"

CLIENT:

HIGHLAND GROVE LLC

PROJECT:

SPLP PFAS SAMPLING WORK PLAN

FORMER SHERWOOD SHOE COMPANY
625 SOUTH GOODMAN ST
ROCHESTER, NEW YORK

NYSDEC BCP #C828201

DRAWING NAME:

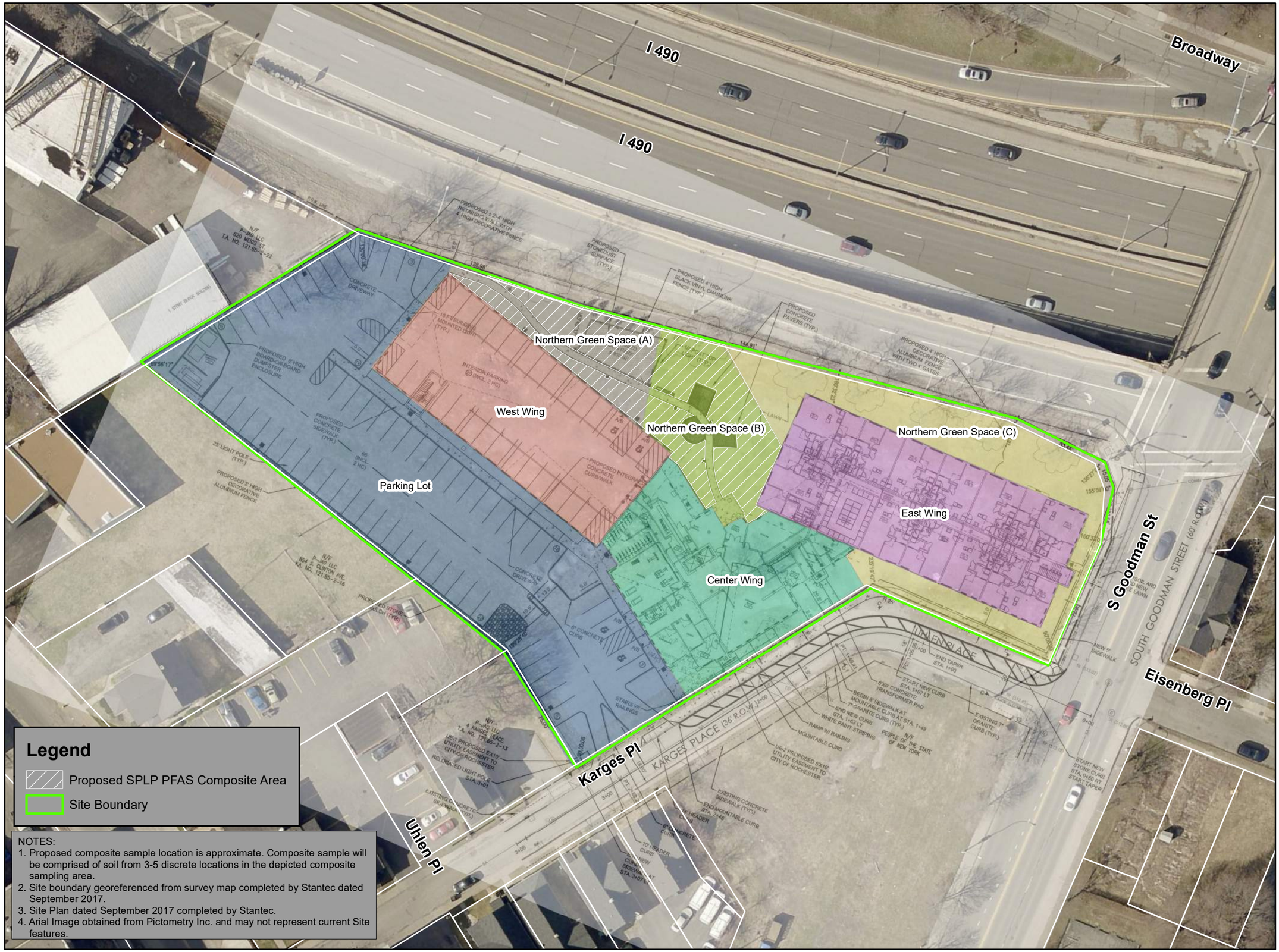
COVER SYSTEM

PROJECT/DRAWING NUMBER:

2172056

FIGURE 3

Path: I:\Highland Grove LLC\2172056 - Karges & Uhlen Place BCP App\Drawings\SPLP PFAS Sampling WP\Figure 1 - Cover System AB 8.4.2020.mxd



NOTES:
1. Proposed composite sample location is approximate. Composite sample will be comprised of soil from 3-5 discrete locations in the depicted composite sampling area.
2. Site boundary georeferenced from survey map completed by Stantec dated September 2017.
3. Site Plan dated September 2017 completed by Stantec.
4. Arial Image obtained from Pictometry Inc. and may not represent current Site features.

LaBella
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Feet
1 inch = 50 feet
INTENDED TO PRINT AS: 11" X 17"

CLIENT:

HIGHLAND GROVE LLC

PROJECT:

SPLP PFAS SAMPLING WORK PLAN

FORMER SHERWOOD SHOE COMPANY
625 SOUTH GOODMAN ST
ROCHESTER, NEW YORK

NYSDEC BCP #C828201

DRAWING NAME:

Proposed SPLP PFAS Composite Sampling

PROJECT/DRAWING NUMBER:

2172056

FIGURE 4

I:\Highland Grove LLC\2172056 - Karges & Uhlen Place BCP App\Drawings\SPLP PFAS Sampling WP\2172056 FIGURE 2 - Proposed SPLP PFAS Composite Sampling Location 8.4.2020.mxd