Greenstar Environmental Solutions, LLC
6 Gellatly Drive
Wappingers Falls, NY 12590

July 17, 2024

Joshuah J. Klier
Project Manager
New York State Department of Environmental Conservation
Division of Environmental Remediation – Region 8
6274 East Avon-Lima Road,
Avon, NY, 14414

Re: Revised Interim Remedial Measure Work Plan, 920 Exchange Street, Rochester, New York, BCP Number C828218

Dear Mr. Klier:

Attached to this letter please find the revised Interim Remedial Measure Work Plan for the above referenced site. Attached are Response to Comments from NYS DEC dated June 2, 2024.

If you have any questions or require more information, please do not hesitate to contact me at 917-655- 5123.

Sincerely,

Pete Nimmer, PG, LSRP
Senior Geologist

RESPONSE TO NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION, REGION 8
COMMENTS DATED JUNE 3, 2024
ON THE INTERM REMEDIAL MEASURE WORK PLAN
920 EXCHANGE STREET, ROCHESTER, NEW YORK
BCP SITE NO. C828218

The New York State Department of Environmental Conservation – Division of Environmental Remediation (NYSDEC-DER) and New York State Department of Health Bureau of Environmental Exposure Investigation (NYSDOH-BEEI), collectively referred to as the Departments, have completed their review of the 'Interim Remedial Measure Work Plan' (workplan) (electronically signed and received on May 13, 2024) as prepared by Greenstar Environmental Solutions, LLC. In accordance with Title 6 of the New York Codes, Rules, and Regulations (NYCRR) part 375-1.6, the Departments are requiring modifications to the workplan. The Departments have the following comments:

Comment No. 1: A state-wide technical memorandum was issued by Andrew Guglielmi, the Director of the Division of Environmental Remediation, on November 2023 to all Brownfield Cleanup Program Applicants, Remedial Parties and DER Standby Contractors. This memorandum updated DEC guidance with respect to the implementation of DER-31 (also known as the Green and Sustainable Remediation (GSR) initiative). This technical memorandum requires that all workplans and reports submitted to DEC pursuant to one of our remedial programs under Part 375 will address GSR and be certified as such in the certifications section. Please revise your certification statement as follows:

A. **Option A:** "I ____ certify that I am currently a [NYS registered professional engineer or Qualified Environmental Professional as defined in 6 NYCRR Part 375] and that this Interim Remedial Work Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10) and DER Green Remediation (DER-31)."

Response: The certification has been amended to include the following certification which has been signed by the Professional Engineer:

> "I, Charles Mcleod, certify that I am currently a [NYS registered professional engineer or Qualified Environmental Professional as defined in 6 NYCRR Part 375] and that this Interim Remedial Work Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10) and DER Green Remediation (DER-31)."

Comment No. 2: Section 2.1 – Soil Pile Removal – Trucks should not enter and exit the property via Violetta Street to avoid any potential queuing on a residential street. Trucks should enter the site from Exchange Street and queue on the parking lot on- site. When excavations begin, the first truck should proceed out the side gate and down the dirt path. Once full, it should turn around and return down the same path and exit the site through Exchange Street.

Response: The entry and exit point for trucks has been changed so that Exchange Street is

used along with the main parking lot as a queueing location. Section 2.1, third paragraph, has been amended as shown below (new text shown in italics):

> Approximately 6 roll-offs or trucks will be required to remove the material. Truck*s* will enter and exit the site property via *Exchange* Street. Trucks will *queue in the parking lot, return using the same path and exit on Exchange Street*. Egress points for truck and equipment transport from the Site will be kept clean of dirt and other materials during the IRM implementation. *Work will coincide with dry weather to avoid muddy conditions and tracking.*

Comment No. 3: Section 2.1 – Soil Pile Removal – Prior to leaving the site, trucks must be checked by a Qualified Environmental Professional (QEP) and decontaminated as deemed necessary. A truck wash station should be utilized to avoid spreading potentially contaminated soils offsite. Discussion should include how the station would be set up and how fluids will be contained. Truck washing fluids must be containerized and characterized for disposal in accordance with all local, state, and federal regulations.

Response: Trucks will be checked by a Qualified Environmental Professional (QEP) to avoid spreading potentially impacted soil. The QEP and will evaluate the best loading method based on conditions at the site. The following paragraph has been added to Section 2.1:

> *If unexpected muddy conditions are encountered, trucks will be loaded in the asphalt parking lot to avoid tracking. A Qualified Environmental Professional will be monitoring this work and tarp the loader bucket in order to prevent spilling during loading.*

Comment No. 4: Section 2.1 – Soil Pile Removal – The workplan indicates soil below the excavation will be removed in addition to the soil pile. The workplan does not detail what will happen to the excavation area post-excavation. The Departments understand from phone call discussions with Greenstar that the excavation is desired to be left open pending review/analysis of RI data for the green space areas. Please indicate and discuss this in the workplan. Discussion should consider the potential for rainwater accumulation in the excavation and should include provisions to check on it after heavy rain events. The workplan must also discuss securing the excavation area with construction snow fencing or other materials. This fencing must remain in place until the excavation has been backfilled.

Response: As per the phone conversation with NYS DEC and NYS DOH held on July 2, 2024 to discuss these comments, the intent of this work is to remove the existing soil pile and not to create a remedial excavation which requires additional confirmatory sampling. Therefore, the Work Plan has been revised to eliminate the removing the soil six inches below the soil pile. Section 2.1, first paragraph, has been amended as follows:

> This IRM will include removal of the soil pile generated during the 2021 sewer line repair. An approximately 40 cubic yard covered pile is currently staged in the rear of the property. Figure 3 shows the approximate location of the soil pile. The contents consist mostly of fill materials (concrete, brick, wood) mixed with soil. The entirety of the soil pile ~~including approximately 6 inches of underlying soil~~ will be removed during this IRM. The Field Operations Leader will be on-site during the soil pile

removal and will direct removal activities to ensure the *soil* pile ~~and 6 inches of underlying soil~~ ha*s* been completely removed. The Field Operations Leader will file daily reports with the NYSDEC *and NYSDOH* project manager*s* during the excavation and removal of the impacted soil pile.

Additionally, the reference to removing the 0 to 6 inch interval has been removed from Section 2.2, as shown.

2.2 SOIL SAMPLING

After the soil pile is removed, confirmatory and/or documentary surface soil samples (Soil Pile-01 to 03) will be collected from below where the pile was located to confirm the petroleum impacted soil was fully removed. ~~The 0-to-6-inch interval below the soil pile will have been removed during the soil pile removal activities.~~

Comment No. 5: Section 2.1 – Soil Pile Removal – Restricted residential soil cleanup objectives require two feet of clean cover. If six inches of soil below the pile are removed, and the following twelve inches are tested, that leaves a gap of information with respect to the 18–24-inch interval. This area must be evaluated separately from the remaining green space areas.
The proposed sampling is not consistent with DER-10 section 5.4(b)5 (confirmation sampling sample frequencies). DER-10 section 5.4(b)5 requires one grab sample per excavation side wall per every 30 linear feet.

As the soil pile has been sitting since 2021, the potential for leaching into the subsurface exists and must be evaluated. As a result, the Departments are requiring additional sampling from what is required:

a. The Departments are requiring the sampling plan to be revised as follows:
    i. Sidewalls
        1. One grab sample per every 30 linear feet per excavation side wall must be collected and analyzed for VOCs, SVOCs, and metals.
    ii. Excavation floor
        1. Two grab samples on the excavation floor from the 0–6- inch interval (after the six inches below the pile have been removed) must be collected and analyzed for VOCs, SVOCs and metals.
        2. One grab sample on the excavation floor from the 0–6- inch interval (after the six inches below the pile have been removed) must be collected and analyzed for VOCs, SVOCs, metals, PCBs, pesticides, 1,4-dioxane and Per- and polyfluoroalkyl substances (PFAS).
        3. Two grab samples from the 6-12-inch interval (after the six inches below the pile have been removed) must be collected and analyzed for VOCs, SVOCs and metals.
        4. One grab sample from the 6-12-inch interval (after the six inches below the pile have been removed) must be collected and analyzed for VOCs, SVOCs, metals, PCBs, pesticides, 1,4-dioxane and Per- and polyfluoroalkyl substances (PFAS).
        5. Two grab samples from the 12-18-inch interval (after the six inches below the pile have been removed) must be collected and analyzed for VOCs, SVOCs

and metals.

6. One grab sample from the 12-18-inch interval (after the six inches below the pile have been removed) must be collected and analyzed for VOCs, SVOCs, metals, PCBs, pesticides, 1,4-dioxane and Per- and polyfluoroalkyl substances (PFAS).

Response: As noted in earlier response to comments, the Work Plan has revised to eliminate text specifying the removal of the soil six inches below the soil pile. Therefore, eliminating post-excavation requirements (see amended language above). The revised sampling protocol includes collection of three soil samples from 0 to 6 inches below the bottom of the soil pile that will be analyzed for VOC by EPA Method 8260 and SVOC by EPA Method 8270 to assess whether downward migration of petroleum may have while the soil pile was staged. Results of the three grab samples from below the soil pile will be reviewed and if concentrations of petroleum is noted the need for any additional samples assessed as part of the Remedial Investigation to identify any potential data gaps in conjunction with the remedial approach for this area.

Section 2.3 has been amended as follows:

> Three grab samples for VOC *and SVOC* analysis will be collected from different locations within the former footprint of the soil pile from the *0* ~~6~~ to *6* ~~12~~-inch bgs interval ~~for a total of 3 samples for VOC analysis~~. *These samples will be used to assess whether petroleum compounds may have migrated from the soil pile into underlying soil. Results of the three grab samples from below the soil pile will be reviewed and if concentrations of petroleum is noted the need for any additional samples assessed as part of the Remedial Investigation to identify any potential data gaps in conjunction with the remedial approach for this area.*

Comment No. 6: Section 2.1 – Soil Pile Removal – Please include a provision in the workplan that the proposed dimensions of the excavation may be adjusted based on the observation of grossly impacted materials.

Response: As noted above the soil pile removal will not result in a remedial excavation. If grossly impacted material is found in underlying soil, the DEC will be contacted and material will be sampled as noted in Comment No. 5.

Comment No. 7: Section 2.1 – Soil Pile Removal – Please copy the NYSDOH-BEEI PM Chris Budd Christopher.Budd@health.ny.gov on submissions of the daily reports.

Response: Daily reports will copy Chris Budd of NYSDOH for this IRM. The language in section 2.1, paragraph 1, has been amended to include the NYSDOH Project Managers.

Comment No 8: Section 2.3 – Laboratory Analysis – The full PFAS Target Analyte List is now 40 compounds. Please indicate.

Response: Section 2.3 has been amended to note 40 PFAS compounds will be analyzed and that sampling will be completed as per the April 2023 guidance.

Comment No. 9: The workplan does not discuss stormwater pollution prevention measures and related erosion controls that will be utilized during excavation and remain in place until the excavation is backfilled.

Response: As noted in previous comments, the Work Plan no longer includes completion of a remedial excavation below the soil pile area and therefore specific Stormwater Pollution Prevention Measures are not required. After the soil pile is removed the area will match surrounding conditions and be monitored for any differential erosion.

The following text has been added to the end of Section 2.1.

After the soil pile is removed the area will match surrounding conditions and be monitored for any differential erosion. If needed, hay bales or other stormwater prevention measures will be used until vegetation cover is in place.

Comment No. 10: The workplan must include a provision that the forthcoming Construction Completion Report will include "as-built" drawing(s) bearing a NYS professional engineer's stamp and signature which detail soil removals, indicating the surveyed limits of the excavation and location of all final documentation samples.

Response: Boundaries of the soil pile will be identified using triangulated measurements utilizing surveyed locations proximal to the area and included in future drawings bearing a NYS engineer's stamp and signature. The first paragraph of Section 3.1 has been updated as shown:

> A Construction Completion Report (CCR) will be prepared as per the requirements of DER-10. The CCR will summarize the IRM activities, provide a discussion of all sample results collected as part of the IRM, *a detailed figure identifying the location of the soil pile using measured distances from building corners* and provide documentation of transport and disposal of all materials removed from the site.

Comment No. 11: Please include a provision that the Construction Completion Report will include all fully executed manifests documenting off-site transport of waste material.

Response: The Construction Completion Report will include all fully executed manifests documenting off-site transport of waste material. The third bullet of Section 3.1 has been amended as follows:

- The Bills of Lading and *fully executed* disposal manifest*s* for the non-hazardous wastes and contaminated soil*s*.

Interim Remedial Measure Work Plan
920 Exchange Street, Rochester, New York
Revision 1

BCP Number C828218

Prepared for

Sofia Redevelopment, Inc
920 Exchange Street
Rochester, New York

Prepared by

Greenstar Environmental Solutions, LLC
6 Gellatly Drive
Wappingers Falls, New York 12590
(845) 223-9944

July 17, 2024

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APPENDIX

CERTIFICATION

"I, Charles Mcleod, certify that I am currently a NYS registered professional engineer and that this Interim Remedial Work Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10) and DER Green Remediation (DER-31)."

Name

July 17, 2024
Date

1.0 INTRODUCTION

This Interim Remedial Measure (IRM) Work Plan was prepared on behalf of Sofia Redevelopment Inc. for the property known as the 920 Exchange Site, located at 920 Exchange Street in Rochester, New York (Site). An application for acceptance into the New York State Brownfield Cleanup Program (BCP) was accepted by the New York State Department of Environmental Conservation (NYSDEC) on November 9, 2022, and the Site was assigned BCP Number C828218. The Site has confirmed petroleum, volatile organic compound (VOC) and semi-volatile organic compound (SVOC) contamination in soil and groundwater related to historic operations.

A Remedial Investigation (RI) is currently being completed at the property as per the Remedial Investigation Work Plan dated June 22, 2023[1] that was accepted by the New York State Department of Environmental Conservation (NYSDEC) on June 27, 2023[2]. The purpose of the RI is to identify the nature and extent of impacts including soil, groundwater and sub-slab vapor.

In 2021 an emergency plumbing repair was completed on an exterior sewer line in the parking lot area of the Site. The sewer line was located at approximately 4 ft below ground surface and had collapsed. During the repair of this line petroleum impacted soil was identified and stockpiled on the south side of the property. The soil was observed to contain an oily sheen and petroleum odor in addition to containing historic fill material including brick, concrete and wood mixed with soil. The soil pile contains approximately 40 cubic yards of material which is covered with tarps. One characterization sample of the soil pile was collected on August 24, 2021 which determined the material in the soil pile is non-hazardous. This IRM Work Plan details how this material will be removed and confirmatory sampling that will be conducted.

This IRM Work Plan was prepared as per the requirements of Division of Environmental Remediation (DER)-10, Technical Guidance for Site Investigation and Remediation Issued on May 3, 2010.

The Soil Pile is located within the Recognized Environmental Concern (REC) 4 – Debris Piles discussed in the RI Work Plan. The removal of this soil pile will be completed as detailed in this IRM Work Plan. Additional soil and groundwater sampling at REC-4 will be completed as detailed in the RI Work Plan.

1.1 SITE LOCATION AND DESCRIPTION

The Site is located at 920 Exchange Street, Rochester, New York. The site location map is shown on Figure 1. This is an urban area that is a mix of residential, commercial, and industrial properties. The site features and uses of the surrounding properties are shown on Figure 2.

[1] Final Remedial Investigation Work Plan, 920 Exchange Street, Rochester, New York, BCP Number C828218 dated June 27, 2023. Greenstar Environmental Solutions, LLC.
[2] Letter dated June 27, 2023 from NYS DEC Region 8 to Sophia Kolokouris of Sofia Redevelopment, Inc. regarding Remedial Investigation Work Plan.

The three buildings located at 920 Exchange Street include a one story out building on the eastern side of the property that was historically used for cold storage, a one-story building that contains approximately 55,000 square feet of floor space with two storage buildings attached to its northeast side, and a four-story 67,000 square foot building, with a roof top water tank. The site is paved on the west, south, north, and part of the east side of the property. The buildings are constructed from a combination of wood, plaster, brick and concrete.

The Site is currently zoned as an M-1 (Industrial District) which is used for both commercial and industrial purposes, such as warehousing, manufacturing, high-tech or light industrial uses. The surrounding area consists of residential, commercial, and industrial uses. The City of Rochester has recognized the obsolescence of many industrial buildings for traditional manufacturing purposes, and the M-1 District encourages re-occupancy and redevelopment of those buildings, and therefore, allows re-use for retail sales and services, offices, eating and drinking establishments, in addition to the existing commercial and industrial uses. Residential uses are also allowed for areas above the ground floor primarily to accommodate loft-style living spaces.

Current building use includes occupied tenant spaces (see Figure 2) which have active businesses, including light industrial and commercial operations. A significant portion of the one-story building, however, is not occupied regularly and is currently used for warehousing/storage. The four-story building is entirely unoccupied.

1.2 SITE HISTORY

The Site has been used for industrial distillation and manufacturing operations for over 150 years. The Vacuum Oil Company used this property in addition to several other near-by properties for operations from about 1866 to about 1936. Vacuum Oil operated a large oil refining complex at these properties, involving the distillation of crude oil into kerosene, and in its entirety, contained many structures, numerous aboveground storage tanks (ASTs) and underground ground storage tanks (USTs) (approximately 135), six boilers, a refined oil warehouse, a bleaching area, a grease warehouse, a rail yard, tank cars, stills and pipelines, and other structures associated with the oil refinery operation, some of which were located on a portion of the 920 Exchange Street Site. Vacuum Oil ceased operations in 1935 and the refinery was subdivided into smaller properties.

Later use of 920 Exchange Street Site included a fish processing operation, storage (including chemical storage), and various commercial and light industrial businesses.

In 2006, the City of Rochester created the Vacuum Oil - South Genesee River Brownfield Opportunity Area (BOA), which includes the 920 Exchange Street property. Other nearby properties that were part of the larger Vacuum Oil complex are already in the process of undergoing property re-development consistent with the BOA as part of the BCP.

Further details about the site can be found in the Final Remedial Investigation Work Plan (Greenstar, 2023) including information related to previous investigations, a detailed description of site geology and hydrogeology, the Site Conceptual Model and Recognized Environmental Concerns identified for investigation as part of the Remedial Investigation.

2.0 INTERM REMEDIAL MEASURES

This section details the Interim Remedial Measures that will be completed which include the soil pile removal and confirmatory/documentary sample collection and analysis.

Further details regarding soil sampling activities and methods are provided in the 2023 RI Work Plan including:

- Section 3.1 – Standards, Criteria and Guidance for Remedial Actions.
- Section 3.2 – Project Organization.
- Section 4.1 – Soil Sampling.
- Section 4.5 – Emerging Contaminant Sampling.
- Section 5.2 – Equipment Decontamination.
- Section 5.5 – Data Usability Summary Report.

2.1 SOIL PILE REMOVAL

This IRM will include removal of the soil pile generated during the 2021 sewer line repair. An approximately 40 cubic yard covered pile is currently staged in the rear of the property. Figure 3 shows the approximate location of the soil pile. The contents consist mostly of fill materials (concrete, brick, wood) mixed with soil. The entirety of the soil pile will be removed during this IRM. The Field Operations Leader will be on-site during the soil pile removal and will direct removal activities to ensure the soil pile has been completely removed. The Field Operations Leader will file daily reports with the NYS DEC and NYS DOH project managers during the excavation and removal of the impacted soil pile.

The soil pile will be removed using heavy equipment (backhoe or loader) and the material will be directly live-loaded into roll off containers or trucks for off-site disposal. Waste Management at High Acres located in Fairport, NY has been identified as the receiving facility for all material removed from the site during the IRM. The soil removed from the Site will be disposed of as non-hazardous material based on the August 24, 2021 soil pile sample classification results and Department approval received via email on January 30, 2023 (provided in Appendix A).

Approximately 6 roll-offs or trucks will be required to remove the material. Trucks will enter and exit the site property via Exchange Street. Trucks will queue in the parking lot, return using the same path and exit on Exchange Street. Egress points for truck and equipment transport from the Site will be kept clean of dirt and other materials during the IRM implementation. Work will coincide with dry weather to avoid muddy conditions and tracking.

If unexpected muddy conditions are encountered, trucks will be loaded in the asphalt parking lot to avoid tracking. A Qualified Environmental Professional will be monitoring this work and tarp the loader bucket in order to prevent spilling during loading.

The transport of materials will be performed by licensed haulers in accordance with appropriate local, State, and Federal regulations, including 6 NYCRR Part 364. Haulers will be appropriately licensed and trucks properly placarded. Material transported by trucks exiting the Site will be secured with tight fitting covers.

After the soil pile is removed the area will match surrounding conditions and be monitored for any differential erosion. If needed, hay bales or other stormwater prevention measures will be used until vegetation cover is in place.

2.2 SOIL SAMPLING

After the soil pile is removed, confirmatory and/or documentary surface soil samples (Soil Pile-01 to 03) will be collected from below where the pile was located to confirm the petroleum impacted soil was fully removed.

Figure 3 shows the approximate locations where the soil samples will be collected. Specific locations will be identified in the field based on field conditions and in consultation with NYS DEC staff.

2.3 LABORATORY ANALYSIS

Three grab samples for VOC and SVOC analysis will be collected from different locations within the former footprint of the soil pile from the 0 to 6-inch bgs interval for a total of 3 samples for VOC analysis. These samples will be used to assess whether petroleum compounds may have migrated from the soil pile into underlying soil. Results of the three grab samples from below the soil pile will be reviewed and if concentrations of petroleum is noted the need for any additional samples assessed as part of the Remedial Investigation to identify any potential data gaps in conjunction with the remedial approach for this area.

One composite sample will be collected to be comprised of 3 separate locations from the 0 to 6-inch bgs. The composite sample will be analyzed for SVOC, metals, PCBs, Pesticides and Emerging Contaminants.

Soil samples will be analyzed for the following parameters:

- VOCs by EPA Method 8260 plus Tentatively Identified Compounds (TICs):
- SVOCs by EPA Method 8270 plus TICs
- Target Analyte List (TAL) metals,
- Pesticides/PCBs by Method 8081/8082,
- PFAS compounds by EPA Method 1633 for Full PFAS Target Analyte List (40 compounds). Note that PFAS samples will be conducted in accordance with Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) (April 2023)
    - 1,4-Dioxane by Method 8270

The soil samples will be placed in pre-cleaned laboratory supplied containers and placed in a cooler packed with ice for transport to the laboratory. Samples will be submitted to the laboratory for a standard turnaround time. The Laboratory Project Manager will verify that the chosen analytical lab will meet all minimum reporting limits as required in DER-10.

3.0 REPORTING

3.1 CONSTRUCTION COMPLETION REPORT

A Construction Completion Report (CCR) will be prepared as per the requirements of DER-10. The CCR will summarize the IRM activities, provide a discussion of all sample results collected as part of the IRM, a detailed figure identifying the location of the soil pile using measured distances from building corners and provide documentation of transport and disposal of all materials removed from the site.

The following documentation will be provided in the CCR:

- A letter or facility-specific waste profile/application from Greenstar or Sofia Redevelopment Inc. to the receiving facility describing the material to be disposed and requesting formal written acceptance of the material. This letter/profile/application will state that material to be disposed is contaminated material generated at an environmental remediation Site in New York State. The letter will provide the project identity and the name and phone number of the Greenstar or Sofia Redevelopment Inc. contact. The letter will include as an attachment a summary of all chemical data for the material being transported including soil characterization data.

- A letter from all receiving facilities stating it is in receipt of the correspondence (above) and is approved to accept the material.

- The Bills of Lading and fully executed disposal manifests for the non-hazardous wastes and contaminated soils.

3.2 QUALITY ASSURANCE

The Quality Assurance Project Plan (QAPP) details analysis accuracy, precision, and sensitivity of analysis for laboratory analytical data to achieve the Quality Control acceptance of the analytical protocol. The accuracy, precision and completeness requirements will be addressed by the laboratory for all data generated. The QAPP prepared for the Site is provided in Appendix D of the 2023 RI Work Plan.

Collected samples will be appropriately packaged, placed in coolers, and shipped via overnight courier or delivered directly to a secured analytical laboratory service center by field personnel. Samples will be containerized in appropriate laboratory provided glassware and shipped in plastic coolers. Samples will be preserved through the use of ice to maintain a temperature of 4ºC.

One trip blank will accompany the sample cooler transported to the laboratory. Laboratory reports will include ASP category B deliverables for use in the preparation of a Data Usability Summary Report (DUSR).

3.3 REPORTING OF RESULTS

Sample analysis will be provided by a New York State certified environmental laboratory.

Laboratory reports will include ASP category B deliverables for use in the preparation of a data usability summary report (DUSR). Sample results will be provided in accordance with the NYSDEC Environmental Information Management System (EIMS) electronic data deliverable (EDD) format (EQuIS).

3.4 DATA USABILITY SUMMARY REPORT

A Data Usability Summary Report (DUSR) will be prepared for the confirmatory soil samples collected after the IRM is completed. The DUSR provides a thorough evaluation of analytical data with third party data validation. Third party validation is a requirement and will be completed on analytical laboratory data per NYSDEC DER-10. The primary objective of a DUSR is to determine whether or not the data, as presented, meets the Site/project specific criteria for data quality and data use. Verification and/or performance monitoring samples collected under this RIWP will be reviewed and evaluated in accordance with the Guidance for the Development of Data Usability Summary Reports as presented in Appendix 2B of NYSDEC DER-10. A qualified Data Validator will review the laboratory reports and prepare a DUSR for the RI sampling event. The completed DUSR for verification/performance samples collected during implementation of this IRM will be included in the CCR prior to its formal approval.

4.0 HEALTH AND SAFETY PLAN

The Health and Safety Plan (HASP) takes into account the specific hazards inherent in conducting the RI/IRM and presents the minimum requirements which are to be met by Greenstar, its subcontractors, and other personnel in order to avoid and, if necessary, protect against health and/or safety hazards. A HASP has been prepared and is provided in Appendix E of the 2023 RI Work Plan.

Sub-contractors will have to develop their own site-specific document, which at their discretion may be modelled after this HASP. The subcontractor's HASP must meet the minimum requirements as detailed in the RI HASP prepared by Greenstar and must be made available upon request to Greenstar and the NYSDEC.

Activities performed under the HASP will comply with applicable parts of OSHA Regulations, primarily 29 CFR Parts 1910 and 1926. Modifications to this HASP may be made with the approval of the Greenstar Site Safety Manager (SSM) and/or Project Manager (PM).

5.0 COMMUNITY AIR MONITORING PLAN

The Community Air Monitoring Plan (CAMP) provides measures for protection for on-site workers and the downwind community (i.e., off-site receptors including residences, businesses, and on-site commercial workers) from potential airborne contaminant releases resulting from investigation/IRM activities. CAMP monitoring and reporting is required for intrusive work including implementation of this IRM work plan. The NYSDEC and NYSDOH will be notified separately for any CAMP exceedances within 24 hours.

The action levels specified require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, the CAMP helps to confirm that the investigation work did not spread contamination off-site through the air.

The primary concerns during the investigation are odors and dust from petroleum, VOCs, SVOCs, and metals which are potential contaminants of concern at the Site along with metals in historic fill. The CAMP is provided as Appendix F of the 2023 RI Work Plan.

Bi-weekly CAMP reports will be submitted to NYS DEC and NYS DOH for review.

6.0 SCHEDULE

The anticipated schedule for completing the IRM activities is as follows:

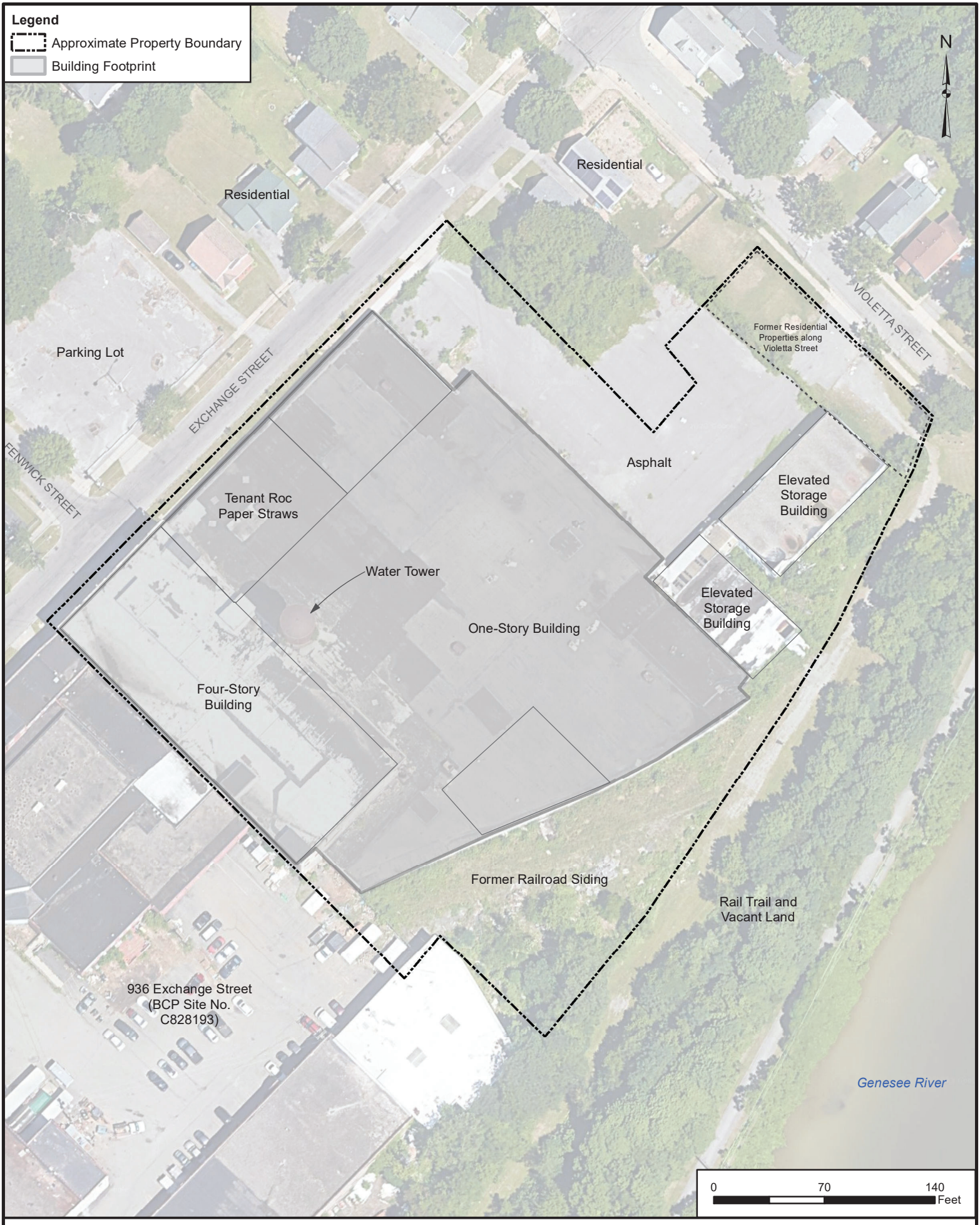
Schedule Task	Estimated Date
Submission of Draft Interim Remedial Measure Work Plan	May 2024
Resubmission of a Revised Interim Remedial Measure Work Plan based on NYSDEC Comments	July 2024
Commencement of Interim Remedial Measure Work Plan	August 2024
Submission of a Construction Completion Report	November 2024

GREENSTAR Environmental Solutions, LLC

920 EXCHANGE STREET
ROCHESTER, NEW YORK

FIGURE 1
SITE LOCATION MAP

Document Path: C:\GIS\Rochester_VacuumOil\MXD\2023\RIWP\Fig01_SiteLocationMap_RIWP_Rochester.mxd

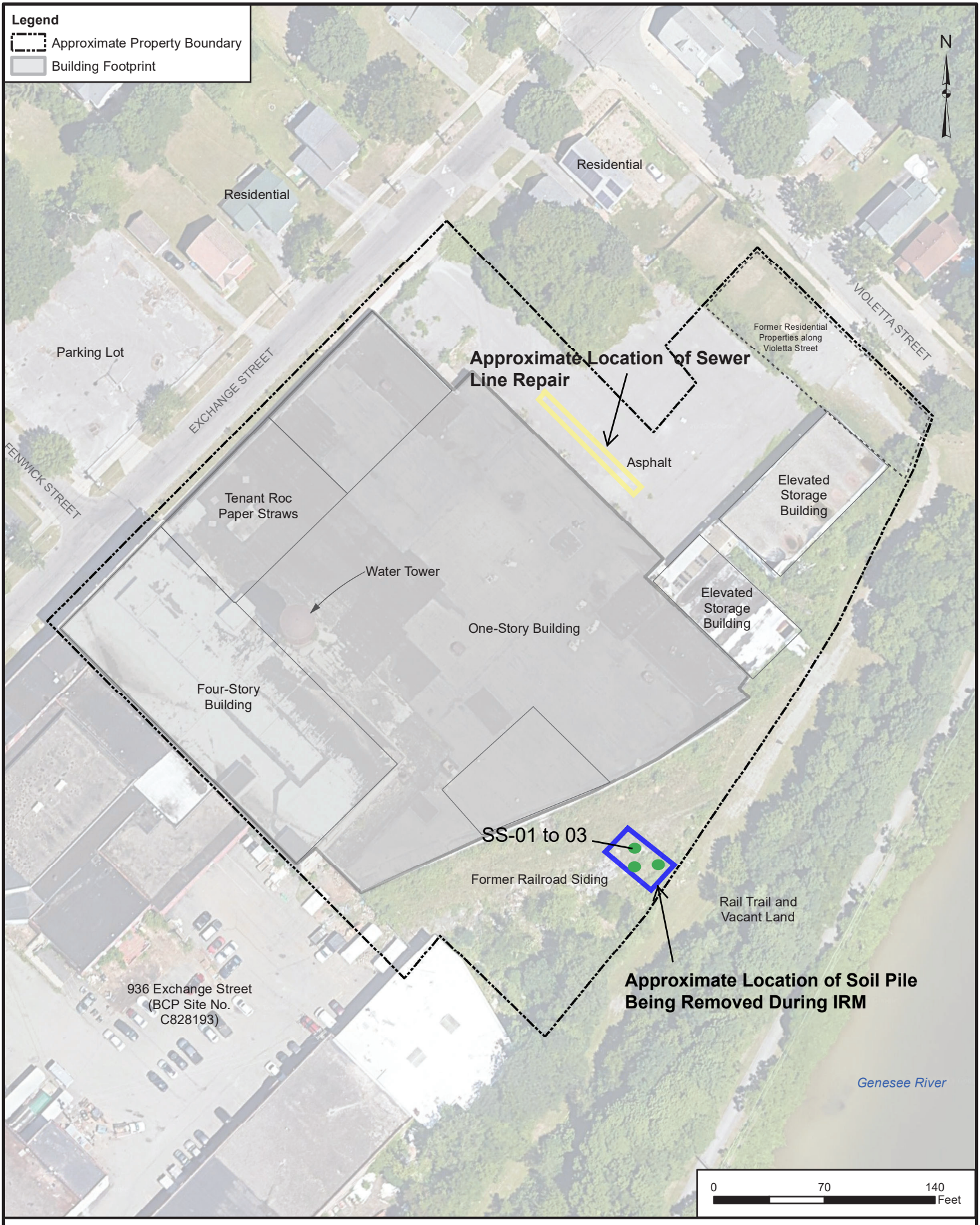


GREENSTAR Environmental Solutions, LLC

920 EXCHANGE STREET
ROCHESTER, NEW YORK

FIGURE 2
SITE MAP

Document Path: C:\GIS\Rochester_VacuumOil\MXD\2023\RIWP\Fig02_SiteMap_RIWP_Rochester.mxd



GREENSTAR Environmental Solutions, LLC

920 EXCHANGE STREET
ROCHESTER, NEW YORK

FIGURE 3
SOIL PILE & SAMPLE LOCATION MAP

Document Path: C:\GIS\Rochester_VacuumOil\MXD\2023\RIWP\Fig02_SiteMap_RIWP_Rochester.mxd

APPENDIX A

SOIL PILE CONFIRMATION SAMPLE RESULTS AND CORRESPONDENCE

Soil Piles - 920 Exchange

Klier, Joshuah J (DEC) <Joshuah.Klier@dec.ny.gov> Mon, Jan 30, 2023 at 11:35 AM
To: Alex Wirth <alex@rocterra.org>
Cc: "Morgan, Adam T (DEC)" <Adam.Morgan@dec.ny.gov>

Alex,

Upon further review of the situation, the Department has determined two potential pathways regarding the generated material.

1. The material may be disposed of to an accepting landfill with the current laboratory results.
    a. This material would need to be transported under normal BCP requirements:
        i. the trucks hauling will need to be permitted and placarded as appropriate. Weigh tickets/manifests would need to be submitted. Trucks will need to be tightly covered to stop dust/material from escaping.
        ii. A direct report to the P.E. of record or the P.E. of record will need to be on site for the load out and they will have to do CAMP monitoring.
        iii. The trucks will need to be deconned before they leave the site as well and ~~the~~ whoever is there overseeing the load out will need to make sure no material from the site gets onto the City streets.
        iv. Trucks cannot be idling in the neighborhood.

    b. Use of the material as daily cover at the disposal facility could be evaluated, however it would be up to the landfill to make that determination.

2. The material must be tested for the full suite of contaminates (TCL VOCS + TICs, TCL SVOCs + TICs, TAL Metals, Cyanide, PCBs, Pesticides, 1,4-dioxane, and PFOS) and managed under the BCP program and DER-10 prior to using it under cover. Volume would determine number of samples required and samples would have to come from within the pile and be representative of the material.
    a. As we are completing the site investigation, the material will have to be moved to see if impacts to the ground below are present as it is considered an area of concern.
    b. The material would likely need to be moved when evaluating surface soils.
    c. The material needs to be staged on a tarp or roll off, covered, monitored/inspected, and managed under DER-10.

The Department recommends disposing of the material so that it will not inhibit investigation work during the RI.

Cheers,

Josh.

--

Joshuah J. Klier, G.I.T., M.S.

Assistant Geologist | Project Manager | Licensed Asbestos Inspector (NYS #21-15869)

New York State Department of Environmental Conservation

Division of Environmental Remediation – Region 8

6274 East Avon-Lima Road, Avon, NY, 14414

P: (585) 226-5357 | F: (585) 226-8139 | joshuah.klier@dec.ny.gov

From: Alex Wirth <alex@rocterra.org>
Sent: Friday, January 27, 2023 12:31 PM
To: Klier, Joshuah J (DEC) <Joshuah.Klier@dec.ny.gov>
Cc: Morgan, Adam T (DEC) <Adam.Morgan@dec.ny.gov>
Subject: Re: Soil Piles - 920 Exchange

Hi Josh,

We ran a composite sample last year for TCLP SVOCs, RCRA metals, VOCs, Ignitability and PCBs per Waste Management's disposal classification requirements (attached).

At that time it was my recommendation to remove it from the site as we did not have clarity on our BCP application etc etc.

Now that we're in the program, Sofia Redevelopment would like to reevaluate how we address that pile/debris. It was originally generated during some plumbing repairs in the front parking lot. While I was not on site during that work, I was told that there were visual and olfactory indicators of petroleum contamination. The composition looks like mostly if not all fill material, with a fair amount of rock debris.

I think the proposed use would be general backfill, but would be under whatever the cover system ends up being (i.e. asphalt/clean fill cap). One of my reservations for this scenario is that it could take quite some time before we're able to place this material at it's final location.

Hopefully this paints a clear picture on its origin and planned use. My goal is to provide the client with some definitive use/reuse options now that this material has been disturbed and compare that to the disposal option.

Thanks again for the assistance/clarification...

Best Regards,

Alex Wirth

Principal/Sr. Geologist

ROCTerra

585 698 6842

rocterra.org

[Quoted text hidden]

PARADIGM
ENVIRONMENTAL SERVICES, INC.

Analytical Report For

Sofia Redevelopment Inc.

For Lab Project ID

213717

Referencing

N/A

Prepared

Tuesday, August 24, 2021

Any noncompliant QC parameters or other notes impacting data interpretation are flagged or documented on the final report or are noted below.

Certifies that this report has been approved by the Technical Director or Designee

179 Lake Avenue • Rochester, NY 14608 • (585) 647-2530 • Fax (585) 647-3311 • ELAP ID# 10958

PARADIGM ENVIRONMENTAL SERVICES, INC.

Lab Project ID: 213717

Client: **Sofia Redevelopment Inc.**

Project Reference: N/A

Sample Identifier:	Excav 1		
Lab Sample ID:	213717-01	**Date Sampled:**	8/17/2021
Matrix:	Soil	**Date Received:**	8/17/2021

Ignitability

Analyte	Result	Units	Qualifier	Date Analyzed
Ignitability	No Burn	mm / sec		8/19/2021

Method Reference(s): EPA 1030

PCBs

Analyte	Result	Units	Qualifier	Date Analyzed
PCB-1016	< 0.0315	mg/Kg		8/18/2021 18:04
PCB-1221	< 0.0315	mg/Kg		8/18/2021 18:04
PCB-1232	< 0.0315	mg/Kg		8/18/2021 18:04
PCB-1242	< 0.0315	mg/Kg		8/18/2021 18:04
PCB-1248	< 0.0315	mg/Kg		8/18/2021 18:04
PCB-1254	< 0.0315	mg/Kg		8/18/2021 18:04
PCB-1260	< 0.0315	mg/Kg		8/18/2021 18:04
PCB-1262	< 0.0315	mg/Kg		8/18/2021 18:04
PCB-1268	< 0.0315	mg/Kg		8/18/2021 18:04

Surrogate	Percent Recovery	Limits	Outliers	Date Analyzed
Tetrachloro-m-xylene	**21.2**	18.5 - 93.4		8/18/2021 18:04

Method Reference(s): EPA 8082A
EPA 3546

Preparation Date: 8/18/2021

PARADIGM ENVIRONMENTAL SERVICES, INC.

Lab Project ID: 213717

Client: **Sofia Redevelopment Inc.**

Project Reference: N/A

Sample Identifier:	Excav 1		
Lab Sample ID:	213717-01A	**Date Sampled:**	8/17/2021
Matrix:	TCLP Extract	**Date Received:**	8/17/2021

TCLP Semi-Volatile Organics

Analyte	Result	Units	Regulatory Limit	Qualifier	Date Analyzed
1,4-Dichlorobenzene	< 40.0	ug/L	7500		8/19/2021 18:38
2,4,5-Trichlorophenol	< 40.0	ug/L	400000		8/19/2021 18:38
2,4,6-Trichlorophenol	< 40.0	ug/L	2000		8/19/2021 18:38
2,4-Dinitrotoluene	< 40.0	ug/L	130		8/19/2021 18:38
Cresols (as m,p,o-Cresol)	< 80.0	ug/L	200000		8/19/2021 18:38
Hexachlorobenzene	< 40.0	ug/L	130		8/19/2021 18:38
Hexachlorobutadiene	< 40.0	ug/L	500		8/19/2021 18:38
Hexachloroethane	< 40.0	ug/L	3000		8/19/2021 18:38
Nitrobenzene	< 40.0	ug/L	2000		8/19/2021 18:38
Pentachlorophenol	< 80.0	ug/L	100000		8/19/2021 18:38
Pyridine	< 40.0	ug/L	5000		8/19/2021 18:38

Surrogate	Percent Recovery	Limits	Outliers	Date Analyzed
2,4,6-Tribromophenol	**77.5**	55.4 - 111		8/19/2021 18:38
2-Fluorobiphenyl	**64.7**	30.9 - 98.1		8/19/2021 18:38
2-Fluorophenol	**60.6**	10 - 105		8/19/2021 18:38
Nitrobenzene-d5	**68.3**	49.6 - 104		8/19/2021 18:38
Phenol-d5	**50.6**	10 - 105		8/19/2021 18:38
Terphenyl-d14	**79.2**	56.5 - 118		8/19/2021 18:38

Method Reference(s): EPA 8270D
EPA 1311 / 3510C
Preparation Date: 8/18/2021
Data File: B56391.D

TCLP Mercury

Analyte	Result	Units	Regulatory Limit	Qualifier	Date Analyzed
Mercury	< 0.00200	mg/L	0.2		8/23/2021 08:50

Method Reference(s): EPA 7470A
EPA 1311
Preparation Date: 8/20/2021
Data File: Hg210823A

PARADIGM ENVIRONMENTAL SERVICES, INC.

Lab Project ID: 213717

Client: **Sofia Redevelopment Inc.**

Project Reference: N/A

Sample Identifier:	Excav 1		
Lab Sample ID:	213717-01A	**Date Sampled:**	8/17/2021
Matrix:	TCLP Extract	**Date Received:**	8/17/2021

TCLP RCRA Metals (ICP)

Analyte	Result	Units	Regulatory Limit	Qualifier	Date Analyzed
Arsenic	< 0.500	mg/L	5		8/18/2021 18:13
Barium	**1.14**	mg/L	100		8/18/2021 18:13
Cadmium	< 0.0250	mg/L	1		8/18/2021 18:13
Chromium	< 0.500	mg/L	5		8/18/2021 18:13
Lead	< 0.500	mg/L	5		8/18/2021 18:13
Selenium	< 0.200	mg/L	1		8/18/2021 18:13
Silver	< 0.500	mg/L	5		8/18/2021 18:13

Method Reference(s): EPA 6010C
EPA 1311 / 3005A
Preparation Date: 8/18/2021
Data File: 210818B

TCLP Volatile Organics

Analyte	Result	Units	Regulatory Limit	Qualifier	Date Analyzed
1,1-Dichloroethene	< 20.0	ug/L	700		8/24/2021 12:12
1,2-Dichloroethane	< 20.0	ug/L	500		8/24/2021 12:12
2-Butanone	< 100	ug/L	200000		8/24/2021 12:12
Benzene	< 20.0	ug/L	500		8/24/2021 12:12
Carbon Tetrachloride	< 20.0	ug/L	500		8/24/2021 12:12
Chlorobenzene	< 20.0	ug/L	100000		8/24/2021 12:12
Chloroform	< 20.0	ug/L	6000		8/24/2021 12:12
Tetrachloroethene	< 20.0	ug/L	700		8/24/2021 12:12
Trichloroethene	< 20.0	ug/L	500		8/24/2021 12:12
Vinyl chloride	< 20.0	ug/L	200		8/24/2021 12:12

PARADIGM ENVIRONMENTAL SERVICES, INC.

Lab Project ID: 213717

Client: **Sofia Redevelopment Inc.**

Project Reference: N/A

Sample Identifier:	Excav 1		
Lab Sample ID:	213717-01A	**Date Sampled:**	8/17/2021
Matrix:	TCLP Extract	**Date Received:**	8/17/2021

Surrogate	Percent Recovery	Limits	Outliers	Date Analyzed	
1,2-Dichloroethane-d4	**102**	83 - 120		8/24/2021	12:12
4-Bromofluorobenzene	**101**	65.5 - 118		8/24/2021	12:12
Pentafluorobenzene	**102**	91.2 - 109		8/24/2021	12:12
Toluene-D8	**110**	79.7 - 112		8/24/2021	12:12

Method Reference(s): EPA 8260C
EPA 1311 / 5030C

Data File: z03707.D

PARADIGM

PARADIGM
ENVIRONMENTAL SERVICES, INC

Method Blank Report

Client: Sofia Redevelopment Inc.

Project Reference: N/A

Lab Project ID: 213717

SDG #: 3717-01

Matrix: Soil

PCBs

Analyte	Result	Units	Qualifier	Date Analyzed
PCB-1016	<0.0272	mg/Kg		8/18/2021 17:17
PCB-1221	<0.0272	mg/Kg		8/18/2021 17:17
PCB-1232	<0.0272	mg/Kg		8/18/2021 17:17
PCB-1242	<0.0272	mg/Kg		8/18/2021 17:17
PCB-1248	<0.0272	mg/Kg		8/18/2021 17:17
PCB-1254	<0.0272	mg/Kg		8/18/2021 17:17
PCB-1260	<0.0272	mg/Kg		8/18/2021 17:17
PCB-1262	<0.0272	mg/Kg		8/18/2021 17:17
PCB-1268	<0.0272	mg/Kg		8/18/2021 17:17

Surrogate	Percent Recovery	Limits	Outliers	Date Analyzed
Tetrachloro-m-xylene	**51.3**	18.5 - 93.4		8/18/2021 17:17

Method Reference(s): EPA 8082A
EPA 3546

Preparation Date: 8/18/2021

Data File: PC106973.D

QC Batch ID: QC210818PCBS

QC Number: Blk 1

PARADIGM
ENVIRONMENTAL SERVICES, INC

QC Report for Laboratory Control Sample

Client: Sofia Redevelopment Inc.

Project Reference: N/A

Lab Project ID: 213717

SDG #: 3717-01

Matrix: Soil

PCBs

Analyte	Spike Added	Spike Units	LCS Result	LCS % Recovery	% Rec Limits	LCS Outliers	Date Analyzed
PCB-1016/1260	0.133	mg/Kg	0.0364	27.4	10 - 102		8/18/2021

Method Reference(s): EPA 8082A
EPA 3546
Preparation Date: 8/18/2021
Data File: PC106974.D
QC Number: LCS 1
QC Batch ID: QC210818PCBS

This report is part of a multipage document and should only be evaluated in its entirety. The Chain of Custody provides additional sample information, including compliance with the sample condition requirements upon receipt.

Report Prepared Thursday, August 19, 2021

PARADIGM
ENVIRONMENTAL SERVICES, INC

Method Blank Report

Client: Sofia Redevelopment Inc.
Project Reference: N/A
Lab Project ID: 213717
SDG #: 3717-01
Matrix: TCLP Extract

TCLP Semi-Volatile Organics

Analyte	Result	Units	Qualifier	Date Analyzed	
1,4-Dichlorobenzene	<40.0	ug/L		8/18/2021	14:51
2,4,5-Trichlorophenol	<40.0	ug/L		8/18/2021	14:51
2,4,6-Trichlorophenol	<40.0	ug/L		8/18/2021	14:51
2,4-Dinitrotoluene	<40.0	ug/L		8/18/2021	14:51
Cresols (as m,p,o-Cresol)	<80.0	ug/L		8/18/2021	14:51
Hexachlorobenzene	<40.0	ug/L		8/18/2021	14:51
Hexachlorobutadiene	<40.0	ug/L		8/18/2021	14:51
Hexachloroethane	<40.0	ug/L		8/18/2021	14:51
Nitrobenzene	<40.0	ug/L		8/18/2021	14:51
Pentachlorophenol	<80.0	ug/L		8/18/2021	14:51
Pyridine	<40.0	ug/L		8/18/2021	14:51

Method Reference(s): EPA 8270D
EPA 3510C
Preparation Date: 8/18/2021
Data File: B56347.D
QC Batch ID: QC210818ABNT
QC Number: 1

PARADIGM
ENVIRONMENTAL SERVICES, INC

QC Report for Laboratory Control Sample

Client: Sofia Redevelopment Inc.

Project Reference: N/A

Lab Project ID: 213717

SDG #: 3717-01

Matrix: TCLP Extract

TCLP Semi-Volatile Organics

Analyte	Spike Added	Spike Units	LCS Result	LCS % Recovery	% Rec Limits	LCS Outliers	Date Analyzed
1,4-Dichlorobenzene	200	ug/L	140	70.1	24.6 - 94.2		8/18/2021
2,4,6-Trichlorophenol	300	ug/L	265	88.5	60.6 - 123		8/18/2021
2,4-Dinitrotoluene	200	ug/L	172	85.9	58.1 - 113		8/18/2021
Pentachlorophenol	300	ug/L	358	119	48.5 - 153		8/18/2021

Method Reference(s): EPA 8270D
EPA 3510C
Preparation Date: 8/18/2021
Data File: B56348.D
QC Number: 1
QC Batch ID: QC210818ABNT

PARADIGM
ENVIRONMENTAL SERVICES, INC

Method Blank Report

Client: Sofia Redevelopment Inc.

Project Reference: N/A

Lab Project ID: 213717

SDG #: 3717-01

Matrix: TCLP Extract

TCLP Mercury

Analyte	Result	Units	Qualifier	Date Analyzed
Mercury	<0.00200	mg/L		8/23/2021 08:32

Method Reference(s): EPA 7470A
Preparation Date: 8/20/2021
Data File: Hg210823A
QC Batch ID: QC210820HgTCLP
QC Number: Blk 1

PARADIGM
ENVIRONMENTAL SERVICES, INC

QC Report for Laboratory Control Sample and Control Sample Duplicate

Client: Sofia Redevelopment Inc.

Project Reference: N/A

Lab Project ID: 213717

SDG #: 3717-01

Matrix: TCLP Extract

TCLP Mercury

Analyte	LCS Added	LCSD Added	Spike Units	LCS Result	LCSD Result	LCS % Recovery	LCSD % Recovery	% Rec Limits	LCS Outliers	LCSD Outliers	Relative % Difference	RPD Limit	RPD Outliers	Date Analyzed
Mercury	0.0200	0.0200	mg/L	0.0171	0.0201	85.6	101	80 - 120			16.1	20		8/23/2021

Method Reference(s): EPA 7470A
Preparation Date: 8/20/2021
Data File: Hg210823A
QC Number: 1
QC Batch ID: QC210820HgTCLP

This report is part of a multipage document and should only be evaluated in its entirety. The Chain of Custody provides additional sample information, including compliance with the sample condition requirements upon receipt.

PARADIGM
ENVIRONMENTAL SERVICES, INC.

Method Blank Report

Client: **Sofia Redevelopment Inc.**

Project Reference: N/A

Lab Project ID: 213717

SDG #: 3717-01

Matrix: TCLP Extract

TCLP RCRA Metals (ICP)

Analyte	Result	Units	Qualifier	Date Analyzed	
Arsenic	<0.500	mg/L		8/18/2021	16:48
Barium	<0.500	mg/L		8/18/2021	16:48
Cadmium	<0.0250	mg/L		8/18/2021	16:48
Chromium	<0.500	mg/L		8/18/2021	16:48
Lead	<0.500	mg/L		8/18/2021	16:48
Selenium	<0.200	mg/L		8/18/2021	16:48
Silver	<0.500	mg/L		8/18/2021	16:48

Method Reference(s): EPA 6010C
EPA 3005
Preparation Date: 8/18/2021
Data File: 210818B
QC Batch ID: QC210818TCLP
QC Number: Blk 1

PARADIGM
ENVIRONMENTAL SERVICES, INC.

QC Report for Laboratory Control Sample and Control Sample Duplicate

Client: **Sofia Redevelopment Inc.**

Project Reference: N/A

Lab Project ID: 213717

SDG #: 3717-01

Matrix: TCLP Extract

TCLP RCRA Metals (ICP)

Analyte	LCS Added	LCSD Added	Spike Units	LCS Result	LCSD Result	LCS % Recovery	LCSD % Recovery	% Rec Limits	LCS Outliers	LCSD Outliers	Relative % Difference	RPD Limit	RPD Outliers	Date Analyzed
Arsenic	12.5	12.5	mg/L	12.4	12.6	99.2	101	80 - 120			1.74	20		8/18/2021
Barium	12.5	12.5	mg/L	13.5	13.6	108	109	80 - 120			1.14	20		8/18/2021
Cadmium	5.00	5.00	mg/L	5.20	5.25	104	105	80 - 120			0.954	20		8/18/2021
Chromium	12.5	12.5	mg/L	12.4	12.6	99.6	100	80 - 120			0.896	20		8/18/2021
Lead	12.5	12.5	mg/L	13.0	13.1	104	105	80 - 120			0.820	20		8/18/2021
Selenium	12.5	12.5	mg/L	12.9	13.0	103	104	80 - 120			0.817	20		8/18/2021
Silver	1.25	1.25	mg/L	1.24	1.25	99.0	99.9	80 - 120			0.882	20		8/18/2021

Method Reference(s): EPA 6010C
EPA 3005
Preparation Date: 8/18/2021
Data File: 210818B
QC Number: 1
QC Batch ID: QC210818TCLP

PARADIGM

PARADIGM
ENVIRONMENTAL SERVICES, INC

Method Blank Report

Client: Sofia Redevelopment Inc.

Project Reference: N/A

Lab Project ID: 213717

SDG #: 3717-01

Matrix: TCLP Extract

TCLP Volatile Organics

Analyte	Result	Units	Qualifier	Date Analyzed	
1,1-Dichloroethene	<20.0	ug/L		8/24/2021	11:52
1,2-Dichloroethane	<20.0	ug/L		8/24/2021	11:52
2-Butanone	<100	ug/L		8/24/2021	11:52
Benzene	<20.0	ug/L		8/24/2021	11:52
Carbon Tetrachloride	<20.0	ug/L		8/24/2021	11:52
Chlorobenzene	<20.0	ug/L		8/24/2021	11:52
Chloroform	<20.0	ug/L		8/24/2021	11:52
Tetrachloroethene	<20.0	ug/L		8/24/2021	11:52
Trichloroethene	<20.0	ug/L		8/24/2021	11:52
Vinyl chloride	<20.0	ug/L		8/24/2021	11:52

Surrogate	Percent Recovery	Limits	Outliers	Date Analyzed	
1,2-Dichloroethane-d4	**101**	83 - 120		8/24/2021	11:52
4-Bromofluorobenzene	**99.3**	65.5 - 118		8/24/2021	11:52
Pentafluorobenzene	**99.8**	91.2 - 109		8/24/2021	11:52
Toluene-D8	**103**	79.7 - 112		8/24/2021	11:52

Method Reference(s): EPA 8260C
EPA 5030

Data File: z03706.D

QC Batch ID: voax210824

QC Number: Blk 1

PARADIGM
ENVIRONMENTAL SERVICES, INC

QC Report for Laboratory Control Sample

Client: Sofia Redevelopment Inc.

Project Reference: N/A

Lab Project ID: 213717

SDG #: 3717-01

Matrix: TCLP Extract

TCLP Volatile Organics

Analyte	Spike Added	Spike Units	LCS Result	LCS % Recovery	% Rec Limits	LCS Outliers	Date Analyzed
1,1-Dichloroethene	20.0	ug/L	16.3	81.4	66.7 - 112		8/24/2021
1,2-Dichloroethane	20.0	ug/L	19.1	95.4	83 - 112		8/24/2021
Benzene	20.0	ug/L	18.6	93.1	87.6 - 106		8/24/2021
Carbon Tetrachloride	20.0	ug/L	18.1	90.4	85.9 - 117		8/24/2021
Chlorobenzene	20.0	ug/L	18.2	91.1	82.7 - 103		8/24/2021
Chloroform	20.0	ug/L	18.2	91.2	86.9 - 113		8/24/2021
Tetrachloroethene	20.0	ug/L	18.5	92.6	73 - 112		8/24/2021
Trichloroethene	20.0	ug/L	17.7	88.7	84.7 - 109		8/24/2021
Vinyl chloride	20.0	ug/L	18.5	92.7	54.9 - 139		8/24/2021

Method Reference(s): EPA 8260C
EPA 5030
Data File: z03705.D
QC Number: LCS 1
QC Batch ID: voax210824

This report is part of a multipage document and should only be evaluated in its entirety. The Chain of Custody provides additional sample information, including compliance with the sample condition requirements upon receipt.

Analytical Report Appendix

The reported results relate only to the samples as they have been received by the laboratory.

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All soil/sludge samples have been reported on a dry weight basis, unless qualified "reported as received". Other solids are reported as received.

Low level Volatiles blank reports for soil/solid matrix are based on a nominal 5 gram weight. Sample results and reporting limits are based on actual weight, which may be more or less than 5 grams.

The Chain of Custody provides additional information, including compliance with sample condition requirements upon receipt. Sample condition requirements are defined under the 2003 NELAC Standard, sections 5.5.8.3.1 and 5.5.8.3.2.

NYSDOH ELAP does not certify for all parameters. Paradigm Environmental Services or the indicated subcontracted laboratory does hold certification for all analytes where certification is offered by ELAP unless otherwise specified. Aliquots separated for certain tests, such as TCLP, are indicated on the Chain of Custody and final reports with an "A" suffix.

Data qualifiers are used, when necessary, to provide additional information about the data. This information may be communicated as a flag or as text at the bottom of the report. Please refer to the following list of analyte-specific, frequently used data flags and their meaning:

"<" = Analyzed for but not detected at or above the quantitation limit.
"E" = Result has been estimated, calibration limit exceeded.
"Z" = See case narrative.
"D" = Sample, Laboratory Control Sample, or Matrix Spike Duplicate results above Relative Percent Difference limit.
"M" = Matrix spike recoveries outside QC limits. Matrix bias indicated.
"B" = Method blank contained trace levels of analyte. Refer to included method blank report.
"J" = Result estimated between the quantitation limit and half the quantitation limit.
"L" = Laboratory Control Sample recovery outside accepted QC limits.
"P" = Concentration differs by more than 40% between the primary and secondary analytical columns.
"NC" = Not calculable. Applicable to RPD if sample or duplicate result is non-detect or estimated (see primary report for data flags). Applicable to MS if sample is greater or equal to ten times the spike added. Applicable to sample surrogates or MS if sample dilution is 10x or higher.
"" = Indicates any recoveries outside associated acceptance windows. Surrogate outliers in samples are presumed matrix effects. LCS demonstrates method compliance unless otherwise noted.*
"(1)" = Indicates data from primary column used for QC calculation.
"A" = denotes a parameter for which ELAP does not offer approval as part of their laboratory certification program.
"F" = denotes a parameter for which Paradigm does not carry certification, the results for which should therefore only be used where ELAP certification is not required, such as personal exposure assessment.

GENERAL TERMS AND CONDITIONS
LABORATORY SERVICES

These Terms and Conditions embody the whole agreement of the parties in the absence of a signed and executed contract between the Laboratory (LAB) and Client. They shall supersede all previous communications, representations, or agreements, either verbal or written, between the parties. The LAB specifically rejects all additional, inconsistent, or conflicting terms, whether printed or otherwise set forth in any purchase order or other communication from the Client to the LAB. The invalidity or unenforceability in whole or in part of any provision, tern or condition hereof shall not affect in any way the validity or enforceability of the remainder of the Terms and Conditions. No waiver by LAB of any provision, term, or condition hereof or of any breach by or obligation of the Client hereunder shall constitute a waiver of such provision, term, or condition on any other occasion or a waiver of any other breach by or obligation of the Client. This agreement shall be administered and interpreted under the laws of the state which services are procured.

Warranty. Recognizing that the nature of many samples is unknown and that some may contain potentially hazardous components, LAB warrants only that it will perform testing services, obtain findings, and prepare reports in accordance with generally accepted analytical laboratory principles and practices at the time of performance of services. LAB makes no other warranty, express or implied.

Scope and Compensation. LAB agrees to perform the services described in the chain of custody to which these terms and conditions are attached. Unless the parties agree in writing to the contrary, the duties of LAB shall not be construed to exceed the services specifically described. LAB wi use LAB default method for all tests unless specified otherwise on the Work Order.
Payment terms are net 30 days from the date of invoice. All overdue payments are subject to an interest charge of one and one-half percent (1-1/2%) per month or a portion thereof. Client shall also be responsible for costs of collection, including payment of reasonable attorney fees if such expense is incurred. The prices, unless stated, do not include any sale, use or other taxes. Such taxes will be added to invoice prices when required.

Prices. Compensation for services performed will be based on the current Lab Analytical Fee Schedule or on quotations agreed to in writing by the parties. Turnaround time based charges are determined from the time of resolution of all work order questions. Testimony, court appearances or data compilation for legal action will be charged separately. Evaluation and reporting of initial screening runs may incur additional fees.

Limitations of Liability. In the event of any error, omission, or other professional negligence, the sole and exclusive responsibility of LAB shall be to re-perform the deficient work at its own expense and LAB shall have no other liability whatsoever. All claims shall be deemed waived unless made in writing and received by LAB within ninety (90) days following completion of services.
LAB shall have no liability, obligation, or responsibility of any kind for losses, costs, expenses, or other damages (including but not limited to any special, direct, incidental or consequential damages) with respect to LAB's services or results.
All results provided by LAB are strictly for the use of its clients and LAB is in no way responsible for the use of such results by clients or third parties. All reports should be considered in their entirety, and LAB is not responsible for the separation, detachment, or other use of any portion of these reports. Client may not assign the lab report without the written consent of the LAB.
Client covenants and agrees, at its/his/her sole expense, to indemnify, protect, defend, and save harmless the LAB from and against any and all damages, losses, liabilities, obligations, penalties, claims, litigation, demands, defenses, judgments, suits, actions, proceedings, costs, disbursements and/or expenses (including, without limitation attorneys' and experts' fees and disbursements) of any kind whatsoever which may at any time be imposed upon, incurred by or asserted or awarded against client relating to, resulting from or arising out of (a) the breach of this agreement by this client, (b) the negligence of the client in handling, delivering or disclosing any hazardous substance, (c) the violation of the Client of any applicable law, (d) non-compliance by the Client with any environmental permit or (e) a material misrepresentation in disclosing the materials to be tested.

Hazard Disclosure. Client represents and warrants that any sample delivered to LAB will be preceded or accompanied by complete written disclosure of the presence of any hazardous substances known or suspected by Client. Client further warrants that any sample containing any hazardous substance that is to be delivered to LAB will be packaged, labeled, transported, and delivered properly and in accordance with applicable laws.

Sample Handling. Prior to LAB's acceptance of any sample (or after any revocation of acceptance), the entire risk of loss or of damage to such sample remains with Client. Samples are accepted when receipt is acknowledged on chain of custody documentation. In no event will LAB have any responsibility for the action or inaction of any carrier shipping or delivering any sample to or from LAB premises.
Client authorizes LAB to proceed with the analysis of samples as received by the laboratory, recognizing that any samples not in compliance with all current DOH-ELAP-NELAP requirements for containers, preservation or holding time will be noted as such on th final report.
Disposal of hazardous waste samples is the responsibility of the Client. If the Client does not wish such samples returned, LAB may add storage and disposal fees to the final invoice. Maximum storage time for samples is 30 days after completion of analysis unless modified by applicable state or federal laws. Client will be required to give the LAB written instructions concerning disposal of these samples.
LAB reserves the absolute right, exercisable at any time, to refuse to receive delivery of, refuse to accept, or revoke acceptance of any sample, which, in the sole judgment of LAB (a) is of unsuitable volume, (b) may be or become unsuitable for or may pose a risk in handling, transport, or processing for any health, safety, environmental or other reason whether or not due to the presence in the sample of any hazardous substance, and whether or not such presence has been disclosed to LAB by Client or (c) if the condition or sample date make the sample unsuitable for analysis.

Legal Responsibility. LAB is solely responsible for performance of this contract, and no affiliated company, director, officer, employee, or agent shall have any legal responsibility hereunder, whether in contract or tort including negligence.

Assignment. LAB may assign its performance obligations under this contract to other parties, as it deems necessary. LAB shall disclose to Client any assignee (subcontractor) by ELAP ID # on the submitted final report.

Force Majeure. LAB shall have no responsibility or liability to the Client for any failure or delay in performance by LAB, which results in whole or in part from any cause or circumstance beyond the reasonable control of LAB. Such causes and circumstances shall include, but not limited to, acts of God, acts or orders of any government authority, strikes or other labor disputes, natural disasters, accidents, wars, civil disturbances, difficulties or delays in transportation, mail or delivery services, inability to obtain sufficient services or supplies from LAB's usual suppliers, or any other cause beyond LAB's reasonable control.

Law. This contract shall be continued under the laws of the State of New York without regard to its conflicts of laws provision.

179 Lake Avenue, Rochester, NY 14608 Office (585) 647-2530 Fax (585) 647-3311

PARADIGM ENVIRONMENTAL SERVICES, INC.

CHAIN OF CUSTODY

V1

REPORT TO:		INVOICE TO:		
CLIENT:	Sofia Redevelopment Inc.	CLIENT:	Rocterra	LAB PROJECT ID: 213717
ADDRESS:	920 Exchange Street	ADDRESS:	7 Ontario View Street	
CITY:	Rochester STATE: NY ZIP: 14608	CITY:	Rochester STATE: NY ZIP: 14617	Quotation #: M5210816A
PHONE:		PHONE:	585 698 6842	Email: alex@rocterra.org
ATTN:	Alex Wirth	ATTN:	Alex Wirth	

PROJECT REFERENCE

Matrix Codes:
AQ - Aqueous Liquid; **NQ** - Non-Aqueous Liquid; **WA** - Water; **WG** - Groundwater; **DW** - Drinking Water; **WW** - Wastewater; **SO** - Soil; **SL** - Sludge; **SD** - Solid; **PT** - Paint; **WP** - Wipe; **CK** - Caulk; **OL** - Oil; **AR** - Air

REQUESTED ANALYSIS

DATE COLLECTED	TIME COLLECTED	COMPOSITE	GRAB	SAMPLE IDENTIFIER	MATRIX CODES	NUMBER OF CONTAINERS	TCLP metals	TCLP VOCs	TCLP SVOCs	Flashpoint	PCBs	REMARKS	PARADIGM LAB SAMPLE NUMBER
8/17/21	1200	X		Excav 1	SO	2	X	X	X	X	X		01A
8/17/21	1215	X		Excav 2	SO	2	X	X	X	X	X	Please Hold *	
												A for TCLP extract. CP 8/17/21	

Turnaround Time		Report Supplements			
Availability contingent upon lab approval; additional fees may apply.					
Standard 5 day	X	None Required		None Required	
10 day		Batch QC		Basic EDD	
Rush 3 day		Category A	X	NYSDEC EDD	X
Rush 2 day		Category B			
Rush 1 day					
Date Needed _____ please indicate date needed:		Other please indicate package needed:		Other EDD please indicate EDD needed:	

Sampled By — 8/17/21 1220 Date/Time

Total Cost:

Relinquished By — Date/Time

Received By — Emily Tarnen 8/17/21 1233 Date/Time

P.I.F.

Received @ Lab By — CP 8/17/21 13:32 Date/Time

23°C 8/17/21 12:35

By signing this form, client agrees to Paradigm Terms and Conditions (reverse).

Custody Seal N/A, samples delivered by client. CP 8/17/21

See additional page for sample conditions.

PARADIGM

Chain of Custody Supplement

Client: Sofia Redevelopment/RocTerra **Completed by:** Glenn Pezzulo

Lab Project ID: 213717 **Date:** 8/17/21

Sample Condition Requirements

Per NELAC/ELAP 210/241/242/243/244

Condition	NELAC compliance with the sample condition requirements upon receipt- Yes	No	N/A
Container Type	X		
Comments			
Transferred to method-compliant container			X
Headspace (<1 mL)	X TCLP VOA		X
Comments			
Preservation			X
Comments			
Chlorine Absent (<0.10 ppm per test strip)			X
Comments			
Holding Time	X		
Comments			
Temperature		X	X metals
Comments	23 °C	OK to proceed per email	
Compliant Sample Quantity/Type	X		
Comments			