NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8
6274 East Avon-Lima Road, Avon, NY 14414-9516
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www.dec.ny.gov

Via E-mail

November 2, 2022

Parkway Plaza, LP
1000 University Ave, Suite 500
Rochester, NY 14607
Attn: Andrew Bodewes

Re: Remedial Action Work Plan – Addendum #2
Parkway Plaza Cleaners Site #c835028
Canandaigua, Ontario County

Dear Mr. Bodewes:

The New York State Department of Environmental Conservation (NYSDEC), in consultation with New York State Department of Health, has completed its review of the document entitled "Remedial Action Work Plan (RAWP) – Addendum #2" for the Parkway Plaza Cleaners Site #C835028, dated August 2022, revised September 29, 2022, and approve as modified below:

- Planned emerging contaminants monitoring must be completed in accordance with updated PFAS Sampling and Analysis Guidelines found at https://www.dec.ny.gov/chemical/108831.html.
- Schedule – Final Engineering Report (FER) must be updated/finalized to include 12-month performance monitoring results.

Please elect in writing your acceptance of the Remedial Action Work Plan (RAWP) – Addendum #2 Approved as Modified. Additionally, a compiled final workplan, including schedule and this cover letter must be provided to the Agency and document repository prior to commencement of work.

If you wish to discuss / clarify the content of this letter, please contact me via email at timothy.schneider@dec.ny.gov or by phone at (585) 226-5480.

Sincerely,

Timothy Schneider, P.E.
Professional Engineer 1

N. Simon / R. Kampf
D. Pratt / M. Cruden / D. Loew
J. Kenney / J. Deming

REMEDIAL ACTION WORK PLAN
ADDENDUM #2

FORMER PARKWAY CLEANERS
EASTERN BOULEVARD
PARKWAY PLAZA
CITY OF CANANDAIGUA, ONTARIO COUNTY, NEW YORK
BCP SITE NUMBER C835028

Prepared For: Parkway Plaza Limited Partnership
46 Prince Street
Rochester, New York 14607

Prepared By: Day Engineering, P.C.
1563 Lyell Avenue
Rochester, New York 14606

Project No.: 5188R-15

Date: September 2022

INTRODUCTION

Parkway Plaza Limited Partnership, LLP entered the New York State Brownfield Cleanup Program (BCP) to evaluate and remediate environmental impacts at the former Parkway Cleaners site in Canandaigua, New York (BCP Site #C835028 or the Site). As described in the Remedial Action Work Plan (RAWP) for the Site prepared by Day Engineering, P.C. dated May 2021, and conditionally approved by the New York State Department of Environmental Conservation (NYSDEC) June 8, 2022, the highest concentrations of contaminants of concern (COC), including tetrachloroethene and its breakdown products, in the soil and groundwater at the Site remain in proximity to the former source area below the concrete slab of the former alcove. In general, the COC concentrations measured in the groundwater downgradient of the source zone decreases prior to increasing in monitoring well MW-103s, which is located in proximity of the southeastern property boundary of the Site.

Based on the extent of COC-impact identified in the groundwater, soil and soil vapor, three areas of concern (AOC) are identified.

- AOC#1 – Includes the former alcove area, potentially the area to the east where buried utilities precluded soil removal during a soil removal IRM completed in 2001, an area extending to a maximum depth of 18 ft. bgs;

- AOC#2 – Includes a localized area south of AOC#1 where COC concentrations in excess of the Protection of Groundwater were detected in two test borings at depths of predominately between about 16 and 32 ft. bgs; and

- AOC#3 – Includes the on-site area in proximity of MW-103s that extends to a depth of about 13 ft. bgs.

The Recommended Remedial Alternative (i.e., Track 4 Restricted Commercial Use) to be implemented at the Site includes:

- A cover system consisting of asphalt pavement, building slabs and sidewalks will be maintained to allow for restricted commercial use of the Site;
- The AOC#1 source will be addressed by in-situ treatment/chemical reduction of groundwater (containment) by in-situ chemical reduction via injection of zero-valent iron within a targeted injection zone of 4 ft. and 18 ft. bgs to treat COC in groundwater;
- Groundwater plume migration (AOC#1/AOC#3) will be addressed by in-situ treatment/biodegradation of groundwater (containment) by in-situ enhanced biodegradation to treat COC in groundwater through anaerobic reductive dechlorination via the injection of emulsified vegetable oil (EVO) between 4 ft. and 18 ft. bgs;
- The continued operation of the SSDS within the former Parkway Cleaners tenant space and testing as deemed necessary in adjacent tenant spaces to mitigate potential soil vapors from entering the existing build and the installation of a SSDS in new buildings, if warranted;
- Implementation of engineering controls (e.g., maintenance of the cover system, continued operation of the SSDS, etc.);
- Imposition of an institutional control in the form of environmental easement or deed restriction for the Site; and

- Development and implementation of a Site Management Plan (SMP).

COVER SYSTEM

A cover system is a required element of the remedy to preclude direct contact with exposed surface soil that may contain concentrations above the applicable Standards, Criteria and Guidance (SCG) unless adequate surface soil sampling has been completed. While much of the Site is currently covered with building and asphalt pavement, there is some exposed surface soil present at the Site. Refer to Figure 2 for the location of the currently exposed surface soil between the edge of pavement and the southern property that requires placement of additional cover material. The cover in this area will be in completed by extending the asphalt pavement to the property line in accordance with appropriate provisions outlined in DER-10. Refer to Figure 3 for a cross section showing construction details of the asphalt cover system to be installed along the southern property boundary and described on Figure 2. Specifically, the existing vegetation and accumulated debris in this area will be removed, sub-base material meeting the applicable DER-10 provisions for imported material will be placed on the resulting ground surface and subsequently covered with asphalt paving to match the existing asphalt paving surface.

The soil and/or fill along the southern property boundary in the area of the cover system expansion will be removed by a qualified contractor (e.g., HAZWOPER trained) in preparation of installation of the sub-base and asphalt cover. During ground intrusive activities, the community air monitoring plan provided in the May 2021 RAWP will be implemented and, if necessary, work practices will be adjusted accordingly to maintain compliance with the CAMP. Subsequent to installation, the extent of the new cover will be documented by a New York State Licensed Land Surveyor. Prior to disposal, soil and/or fill samples of the excavated materials will be collected and submitted to an Environmental Laboratory Approval Program (ELAP) certified laboratory approved by the New York State Department of Health (NYSDOH) and tested for the waste characterization parameters required by the designated disposal facility.

This task will result in a complete impermeable cover (i.e., asphalt, concrete, etc.) system for the Site and meet the objective of the selected remedial alternative for the Site.

EMERGING CONTAMINANT SAMPLING

Previous emerging contaminant sampling identified some per-and polyfluoralkyl substances (PFAS) at concentrations exceeding appliable NYSDEC screening levels. As such, groundwater samples from monitoring wells MW-103s, MW-TB-4 and MW-2.1 will be collected during the 9-month effectiveness monitoring event identified in the NYSDEC approved RAWP, and tested for PFAS substances. Groundwater samples will be collected from the above monitoring wells using dedicated disposable high-density polyethylene (HDPE) and silicon tubing connected through a peristaltic pump and placed in pre-cleaned HDPE or polypropylene bottles and submitted to an ELAP certified laboratory approved by the NYSDOH to test PFAS concentrations (i.e., currently anticipated to be Alpha Analytical Laboratories). The samples will be tested for the following parameters:

- 21-compound PFAS target analyte list provided by NYSDEC using Modified United States Environmental Protection Agency (USEPA) Method 537, with reporting limits for

perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS) not to exceed 2 nanograms per liter (ng/L)

The following quality assurance samples will be collected and tested for PFAS:

- One equipment blank, collected using laboratory supplied PFAS-free water;
- One field duplicate; and
- One matrix spike/matrix spike duplicate (MS/MSD).

The emerging contaminant sampling will be conducted using the protocols described in the following NSYDEC document:

- *Sampling, Analysis, and Assessment of Per and Polyfluoroalkyl Substances (PFAS), dated January 2021.*

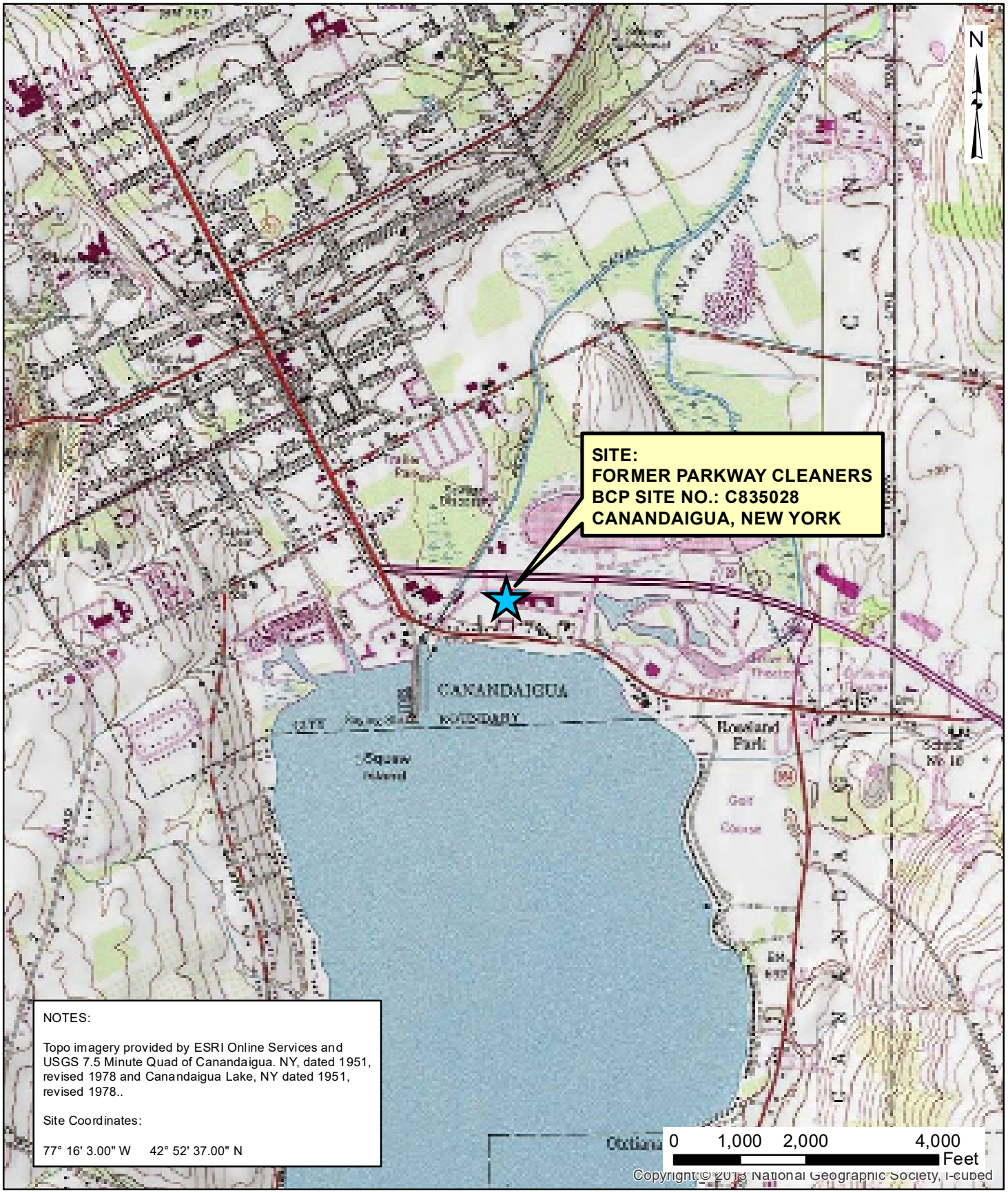
Laboratory data will be a full Analytical Services Protocol (ASP) Category B deliverable and NYSDEC Equis electronic data deliverable (EDD).

Depending on the test results, additional sampling/testing of select monitoring wells for PFAS may be required following discussions with the NYSDEC.

SUMMARY AND SCHEDULE

The proposed modifications presented herein is not a change in remedy, but a modification to the cover system and groundwater monitoring program to include emerging contaminants. With the exception of the modifications discussed herein, the methods identified NYSDEC approved RAWP dated May 2021 and Addendum #1 to the RAWP dated July 26, 2022, will be implemented without modification. Refer to Attachment 1 for a copy of the updated project schedule including estimated dates/timeframes for the Asphalt Cover installation and Emerging contaminant sampling tasks.

FIGURES



NOTES:

Topo imagery provided by ESRI Online Services and USGS 7.5 Minute Quad of Canandaigua. NY, dated 1951, revised 1978 and Canandaigua Lake, NY dated 1951, revised 1978..

Site Coordinates:

77° 16' 3.00" W 42° 52' 37.00" N

Date: 02-17-2021 Drawn By: CPS Scale: AS NOTED	**DAY ENGINEERING, PC.** Environmental Engineering Consultants Rochester, New York 14606 New York, New York 10170	Project Title: FORMER PARKWAY CLEANERS BCP SITE NO.: C835028 CANANDAIGUA, NEW YORK Drawing Title: Project Locus Map	Project No.: 5188R-15 FIGURE 1

Document Path: E:\GIS Mapping\Conifer\5188R-15Park\5188R-01-Locus.mxd

Last Date Saved: 17 Feb 2021

Legend

- Designated groundwater sample location to monitor emerging contaminant concentrations
- Groundwater sample location
- Area requiring impermeable material cover
- BCP boundary
- Parcel boundaries
- Typical groundwater flow

NOTES:

Test locations tape-measured in relation to existing site structures and should be considered accurate to the degree implied by the method used.

Property boundaries provided by Ontario County ONCOR online GIS services, dated 2019. These boundaries are approximate.

	DATE
PROJECT MANAGER	NES
DATE DRAWN	08-2022
	CPS
DATE ISSUED	08-03-2022
SCALE	AS NOTED

DAY ENVIRONMENTAL, INC.
Environmental Consultants
Rochester, New York 14606

Project Title
FORMER PARKWAY CLEANERS
BCP SITE NO.: C835028
CANANDAIGUA, NEW YORK

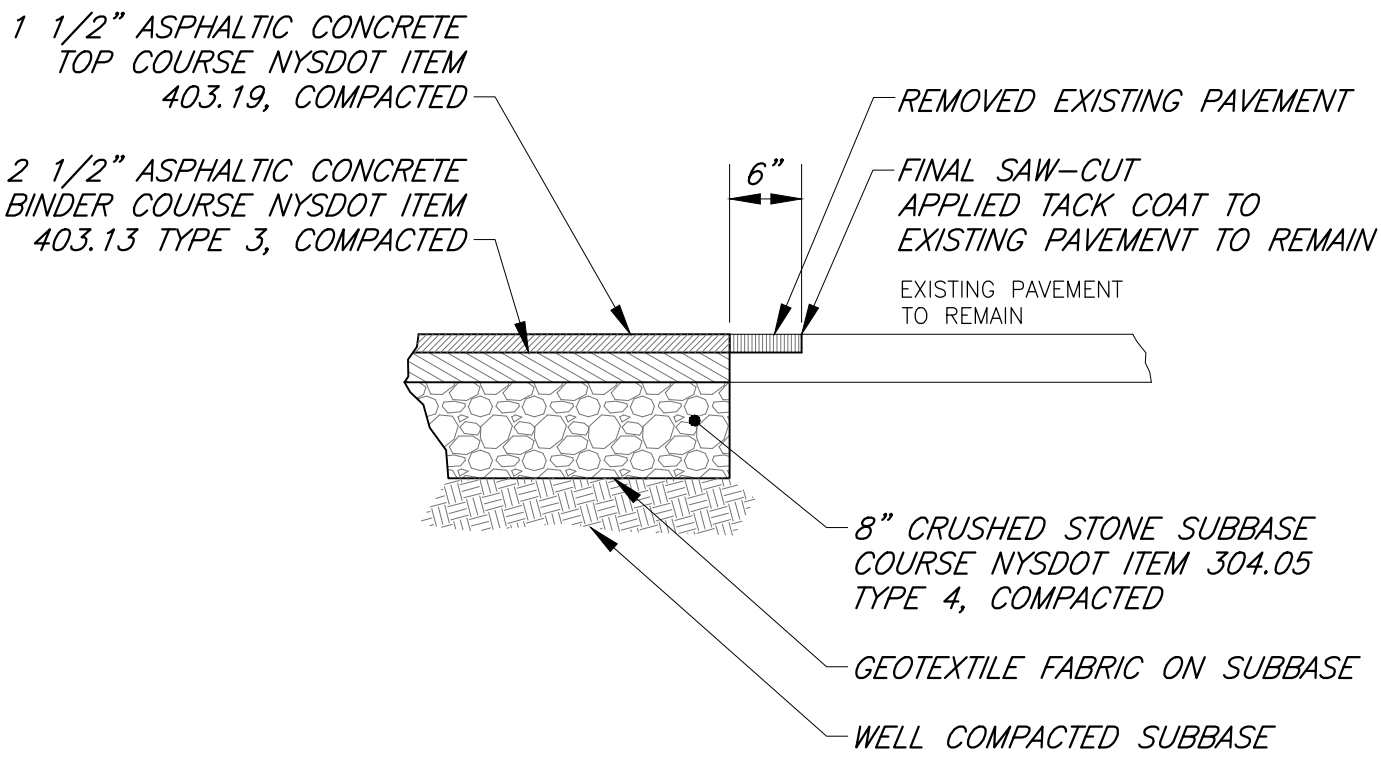
RAWP ADDENDUM #2

Drawing Title
Site Plan with Cover System and Emerging Contaminant Sampling Locations

Project No.
5188R-15

FIGURE 2

Last Date Saved: 8/4/2022 10:44 AM Document Path: E:\GIS Mapping\Conifer\ParkwayPlaza_BCP\ParkwayPlaza_BCP.aprx



ASPHALT COVER SYSYTEM SECTION

3/4" = 1'-0"

0' 1'-4" 2'-8" 4'

DATE	9-22-2022
DRAWN BY	RJM
SCALE	AS NOTED

DAY ENVIRONMENTAL, INC.
ENVIRONMENTAL CONSULTANTS
ROCHESTER, NEW YORK 14606
NEW YORK, NEW YORK 10170

PROJECT TITLE
FORMER PARKWAY CLEANERS
BCP SITE NO.; C835028
CANANDAIGUA, NEW YORK
RAWP ADDENDUM #2

DRAWING TITLE
Asphalt Cover System Section

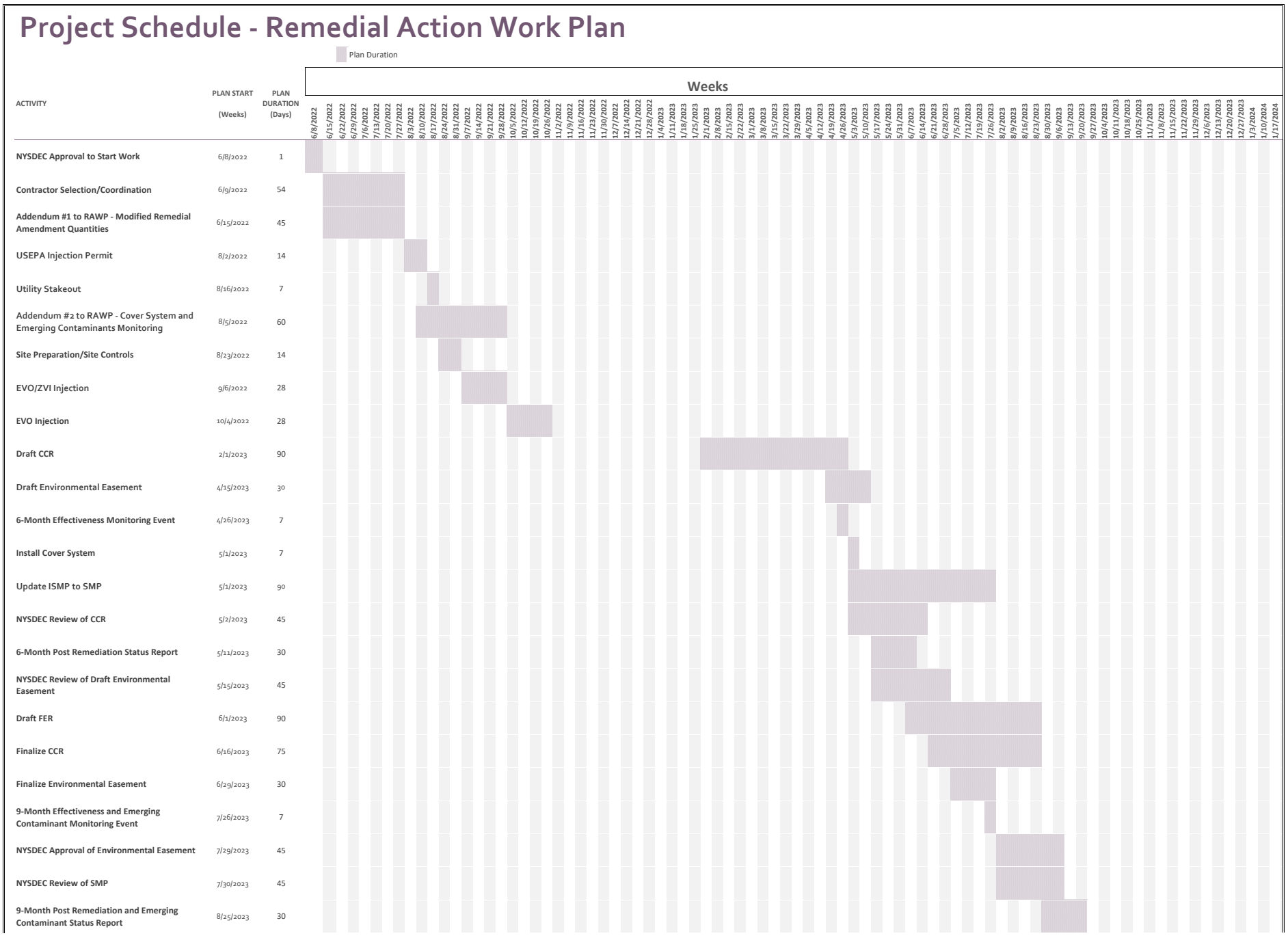
PROJECT NO.
5188R-15

FIGURE 3

Attachment 1
Project Schedule

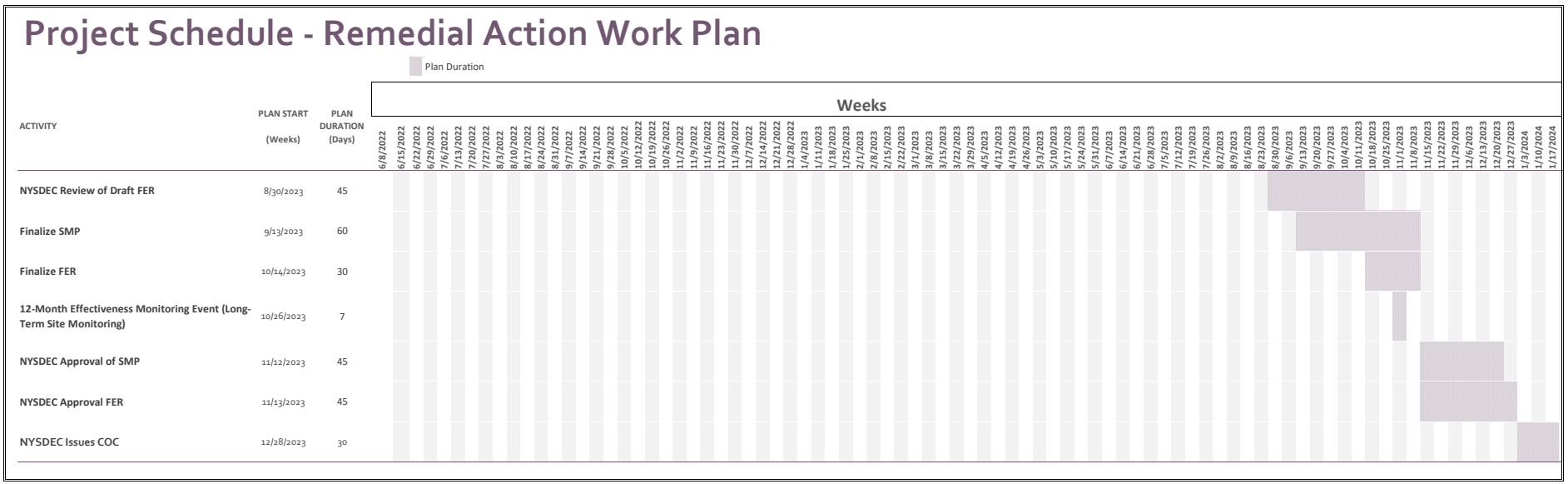
Table 6
Former Parkway Cleaners
Parkway Plaza
Canandaigua, New York
BCP Site #C835028

Project Schedule - Remedial Action Work Plan



ACTIVITY	PLAN START (Weeks)	PLAN DURATION (Days)
NYSDEC Approval to Start Work	6/8/2022	1
Contractor Selection/Coordination	6/9/2022	54
Addendum #1 to RAWP - Modified Remedial Amendment Quantities	6/15/2022	45
USEPA Injection Permit	8/2/2022	14
Utility Stakeout	8/16/2022	7
Addendum #2 to RAWP - Cover System and Emerging Contaminants Monitoring	8/5/2022	60
Site Preparation/Site Controls	8/23/2022	14
EVO/ZVI Injection	9/6/2022	28
EVO Injection	10/4/2022	28
Draft CCR	2/1/2023	90
Draft Environmental Easement	4/15/2023	30
6-Month Effectiveness Monitoring Event	4/26/2023	7
Install Cover System	5/1/2023	7
Update ISMP to SMP	5/1/2023	90
NYSDEC Review of CCR	5/2/2023	45
6-Month Post Remediation Status Report	5/11/2023	30
NYSDEC Review of Draft Environmental Easement	5/15/2023	45
Draft FER	6/1/2023	90
Finalize CCR	6/16/2023	75
Finalize Environmental Easement	6/29/2023	30
9-Month Effectiveness and Emerging Contaminant Monitoring Event	7/26/2023	7
NYSDEC Approval of Environmental Easement	7/29/2023	45
NYSDEC Review of SMP	7/30/2023	45
9-Month Post Remediation and Emerging Contaminant Status Report	8/25/2023	30

Project Schedule - Remedial Action Work Plan



ACTIVITY	PLAN START (Weeks)	PLAN DURATION (Days)
NYSDEC Review of Draft FER	8/30/2023	45
Finalize SMP	9/13/2023	60
Finalize FER	10/14/2023	30
12-Month Effectiveness Monitoring Event (Long-Term Site Monitoring)	10/26/2023	7
NYSDEC Approval of SMP	11/12/2023	45
NYSDEC Approval FER	11/13/2023	45
NYSDEC Issues COC	12/28/2023	30