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869.001

April 23, 2015

Mr. James H. Craft
Region 8
New York State Department of Environmental Conservation
6274 Avon-Lima Road
Avon, New York 14414-9516

Re: Former J&S Conveyor
Site V00644
Remedial Action Work Plan Addendum

Dear Mr. Craft:

Leader Professional Services, Inc. has been retained by Poinkers, LLC to complete the required environmental services needed to finalize the Voluntary Cleanup Program requirements. Based on our conversation with Julia Kenny and you, the work requiring completion includes the following tasks:

- Sampling and analysis of the soil in the impacted area to define the extent of Lead contamination.
- Complete a building walk through to evaluate current conditions for sub-slab and indoor air sampling of the on-site building, and to conduct sampling as needed in the future.
- Complete the soil removal and cleanup verification sampling.
- Prepare a Final Engineering Report.

This letter identifies the work Leader will be completing and serves as an addendum to the Remedial Action Work Plan, dated April 2006 and Revised Work Plan for the collection of Soil Gas and Indoor Air Samples dated March 2006. In addition to the amendments to these documents, Leader also intends to follow the site's Health and Safety Plan and Community Air Monitoring Plan (discussed later in this letter) for the completion of the tasks identified below.

Scope of Work

The tasks to be completed within this scope of work will include:

1. Lead in soil delineation sampling and analysis.
2. To evaluate the site conditions for the future collection and analysis of sub-slab soil vapor samples, indoor air samples and an outdoor air sample, and propose sampling procedures.
3. The completion of the Remedial Action.
4. The preparation of the Final Engineering Report.

Field Sampling

Lead in Soil Sampling and Analysis

Sampling conducted by NYSDEC found elevated Lead concentrations in surface soil (0 to 2 inches) in the area identified in Figure 1. There is a need to determine the depth of the Lead contaminated soil so a removal can be planned. It is Leader's intent to conduct additional sampling to delineate the vertical extent of Lead contamination or determine what the Lead concentration is at a depth of 12 inches below the ground surface. If the Lead contaminated soil is removed to a depth of 12 inches and clean fill is placed on top then the potential risks of the Lead contaminated soil are minimized.

The soil sampling plan will include sampling and analyzing the soil at two depths: a depth of 6 inches to evaluate the Lead concentrations at an intermediate depth while reducing waste disposal costs; and to sample the soil at a depth of 12 inches to evaluate the soil Lead concentrations at the soil removal depth limit. The sampling will be conducted following the procedures identified in Appendix 1 of this letter. Figure 2 shows the approximate locations for the soil samples. All samples will be analyzed for Lead following USEPA Method 6010B by a laboratory certified by the New York State Department of Health's Environmental Laboratory Approval Program. The Quality assurance samples collected during the sampling event will follow those procedures identified in the Quality Assurance Quality Control ("QA/QC") Plan, dated April 2006 for the project and previously submitted and approved by NYSDEC. The QA/QC Plan identifies the collection of duplicate samples at a rate of 1 per 20 samples. The goal is to delineate the Lead contamination to identify concentrations greater than 1,000 milligrams per kilogram ("mg/Kg").

Sub-slab Soil Vapor and Indoor Air Samples

Past sub-slab and indoor air sampling data indicates there is a potential for vapor intrusion to impact the indoor air quality in the building. It is suspected, however, the current use of the building may severely impact the data that might be collected. Because the current use of the building is unknown, the activities being proposed will have two parts: Part 1 – Conduct a building walk-through to evaluate the current use and to determine suitable sampling locations; and Part 2 – Conduct the sampling. If the current use of the building is not chemical-intensive then sampling will be conducted immediately if cold weather and building heating continues or delayed until the next heating season when the building will be heated and when windows and doors will likely be closed. If the building's current use is chemical-intensive, sampling will be put off to a time in the future when this tenant leaves. Future changes in tenants, changes to the use of the building, or renovations to the building will require a review of the potential impacts created by vapor intrusion, mitigation or sampling.

Based on the building walk-through and future potential use(s) of the building the following proposal may require changes to determine the appropriate number of sub-slab soil vapor and indoor air samples. In general, if sampling is required, the procedures accepted by NYSDEC

in the "Revised Work Plan for the Collection of Soil Gas, Soil Vapor and Ambient Air Samples" dated March 2006 will be used unless superseded by new guidance from either NYSDEC or NYSDOH.

The sampling being proposed in this amendment pertains to only sub-slab soil vapor, indoor air samples and an outdoor air sample. For the sampling, the following changes to the accepted procedures are proposed.

- Each sub-slab sampling point will be tested to determine if the floor seal is adequate using one of the following methods:

    1. Placing a container over the sampling location and sealing it to the floor (the test method originally accepted) and flooding the space beneath the container and over the sampling hole with an appropriate gas.

    2. Or taping a plastic sheet over the sampling location and flooding the space beneath the sheet and above the sampling location with an appropriate gas.

- The gas used to evaluate the floor seal surrounding the sampling point can be either Helium or Propane. The use of Propane will allow the use of a portable organic vapor analyzer with either a photoionization detector or a flame ionization detector. The same instrument will be used to screen the vapors in the sub-slab environment prior to sampling.

- A duplicate sample from either the sub-slab or indoor air will be collected and analyzed.

Reporting

At the completion of each sampling event (soil sampling or sub-slab/indoor air sampling), a letter report will be prepared summarizing the sampling results and include a comparison to previously collected data, if available. The report will also discuss any deviations from this amendment or the Work Plans and any data quality issues.

Remedial Action Plan

The removal of Lead-contaminated soil will follow the general procedures identified in the Remedial Action Work Plan, dated March 2006 for the site, with the following changes:

- The soil removal is focusing only on Lead contamination and thus any follow up sampling will be for Lead only.

- Since the delineation sampling will be conducted at two levels, it is hoped that one of the sampling intervals acceptable soil will be found. For example, if at the 6-inch depth interval Lead concentrations are found below commercial soil cleanup levels, then no further sampling will be conducted following the removal. If however, the delineation sampling results are not definitive (i.e. a uniform depth across multiple adjacent grids), then the soil removal will extend to a 12 inch depth and verification sampling will be conducted following removal. This sampling will be conducted following the Division of Environmental Remediation, DER-10, "Technical Guidance for Site Investigation and Remediation," and sampling of the new ground surface with up to 5 samples.

- If the soil removal does not cleanup the Lead contamination to the soil cleanup objective of 1000 mg/Kg, the excavated area will be backfilled with at least 1 foot of clean fill as required by the Brownfield Cleanup Program for commercial industrial property. The soil or gravel backfill will be tested following the sampling schedule identified on Table 4, "Recommended Number of Soil Samples for Soil Imported to or Exported From a Site" of the Soil Cleanup Guidance, CP-51. The soil quality for the backfilled soil is expected to meet the soil quality requirements identified in the Part 375 Soil Cleanup Objectives for commercial property use.

- Following removal, the excavated soil will be sampled and analyzed to determine the waste characteristics and profiling requirements for acceptance into a permitted facility for landfilling or treatment. While the excavated soil is onsite it will be in an envelope of plastic sheeting and posted with a sign identifying the pile as waste.

Final Engineering Report

Following completion of the sampling and soil removal, a Final Engineering Report ("FER") will be prepared summarizing the activities completed by Poinkers, LLC. The FER will be prepared following the guidelines in DER-10 and its preparation will be supervised and signed by a Professional Engineer, licensed in the State of New York.

Upon approval of this addendum, Leader will begin scheduling the listed activities. In the event snow and possibly frozen ground persist at the time of plan approval, Leader will arrange to start the project with the collection of outdoor air, indoor air, and sub-slab soil vapor samples or delayed until the next heating season.

If you have any questions regarding this addendum please contact me at pvonschondorf@leaderlink.com or (585) 248-2413.

Sincerely;

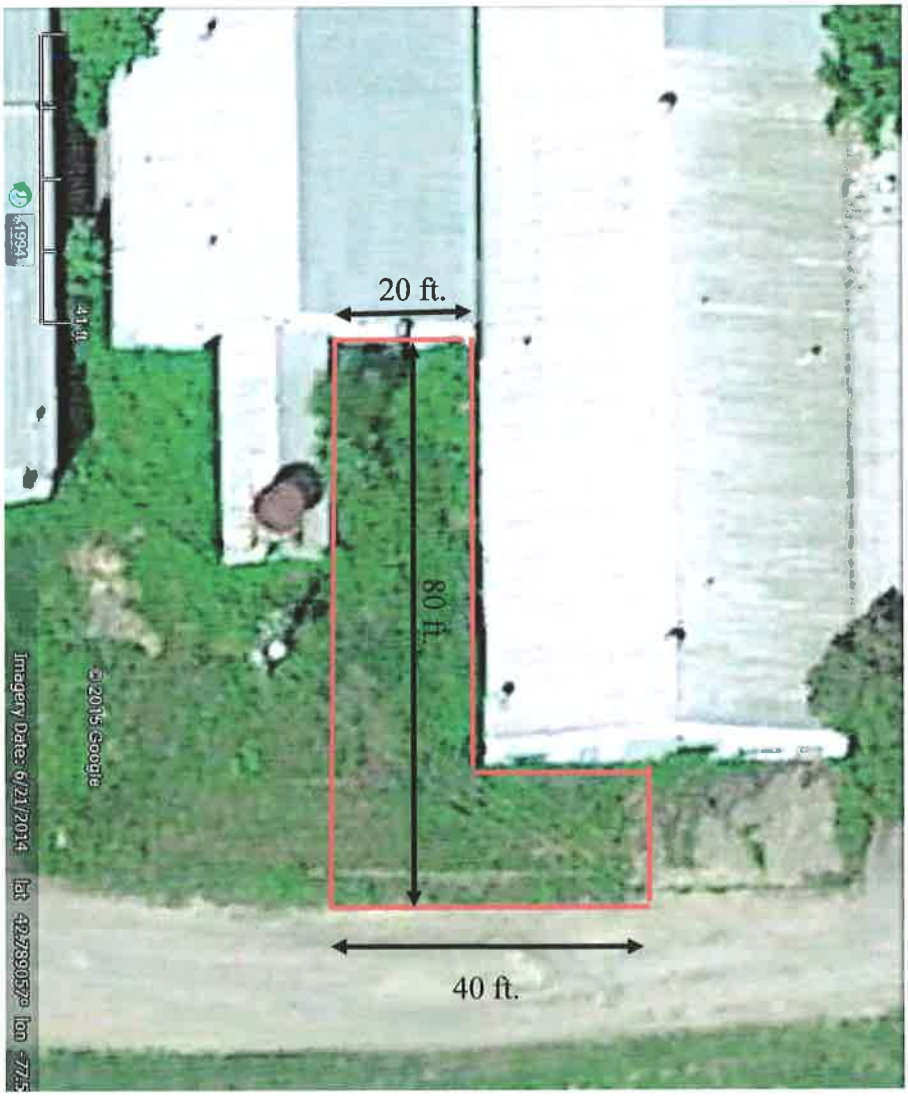
LEADER PROFESSIONAL SERVICES, INC.

Peter von Schondorf
Senior Project Manager

Michael P. Rumrill
President

Cc: Robert Greenebaum, Poinkers, LLC

Enclosures as noted



Title: Lead Contaminated Area Former J&S Conveyor Property Honeoye, New York	LEADER Leader Professional Services, Inc 271 Marsh Road, Suite 2 Pittsford, NY 14534 (585) 248-2413 FAX (585) 248-2834	Project: 869.001 Date: 2/15/15 Scale: As shown	Drawn: PVS Checked: MPR File Name: Site Map	Figure: 1
Prepared For: Poinkers, LLC Pittsford, New York				

The grid shown is approximately
10x10-ft. 6-inch and 12-inch
samples will be collected at the red
grid nodes. Within the blue grid samples will
Be collected from those spots identified with a Δ.

Title: Proposed Sample Locations Former J&S Conveyor Property Honeoye, New York	LEADER Leader Professional Services, Inc 271 Marsh Road, Suite 2 Pittsford, NY 14534 (585) 248-2413 FAX (585) 248-2834	Project: 869.001 Date: 4/23/15 Scale: NTS	Drawn: PVS Checked: MPR File Name: Site Map	Figure: 2
Prepared For: Poinkers, LLC Pittsford, New York				

▲ Sub-slab sample locations

△ Ambient indoor air sample locations

▲ Ambient outdoor air sample locations

Title: Proposed Sub-slab and Air Sampling Locations Former J&S Conveyor Property Honeoye, New York	LEADER Leader Professional Services, Inc. 271 Marsh Road, Suite 2 Pittsford, NY 14534 (585) 248-2413 FAX (585) 248-2834	Project: 869.001 Date: 4/23/15 Scale: As shown	Drawn: PVS Checked: MPR File Name: Site Map	Figure: 3
Prepared For: Poinkers, LLC Pittsford, New York				

APPENDIX 1
SOIL SAMPLING

Soil Sampling Procedures

The purpose of this field operation procedure is for the collection of soil samples for the analysis of Lead. Samples will be collected from two depths; 6 inches and 12 inches below the ground surface. The soil sample will be collected from an area of approximately 6 square inches. The sample depth will be exposed with a shovel hole and the laboratory sample collected using a clean sample spoon or trowel. The data to be obtained will be used to assess the environmental quality of the soil.

Physical Description

For each sample interval will be visually examined and described in accordance with the Unified Soil Classification System. This information, together with the following information will be entered into the field logbook:

- Date;
- Sample Number;
- Grid Location;
- Depth Interval; and
- Job Number.

Soil Samples for Laboratory Analysis

The Project's Work Plan and, or Quality Assurance Plan specifies the sample containers to be used and the parameters to be analyzed. Samples to be analyzed shall be placed in the containers as quickly as possible. Furthermore, all samples for laboratory analysis shall be preserved and transported in accordance with the following procedures. All samples to be sent to the laboratory for chemical analysis must be maintained in a condition that is as close as possible to in situ conditions. The first consideration is the proper selection of containers, preservation, and associated holding times. Other considerations include proper field notes, proper chain-of-custody procedures, and proper labeling of the samples.

Containers

The Quality Assurance Plan specifies the containers to be used.

Preservation

The general purpose of preservation is to maintain the original characteristics (and thus validity) of the sample during the time required for shipping of the sample to the laboratory. For soil, the only preservation technique is cooling the sample to approximately 4°C. This will be done in the field using ice or cold packs in coolers.

Sample Custody Procedures

The goal of implementing chain-of-custody procedures is to ensure that the sample is traceable from the time it is collected until it, or its derived data, are used. Samples would be considered in "custody" under the following conditions:

1. It is in personal possession.
2. It is in personal view after being in personal possession.
3. It was in personal possession when it was property secured.
4. It is in a designated secure area.

When transferring and/or shipping from the field, samples will be accompanied by the chain-of-custody record. The form includes the signatures of the relinquishers and the receiver as well as the date and time of the exchange, and any pertinent remarks. Since all samples will be immediately placed in coolers, shipment will also be made using these coolers. The samplers will complete the appropriate portion of the chain-of-custody form and deliver the cooler to the laboratory or to the shipping company. The receiving party will complete the remainder of the form and a copy will be retained by the sampler and kept with the field data sheets for that round of sampling. Each cooler will also be sealed using chain-of-custody tape.

Labels

The sample to be sent to the laboratory for chemical analysis will be identified with the following information:

- Date and time of collection;
- Sample number;
- Grid location and
- Sampler's name and affiliation.

Equipment Cleaning Methods

Equipment in actual contact with a laboratory sample will be cleaned prior to and between each use. The equipment will then be temporarily placed on clean racks, off the ground until it is used. Equipment such as trowels and hand auger will be cleaned with the following materials:

- Trisodium phosphate dissolved in clean water;
- Brushing the tools with a nylon brush to remove soil;
- Clean water rinse; and
- Air dry.