Periodic Review Report
June 1, 2018- June 1, 2019

Former Churchville Ford, Inc. Site
NYSDEC Voluntary Cleanup Program Site #V00658
Village of Churchville, Town of Riga, Monroe County, New York

Prepared for:
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June 2019

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Executive Summary

The former Churchville Ford Site (hereinafter referred to as the "Site"), located at 111 South Main Street in the Village of Churchville, Town of Riga, Monroe County, New York, is approximately six (6) acres. The Site is owned by BLW Properties of Churchville, LLC and has been used as a commercial auto, boat and recreational vehicle sales and service facility. An environmental investigation conducted in 2002 (in conjunction with the transfer of ownership of property) identified groundwater and subsurface soil contamination. A remedial investigation (RI) was conducted between 2004 and 2008. This Periodic Review Report (PRR) covers Site monitoring and inspection events and activities conducted at the Site from June 1, 2018- June 1, 2019.

The Site was remediated in accordance with and subject to a Voluntary Cleanup Agreement (VCA) # B8-0640-03-09, Site # V00658-8 which was executed on September 29, 2003 and amended on April 9, 2009. The VCA was initiated by former owners, Joseph Ognibene and Antonio Gabriele. Remedial activities occurred from May 2009 to January 2010 and were conducted in accordance with the Site Remedial Action Work Plan (RAWP), dated December 2008, and a minor modification, dated September 4, 2009. In-situ chemical oxidation (ISCO), using injected sodium permanganate (NaMnO4), was started in June 2009 and completed in January 2010. NaMnO4 was injected into the soil and groundwater underlying the source area in the southwestern portion of the building. As detailed in the Site Management Plan (SMP), a Sub-Slab Depressurization System (SSDS) was installed in June 2011 in the western portion of the original building (workshop).

In September 2015, a Site Change of Use was approved by the NYSDEC for Site redevelopment activities. As part of the redevelopment, a series of pre-excavation notifications detailing soil sampling programs prior to soil excavation/disturbance were submitted to the NYSDEC in accordance to requirements set forth in the SMP and EWP. A remedial approach to address impacted subsurface soils beneath the western portion of the former building, the "Source Area," was also developed and approved by the NYSDEC in 2016. A Remedial Design Construction Completion Report (CCR) detailing all Site activities associated with the redevelopment was submitted to the NYSDEC.

The remedial approach included soil removal and ISCO (Regenesis Inc. PersulfOx®) to address residual impacted groundwater. The effectiveness of ISCO is being evaluated through subsequent groundwater sampling as discussed in this report. The Site cap was restored upon completion of the project and was evaluated as part of the Site inspection.

The effectiveness of the remedial program as outlined in the SMP has been monitored through on-going groundwater sampling and Site Inspection with respect to Institutional and Engineering Controls (ICs/ECs). Post-remedial groundwater sampling results indicate that residual contamination appears to be attenuating in groundwater in the vicinity of the established source area. It is likely that concentrations will continue declining due to the

sustained oxidative action of PersulfOx®. Groundwater samples were not collected during this reporting period due to the recently NYSDEC-approved sampling and inspection schedule of every fifth quarter. The due date of the 2019 PRR (July 1, 2019) precedes the third quarter sampling event in 2019. A Site inspection was completed during this reporting period and is included as an attachment to this report.

The implemented remedies to manage the residual contamination are effective, protective, and are progressing towards the remedial action objectives. The ICs/ECs and procedures outlined in the Monitoring Plan and Operation and Maintenance Plan were complied with during this reporting period.

1.0 Periodic Review Report

This Periodic Review Report (PRR) was prepared by Lu Engineers, on behalf of BLW Properties of Churchville, LLC, pursuant to NYSDEC DER-10 Technical Guidance for Site Investigation and Remediation, dated May, 2010 and the guidelines provided by the NYSDEC. The first PRR was required eighteen (18) months after the issuance of the Release and Covenant. The reporting period for this PRR is from June 1, 2018 to June 1, 2019. The following items are included in this PRR:

- Identification, assessment, and certification of each EC/IC required by the remedy for the Site.
- Results of the Site inspection and sampling events including applicable inspection forms and other records generated for the Site during the reporting period.
- A summary of any discharge monitoring data and/or information generated during the reporting period with comments and conclusions.
- Data summary tables of groundwater and surface water contaminants of concern by media. These include a presentation of past VOC and metal data as part of an evaluation of contaminant concentration trends.
- Laboratory analysis results and the required laboratory data deliverables for each sample collected during the reporting period have been and will continue to be submitted electronically in a NYSDEC-approved EQuIS format.
- A Site evaluation, which includes the following:
    I. The compliance of the remedy with the requirements of the Site-specific Record of Decision (ROD);
    II. The operation and the effectiveness of each treatment unit, including identification of any needed repairs or modifications;
    III. Any new conclusions or observations regarding Site contamination based on inspection or lab data generated during the monitoring events;
    IV. Recommendations regarding any necessary changes to the remedy and/or SMP; and

V. The overall performance and effectiveness of the remedy to date.

2.0 Site Overview

The former Churchville Ford Site, located at 111 South Main Street in the Village of Churchville, Town of Riga, Monroe County, New York, consists of approximately six (6) acres and has been used as a commercial auto, boat and recreational vehicle sales and service facility in recent years (Figure 1). The Site is located north of Interstate Route 490 and Sanford Road. The topography of the Site is relatively flat, however, the elevation drops abruptly towards Sanford Road to the south and gently westward.

The Site is surrounded by residential and commercial land to the north, South Main Street and residential housing to the east, Sanford Road and Interstate Route 490 to the south and a commercial Camping World Recreational Vehicle sales facility to the west. The majority of the Site is covered with asphalt pavement and the Site sales/service building.

Contamination was found at the Site in 2002 during an environmental investigation conducted in conjunction with a property transfer. A Remedial Investigation (RI) was conducted between 2004 and 2008. Subsurface soil analytical results did not indicate VOCs, SVOCs, or metals above the Restricted Commercial Use Guidance Values (6 New York Codes, Rules, and Regulations (NYCRR) Part 375-6), therefore soil remediation was not required. CVOCs were detected in groundwater beneath the southwestern portion of the building at levels exceeding 6 NYCRR Part 703.5 Class GA drinking water standards. This area was formerly used for solvent and waste oil storage. The contamination appeared to be limited to this areas and west of the western wall of the building. Based on the findings of the RI, remedial action was recommended to address chlorinated solvents detected in groundwater at levels exceeding applicable guidance criteria.

Remedial activities were completed at the Site between May 2009 and January 2010. The remedial measure utilized was In-Situ Chemical Oxidation (ISCO) using sodium permanganate ($NaMnO_4$). $NaMnO_4$ was injected into groundwater where CVOC concentrations exceeded 5 parts per billion (ppb) and 2 ppb for vinyl chloride. When this chemical oxidant comes into contact with organic compounds such as TCE, PCE, and associated breakdown products, a reaction occurs oxidizing the organic contaminants to relatively benign compounds, such as carbon dioxide (CO^2) and water (H_2O). NaMnO4 was injected using a Geoprobe® GS2000 cart-mounted injection system and was administered through a series of injection wells (primarily 4 to 11.5 feet with a maximum depth of 20 feet) to treat saturated soils as well as groundwater.

Soil vapor intrusion (SVI) sampling was conducted after the NaMnO4 injection was completed to determine if additional vapor intrusion mitigation or long-term indoor air monitoring measures were needed. Based on the results and as described in the SMP, a SSDS was installed in June 2011 in the western portion of the original Site building. The presence of the SSDS precluded the need for monitoring of indoor air.

As part of Site redevelopment in 2016, a remedial approach to address impacted subsurface soils beneath the western portion of the former building, the "Source Area," was developed and approved by the NYSDEC in 2016. The Excavation Notification-Remedial Design, dated April 19, 2016, was submitted and approved by the NYSDEC, per requirements set forth in the SMP and EWP. Excavation oversight, existing utility protection, field screening and sampling along with community air monitoring were performed in accordance to the EWP.

Soil was removed from the source area and appropriately handled for off-Site disposal as non-hazardous waste to Mill Seat Landfill in Riga, New York. Soil designated as "clean" per 6 NYCRR Part 375 Unrestricted Reuse Criteria was used as clean cover soil in the property adjoining the VCP property as fill and Site grading material.

The remedial approach also involved the application of ISCO (PersulfOx®) to address residual impacted groundwater. The effectiveness of ISCO was evaluated through subsequent groundwater sampling completed in December 2017 and May 2018, as discussed in this report and in accordance to the SMP. Upon completion of ISCO application, the excavation area was backfilled with #2 crusher run, compliant with DER-10 Section 5.4(e), and the Site was regraded with a new asphalt cover in the location of the former building for use as a parking lot.

It is noted that due to the excavation activities, MW-03 was decommissioned pursuant to NYSDEC CP-43 and removed. This well was replaced with MW-03R following completion of source area soil removal. The locations of the monitoring wells were re-surveyed in December 2016 (refer to Figures 2, 3, and 4). The Cap was fully restored upon completion of Site regrading and excavation work.

A SSDS was not installed in the newly constructed building, therefore, a SVI Corrective Measures Plan was implemented following the completion of building construction and contaminant source removal in 2016. Two (2) rounds of SVI sampling to assess the sub-slab and interior air quality were completed in July 2016 and December 2016, pursuant to the *NYSDOH Final Guidance for Evaluating Soil Vapor Intrusion in the State of New York, dated October 2006*. The second round was completed during the heating season due to the pressure differential associated with typical building heating systems. SVI analytical results indicate the presence of Site contaminants below New York State Department of Health (NYSDOH) guidelines.

The effectiveness of the remedial program as outlined in the SMP has been monitored through 2016 SVI sampling in the recently constructed building and on-going groundwater sampling. In general, post-remedial groundwater sampling results indicate that the existing contamination persist, but also appears to be attenuating in groundwater in the source area. Groundwater samples collected during this reporting period (June 1, 2017 to June 1, 2018) showed concentrations of chlorinated volatile organic compounds (CVOCs) exceeding applicable groundwater standards, generally at lower concentrations than previously observed.

The SMP requires an Institutional Control (IC) in the form a Deed Restriction (DR) which requires the following; a) limiting the use and development of the property to commercial use,

which also permits industrial use; b) compliance with the approved SMP; c) restriction on the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the New York State Department of Health (NYSDOH); and d) the property owner to complete and submit an annual certification of Institutional and Engineering Controls (ICs/ECs).

Long-term management of remaining contamination, as required by the DR, includes the following plans for ECs; 1) Monitoring; 2) Operation and maintenance; and 3) Reporting. The specific ECs implemented at the Site include: a) semi-annual groundwater sampling of monitoring wells MW-3R, MW-6, MW-13 and MW-JCL-02 for VOCs, iron and manganese; b) management and inspection of the existing soil cover system (the cap); and c) inspection and maintenance (if required) of the existing retaining wall.

3.0 Remedy Performance, Effectiveness, and Protectiveness

The most recent ISCO application (PersulfOx®) occurred in 2016 and prior to 2016, the last remedial ISCO injection occurred on January 15, 2010 by Lu Engineers using $NaMNO_4$. Post-remedial groundwater and SVI sampling indicate that groundwater contamination remains in the source area with evidence of attenuation, as suggested by analytical data. 13 post-remedial groundwater sampling events and three (3) SVI sampling events have been conducted at the Site since the completion of the $NaMnO_4$ ISCO program. All sampling events were conducted in accordance with and as outlined in the RAWP and SMP. The following is a list of all post-remedial groundwater and SVI sampling events:

- February and August 2010 (per RAWP)
- December 2011 (per SMP)
- June and November 2012 (per SMP)
- June and November 2013 (per SMP)
- June 2014 (per SMP)
- November 2014 (per SMP)
- June 2015 (per SMP)
- November 2015 (per SMP)
- July 2016 (per SVI Corrective Measures Plan)
- December 2016 (per SMP and SVI Corrective Measures Plan)
- May 2017 (per SMP)
- December 2017 (per SMP)
- May 2018 (per SMP)
- July 2019 (per SMP)*

*The NYSDEC approved the request to complete groundwater sampling and inspections every fifth quarter in a letter dated September 5, 2018.

Tables 1 and 2, included as an attachment to this report, indicate bi-annual VOC and iron and manganese sample concentrations since June 2012 following implementation of the remedies described in the SMP. Table 1 shows detected VOC concentrations in groundwater samples

compared to the applicable NYSDEC 6 NYCRR Part 703.5 Class GA and TOGs 1.1.1 Groundwater Standards. Table 2 shows detected concentrations of iron and manganese, known indicators of natural attenuation, in comparison to applicable groundwater standards. Both tables include a trend analysis graph of contaminant concentration in groundwater since June 2012.

Groundwater collected from MW-06 and MW-JCL-02 continues to exceed applicable groundwater standards through the most recent sampling event conducted in May 2018.

The ICs established for the Site have been and continue to be in compliance with the SMP. Though residual contamination exists in the groundwater following source area soil removal, these controls reduce the potential for human exposure. The ECs established for the Site are also effective in limiting the potential for human exposure to known Site contaminants.

4.0 Institutional Controls/Engineering Control Plan Compliance

Since remaining contaminated soil, groundwater, and soil vapor exists beneath the Site, ICs/ECs are required to protect public health and the environment. The IC/EC Plan is one (1) component of the SMP and is subject to revision by NYSDEC.

Institutional Controls (ICs)

A series of ICs are required by the SMP to: (1) implement, maintain and monitor EC systems; (2) prevent exposure to remaining contamination by controlling disturbances of the subsurface contamination; and (3) limit the use and development of the Site to commercial and industrial uses only. Adherence to these ICs on the Site is required by the DR and implemented under the SMP.

- Land Use Restriction – Site property use is limited to Commercial and Industrial uses only; the Site is currently used as a commercial recreational vehicle sales and service facility and has met the requirements of this restriction throughout this reporting period.

- Groundwater Use Restriction – Use of groundwater as a potable or process water source is prohibited; the Site is currently connected to a supplied potable water source from the Village of Churchville and does not use the Site groundwater.

- Site Management Plan (SMP) – Compliance with the SMP is required, including required periodic certifications; the Site was in compliance with all components of the Site-specific SMP throughout this reporting period.

Additional Site restrictions that apply to the Controlled Property are:

- The property may not be used for a higher level of use, without additional remediation and amendment of the DR, as approved by the NYSDEC;
- All future activities on the property that will disturb residual impacted material must be conducted in accordance with the SMP;

- The potential for vapor intrusion must be evaluated for any buildings developed on the Site, any potential impacts that are identified must be monitored or mitigated;
- The Site owner or remedial party will submit to NYSDEC a written statement that certifies, under penalty of perjury, that: (1) controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and, (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP;
- NYSDEC retains the right to access such Controlled Property at any time in order to evaluate the continued maintenance of any and all controls. This certification shall be submitted annually, or an alternate period of time that NYSDEC may allow and will be made by an expert that the NYSDEC finds acceptable.

Institutional Controls identified in the DR may not be discontinued without an amendment to or extinguishment of the DR.

Engineering Controls (ECs)

- Soil Cover System (Cap) – Exposure to residual contamination in subsurface soil/fill, groundwater and soil vapor at the Site is prevented by a soil cover system placed over the Site (the "Cap"). This cover system consists of asphalt pavement, concrete-covered sidewalks, and concrete building slabs. Procedures for maintaining the Cap are documented in the Operation and Maintenance Plan in Section 4 of the SMP.

  The Excavation Work Plan (EWP) in Appendix A of the SMP outlines the procedures required to be implemented in the event the cover system is breached, penetrated or temporarily removed, and any underlying residual contamination is disturbed. Procedures for the inspection, maintenance and monitoring of this cover are provided in the Monitoring Plan included in Section 3 of the SMP.

  Per NYSDEC and NYSDOH determination, in a letter dated May 15, 2017, a SSDS is not required for the building located at the site and no additional SVI testing is planned.

  The required IC/EC certification has been completed as a component of this report and a copy is included as Attachment D.

5.0 Monitoring Plan Compliance Report

The Monitoring Plan describes the measures for evaluating the performance and effectiveness of the remedy to reduce or mitigate contamination at the Site, the soil cover system, and all affected Site media are identified in the table below.

Monitoring/Inspection Schedule

Monitoring Program	Frequency*	Matrix	Analysis
1	Every fifth quarter	Groundwater	EPA Method 8260 EPA Method 6010 Manganese and Iron
2	N/A	SSDS	N/A
3	Every fifth quarter	Soil Cover	N/A

* The frequency of events will be conducted as specified until otherwise approved by NYSDEC and NYSDOH

Groundwater samples were not collected during this reporting period due to the recently NYSDEC-approved reduced sampling and inspection schedule of every fifth quarter. The due date of the 2019 PRR (July 1, 2019) precedes the third quarter sampling event in 2019. A Site inspection was completed during this reporting period and is included as an attachment to this report.

Groundwater Sampling

The following table summarizes the details of the groundwater sampling program to be completed during each bi-annual sampling event.

Media Sampling and Analysis Summary

Sample Type	Sample Location	Analytical Parameters	Frequency	QA/QC	Total
Groundwater	MW-03R, 06, 13, MW-JCL-02	EPA 8260 EPA 6010 Manganese and Iron	Every fifth quarter	Trip Blank (1)	5

The Site wells were sampled bi-annually with dedicated bailers per the procedures outlined in the SMP. NYSDEC approval for a reduced sampling frequency (every fifth quarter) was received in September2018. Each well was purged a minimum of three (3) well volumes prior to sampling. Groundwater quality measurements including temperature, turbidity, pH, conductivity and oxidation reduction potential (ORP) were collected during the purging process at each well. No odors were observed during the groundwater sampling and water was generally turbid. Purge water from each well was containerized in steel 55-gallon drums.
At each well, samples were collected for TCL VOCs (EPA Method 8260B), iron and manganese (EPA Method 6010C). Groundwater sampling logs are included as Attachment B of this report.

Groundwater analytical results are summarized in Tables 1 and 2 and depicted on Figures 2, 3, and 4. Table 1 presents the analytical results of VOCs detected in groundwater from June 2012 through May 2018 in comparison to applicable standards. Table 2 presents the analytical results of iron and manganese (natural attenuation indicators) from June 2012 through May 2018. Both tables include a trend analysis graph of the analytical data. Figure 2 illustrates the detected VOCs concentrations in groundwater that exceeded applicable standards for December 2017. Figure 3 illustrates the detected VOCs and associated concentrations in groundwater that exceed applicable standards in the May 2018 sampling event. Each figure also illustrates groundwater elevation contours based on water level measurements collected at each well during each sampling event. It is noted that groundwater generally flows south and west across the Site, following Site topography.

For comparison and future reference, the following sections summarize the analytical results since 2014.

2014

From June 2014 to November 2014, CVOC concentrations fluctuated and continued to exceed applicable groundwater standards in all monitoring wells. There was a general decline in concentration levels of PCE, TCE, and cis-1,2-DCE in MW-03 and MW-JCL-02. In MW-06, the PCE concentration level increased and dichlorodifluoromethane was detected for the first time since the June 2012 sampling event. Iron and manganese concentrations increased in MW-03 and MW-06 and decreased in MW-JCL-02. Concentration levels of these metals exceeded groundwater standards except for iron in MW-JCL-02.

2015

CVOC concentrations continued to fluctuate between July 2014 and July 2015. In MW-03, PCE and cis-1,2-DCE concentrations decreased and TCE slightly increased. Dichlorodifluoromethane concentration increased and PCE concentrations decreased in MW-06. Chloroform and TCE were also detected for the first time in MW-06 since semi-annual groundwater monitoring began in 2012. MW-JCL-02 had increases in cis-1,2-DCE, TCE, and PCE. Dichlorodifluoromethane was detected for the first time since the June 2012 sampling event in MW-JCL-02 as well. Between June 2015 and November 2015, contaminant concentrations remained relatively the same in MW-03 and MW-06. PCE decreased in MW-03 and slightly increased in MW-06. Cis-1,2-DCE also decreased in MW-03. In JCL-02, dichlorodifluoromethane was not detected and concentrations of PCE, TCE, and 1,2-DCE declined. Consistent with previous years, no VOCs were detected in MW-13. All four (4) wells had increased concentrations of iron and manganese with the exception of manganese in MW-06. All concentrations of iron and manganese exceeded NYS groundwater standards for this period.

2016 - May 2017

From November 2015 to December 2016, CVOC concentrations generally declined as indicated by analytical results from MW-JCL-02 and MW-06. MW-03 was decommissioned and removed during the source area soil removal in 2016 and replaced with MW-03R, installed on September 12, 2016. No CVOC concentration exceedances were detected in MW-03R in December 2016 or

May 2017. It is noted that the ISCO agent, PersulfOx®, was installed into the excavation following source area removal as approved by the NYSDEC in the Excavation Notification-Remedial Design, dated April 19, 2016.

Presumably, CVOC reductions observed can be attributed to the installation of the oxidizing agent. Significant reductions in PCE, TCE, and cis-1,2-DCE were observed in MW-JCL-02 between December 2016 and May 2017, as shown on Table 1. A slight increase in PCE and dichlorodifluoromethane occurred in MW-06 between December 2016 and May 2017. No VOCs were detected in MW-13, as found in previous years.

As shown on Table 2, iron and manganese concentrations fluctuated from December 2016-May 2017. Overall, iron concentrations appeared to increase from November 2015 to May 2017 in three (3) of the monitoring wells. A notable increase in manganese and iron was noted between December2016 and May 2017 in MW-06. A significant rise in iron was also observed in MW-JCL-02 between December 2016 and May 2017.

Concentrations of CVOCs in the source area exceeded applicable groundwater standards. With the exception of MW-06, an overall decline in the concentrations of CVOCs was observed.

June 2017 - June 2018

From June 2017 to June 2018, CVOC concentrations generally declined as indicated by the analytical results from MW-JCL-02, and MW-06. No CVOC concentration exceedances were detected in MW-03R in December 2017 or May 2018. This reduction in CVOC concentration is attributed to the introduction of the ISCO agent, PersulfOx®, administered in the excavation following source area removal and natural attenuation in April 2016.

As shown in Table 1 Iron and Manganese concentrations fluctuated from December 2017 to May 2018. Overall, iron concentrations generally appeared to increase from 2014 to June 2018 in four (4) of the monitoring wells. An increase in iron concentration was observed in MW-03R and MW-JCL-02 from June 2017 to June 2018. An increase in manganese was noted in MW-03R, MW-06 and MW-JCL-02 during the reporting period. Iron and manganese serve as alternate electron acceptors for microbial respiration in the absence of oxygen and nitrate. An increase in dissolved or total manganese and iron indicates that the groundwater environment is sufficiently reducing to sustain Mn and FE reduction and for anaerobic dechlorination to occur (ITRC. 2008. In Situ Bioremediation of Chlorinated Ethene: DNAPL Source Zones. Interstate Technology and Regulatory Council).

All laboratory analytical data is included as Attachment C of this report. Samples were analyzed at Paradigm Environmental Services, Inc., a NYSDOH ELAP-CLP certified laboratory (ELAP) located in Rochester, New York. All sampling methods and QA/QC measures were adhered to as outlined in the approved SMP.

June 2018- June 2019

No groundwater sampling was completed as part of this reporting period. The NYSDEC approved a reduced groundwater frequency sampling schedule to every fifth quarter. The most recent groundwater sampling event was completed in June 2018 (refer to June 2017- June 2018 result summary), the next sampling event will be completed in the third quarter of 2019 (July, August, September).

6.0 Operation and Maintenance Plan Compliance Report

ECs in place at the Site are the building floor slab, sidewalks and asphalt pavement, collectively referred to as the "Cap" or soil cover system, and the retaining wall. During this reporting period, operation and maintenance is limited to periodic inspection of the Cap, which is documented using the Site Inspection Form. Copies of the Site Inspection Form are included as Attachment A in this report. The Operation and Maintenance Plan located in the SMP describes the measures necessary to operate, monitor and maintain the mechanical components of the remedy selected for the Site.

7.0 Conclusions and Recommendations

IC/EC Compliance

The requirements and regulations set forth in the SMP for ICs were complied with during this reporting period. This includes the following:

Landuse Restriction – The Site is currently used as a commercial recreational vehicle sales and service facility and the requirements of this restriction has been met during this reporting period.

Groundwater Use Restriction – The Site is currently connected to a supplied potable water source and does not use Site groundwater in any capacity, therefore meeting the requirements of this restriction in this reporting period.

Site Management Plan (SMP) – The Site is currently in compliance with all components of the Site-specific SMP and all requirements have been met during this reporting period.

The requirements set forth in the SMP for all ECs were met during this reporting period. This includes the following:

Soil Cover System (Cap) – The Site Cap was in compliance with the SMP during this reporting period. Following asphalt replacement per the provisions outlined in the SMP in 2013 as well as Cap restoration following redevelopment activities in 2016, the Cap met and continues to meet the necessary compliance requirements. The retaining wall, as part of the cover system, is also in compliance with all components of the Site-specific SMP. All requirements have been met during this reporting period.

Based on post-remedial groundwater and SVI sampling conducted to date, residual groundwater, soil, and soil vapor contamination persists, but appears to be attenuating. The previously discussed Site-specific ICs and ECs for the Site continue to meet the remedial objectives while establishing protection of public health and the environment. The continued effectiveness of the ICs/ECs have allowed the remedial objectives at the Site to be met for this reporting period.

It is recommended that the next PRR be submitted approximately one (1) year from submittal of this PRR.

Tables

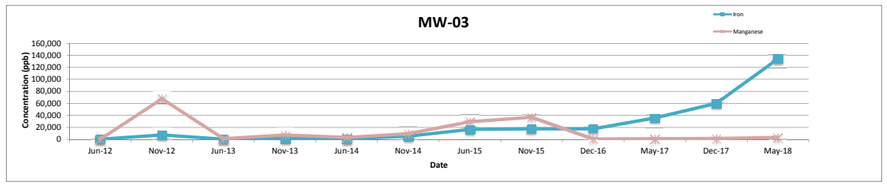
Wilkins RV (Former Churchville Ford) Site (#V00658-8)
Village of Churchville
Town of Riga
June 2018

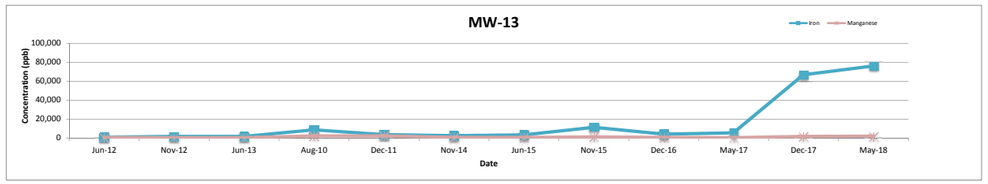
Table 1 Groundwater Results - Metals

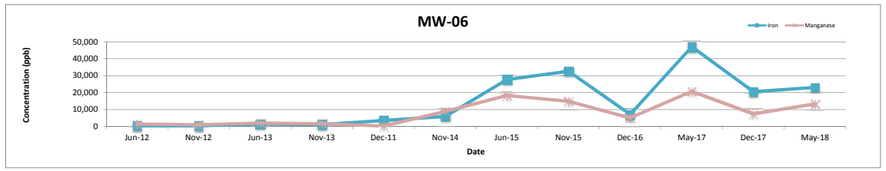
Analytical Parameters[1]	Groundwater Standard[2]	MW-03								MW-03R				MW-06												MW-13												MW-JCL-02											
		Post-Remediation												Post-Remediation												Post-Remediation												Post-Remediation											
		Jun-12	Nov-12	Jun-13	Nov-13	Jun-14	Nov-14	Jun-15	Nov-15	Dec-16	May-17	Dec-17	May-18	Jun-12	Nov-12	Jun-13	Nov-13	Dec-11	Nov-14	Jun-15	Nov-15	Dec-16	May-17	Dec-17	May-18	Jun-12	Nov-12	Jun-13	Aug-10	Dec-11	Nov-14	Jun-15	Nov-15	Dec-16	May-17	Dec-17	May-18	Jun-12	Nov-12	Jun-13	Nov-13	Jun-14	Nov-14	Jun-15	Nov-15	Dec-16	May-17	Dec-17	18-May
Iron	300**	134	7,370	229	1,740	789	5,460	16,700	17,700	17,400	35,600	60,000	134,000	360	378	1,340	1,110	3,510	5,830	27,700	32,700	6,990	47,200	20,500	23,100	875	1,670	1,800	8,610	3,740	2,710	3,340	11,400	4,060	5,630	66,900	76,200	5,250	611	6,140	10,600	4,630	195	22,700	38,000	7,860	47,500	46,700	87,000
Manganese	300**	293	67,600	1,250	7,350	3,350	9,540	29,200	36,800	913	1,030	1,530	3,030	1,290	920	1,940	1,470	146	8,840	18,200	14,900	4,910	20,700	7,330	13,300	606	576	411	2,260	2,260	738	699	1,240	777	327	1,690	1,930	2,260	1,290	1,580	2,710	2,190	557	6,650	11,100	1,740	2,780	1,490	3,350

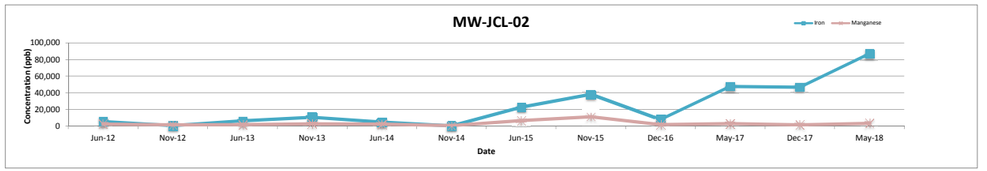
~ parameter detected above NYS Ambient Groundwater Standard or applicable NYSDEC Guidance Value

1 - Results presentend in ug/L (parts per billion)
2 - NYS Ambient Groundwater Standards (6 NYCRR Part 703.5)
** - Sum total concentration of Iron and Manganese standard is 500 ug/L per NYSDEC Part 703.5 Class GA groundwater standards









Wilkins RV (Former Churchville Ford) Site (#V00658-8)
Village of Churchville
Town of Riga
June 2018

Table 2 Groundwater Results - CVOCs/VOCs

Detected Parameters[1]	NYS Groundwater Standard[2]	MW-03 Post-Remediation								MW-03R			
		Jun-12	Nov-12	Jun-13	Nov-13	Jun-14	Nov-14	Jun-15	Nov-15	Dec-16	May-17	Dec-17	May-18
Acetone	50*	ND	ND	2270	1,200 B	ND	ND	ND	ND	14.9	7.99 J	ND	6.57 J
Benzene	1	ND	ND	ND	ND	ND	ND	ND	ND	0.510 J	ND	ND	ND
Methylene Chloride	5	ND	995 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Methyl Ethyl Ketone (2-butanone)	50*	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Carbon disulfide	-	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chloroform	7	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chloromethane	-	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Dichlorodifluoromethane	5	ND	ND	ND	ND	ND	ND	ND	ND	1.49	ND	2.64	2.1
1,1-Dichloroethane	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Methyl-Tert-Butyl Ether (MTBE)	10*	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Tetrachloroethene	5	11,000	9,140	3480	14,000	7,530	4,920	2,840	2,170	ND	ND	ND	ND
trans-1,2-Dichloroethene	5*	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Trichloroethene	5	8,940	4,760	5300	6,340	6,930	2,700	2,830	2,960	ND	ND	ND	ND
Vinyl chloride	2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
cis-1,2-Dichloroethene	5	5,900	3,170	4030	7,380	6,150	4,040	3,030	3,300	ND	ND	ND	ND

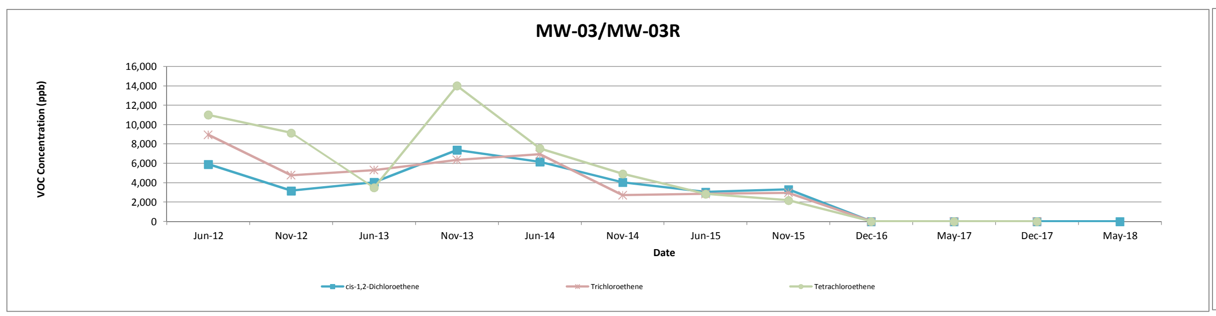
Detected Parameters[1]	MW-06 Post-Remediation											
	Jun-12	Nov-12	Jun-13	Nov-13	Jun-14	Nov-14	Jun-15	Nov-15	Dec-16	May-17	Dec-17	May-18
Acetone	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Benzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Methylene Chloride	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Methyl Ethyl Ketone (2-butanone)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Carbon disulfide	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chloroform	ND	ND	ND	ND	ND	ND	2.92	2.91	1.59	ND	1.03	ND
Chloromethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Dichlorodifluoromethane	17.4	1.75 J	3.59	3.15	4.01	6.11	19.3	11.3	6.8	10.1	8.3	2.1
1,1-Dichloroethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Methyl-Tert-Butyl Ether (MTBE)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Tetrachloroethene	14.7	8.51	8.89	11.9	9.01	12.8	10.1	12.1	14.5	18.6	22.2	11.9
trans-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Trichloroethene	2.22	1.92 J	1.5 J	1.78 J	1.47 J	ND	1.94	2.06	2.14	1.88 J	2.73	1.26
Vinyl chloride	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
cis-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

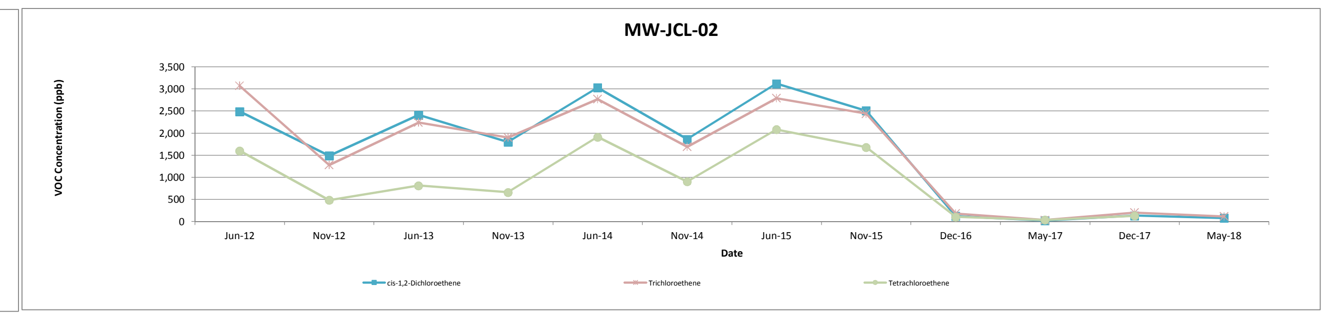
Detected Parameters[1]	MW-13 Post-Remediation											
	Jun-12	Nov-12	Jun-13	Nov-13	Jun-14	Nov-14	Jun-15	Nov-15	Dec-16	May-17	Dec-17	May-18
Acetone	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Benzene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Methylene Chloride	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Methyl Ethyl Ketone (2-butanone)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Carbon disulfide	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chloroform	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chloromethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Dichlorodifluoromethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1-Dichloroethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Methyl-Tert-Butyl Ether (MTBE)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Tetrachloroethene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
trans-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Trichloroethene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Vinyl chloride	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
cis-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	2.54

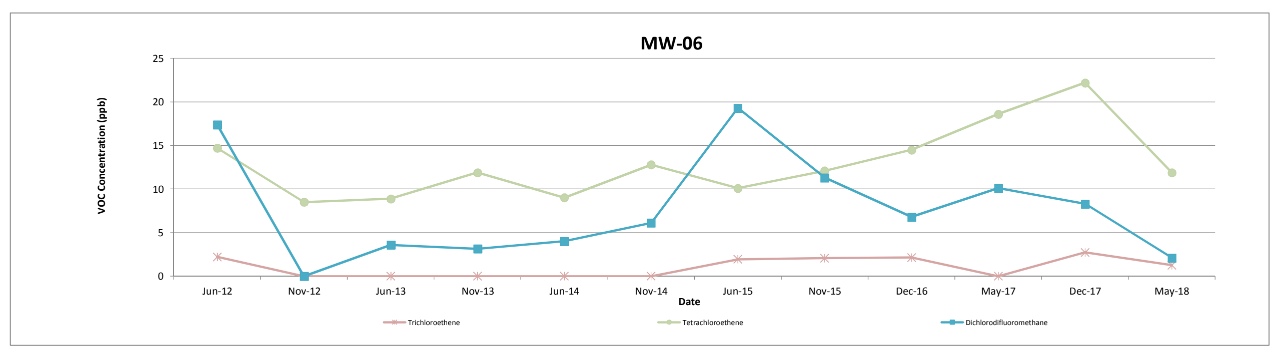
Detected Parameters[1]	MW-JCL-02 Post- Remediation											
	Jun-12	Nov-12	Jun-13	Nov-13	Jun-14	Nov-14	Jun-15	Nov-15	Dec-16	May-17	Dec-17	May-18
Acetone	ND	ND	314	626 B	ND	ND	ND	ND	13.0	21.1	206	96.6
Benzene	ND	ND	ND	ND	ND	ND	ND	ND	0.738	ND	7.38	2.96
Methylene Chloride	ND	118 J	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Methyl Ethyl Ketone (2-butanone)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Carbon disulfide	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.14 J	2.27	1.28 J
Chloroform	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chloromethane	ND	ND	ND	ND	ND	ND	ND	ND	1.76	1.51 J	35.3	9.1
Dichlorodifluoromethane	90 J	ND	ND	ND	ND	ND	68.5 J	ND	2.91	ND	23.7	3.68
1,1-Dichloroethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Methyl-Tert-Butyl Ether (MTBE)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Tetrachloroethene	1,600	480	812	659	1,910	900	2,080	1,680	102	32.2	127	43.1
trans-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	ND	ND	3.45	1.23 J	5.7	ND
Trichloroethene	3,070	1,280	2240	1,900	2,770	1,690	2,790	2,440	180	28.8	200	114
Vinyl chloride	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
cis-1,2-Dichloroethene	2,490	1,490	2410	1,800	3,030	1,860	3,120	2,510	121	17.8	130	76.7

~ parameter detected above NYS Ambient Groundwater Standard or applicable NYSDEC Guidance Value

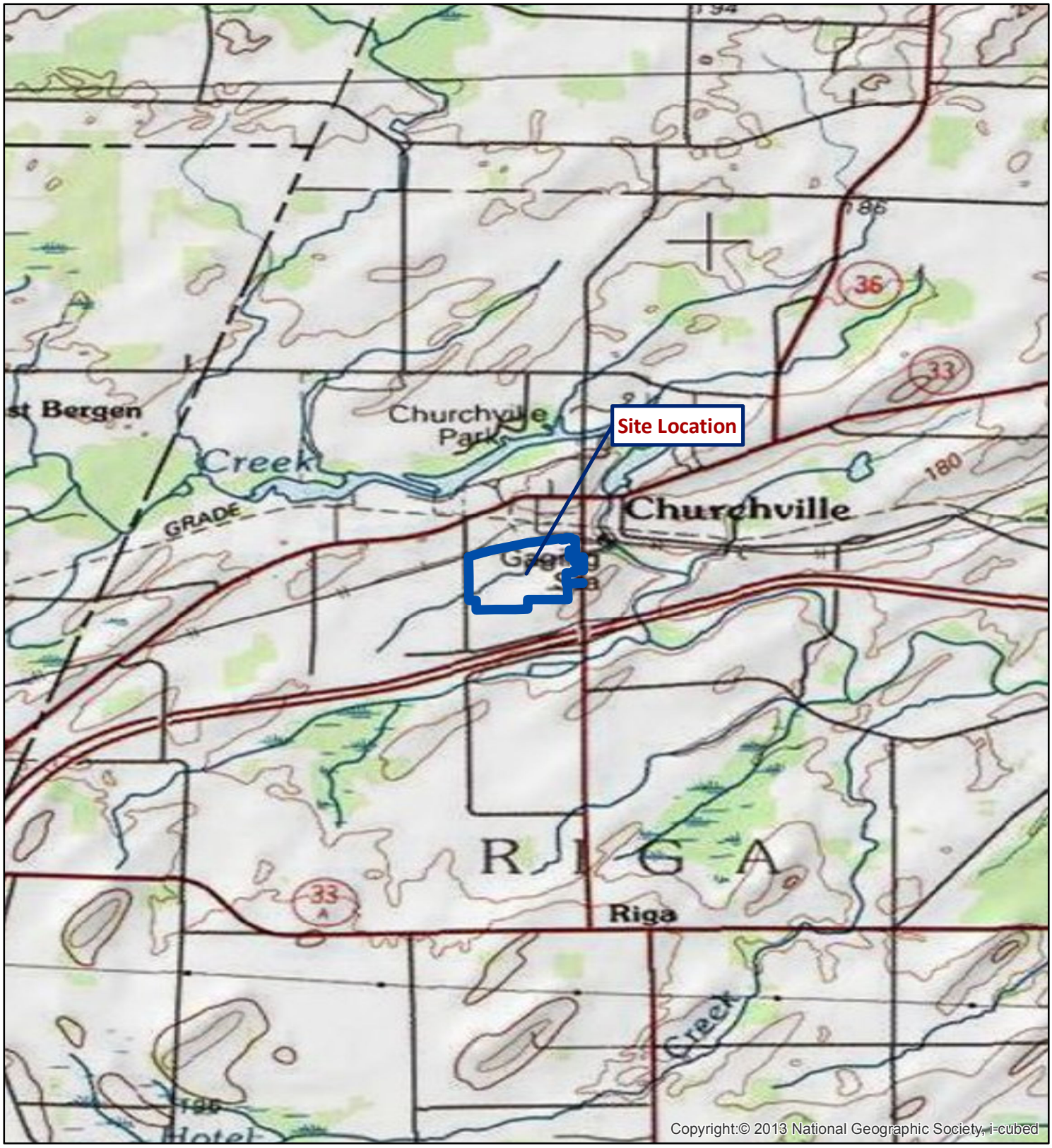
J - value is estimated
ND - Not detected above reporting limit
1 - Results presentend in ug/L or parts per billion (ppb)
2 - NYS Ambient Groundwater Standards (6 NYCRR Part 703.5)







Figures



1 inch = 4,000 feet

0 2,500 5,000 10,000 Feet

N W E S

New York Quadrangle Location

Lu Engineers
ENVIRONMENTAL • TRANSPORTATION • CIVIL

FIGURE 1
SITE LOCATION PLAN

97 SOUTH MAIN STREET
CHURCHVILLE, NEW YORK

DATE: June 2017
SCALE: AS NOTED
DRAWN/CHECKED: SMK/JB
DATA SOURCE: AS NOTED

SITE-WIDE INSPECTION FORM
FORMER CHURCHVILLE FORD VCP SITE

Date: 6/7/19

Name: LAURA GREGOR, ENVIRONMENTAL SCIENTIST

Company: LU ENGINEERS

Position of person(s) conducting maintenance/inspection activities:

Document the following information during each ~~biannual~~ site visit for groundwater sampling: Per 9/5/18 DEC Letter, Department approved Sampling every 5th quarter.

1. Compliance with all ECs/ICs, including site usage

   yes, the site is only used for commercial/industrial purposes. All other IC/ECs are in compliance with the SMP.

2. An evaluation of the condition and continued effectiveness of the Site Cap and SSDS

   Site cover system/cap was in good condition, no cracks ~~or~~ or penetrations were observed. Monitoring wells were all in good condition & do not require repair at this time.

3. General site conditions at the time of the inspection

   Site conditions were in compliance with the SMP.

4. The site management activities being conducted including, where appropriate, confirmation sampling and a health and safety inspection

   SMP activities involved a Site Inspection. No groundwater sampling was completed during this period.

5. Compliance with permits and schedules included in the Operation and Maintenance Plan

   Yes

6. Confirm that site records are up to date

   Yes

7. Conduct a visual inspection of the complete SSDS (i.e., vent fan, piping, warning device, labeling on systems, etc.). N/A. New building does not have a SSDS. (as approved by the NYSDEC)

8. Conduct an inspection of all surfaces to which vacuum is applied.

N/A

9. Inspect all components for condition and proper operation. Are both fans operational?

N/A

10. Inspect the exhaust or discharge point to verify that no air intakes have been located nearby.

N/A

11. Identify and repair any leaks in accordance with Sections 4.3.1(a) and 4.3.4(a) of the NYSDOH Guidance (i.e.; with the systems running, smoke tubes will used to check for leaks through concrete cracks, floor joints and at the suction points and any leaks will be resealed until smoke is no longer observed flowing through the opening).

N/A

12. Interview an appropriate occupant seeking comments and observations regarding the operation of the System. N/A

Any Questions or Service needed to the SSDS call MITIGATION TECH at 1-800-637-9228

End of Inspection Form

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Division of Environmental Remediation
625 Broadway, 11th Floor, Albany, NY 12233-7020
P: (518)402-9543 | F: (518)402-9547
www.dec.ny.gov

6/14/2019

Brian Wilkins
BLW Properties of Churchville, LLC
7520 State Rte 415
Bath, NY 14810

Re: Reminder Notice: Site Management Periodic Review Report and IC/EC Certification Submittal
Site Name: Churchville Ford, Inc.
Site No.: V00658
Site Address: 111 South Main Street
Churchville, NY 14428

Dear Brian Wilkins:

This letter serves as a reminder that sites in active Site Management (SM) require the submittal of a periodic progress report. This report, referred to as the Periodic Review Report (PRR), must document the implementation of, and compliance with, site specific SM requirements. Section 6.3(b) of DER-10 *Technical Guidance for Site Investigation and Remediation* (available online at http://www.dec.ny.gov/regulations/67386.html) provides guidance regarding the information that must be included in the PRR. Further, if the site is comprised of multiple parcels, then you as the Certifying Party must arrange to submit one PRR for all parcels that comprise the site. The PRR must be received by the Department no later than **July 01, 2019**. Guidance on the content of a PRR is enclosed.

Site Management is defined in regulation (6 NYCRR 375-1.2(at)) and in Chapter 6 of DER-10. Depending on when the remedial program for your site was completed, SM may be governed by multiple documents (e.g., Operation, Maintenance, and Monitoring Plan; Soil Management Plan) or one comprehensive Site Management Plan.

A Site Management Plan (SMP) may contain one or all of the following elements, as applicable to the site: a plan to maintain institutional controls and/or engineering controls ("IC/EC Plan"); a plan for monitoring the performance and effectiveness of the selected remedy ("Monitoring Plan"); and/or a plan for the operation and maintenance of the selected remedy ("O&M Plan"). Additionally, the technical requirements for SM are stated in the decision document (e.g., Record of Decision) and, in some cases, the legal agreement directing the remediation of the site (e.g., order on consent, voluntary agreement, etc.).

When you submit the PRR (by the due date above), include the enclosed forms documenting that all SM requirements are being met. The Institutional Controls (ICs) portion of the form (Box 6) must be signed by you or your designated representative. The Engineering Controls (ECs) portion of the form (Box 7) must be signed by a Professional Engineer (PE). If you cannot certify that all SM requirements are being met, you must submit a Corrective Measures Work Plan that identifies the actions to be taken to restore compliance. The work plan must include a schedule to be approved by the Department. The Periodic Review process will not be considered complete until all necessary corrective measures are completed and all required controls are certified. Instructions for completing the certifications are enclosed.

All site-related documents and data, including the PRR, are to be submitted in electronic format to the Department of Environmental Conservation. The Department will not approve the PRR unless all documents and data generated in support of that report have been submitted in accordance with the electronic submissions protocol. In addition, the certification forms are required to be submitted in both paper and electronic formats.

Information on the format of the data submissions can be found at:
http://www.dec.ny.gov/regulations/2586.html

The signed certification forms should be sent to Danielle Miles, Project Manager, at the following address:

New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, NY 14414

Phone number: 585-226-5349. E-mail: danielle.miles@dec.ny.gov

The contact information above is also provided so that you may notify the project manager about upcoming inspections, or for any other questions or concerns that may arise in regard to the site.

Enclosures

PRR General Guidance
Certification Form Instructions
Certification Forms

ec: w/ enclosures
Danielle Miles, Project Manager
Bernette Schilling, Hazardous Waste Remediation Engineer, Region 8

Enclosure 1

Certification Instructions

I. Verification of Site Details (Box 1 and Box 2):

Answer the three questions in the Verification of Site Details Section. The Owner and/or Qualified Environmental Professional (QEP) may include handwritten changes and/or other supporting documentation, as necessary.

II. Certification of Institutional Controls/ Engineering Controls (IC/ECs)(Boxes 3, 4, and 5)

1.1.1. Review the listed IC/ECs, confirming that all existing controls are listed, and that all existing controls are still applicable. If there is a control that is no longer applicable the Owner / Remedial Party should petition the Department separately to request approval to remove the control.

2. In Box 5, complete certifications for all Plan components, as applicable, by checking the corresponding checkbox.

3. If you cannot certify "YES" for each Control listed in Box 3 & Box 4, sign and date the form in Box 5. Attach supporting documentation that explains why the **Certification** cannot be rendered, as well as a plan of proposed corrective measures, and an associated schedule for completing the corrective measures. Note that this **Certification** form must be submitted even if an IC or EC cannot be certified; however, the certification process will not be considered complete until corrective action is completed.

If the Department concurs with the explanation, the proposed corrective measures, and the proposed schedule, a letter authorizing the implementation of those corrective measures will be issued by the Department's Project Manager. Once the corrective measures are complete, a new Periodic Review Report (with IC/EC Certification) must be submitted within 45 days to the Department. If the Department has any questions or concerns regarding the PRR and/or completion of the IC/EC Certification, the Project Manager will contact you.

III. IC/EC Certification by Signature (Box 6 and Box 7)**:**

If you certified "YES" for each Control, please complete and sign the IC/EC Certifications page as follows:

- For the Institutional Controls on the use of the property, the certification statement in Box 6 shall be completed and may be made by the property owner or designated representative.

- For the Engineering Controls, the certification statement in Box 7 must be completed by a Professional Engineer or Qualified Environmental Professional, as noted on the form.

Enclosure 2
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form

Site Details **Box 1**

Site No. **V00658**

Site Name Churchville Ford, Inc.

Site Address: 111 South Main Street Zip Code: 14428
City/Town: Churchville
County: Monroe
Site Acreage: 6.0

Reporting Period: June 01, 2018 to June 01, 2019

	YES	NO
1. Is the information above correct?	X	☐
If NO, include handwritten above or on a separate sheet.		
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?	☐	X
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	☐	X
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	☐	X
If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.		
5. Is the site currently undergoing development?	☐	X

Box 2

	YES	NO
6. Is the current site use consistent with the use(s) listed below? Commercial and Industrial	X	☐
7. Are all ICs/ECs in place and functioning as designed?	X	☐

IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative Date

SITE NO. V00658 **Box 3**

Description of Institutional Controls

Parcel	Owner	Institutional Control
143.17-1-50	BLW Properties of Churchville, LLC.	Ground Water Use Restriction Landuse Restriction Site Management Plan

1. Site use is limited to Commercial and industrial uses.
2. Groundwater use is prohibited.
3. Compliance with a Site Management Plan is required.
4. Periodic certifications are required.
5. The Site and associated institutional controls apply to a 6-acre portion of a 16-acre parcel.

Box 4

Description of Engineering Controls

Parcel	Engineering Control
143.17-1-50	Cover System

1. Cover system consisting primarily of asphalt pavement and the building slab.
2. The Site and associated engineering controls apply to a 6-acre portion of a 16-acre parcel.

Box 5

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

   a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;

   b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and compete.

YES	NO
X	☐

2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

   (a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

   (b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

   (c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

   (d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

   (e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES	NO
X	☐

IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. V00658

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1,2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Gregory L. Andrus, P.G. at 339 East Ave Rochester, NY 14604,
print name print business address

am certifying as Owner's Representative (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.

Signature of Owner, Remedial Party, or Designated Representative Rendering Certification

6/26/19
Date

IC/EC CERTIFICATIONS

Box 7

Professional Engineer Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Gregory L. Andrus P.G. at 339 East Ave. Rochester, NY 14604,
print name print business address

am certifying as a Professional ~~Engineer~~ Geologist for the Owner
(Owner or Remedial Party)

Signature of Professional Engineer, for the Owner or Remedial Party, Rendering Certification

Stamp (Required for PE)

6/26/19
Date

Enclosure 3

Periodic Review Report (PRR) General Guidance

I. Executive Summary: (1/2-page or less)
   A. Provide a brief summary of site, nature and extent of contamination, and remedial history.
   B. Effectiveness of the Remedial Program - Provide overall conclusions regarding;
      1. progress made during the reporting period toward meeting the remedial objectives for the site
      2. the ultimate ability of the remedial program to achieve the remedial objectives for the site.
   C. Compliance
      1. Identify any areas of non-compliance regarding the major elements of the Site Management Plan (SMP, i.e., the Institutional/Engineering Control (IC/EC) Plan, the Monitoring Plan, and the Operation & Maintenance (O&M) Plan).
      2. Propose steps to be taken and a schedule to correct any areas of non-compliance.
   D. Recommendations
      1. recommend whether any changes to the SMP are needed
      2. recommend any changes to the frequency for submittal of PRRs (increase, decrease)
      3. recommend whether the requirements for discontinuing site management have been met.

II. Site Overview (one page or less)
   A. Describe the site location, boundaries (figure), significant features, surrounding area, and the nature and extent of contamination prior to site remediation.
   B. Describe the chronology of the main features of the remedial program for the site, the components of the selected remedy, cleanup goals, site closure criteria, and any significant changes to the selected remedy that have been made since remedy selection.

III. Evaluate Remedy Performance, Effectiveness, and Protectiveness

Using tables, graphs, charts and bulleted text to the extent practicable, describe the effectiveness of the remedy in achieving the remedial goals for the site. Base findings, recommendations, and conclusions on objective data. Evaluations and should be presented simply and concisely.

IV. IC/EC Plan Compliance Report (if applicable)
   A. IC/EC Requirements and Compliance
      1. Describe each control, its objective, and how performance of the control is evaluated.
      2. Summarize the status of each goal (whether it is fully in place and its effectiveness).
      3. Corrective Measures: describe steps proposed to address any deficiencies in ICECs.
      4. Conclusions and recommendations for changes.
   B. IC/EC Certification
      1. The certification must be complete (even if there are IC/EC deficiencies), and certified by the appropriate party as set forth in a Department-approved certification form(s).

V. Monitoring Plan Compliance Report (if applicable)
   A. Components of the Monitoring Plan (tabular presentations preferred) - Describe the requirements of the monitoring plan by media (i.e., soil, groundwater, sediment, etc.) and by any remedial technologies being used at the site.
   B. Summary of Monitoring Completed During Reporting Period - Describe the monitoring tasks actually completed during this PRR reporting period. Tables and/or figures should be used to show all data.
   C. Comparisons with Remedial Objectives - Compare the results of all monitoring with the remedial objectives for the site. Include trend analyses where possible.
   D. Monitoring Deficiencies - Describe any ways in which monitoring did not fully comply with the monitoring plan.
   E. Conclusions and Recommendations for Changes - Provide overall conclusions regarding the monitoring completed and the resulting evaluations regarding remedial effectiveness.

VI. Operation & Maintenance (O&M) Plan Compliance Report (if applicable)
   A. Components of O&M Plan - Describe the requirements of the O&M plan including required activities, frequencies, recordkeeping, etc.
   B. Summary of O&M Completed During Reporting Period - Describe the O&M tasks actually completed during this PRR reporting period.
   C. Evaluation of Remedial Systems - Based upon the results of the O&M activities completed, evaluated

the ability of each component of the remedy subject to O&M requirements to perform as designed/expected.

D. O&M Deficiencies - Identify any deficiencies in complying with the O&M plan during this PRR reporting period.

E. Conclusions and Recommendations for Improvements - Provide an overall conclusion regarding O&M for the site and identify any suggested improvements requiring changes in the O&M Plan.

VII. Overall PRR Conclusions and Recommendations

A. Compliance with SMP - For each component of the SMP (i.e., IC/EC, monitoring, O&M), summarize;
   1. whether all requirements of each plan were met during the reporting period
   2. any requirements not met
   3. proposed plans and a schedule for coming into full compliance.

B. Performance and Effectiveness of the Remedy - Based upon your evaluation of the components of the SMP, form conclusions about the performance of each component and the ability of the remedy to achieve the remedial objectives for the site.

C. Future PRR Submittals
   1. Recommend, with supporting justification, whether the frequency of the submittal of PRRs should be changed (either increased or decreased).
   2. If the requirements for site closure have been achieved, contact the Departments Project Manager for the site to determine what, if any, additional documentation is needed to support a decision to discontinue site management.

VIII. Additional Guidance

Additional guidance regarding the preparation and submittal of an acceptable PRR can be obtained from the Departments Project Manager for the site.

Laura Gregor

From: Sowers, Frank (DEC) <frank.sowers@dec.ny.gov>
Sent: Monday, October 15, 2018 9:00 AM
To: Greg Andrus; Miles, Danielle J (DEC); 'Brian Wilkins'
Cc: Laura Gregor; JFrazer@monroecounty.gov; WadeSilkworth@monroecounty.gov; O'Neil, Eamonn M (HEALTH); Deming, Justin H (HEALTH); Schilling, Bernette (DEC)
Subject: RE: Churchville Ford V00658 PRR

Greg,

PRRs are due when PRRs are due and they need to document the activities that occurred during the certification period.

Frank Sowers, P.E.
Professional Engineer 1, Division of Environmental Remediation

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6274 East Avon-Lima Rd, Avon, NY 14414
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www.dec.ny.gov | |

From: Greg Andrus [mailto:gregandrus@luengineers.com]
Sent: Sunday, October 14, 2018 5:40 PM
To: Miles, Danielle J (DEC) <Danielle.Miles@dec.ny.gov>; 'Brian Wilkins' <bwilkins@wilkinsrv.com>
Cc: Laura Gregor <lgregor@luengineers.com>; JFrazer@monroecounty.gov; WadeSilkworth@monroecounty.gov; O'Neil, Eamonn M (HEALTH) <Eamonn.ONeil@health.ny.gov>; Deming, Justin H (HEALTH) <justin.deming@health.ny.gov>; Schilling, Bernette (DEC) <bernette.schilling@dec.ny.gov>; Sowers, Frank (DEC) <frank.sowers@dec.ny.gov>
Subject: RE: Churchville Ford V00658 PRR

Hello,

Please advise as to whether the referenced PRR due date will be extended to allow inclusion of sampling results from the planned 3rd quarter 2019 sampling.

Thank you,

Greg

From: Greg Andrus
Sent: Thursday, September 06, 2018 4:41 PM
To: 'Miles, Danielle J (DEC)' <Danielle.Miles@dec.ny.gov>; 'Brian Wilkins' <bwilkins@wilkinsrv.com>
Cc: Laura Gregor <lgregor@luengineers.com>; JFrazer@monroecounty.gov; WadeSilkworth@monroecounty.gov; O'Neil,

Eamonn M (HEALTH) <Eamonn.ONeil@health.ny.gov>; Deming, Justin H (HEALTH) <justin.deming@health.ny.gov>; Schilling, Bernette (DEC) <bernette.schilling@dec.ny.gov>; Sowers, Frank (DEC) <frank.sowers@dec.ny.gov>
Subject: RE: Churchville Ford V00658 PRR

Hello,

Thank you for the preceding letter and your agreement to reduce the sampling frequency. One point of clarification – it would appear that if we sample every fifth quarter from now on, the next sampling event (3rd quarter) will occur after the 2019 PRR is due (the last sampling round having been in May 2018 (2nd quarter)). Is that acceptable to NYSDEC or should the PRR due date be adjusted to account for the sampling program?

Thanks,

Greg
Gregory L Andrus, P.G. CHMM
Group Leader, Investigation/Remediation

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From: Miles, Danielle J (DEC) <Danielle.Miles@dec.ny.gov>
Sent: Wednesday, September 05, 2018 3:37 PM
To: 'Brian Wilkins' <bwilkins@wilkinsrv.com>
Cc: Greg Andrus <gregandrus@luengineers.com>; Laura Gregor <lgregor@luengineers.com>; JFrazer@monroecounty.gov; WadeSilkworth@monroecounty.gov; O'Neil, Eamonn M (HEALTH) <Eamonn.ONeil@health.ny.gov>; Deming, Justin H (HEALTH) <justin.deming@health.ny.gov>; Schilling, Bernette (DEC) <bernette.schilling@dec.ny.gov>; Sowers, Frank (DEC) <frank.sowers@dec.ny.gov>
Subject: Churchville Ford V00658 PRR

Good afternoon,

This e-mail copies you on correspondence from the New York State Department of Environmental Conservation, Division of Environmental Remediation. An electronic file is attached. A hard copy version will follow in the mail. All those on the cc list will only receive this electronic copy.

Please contact Danielle Miles at (585) 226-5349 if you experience problems with this transmission.

Regards,

Danielle Miles
Assistant Engineer, Division of Environmental Remediation

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