NEU-VELLE LLC

January 3, 2020

Mr. Michael Squire
Assistant Engineer
New York State Department of Environmental Conservation
Division of Environmental Remediation, 11th Floor
625 Broadway
Albany, New York 12233

Re: Site Management Periodic Review Report
And IC/EC Certification Submittal (2019)
RG&E Park Street Former MGP Site (NO. V00731)
4 and 6 Park Street
Village of Geneseo, Livingston County, New York

Dear Mr. Squire:

On behalf of our client, Rochester Gas and Electric Corporation (RG&E), NEU-VELLE, LLC. (NEU-VELLE) is pleased to submit the enclosed Periodic Review Report (PRR) and completed certification form which documents the implementation and compliance with the Site Management Plan (SMP) for the Park Street Former Manufactured Gas Plant (MGP) Site (NYSDEC Site No. V00731), located at 4 and 6 Park Street in the Village of Geneseo, Livingston County, New York.

This package has been prepared in response to the letter from the Department to RG&E dated October 18, 2019. This submission completes the requirements for the PRR and the certification for the Park Street site by the Department.

Please feel free to contact me at any time at (585) 478-3167 with any questions you may have regarding this letter report, or contact Mr. Jeremy Wolf, RG&E's Project Manager for the project at (585) 500-8392.

Sincerely,

Logan Reid
Senior Project Manager
NEU-VELLE, LLC

cc: Jeremy Wolf – RG&E
Chuck Reyes – SUNY Geneseo

Site Management Periodic Review Report and IC/EC Certification (2019)

Geneseo Park Street Former MGP Site (NO. V00731)
Village of Geneseo, New York

Submitted to:
New York State Department of Environmental Conservation
Division of Environmental Remediation (BURC)
625 Broadway
Albany, New York

Submitted by:
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On behalf of:
Rochester Gas & Electric
89 East Avenue
Rochester, New York

January 3, 2020

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1. Executive Summary

NEU-VELLE, LLC (NEU-VELLE) conducted the Site Management Periodic Review Report (PRR) and IC/EC Certification submittal for the Geneseo - Park Street Former Manufactured Gas Plant (MGP) Site located in the Village of Geneseo, New York (hereinafter referred to as the "Site") (Figure 1). The Site was formerly in the New York State (NYS) Voluntary Cleanup Program (VCP), Site No. V00731, which is administered by New York State Department of Environmental Conservation (NYSDEC). Rochester Gas and Electric Corporation (RG&E) entered into an Amended and Restated Voluntary Cleanup Agreement (VCA) on December 23, 2014 (DEC Index No. B8-0535-98-07) with the NYSDEC to include this Site. The agreement obligated RG&E to implement a remedial program for hazardous substances that are components of wastes associated with MGP-related operations at the Site. The VCP was terminated by the NYSDEC as part of a statewide mandate in 2018. The Site is currently governed by the requirements of the NYSDEC approved Site Management Plan (SMP) dated June 2018.

After completion of a source material removal interim remedial measure (IRM) performed by the State University of New York (SUNY) and under NYSDEC guidance in 2003, some MGP-related residuals were left at the Site, which is hereafter referred to as "remaining MGP contamination". Imposition of an Institutional Control (IC) in the form of Deed Restriction has been incorporated into the Site remedy to control exposure to remaining MGP contamination to ensure protection of public health and the environment.

The Site was remediated to address the presence of aromatic volatile organic compounds (VOCs) including benzene, toluene, ethylbenzene and xylene (BTEX), and polyaromatic hydrocarbons (PAHs) in the aqueous phase and a dense non-aqueous phase liquid (DNAPL). A Site Characterization was conducted by RG&E in 2015 to 2016 and subsequent report concluded that a Remedial Investigation was not needed because the nature and extent of MGP-related impacts in soil and groundwater had been sufficiently defined for the purposes of conducting a remedial alternatives analysis, and that petroleum (*i.e.*, not MGP-related) may be the primary source of VOCs detected in soil and groundwater within the study area. The *Alternatives Analysis Letter Report* (AA Letter Report) was submitted to the NYSDEC on July 7, 2017 and the *Decision Document* containing the selected Site remedy was subsequently issued by the NYSDEC in August 2017. The elements of the selected remedy include:

- implementation of the remedial design program;
- maintaining the existing site covers;
- installation of an additional monitoring well;
- imposition of an institutional control in the form of a Deed Restriction, and;
- preparation of a post-remediation SMP.

Following the implementation of the selected remedy, the SMP was implemented (See Section 2, Below).

NEU-VELLE found that each component of the SMP was complied with during this reporting period:

- ICs/ECs have been in place and effective and
- Inspections were performed as required.

Based upon the inspections and compliance with the SMP, the Site remedy continues to meet the remedial objectives set forth. RG&E will continue to conduct inspections on an annual frequency and

groundwater monitoring and NAPL removal from the specified monitoring well (MW-5) on a semi-annual and quarterly basis, respectively.

2. Site Overview

2.1 Site Description

As shown on Figure 1, the Site is at the 4 and 6 Park Street properties in the Village of Geneseo, Livingston County, New York. The Site plan showing pre-remediation features is shown on Figure 2. The Site is an approximately ¾ -acre area and is surrounded by commercial buildings and School Street to the north, Park Street to the south, commercial buildings along the west side of Main Street to the east, and a SUNY academic complex (the Brodie Fine Arts building) to the west (Figure 2, Site Map).

The Site consists of a parking lot (L-Lot), access road, and sidewalk for SUNY campus that straddles the boundary between the village commercial district and the SUNY campus. The former gas holder for the MGP is farther west under the Brodie Fine Arts building. Most of the area occupied by the former MGP is either paved or located under paved surfaces. A small landscaped area is located at the southern end of the Site.

2.2 Site Remedial Program Summary

Remediation of MGP-related source materials was completed as an IRM by a contractor of SUNY under the oversight of NYSDEC during SUNY's Park Street entrance improvement program when the Site was developed as a parking lot. In September 2002 during final preparation for paving of the parking lot, a stone/brick containment structure was discovered approximately 4 feet below ground surface (bgs) that contained a black tarry material. The structure appears to have been located between the north side of the former MGP works building and the south side of the former coal house; however, the structure did not appear on any historical mapping. From September 2002 to January 2003 the NYSDEC oversaw the excavation and off-Site disposal by SUNY's contractor of the structure, liquid material inside and outside the structure, and the surrounding soil containing visible impacts.

During the IRM excavation, sidewall samples were collected for laboratory analysis. When laboratory results indicated an exceedance of the cleanup objective of 500 milligrams per kilogram (mg/kg) total PAHs and/or 10 mg/kg total BTEX, or when visible coal tar was encountered, excavation continued. Excavation sidewall and bottom sampling results were presented in the *Report of Activities at LL-Lot* (SUNY 2003). The report indicated that only one sidewall sample (located on the north excavation sidewall) did not meet the 500 mg/kg objective for PAHs (549.7 mg/kg PAHs were reported at that location).

The final excavation depth was approximately 20 feet bgs, terminating at the top of the fractured bedrock. An area near the center of the excavation was excavated an additional 5 feet into the fractured bedrock to approximately 25 feet bgs. Approximately 800 tons of tar-impacted soil and 3,200 gallons of impacted water that accumulated in the excavation were sent off site for disposal. The approximate location of the coal tar structure and the areal limits of the excavation are also shown on Figure 2. Structural fill was placed into the excavation and compacted.

2.2.1 Site Characterization and Alternative Analysis

RG&E conducted site characterization field activities between May 2015 and February 2016. The objectives of the site characterization were to:

- Gather information to evaluate whether MGP-related residuals remained in the subsurface.
- Determine whether MGP-related residual materials, if present, had a potential to pose a threat to public health or the environment.
- Determine whether a remedial investigation at the Site was appropriate.

The results from the Site Characterization were presented in the Site Characterization Report (Arcadis 2016) (SC Report). The SC Report concluded that a remedial investigation was unnecessary because the nature and extent of MGP-related impacts (PAHs and VOCs) in soil and groundwater had been sufficiently defined for the purposes of conducting a remedial alternatives analysis, and that petroleum (*i.e.*, not MGP-related) may be the primary source of VOCs detected in both soil and groundwater within the study area. Similarly, while VOCs were detected in soil vapor samples collected from across the Site, no MGP indicator compounds were present in any of the soil vapor samples. Gasoline indicators were; however, present in all but one of the samples while. Based on the types of VOCs detected, no evidence of MGP impacts existed in the soil vapor.

A seam of MGP-related non-aqueous phase liquid (NAPL) was detected within the weathered bedrock during the installation of MW-5, located immediately west of the former excavation.

RG&E prepared and submitted a July 7, 2017 *Alternatives Analysis Letter Report* (AA Letter Report) to the NYSDEC that compared several remedial alternatives for the site. The NYSDEC subsequently issued a *Decision Document* dated August 2017 that provided the elements of the NYSDEC-selected site remedy. The elements of the selected remedy include:

- implementation of the remedial design program;
- maintaining the existing site covers;
- installation of an additional monitoring well;
- imposition of an institutional control in the form of a Deed Restriction, and;
- preparation of a post-remediation SMP.

A plan providing the parameters, procedures, and applicable information and detail for installation of the additional monitoring well was provided to the NYSDEC on September 12, 2017. The additional monitoring well (MW-8) was installed hydraulically downgradient from MW-5 from October 8 to 10, 2017. No visual evidence of NAPL or sheens, or odors were detected during the installation of MW-8.

2.2.2 Remaining MGP Contamination

During the excavation IRM conducted in 2002 to 2003, endpoint sidewall samples were collected for laboratory analysis and the results compared to the (then current) NYSDEC *Technical and Administrative Guidance Memorandum (TAGM) 4046; Determination of Soil Cleanup Objectives and Cleanup Levels* (TAGM 4046). Excavation endpoint sample results indicated that three of the four overburden sidewall samples met the TAGM 4046 levels for total BTEX (less than 10 mg/kg) and total PAHs (less than 500 mg/kg) (the north wall sample result indicated 549 mg/kg total PAHs).

Additionally, each of the fractured bedrock (*i.e.*, excavation bottom) samples met TAGM 4046 levels. There may be some residual MGP contaminants also present in the weathered bedrock which ranges another 0.3 ft. to 6 ft. bgs and the upper 10 feet of bedrock which was observed to be highly fractured; particularly downgradient of the former brick structure containing the coal tar-like materials excavated during the IRM.

During the site characterization conducted from 2015 to 2016, 22 soil samples were collected from 11 soil borings for laboratory analysis. Two additional soil samples were collected for laboratory analyses during installation of MW-8 in October 2017. The results for each of the analyses were compared to the 6 NYSRR Part 375 Unrestricted Use Soil Cleanup Objectives (SCOs) and Restricted Commercial Use SCOs. BTEX were the only VOCs that exceeded Unrestricted Use SCOs. Methylcyclohexane, xylenes (total), and cyclohexane were the most prevalent VOCs detected in subsurface soil. Methylcyclohexane, cyclohexane, and xylenes are commonly present in weathered gasoline. Methyl tertiary butyl ether (MtBE), an octane enhancing gasoline additive used since 1979 to help prevent engine knocking, was detected in soil samples collected from two locations (MW-3 and MW-6). SVOCs were detected in 12 of the 22 soil samples with total SVOC concentrations ranging from below detection limits (12 samples) to 741,900 µg/kg in the soil sample collected from MW-1 (MW-1 is believed to be located within the backfill of the reported former excavation area).

BTEX and three PAHs have been identified in the Decision Document as the contaminants of potential concern (COPCs) for soil; specifically:

- Benzene
- Toluene
- Ethylbenzene
- Xylenes (total)
- Benzo(a)anthracene
- Benzo(a)pyrene
- Indeno(1,2,3-cd)pyrene

The Decision Document also identified BTEX and the same three PAHs identified as soil COPCs (benzo(a)anthracene, benzo(a)pyrene, and indeno[1,2,3-cd]pyrene) as COPCs for groundwater. Based on the groundwater sampling completed during the site characterization, depth to groundwater across most of the site is 10 ft. to 15 ft. bgs. None of the PAH analytes associated with MGP operations were detected at concentrations above their respective groundwater guidance values; BTEX analytes, where existing, were only detected at concentrations slightly above groundwater standards. Similar to VOC data for soil, data suggests that petroleum is the primary source of VOCs detected in groundwater within the study area.

Soil vapor samples were collected using SUMMA canisters in September 2015 from seven locations (SV-1 through SV-7) around the vicinity of the former MGP structures. Specifically, soil vapor samples were collected along the exterior of the eastern facade of the Brodie Fine Arts building, along the west side of the Brodie Fine Arts building within the courtyard, and north of the excavation area. Soil vapor samples were submitted for analysis by USEPA Compendium Method TO-15. In general, BTEX compounds were detected in much lower concentrations than were non-MGP-related chlorinated VOCs. Acetone and chloroform were the VOCs detected in the highest frequencies and in the highest relative concentrations. None of the "MGP-indicator" analytes included with the TO-15 analyses (indene, isooctane, or thiopenes) were detected in any of the soil gas samples. Gasoline indicators were present in 6 of the 7 soil vapor samples collected from across the site. Based on the types of analytes detected, no evidence of MGP impacts exist in the soil vapor.

2.2.3 Site Management Plan

The SMP, approved by NYSDEC letter dated July 3, 2018, provides the following:

- Institutional Controls:
    - Imposition of a Declaration of Covenants and Restrictions (Deed Restriction) that will:
        - Restrict use of the property to Restricted Residential, Commercial and Industrial Uses, and voluntarily restricts the use of the property to non-residential use
        - Restrict the use of groundwater as a source of potable or process water without appropriate treatment as determined by the New York State Department of Health (NYSDOH) or Livingston County DOH
        - Require inspection of Engineering Controls at the frequency and as described in the SMP
        - Require periodic certification of institutional and engineering controls
        - Require compliance with the SMP
- Engineering Controls:
    - Maintain the existing site covers
- Site Inspections:
    - Annually, and after severe weather conditions
- Monitoring and Sampling:
    - MW-5: Monitored quarterly and NAPL removal, as required, for initial period until less frequent monitoring is approved by the NYSDEC
    - MW-1, MW-2, MW-3, MW-4, MW-6, MW-7, MW-8: monitored and sampled semi-annually for initial 5-year period
- Maintenance:
    - As required based on Site inspections
- Reporting:
    - Periodic Review Report – submitted annually to NYSDEC

3. Remedy Performance Evaluation

The remedial performance is evaluated based on the periodic visual inspection of the Site stone, gravel, vegetative, concrete and/or asphalt covers and condition of monitoring wells.

The annual inspection of the Site surface covers was performed by NEU-VELLE, on May 16, 2019, to monitor its effectiveness at maintaining physical separation of the remaining subsurface contamination at the Site. The evaluation included a visual inspection of the vegetative, concrete, and/or asphalt cover for evidence of disturbance, erosion or removal of cover materials, settlement, or other pathways that could potentially result in exposure to subsurface MGP residuals. Visual observations and photographs were collected during the May 16, 2019 inspection. The existing cover materials and monitoring wells at the Site were observed to be in good condition. There were no noticeable signs of significant deterioration of the surface cover.

An annual inspection report, dated August 16, 2019, including the SMP Site Inspection Form and photographs, was submitted to the NYSDEC and is included as Appendix A.

The SMP also requires a Monitoring and Sampling Plan for evaluating the effectives of the remedy at reducing dissolved MGP-related COPCs at, and downgradient, from the Site. Groundwater sampling for chemical and physical analysis is performed semi-annually to determine if the remedial action objectives are being achieved. Two groundwater sampling events (2rd and 3rd Post-Remediation Sampling Events, September 2018 and May 2019, resp.) were performed during the reporting period (July 1, 2018 through June 30, 2019) and reports dated December 28, 2018 and August 20, 2019, resp., for each event were submitted to the NYSDEC. Laboratory reports with results of analyses from these sampling events are provided as Exhibit A. A summary of the monitoring data is provided below and a summary table of the analytical results compared to standards is provided as Table 1.

2nd Post-Remediation Sampling Event – September 2018

BTEX was detected in four (MW-4, MW-6, MW-7, and MW-8) of the seven wells that were sampled during this sampling event. BTEX was detected in MW-6 and MW-8 at concentrations above the corresponding TOGS 1.1.1 Class GA SCGs. Although the full suite of PAHs was analyzed for this sampling event, none of the PAH COPCs were detected. Two other PAHs (acenaphthylene and naphthalene) were detected (22.2 micrograms per liter [µg/L] and 273 µg/L, resp.) at MW-6, at concentrations consistent with levels previously detected. The naphthalene concentration exceeded the corresponding TOGS 1.1.1 Class GA SCG for naphthalene (10 µg/L). Consistent with previous sampling events, DNAPL was encountered in MW-5.

3rd Post-Remediation Sampling Event – May 2019

BTEX was detected in three (3) of the seven (7) wells that were sampled (MW-4, MW-6, and MW-8) during this sampling event. BTEX was reported at concentrations above the

corresponding TOGS 1.1.1 Class GA SCGs in these three (3) groundwater samples. Although the full suite of PAHs was analyzed for this sampling event, none of the PAH COPCs were detected. Two (2) other PAHs (acenaphthylene and naphthalene) were reported (21.4 μg/L and 283 μg/L, resp.) in the sample collected from MW-6 at concentrations consistent with levels previously detected. The naphthalene concentration exceeded the corresponding TOGS 1.1.1 Class GA SCG for naphthalene (10 μg/L). Consistent with previous sampling events, DNAPL was encountered in MW-5.

A time series plot of the COPC concentrations depicting trends over time is provided as Appendix B.

In addition to the semi-annual groundwater sampling events, quarterly NAPL gauging in MW-5 was performed to determine if NAPL is accumulating in the well during the reporting period. Gauging events were performed on:

- July 30, 2018,
- September 24, 2018,
- January 25, 2019, and
- May 20, 2019.

In each event, dense non-aqueous phase liquid (DNAPL) was found to be present in the well. The DNAPL thickness was measured and then DNAPL was removed and collected using a stainless-steel bailer. A letter report for each gauging event was submitted to the NYSDEC and a summary table with the gauging observations and field measurements is provided in Table 2.

In accordance with the SMP, groundwater monitoring will continue as described in Table 10 – Inspection and Monitoring Schedule. Quarterly gauging and recovery of NAPL at MW-5 will continue as conditions warrant. The frequency of groundwater monitoring and recovery of NAPL will only be modified with approval of the NYSDEC.

4. IC/EC Plan Compliance

4.1 IC/EC Requirements

ICs include the following:

- The property may be used for non-residential, *i.e.*, Commercial Uses as described in Part 375-1.8(g)(2)(iii) and Industrial Uses as described in Part 375-1.8(g)(2)(iv);
- The current cover materials at the Site (*i.e.*, parking area, access road, sidewalks, maintained vegetated areas, *etc.*) will be periodically inspected and maintained.
- The use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the NYSDOH or Livingston County DOH to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval to do so from the Department.
- Groundwater and other environmental or public health monitoring must be performed as defined in the SMP;
- Data and information pertinent to Site management must be reported at the frequency and in a manner as defined in the SMP;
- All future activities that will disturb remaining MGP contaminated material must be conducted in accordance with the SMP;
- Monitoring to assess the effectiveness of the remedy must be performed as defined in the SMP;
- Operation, maintenance, monitoring, inspection, and reporting of the physical components of the remedy shall be performed as defined in the SMP;
- Access to the Site must be provided to agents, employees or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by the Deed Restriction.
- The potential for vapor intrusion by residual MGP contamination must be evaluated for any buildings developed on the Site within the IC boundaries noted on Figure 2, and any potential impacts that are identified must be monitored or mitigated; and
- Vegetable gardens and farming on the Site are prohibited.

The Site ECs are the surface covers as described in Section 3 above and in the SMP. The surface covers will be maintained to eliminate potential exposure to remaining MGP contamination at the Site.

4.2 IC/EC Compliance

The NYSDEC-approved SMP is in place. All required inspections were performed in accordance with the SMP. All Site restrictions have been complied with during this reporting period.

4.3 IC/EC Certification

The IC/EC Certification is included in Appendix C.

5. Inspection Plan Compliance

5.1 Inspection Requirements

The inspection requirements as specified in the SMP are presented in Section 3.

5.2 Inspection Compliance

The inspections were conducted in accordance with the SMP.

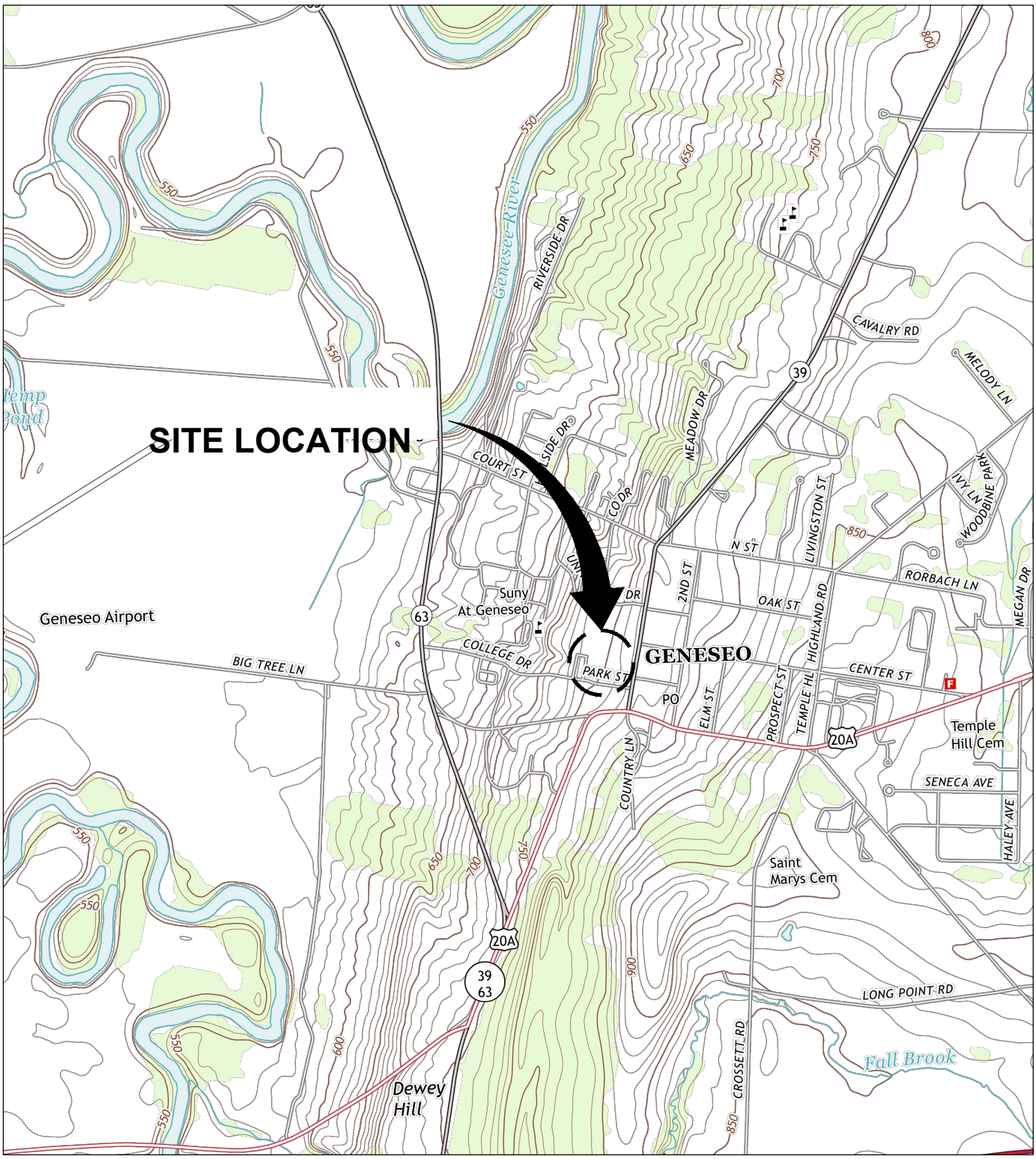
6. Conclusions and Recommendations

Each component of the SMP was complied with:

- ICs/ECs have been in place and effective and
- Inspections were performed as required.

Based upon the inspections and compliance with the SMP, the Site remedy continues to meet the remedial objectives set forth. RG&E will continue to conduct inspections on an annual frequency and groundwater monitoring and NAPL removal from the specified monitoring well (MW-5) on a semi-annual and quarterly basis, respectively.

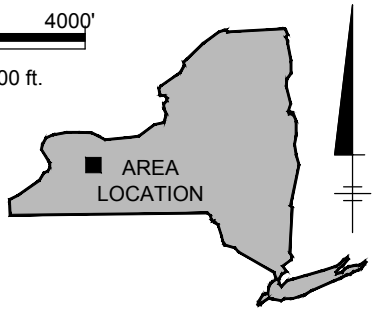
Figures



REFERENCE: BASE MAP USGS 7.5. MIN. TOPO. QUAD., GENESEO, NY, 2013

0 2000' 4000'

Approximate Scale: 1 in. = 2000 ft.



ROCHESTER GAS & ELECTRIC
PARK STREET FORMER MGP SITE
SITE MANAGEMENT PLAN

SITE LOCATION MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE 1

LEGEND:

- PROPERTY LINE
- RIGHT-OF-WAY LINE
- BUILDING LINE
- FENCE LINE
- VEGETATION
- SANITARY SEWER LINE
- STORM SEWER LINE
- WATER LINE
- OVERHEAD ELECTRIC LINE
- UNDERGROUND ELECTRIC LINE
- NATURAL GAS LINE
- OVERHEAD TELEPHONE & CABLE LINE
- TELEPHONE & CABLE LINE
- UNKNOWN UTILITY
- FORMER MGP STRUCTURE
- LIMITS OF BEDROCK EXCAVATION
- LIMITS OF OVERBURDEN EXCAVATION
- FORMER STONE/BRICK STRUCTURE CONTAINING COAL TAR
- SOIL BORING LOCATION
- MONITORING WELL LOCATION
- SOIL VAPOR SAMPLE LOCATION
- SITE BOUNDARY AND INSTITUTIONAL CONTROL BOUNDARY

NOTES:

1. FORMER LOCATIONS OF GAS WORKS STRUCTURES FROM SANBORN LIBRARY, LLC 1906 MAP. LOCATIONS ARE APPROXIMATE.
2. LIMITS OF THE 2002/2003 OVERBURDEN EXCAVATION, BEDROCK EXCAVATION, AND LOCATIONS OF THE FORMER STRUCTURE CONTAINING COAL TAR FROM REPORT OF ACTIVITIES AT LL-LOT, SUNY GENESEO (2003). LOCATIONS ARE APPROXIMATE.

SOURCE:

1. BASEMAP INFORMATION PROVIDED BY FISHER ASSOCIATES, LLC. DATED JUNE, 2015. FILENAME: GENESEO TOPO.DWG. GEOREFERENCED TO NEW YORK STATE PLANE NAD83 COORDINATE SYSTEM.

0 60' 120'

GRAPHIC SCALE

ROCHESTER GAS & ELECTRIC
PARK STREET FORMER MGP SITE
SITE MANAGEMENT PLAN

SITE PLAN

ARCADIS Design & Consultancy for natural and built assets

FIGURE **2**

CITY:CRANBURY-NJ DIV/GROUP:ENV/CAD DB:JMEYER LD:JMEYER PIC:K.WHITE PM:B.AHRENS TM:B.AHRENS LYR:(OPT)ON=*;OFF=*REF*
C:\Users\jmeyer\OneDrive - ARCADIS\BIM 360 DOCS\ROCHESTER GAS & ELECTRIC\ROSE GENESEO\PARK ST - SITE CH2017\B0013138\006\01-DWG\B0003
PLOTTED: 1/23/2018 8:38 AM BY: MEYER, JULIE
LAYOUT: 2 SAVED: 12/19/2017 9:28 AM ACADVER: 19.1S (LMS TECH) PAGESETUP: --- PLOTSTYLETABLE: ---
XREFS: IMAGES: PROJECTNAME: ---
B0013138X01
B0013138X08

Tables

TABLE 1 (page 1 of 2)
POST REMEDIATION GROUNDWATER RESULTS
ROCHESTER GAS & ELECTRIC
PARK STREET FORMER MGP SITE
GENESEO, NEW YORK

Well ID			MW-1	MW-1		MW-1	MW-2	MW-2	MW-2	MW-3	MW-3	MW-3	MW-4	MW-4	MW-4	
Sample ID		NYSDEC TOGS 1.1.1 Class GA[1]	GEN-MW1	GEN-MW1-092718	Duplicate-092718	GEN-MW1-051519	GEN-MW2	GEN-MW2-092918	GEN-MW2-051419	GEN-MW3	GEN-MW3-092718	GEN-MW3-051419	GEN-MW4	GEN-MW4-092818	GEN-MW4-051519	Duplicate-051519
Lab Sample ID			181657-04	184501-03	184501-05	192209-04	181657-03	184501-07	192209-02	181657-01	184501-02	192209-01	181657-05	184501-06	192209-03	192209-05
Date Sampled	Units		4/23/2018	9/27/2018		5/15/2019	4/23/2018	9/29/2018	5/14/2019	4/23/2018	9/27/2018	5/14/2019	4/23/2018	9/28/2018	5/15/2019	
Volatiles																
Benzene	µg/L	1	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 U	**0.857 J**	1 U	**0.547 J**	**1.04**
Ethylbenzene	µg/L	5*	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U
Toluene	µg/L	5*	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U
Xylene (total)	µg/L	5*	2 U	2 U	2 U	2 U	**1.39 J**	2 U	2 U	2 U	2 U	2 U	**2.97**	**1.97 J**	**2.02**	**2.60**
Semi-Volatiles																
Acenaphthene	µg/L	20	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Acenaphthylene	µg/L	NS	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Anthracene	µg/L	50	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Benzo(a)anthracene	µg/L	0.002**	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Benzo(a)pyrene	µg/L	ND	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Benzo(b)fluoranthene	µg/L	0.002	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Benzo(g,h,i)perylene	µg/L	NS	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Benzo(k)fluoranthene	µg/L	0.002	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Dibenzo(a,h)anthracene	µg/L	NS	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Chrysene	µg/L	0.002	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Fluoranthene	µg/L	50	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Fluorene	µg/L	50	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Indeno(1,2,3-cd) pyrene	µg/L	0.002**	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Naphthalene	µg/L	10	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Phenanthrene	µg/L	50	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Pyrene	µg/L	50	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U

Notes:
µg/L = micrograms per liter
NT = Not Tested
NS = No Standard
NL = Not Listed
MDL = Method Detection Limit
D - Indicates that the result is from a diluted run
J - Indicates an estimated value.
U - Indicates that the constituent was not detected at the reported detection limit.
Bolded value indicates that the compound was detected above laboratory reporting limit.
Bolded and highlighted value indicates that the compound was detected above its respective regulatory standard or guidance value.
[1]Class GA Drinking Water Standard or Guidance Value
ND = Non-detectable concentration by the approved analytical methods referenced in 6 NYCRR 700.3
*Principal Organic Contaminant Standard
**Class GA Guidance Value
April 2018 Duplicate sample ("GEN-FIELD DUPE") collected
October 2018 Duplicate sample ("Duplicate-092718") collected at MW-1.

TABLE 1 (page 2 of 2)
POST REMEDIATION GROUNDWATER RESULTS
ROCHESTER GAS & ELECTRIC
PARK STREET FORMER MGP SITE
GENESEO, NEW YORK

Well ID			MW-6		MW-6	MW-6	MW-7	MW-7	MW-7	MW-8	MW-8	MW-8
Sample ID		NYSDEC TOGS 1.1.1 Class GA[1]	GEN-MW6	GEN- FIELD DUPE	GEN-MW6-092918	GEN-MW6-051619	GEN-MW7	GEN-MW7-092618	GEN-MW7-051719	GEN-MW8	GEN-MW8-092818	GEN-MW8-051619
Lab Sample ID			181657-08	181657-09	184501-09	192209-06	181657-07	184501-01	192209-09	181657-06	184501-04	192209-07
Date Sampled	Units		4/24/2018		9/29/2018	5/16/2019	4/24/2018	9/26/2018	5/17/2019	4/23/2018	9/28/2018	5/16/2019
Volatiles												
Benzene	µg/L	1	**147**	**150**	**170**	**148**	1 U	**0.606 J**	1 U	**8.93**	**8.08**	**6.00**
Ethylbenzene	µg/L	5*	**31.5**	**32.5**	**35.8**	**22.5**	2 U	2 U	2 U	**7.3**	**7.08**	**5.84**
Toluene	µg/L	5*	**51.5**	**53.1**	**62.7**	**71.8**	2 U	2 U	2 U	**2.76**	**5.78**	**4.99**
Xylene (total)	µg/L	5*	**107.3**	**108.9**	**116.2**	**125.6**	2 U	**1.65 J**	2 U	**3.85**	**11.77**	**8.26**
Semi-Volatiles												
Acenaphthene	µg/L	20	20 U	20 U	20 U	20 U	10 U	10 U	10 U	10 U	10 U	10 U
Acenaphthylene	µg/L	NS	**25.1**	**25.3**	**22.2**	**21.4**	10 U	10 U	10 U	10 U	10 U	10 U
Anthracene	µg/L	50	20 U	20 U	20 U	20 U	10 U	10 U	10 U	10 U	10 U	10 U
Benzo(a)anthracene	µg/L	0.002**	10 U	20 U	20 U	20 U	10 U	10 U	10 U	10 U	10 U	10 U
Benzo(a)pyrene	µg/L	ND	10 U	20 U	20 U	20 U	10 U	10 U	10 U	10 U	10 U	10 U
Benzo(b)fluoranthene	µg/L	0.002	20 U	20 U	20 U	20 U	10 U	10 U	10 U	10 U	10 U	10 U
Benzo(g,h,i)perylene	µg/L	NS	20 U	20 U	20 U	20 U	10 U	10 U	10 U	10 U	10 U	10 U
Benzo(k)fluoranthene	µg/L	0.002	20 U	20 U	20 U	20 U	10 U	10 U	10 U	10 U	10 U	10 U
Dibenzo(a,h)anthracene	µg/L	NS	20 U	20 U	20 U	20 U	10 U	10 U	10 U	10 U	10 U	10 U
Chrysene	µg/L	0.002	20 U	20 U	20 U	20 U	10 U	10 U	10 U	10 U	10 U	10 U
Fluoranthene	µg/L	50	20 U	20 U	20 U	20 U	10 U	10 U	10 U	10 U	10 U	10 U
Fluorene	µg/L	50	20 U	20 U	20 U	20 U	10 U	10 U	10 U	10 U	10 U	10 U
Indeno(1,2,3-cd) pyrene	µg/L	0.002**	10 U	20 U	20 U	20 U	10 U	10 U	10 U	10 U	10 U	10 U
Naphthalene	µg/L	10	**279**	**299**	**273**	**283**	10 U	10 U	10 U	10 U	10 U	10 U
Phenanthrene	µg/L	50	20 U	20 U	20 U	20 U	10 U	10 U	10 U	10 U	10 U	10 U
Pyrene	µg/L	50	20 U	20 U	20 U	20 U	10 U	10 U	10 U	10 U	10 U	10 U

Notes:
µg/L = micrograms per liter
NT = Not Tested
NS = No Standard
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MDL = Method Detection Limit
D - Indicates that the result is from a diluted run
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Bolded value indicates that the compound was detected above laboratory reporting limit.
Bolded and highlighted value indicates that the compound was detected above its respective regulatory standard or guidance value.
[1]Class GA Drinking Water Standard or Guidance Value
ND = Non-detectable concentration by the approved analytical methods referenced in 6 NYCRR 700.3
*Principal Organic Contaminant Standard
**Class GA Guidance Value
April 2018 Duplicate sample ("DUPE") collected at MW-6.
October 2018 Duplicate sample ("Duplicate-092718")

Table 2

DNAPL MEASURMENTS
RG&E - Park Street Site - Geneseo, New York
Quarterly NAPL Summary

Well ID	Date of Monitoring NAPL	TOC Elevation	Depth to Water ft (bgs)	NAPL Depth ft (bgs) Before Removal	NAPL Thickness (ft) Before Removal	NAPL Depth ft (bgs) After Removal	NAPL Thickness (ft) After Removal	NAPL Removal Volume (gal)	Total Well Depth ft (bgs)
				DNAPL					
MW5	4/23/2018	757.82	18.52	33.23	1.67	34.51	0.39	0.21	34.90
	7/30/2018	757.82	17.71	33.97	0.93	34.54	0.36	0.09	34.90
	9/24/2018	757.82	18.02	33.30	1.6	NM	NM	Negligible	34.90
	1/25/2019	757.82	17.90	33.50	1.4	NM	NM	0.2	34.90
	5/20/2019	757.82	16.82	34.65	0.25	NM	NM	±0.05	34.90

Notes:

1. ft AMSL = Feet above mean sea level.
2. bgs = below ground surface
3. NM = Not Measure

Appendix A

2019 Annual Site-wide Inspection Report

NEU-VELLE LLC

August 16, 2019

Mr. Michael Squire
Assistant Engineer
New York State Department of Environmental Conservation
Division of Environmental Remediation, 11th Floor
625 Broadway
Albany, New York 12233

Subject: 2019 Annual Site-wide Inspection Report
RG&E Park Street Former MGP Site (#V00731)
Geneseo, New York

Dear Mr. Squire:

On behalf of Rochester Gas & Electric Corporation (RG&E), NEU-VELLE LLC (NEU-VELLE) completed the annual Site-wide Inspection in accordance with the requirements outlined within the Site Management Plan (SMP) for the Geneseo Park Street Former Manufactured Gas Plant (MGP) Site located at 4 and 6 Park Street in the Village of Geneseo, New York (the "Site").

NEU-VELLE performed a visual inspection of the surface cover at the Site to monitor its effectiveness at maintaining physical separation of the remaining subsurface contamination at the Site. The evaluation included a visual inspection of the vegetative, concrete, and/or asphalt cover for evidence of disturbance, erosion or removal of cover materials, settlement, or other pathways that could potentially result in exposure to subsurface MGP residuals. Visual observations and photographs were collected during the May 16, 2019 inspection. The existing cover materials at the Site were observed to be in good condition. There were no noticeable signs of significant deterioration of the surface cover. Documentation of NEU-VELLE's inspection is provided as **Attachment A** of this letter report.

Please feel free to contact me at (585) 478-1666 with any questions or concerns.

Sincerely,

Kyle R. Miller, PG
NEU-VELLE, LLC

Attachment A – Site Inspection Form and Photographs

cc: Mr. Jeremy Wolf, RG&E

Attachment A

Site Inspection Form

Park Street Former MGP Site - Geneseo, New York

Date/Time: May 16, 2019

Personnel: Kyle R. Miller

Weather: Sunny

Temperature: ± 55° F

General Requirements

Photographs will be attached to document the condition of each inspection item identified below. A written description of any item(s) that is considered to be in poor condition is required.

1. General Site Conditions:

Monitoring wells	☒ Good	☐ Poor*
Cover Areas (Pavement)	☒ Good	☐ Poor*
Cover Areas (Sidwalk)	☒ Good	☐ Poor*
Cover Areas (Grass/Landscaping)	☒ Good	☐ Poor*
Signs of intrusive activities	☒ No	☐ Yes*
Evidence of Settlement	☒ No	☐ Yes*

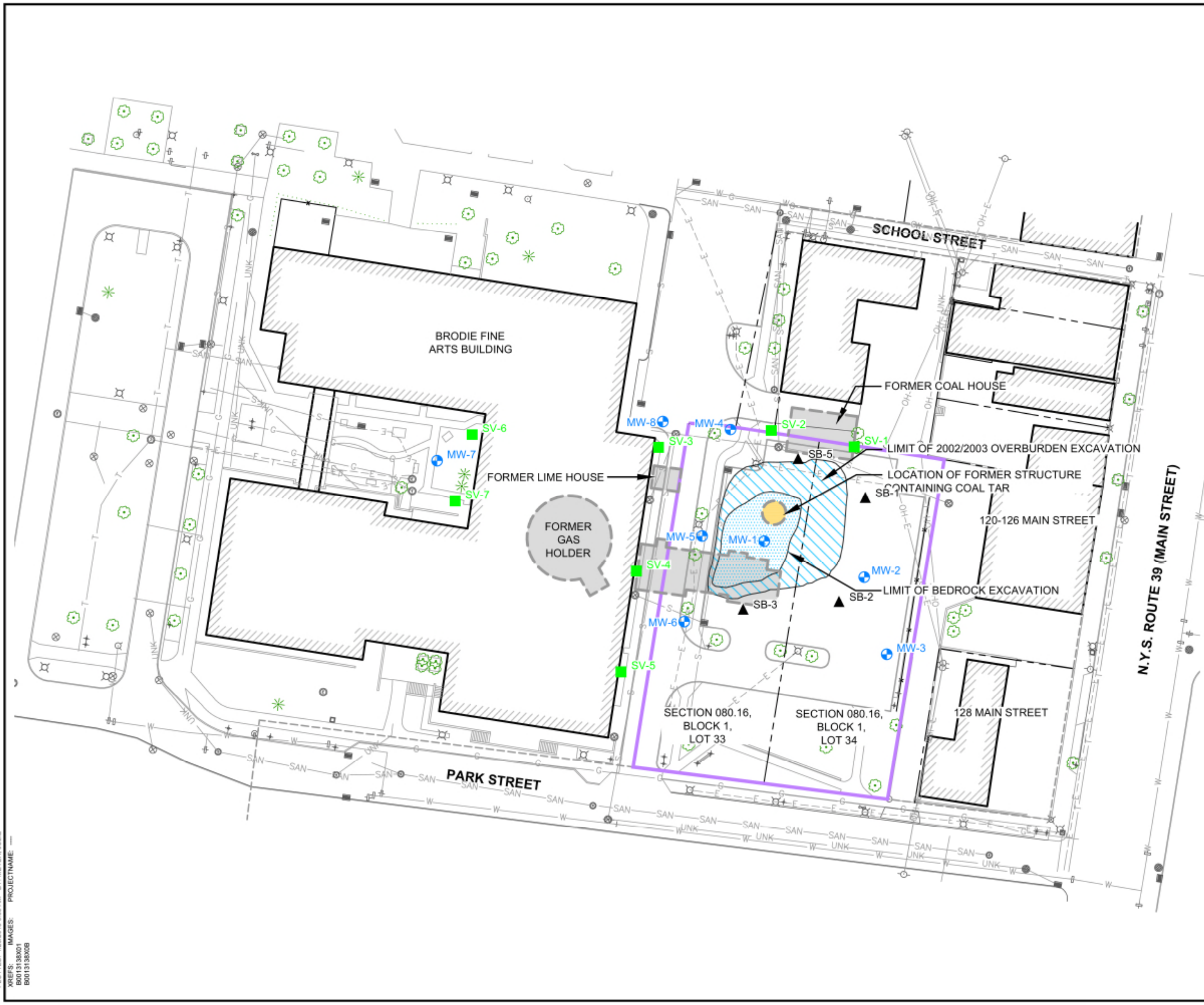
Note:
-Cover area inspection is to determine if intrusive activities may have occurred since the previous site visit.

2. Site Cover Systems:

Borrowing/Depressions	☒ No	☐ Yes*
Standing Water	☒ No	☐ Yes*
Missing Asphal/Sidewalk	☒ No	☐ Yes*
Vegetative Growth (Other than grass/landscaped areas)	☒ No	☐ Yes*
Evidence of Settlement	☒ No	☐ Yes*
Sedimentation	☒ No	☐ Yes*
Damage/Failure	☒ No	☐ Yes*

3. Notes:

All on-site monitoring wells, asphalt pavement, concrete sidewalks, lawn areas, and mulched landscape areas were observed to be in good condition. No maintenance required based upon these observations.
Apparently stressed tree remains on the northwestern portion of the site.



LEGEND:

- PROPERTY LINE
- RIGHT–OF–WAY LINE
- BUILDING LINE
- FENCE LINE
- VEGETATION
- SANITARY SEWER LINE
- STORM SEWER LINE
- WATER LINE
- OVERHEAD ELECTRIC LINE
- UNDERGROUND ELECTRIC LINE
- NATURAL GAS LINE
- OVERHEAD TELEPHONE & CABLE LINE
- TELEPHONE & CABLE LINE
- UNKNOWN UTILITY
- FORMER MGP STRUCTURE
- LIMITS OF BEDROCK EXCAVATION
- LIMITS OF OVERBURDEN EXCAVATION
- FORMER STONE/BRICK STRUCTURE CONTAINING COAL TAR
- SOIL BORING LOCATION
- MONITORING WELL LOCATION
- SOIL VAPOR SAMPLE LOCATION
- SITE BOUNDARY AND INSTITUTIONAL CONTROL BOUNDARY

NOTES:

1. FORMER LOCATIONS OF GAS WORKS STRUCTURES FROM SANBORN LIBRARY, LLC 1906 MAP. LOCATIONS ARE APPROXIMATE.
2. LIMITS OF THE 2002/2003 OVERBURDEN EXCAVATION, BEDROCK EXCAVATION, AND LOCATIONS OF THE FORMER STRUCTURE CONTAINING COAL TAR FROM REPORT OF ACTIVITIES AT LL–LOT, SUNY GENESEO (2003). LOCATIONS ARE APPROXIMATE.

SOURCE:

1. BASEMAP INFORMATION PROVIDED BY FISHER ASSOCIATES, LLC. DATED JUNE, 2015. FILENAME: GENESEO TOPO.DWG. GEOREFERENCED TO NEW YORK STATE PLANE NAD83 COORDINATE SYSTEM.

0 60' 120'
GRAPHIC SCALE

ROCHESTER GAS & ELECTRIC
PARK STREET FORMER MGP SITE
SITE MANAGEMENT PLAN

SITE MAP

ARCADIS Design & Consultancy for natural and built assets

FIGURE
2

Site Inspection Photographs
RG&E Park Street, Geneseo, NY - May 2019

Sidewalk and landscaped area south edge - viewing west

Southern portion of parking lot and landscaped area – viewing west

Site Inspection Photographs
RG&E Park Street, Geneseo, NY - May 2019

Asphalt cover, southern portion of parking lot - viewing west

East sidewalk and landscaped area - viewing southwest

Site Inspection Photographs
RG&E Park Street, Geneseo, NY - May 2019

Eastern edge of parking lot - viewing north

Asphalt cover, western parking lot area - viewing northwest

Site Inspection Photographs
RG&E Park Street, Geneseo, NY - May 2019

Asphalt cover and landscaping, southern portion of parking lot - viewing west

Asphalt cover near MW3, eastern parking lot edge - viewing east

Site Inspection Photographs
RG&E Park Street, Geneseo, NY - May 2019

Asphalt cover near MW2 - viewing north

Asphalt cover, northern portion of parking lot - viewing west

Site Inspection Photographs
RG&E Park Street, Geneseo, NY - May 2019

Asphalt cover and landscaping, northern portion of parking lot - viewing east

Asphalt cover near MW1 - viewing south

Site Inspection Photographs
RG&E Park Street, Geneseo, NY - May 2019

Western sidewalk and parking lot – viewing south

MW4 area – viewing south

Site Inspection Photographs
RG&E Park Street, Geneseo, NY - May 2019

MW5 area – viewing south

MW6 area – viewing southwest

Site Inspection Photographs
RG&E Park Street, Geneseo, NY - May 2019

Western sidewalk, landscaping, and asphalt - viewing north

MW8 area – viewing north

Site Inspection Photographs
RG&E Park Street, Geneseo, NY - May 2019

Sidewalk and asphalt near entrance to Parking Lot L – viewing south

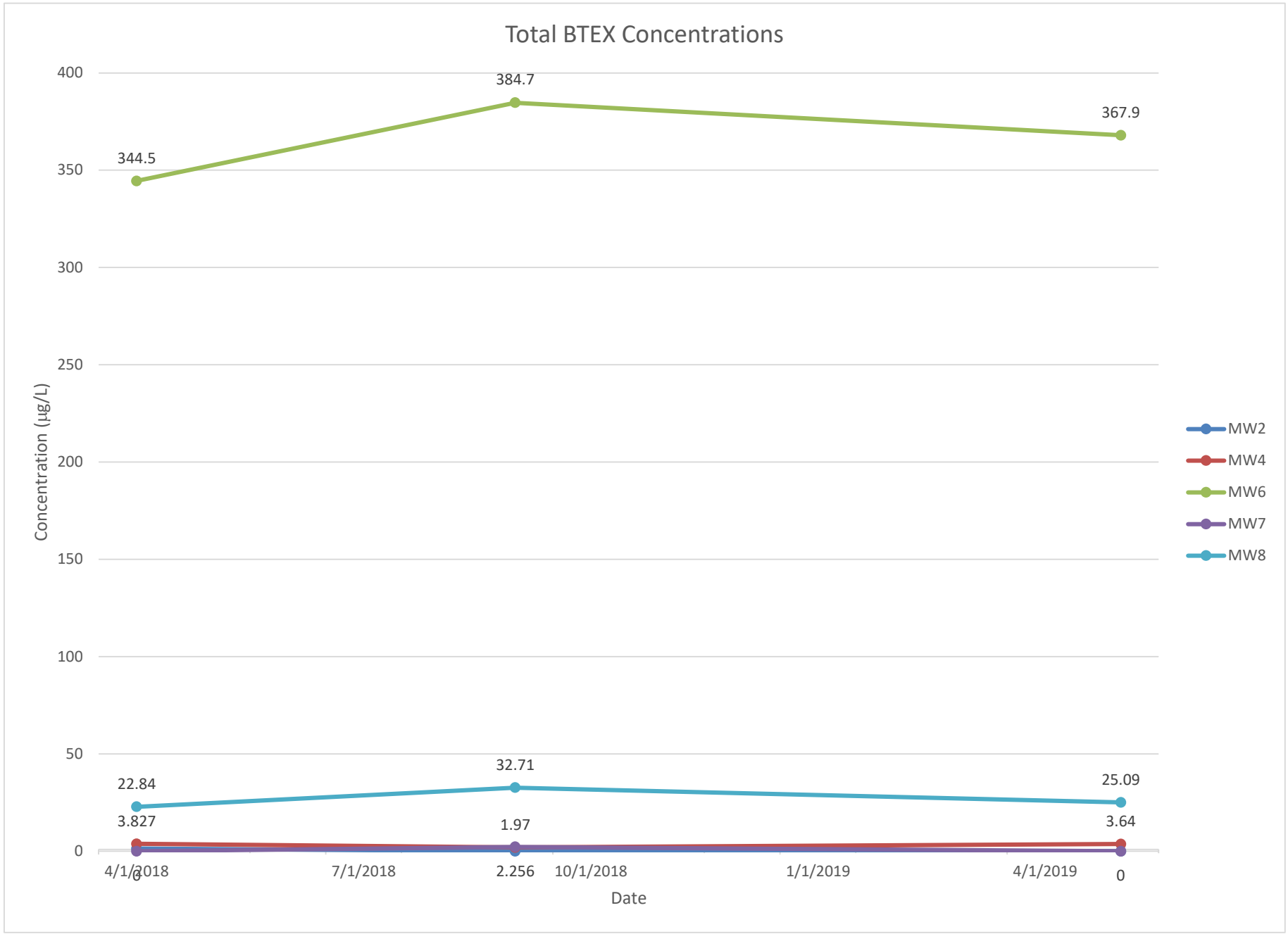
MW7 area – viewing south

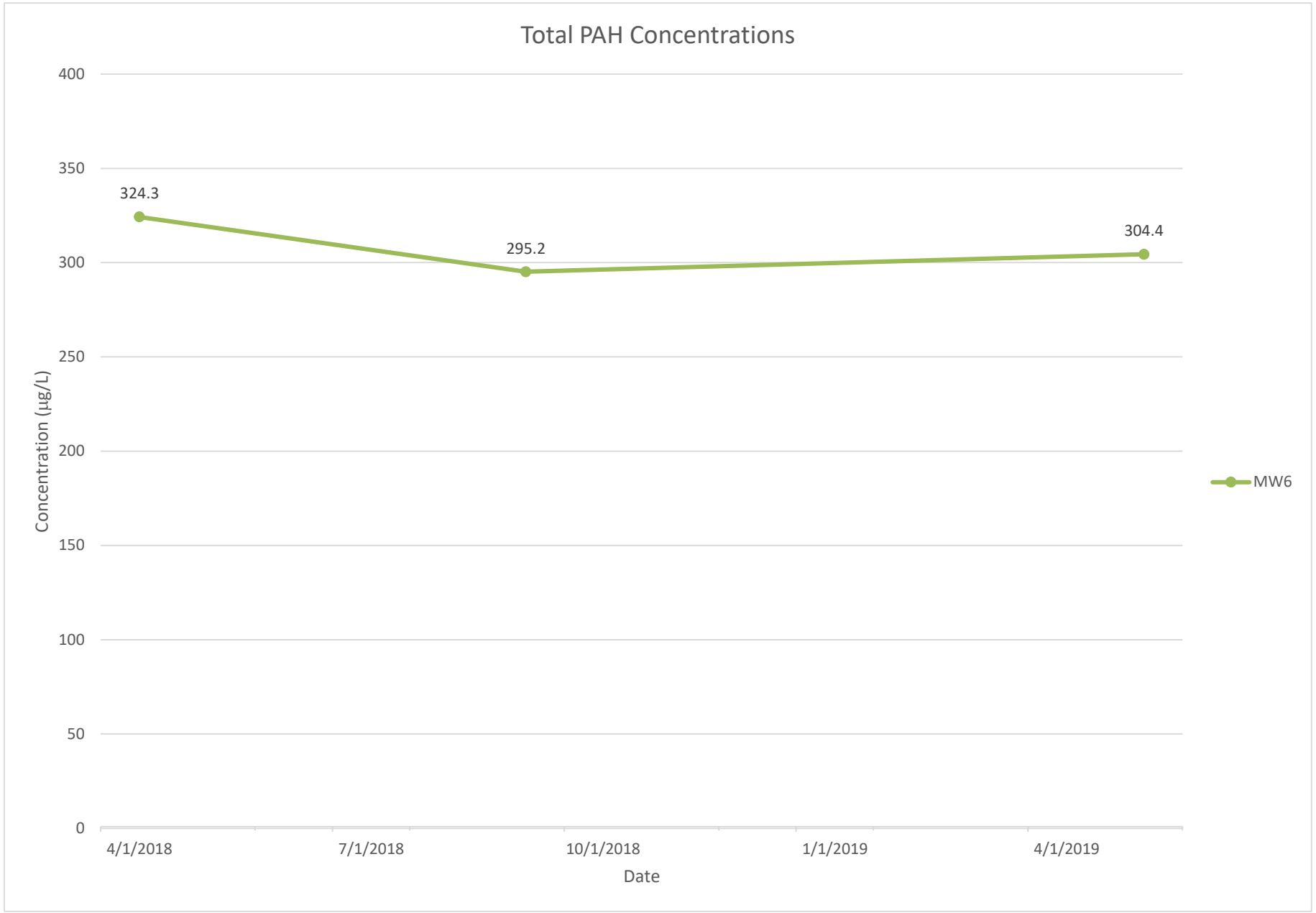
Site Inspection Photographs
RG&E Park Street, Geneseo, NY - May 2019

Stressed existing tree, northwest corner of site boundary - viewing northwest

Appendix B

Time Series Plot of COPCs


Total BTEX Concentrations
400
350
300
250
200
150
100
50
0
Concentration (µg/L)
384.7
367.9
344.5
32.71
25.09
22.84
3.827
1.97
3.64
0
2.256
0
4/1/2018
7/1/2018
10/1/2018
1/1/2019
4/1/2019
Date
MW2
MW4
MW6
MW7
MW8


Total PAH Concentrations
400
350
300
250
200
150
100
50
0
Concentration (µg/L)
324.3
295.2
304.4
4/1/2018
7/1/2018
10/1/2018
1/1/2019
4/1/2019
Date
MW6

Appendix C

Institutional and Engineering Controls Certification 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. V00731

Site Name RGE Geneseo-Park St MGP

Site Address: 4 and 6 Park Street Zip Code: 14454
City/Town: Geneseo
County: Livingston
Site Acreage:

Reporting Period: ~~July 10, 2018 to March 30, 2019~~
July 1, 2018 to June 30, 2019

	YES	NO
1. Is the information above correct?	☐	☒
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?	☐	☒
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	☐	☒
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	☐	☒
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?	☐	☒

Box 2

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

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. V00731 **Box 3**

Description of Institutional Controls

Parcel	Owner	Institutional Control
	Charles Reyes, SUNY Geneseo EHS	Ground Water Use Restriction Soil Management Plan Landuse Restriction Monitoring Plan Site Management Plan IC/EC Plan

Box 4

Description of Engineering Controls

Parcel	Engineering Control
	Cover System Monitoring Wells

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
☒	☐

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
☒	☐

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. V00731

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 Albert G. Lyons, Jr (print name) at NEU-VELLE LLC 1667 LAKE AVE, Bldg 59, Suite 101 Rochester, NY 14615 (print business address),

am certifying as Designated Representative (Owner or Remedial Party)

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

Albert G Lyons Jr — 10/25/19

Signature of Owner, Remedial Party, or Designated Representative Rendering Certification — 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 Albert G. Lyons, Jr (print name) at NEU-VELLE LLC, 1667 LAKE AVE, Bldg 5, suite 101, Rochester, NY 14615 (print business address),

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

STATE OF NEW YORK ALBERT G. LYONS JR. 074710 LICENSED PROFESSIONAL ENGINEER

Albert G Lyons — Signature of Professional Engineer, for the Owner or Remedial Party, Rendering Certification

Stamp (Required for PE)

10/25/19 — Date

Exhibit A

Laboratory Reports for Groundwater Sampling Events

(See Files 2 and 3 of 3)