

September 4, 2024

Mackenzie Osypian, PE
Environmental Engineer
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414

Re: Site Characterization Work Plan
Falls Street Incinerator
52 & 96 Falls Street
Rochester, New York 14608
NYSDEC Site No. 828227
LaBella Project #2241859

Dear Ms. Osypian,

LaBella Associates, D.P.C. (LaBella) is pleased to submit this response on behalf of the City of Rochester to the Department's comment letter dated August 28, 2024 on the Site Characterization Work Plan (SCWP) for the Falls Street Incinerator Site located at 52 & 96 Falls Street, City of Rochester, Monroe County, New York. Responses are provided in bold font.

1. The SCWP must also be developed in accordance with DEC Program Policy DER-31 / Green Remediation.
Section 4.8 Green Remediation was added to the SCWP. In addition, references to DER-31 have been added to Section 1.0 and Section 8.0.
2. Certification language must be updated to include reference to DEC Program Policy DER- 31/ Green Remediation.
The certification language has been updated to include DER-31.
3. The person preparing the DUSR must be included in the report to be pre-approved by the DEC.
The City has not yet selected the consultant that will implement the SCWP. A Request for Proposal will be issued by the City of Rochester to obtain proposals for implementation of the SCWP. The consultant selected will subcontract the third-party validation company to prepare the DUSR. The validation company will be provided to NYSDEC once determined and prior to completion of any DUSRs.
4. A summary table of proposed sampling locations and analysis must be included in accordance with DEC Program Policy DER 10.
An analytical summary table has been added to Section 4.0.
5. Update the project schedule to include the estimated start date and length of time for work to be completed for the following:
 - a. Start of site characterization work
 - b. Demolition of the onsite building
 - c. Demolition or stabilization of the onsite stack
 - d. submittal of a work plan for the investigation of the north section of the

property not included in this SCWP.

Refer to the updated schedule in Section 8.0. Please note the schedule is tentative and the NYSDEC will be notified of any changes.

6. If the proposed SB-28, SB-29, or SB-30 are unable to be sampled due to safety concerns the area must be included in the second phase of sampling once the building and stack have been demolished or stabilized.
As indicated in Section 4.0, if any portion of the planned investigation cannot be completed due to safety reasons associated with the building and stack, further investigation will be addressed following demolition.
7. The samples that will be analyzed for the “full-suite” of parameters must be random and representative of the site.
Full-suite samples will be random and representative of the Site. This has been added to Sections 4.3, 4.4 and 4.5.
8. The final report must compare the soil sampling results to Restricted Residential Soil Cleanup Objectives.
The final report will compare soil sampling results to Restricted Residential Soil Cleanup Objectives. This has been added to Section 8.0.
9. Include a list of names, contact information, and roles of the principal personnel who will participate in the investigation including the project manager, quality assurance officer, contractor, subcontractor, remedial party contact, and onsite facility contacts as an appendix to the SCWP.
The City has not yet selected the consultant that will implement the SCWP. A Request for Proposal will be issued by the City of Rochester to obtain proposals for implementation of the SCWP. The requested information will be provided to the NYSDEC following selection of the consultant and prior to implementation of the work.
10. Include a map of all wetland areas on or near the Site.
According to NYSDEC Environmental Resource Mapper, no wetland areas are present on or near the Site.
11. The management of the investigation derived waste (IDW) will need to be in accordance with DEC Program Policy DER-10 as well as in accordance with all applicable local, State, and Federal regulations and permits.
Understood. This has been added to Section 4.7.
12. All transport of materials must be performed by licensed haulers in accordance with appropriate local, State, and Federal regulations, including 6 NYCRR Part 364. Haulers will be appropriately licensed and trucks properly placarded. Material transported by trucks exiting the site will be secured with either tight-fitting opaque covers that are secured on the sides and/or back, or opaque covers that are locked on all sides. Loose-fitting canvas-

type truck covers will be prohibited. If loads contain wet material capable of producing free liquid, truck liners will be used.

Understood. This has been added to Section 4.7.

13. If a tank containing liquid is encountered during the site characterization field work the liquid must be pumped out of the tank, containerized, stored, handled, and disposed of properly.

The following has been added to Section 4.3: "Any liquids in tanks will be pumped out of the tank, containerized, stored, handled, and disposed of properly prior to removal."

A revised Work Plan is attached to this letter for your review. If you have any questions, or require additional information, please contact me at (585) 295-6289 or aabarber@labellapc.com.

Respectfully submitted,

LABELLA ASSOCIATES, D.P.C.



Ann A. Barber, PE
Environmental Engineer

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