70 Vantage Point Dr, Ste 1
Rochester, NY 14624-1141
P 585-247-3471
Terracon.com

October 20, 2026

New York State Department of Environmental Conservation
Division of Environmental Remediation
6274 East Avon Lima Road
Avon, New York 14414

Attn: Adam Morgan – Project Manager
P: (585) 226-5356
E: adam.morgan@dec.ny.gov

RE: Pre-Interim Remedial Measure Topsoil Sampling Work Plan
Brighton Central School District Site
NYSDEC Site No. 828235
2643 Elmwood Avenue
Rochester, New York 14618
Terracon Project No. 1000043898

Dear Mr. Morgan:

Terracon Consultants-NY, Inc. (Terracon) has prepared this Pre-Interim Remedial Measure (IRM) Topsoil Sampling Work Plan Letter Report for the proposed athletic field upgrade planned at the Brighton Central School District Site ("site") located in Rochester, New York. The site is currently listed as New York State Department of Environmental Conservation (NYSDEC) Site No. 828235 under consent order R8-20260608-134 dated July 10, 2026.

1.0 INTRODUCTION

Terracon Consultants – NY, Inc. (Terracon) has prepared this Pre-IRM Topsoil Sampling Work Plan (TSWP) for Brighton Central School District (BCSD) located in Brighton, New York (Exhibit 1 in Appendix A).

The site is currently listed as NYSDEC Site No. 828236 under consent order R8-20260608-134 dated July 10, 2026. Therefore, this Pre-IRM Sampling Workplan will be implemented in accordance with the NYSDEC approved Interim Site Management Plan and NYSDEC Division of Environmental Remediation Technical Guidance for Site Investigation and Remediation (DER-10).

The purpose of this Pre-IRM Sampling Workplan is to further assess depth of existing topsoil within the construction area and assess topsoil on-site reuse options. The topsoil within the construction area is planned for re-use as constructed vegetative cover system pending sample results and fill presence.

2.0 PROJECT BACKGROUND

2.1 Site Location and Description

The site is located at 2643 Elmwood Avenue in Brighton, Monroe County, New York as shown in **Exhibit 2** in **Appendix A** and includes high school, middle school and elementary school buildings, administrative and support buildings, paved parking lots, and sports fields. The site is zoned as a school and is currently owned by the Brighton Central School District.

3.0 PROPOSED SAMPLING ACTIVITIES

The following sections provide Terracon's approach to assess topsoil for reuse on-site as part of the constructed vegetative cover system required within the planned IRM area of the site.

Based on Terracon's review of information provided by the site contractor, we understand that the intended plan is to strip the in-place topsoil to allow for appropriate depth excavation of underlying fill materials. The stripped topsoil, as well as three on-site topsoil stockpiles, for reuse within the constructed vegetative cover system required at the site.

3.1 Sampling Locations and Quanitities

The approximate volume of excess topsoil generated between the three on-site topsoil stockpiles and the planned area for topsoil stripping to be generated from the work areas is approximately 8,638 cubic yards (CY). Topsoil will be sampled per NYSDEC DER-10 Table 5.4 to determine potential for on-site re-use. A total of 50 discrete samples will be collected for volatile organic compounds (VOCs), and 18 composite samples will be collected for semi-volatile organic compounds (SVOCs), metals, polychlorinated biphenyls (PCBs), pesticides, per- and polyfluoroalkyl substances (PFAS), and 1,4-dioxane. The topsoil areas are summarized in the following subsections.

3.1.1 Topsoil Piles

Approximately 2,640 CY of topsoil was previously stripped, prior to discovery of the historical fill materials, from the central portion of the site. The topsoil was placed in three piles and consists of the following:

- Topsoil Pile 1: 1,500 CY
- Topsoil Pile 2: 580 CY
- Topsoil Pile 3: 560 CY

Each stockpile will be investigated using an excavator to obtain representative samples and assess for the presence of historical fill materials. If historical fill materials are not present, the following samples will be collected from the topsoil piles:

- Topsoil Pile 1 (1,500 CY): nine (9) discrete samples for Target Compound List (TCL) VOCs via Method 8260 and three (3) composite samples for TCL SVOCS via Method 8270, Target Analytes List (TAL) metals via Method 6010/7471, PCBs via Method 8082, pesticides via Method 8081, PFAS via Method 1633, and 1,4-dioxane via Method 8270 SIM.
- Topsoil Pile 2 (580 CY): six (6) discrete samples for TCL VOCs via Method 8260 and two (2) composite samples for TCL SVOCS via Method 8270, Target Analytes List (TAL) metals via Method 6010/7471, PCBs via Method 8082, pesticides via Method 8081, PFAS via Method 1633, and 1,4-dioxane via Method 8270 SIM.
- Topsoil Pile 3 (560 CY): six (6) discrete samples for TCL VOCs via Method 8260 and two (2) composite samples for TCL SVOCS via Method 8270, Target Analytes List (TAL) metals via Method 6010/7471, PCBs via Method 8082, pesticides via Method 8081, PFAS via Method 1633, and 1,4-dioxane via Method 8270 SIM.

3.1.2 In-Place Topsoil Sampling

Approximately 6,010 CY of topsoil remains in-place in the remainder of the construction area for planned striping and consists of the following areas:

- Northern Area: 2,555 CY
- Southern Area: 3,055 CY
- Entrance Area: 400 CY

Each area will be investigated using a hand sampling techniques such as hand auger and/or hand shovel, or other methodology, to complete the following:

- Assess the depth of topsoil at each location;
- Confirm presence of fill material below the topsoil. If fill materials are not present, Terracon may complete deeper excavation to assess fill depth;
- Obtain representative topsoil samples for analytical testing for on-site re-use. Soil sample collection will include the following
  - Northern Area (2,555 CY): eleven (11) discrete samples for TCL VOCs via Method 8260 and four (4) composite samples for TCL SVOCS via Method 8270, Target Analytes List (TAL) metals via Method 6010/7471, PCBs via Method 8082, pesticides via Method 8081, PFAS via Method 1633, and 1,4-dioxane via Method 8270 SIM.

- Southern Area (3,055 CY): thirteen (13) discrete samples for Target Compound List (TCL) VOCs via Method 8260 and five (5) composite samples for TCL SVOCS via Method 8270, Target Analytes List (TAL) metals via Method 6010/7471, PCBs via Method 8082, pesticides via Method 8081, PFAS via Method 1633, and 1,4-dioxane via Method 8270 SIM.
- Entrance area (400 CY): five (5) discrete samples for Target Compound List (TCL) VOCs via Method 8260 and two (2) composite samples for TCL SVOCS via Method 8270, Target Analytes List (TAL) metals via Method 6010/7471, PCBs via Method 8082, pesticides via Method 8081, PFAS via Method 1633, and 1,4-dioxane via Method 8270 SIM.

The thickness of the topsoil in areas anticipated to be stripped will be noted on field logs, and considered in re-use determination. Terracon understands that historical fill materials may not present within the topsoil to be re-used within the constructed vegetative cover system required at the site.

3.1.3 Quality Assurance/Quality Control Samples

Pursuant to NYSDEC guidance and the ISMP, this work plan includes quality assurance procedures to be followed for sampling and analysis. The following quality assurance/quality control (QA/QC) samples will be collected for this scope of work:

- 3 matrix spike/matrix spike duplicates (MS/MSDs) for VOCs
- 3 field duplicates for VOCs
- 1 MS/MSD for composite sample
- 1 field duplicate for composite sample

3.2 Reporting to NYSDEC

At the conclusion of this work, Terracon will provide a Letter Report summarizing field activities and analytical results, along with opinion on potential for on-site re-use.

3.3 Community Air Monitoring Requirements

Terracon is committed to the safety of all its employees. As such, and in accordance with our *Incident and Injury Free (IIF)*® safety goals, Terracon will conduct fieldwork under a site-specific health and safety plan (HASP), which is included in the ISMP. To safeguard and protect workers and the community, air monitoring as describes in the CAMP in the approved ISMP will be performed during the ground-intrusive activities described in this work plan and in accordance with the CAMP included in Appendix E of the NYSDEC approved ISMP.

4.0 STANDARD OF CARE

Terracon's services will be performed in a manner consistent with generally accepted practice of the profession undertaken in similar studies in the same geographical area during the same time. Terracon makes no warranties, either express or implied, regarding findings, conclusions, or recommendations from the work. Please note that Terracon does not warrant the work of laboratories, regulatory agencies, or other third parties supplying information used in the preparation of the report.

If you have any questions regarding this work plan or you would like to discuss the proposed scope of services, please do not hesitate to contact us.

Sincerely,

Terracon Consultants-NY, Inc.

Andrew Koons
Project Geologist

Michele Patterson-Wittman, PG
Operations Manager

Attachments

Attachments A - Exhibits

Exhibit 1 - Topographic Map

Exhibit 2 – Site Diagram

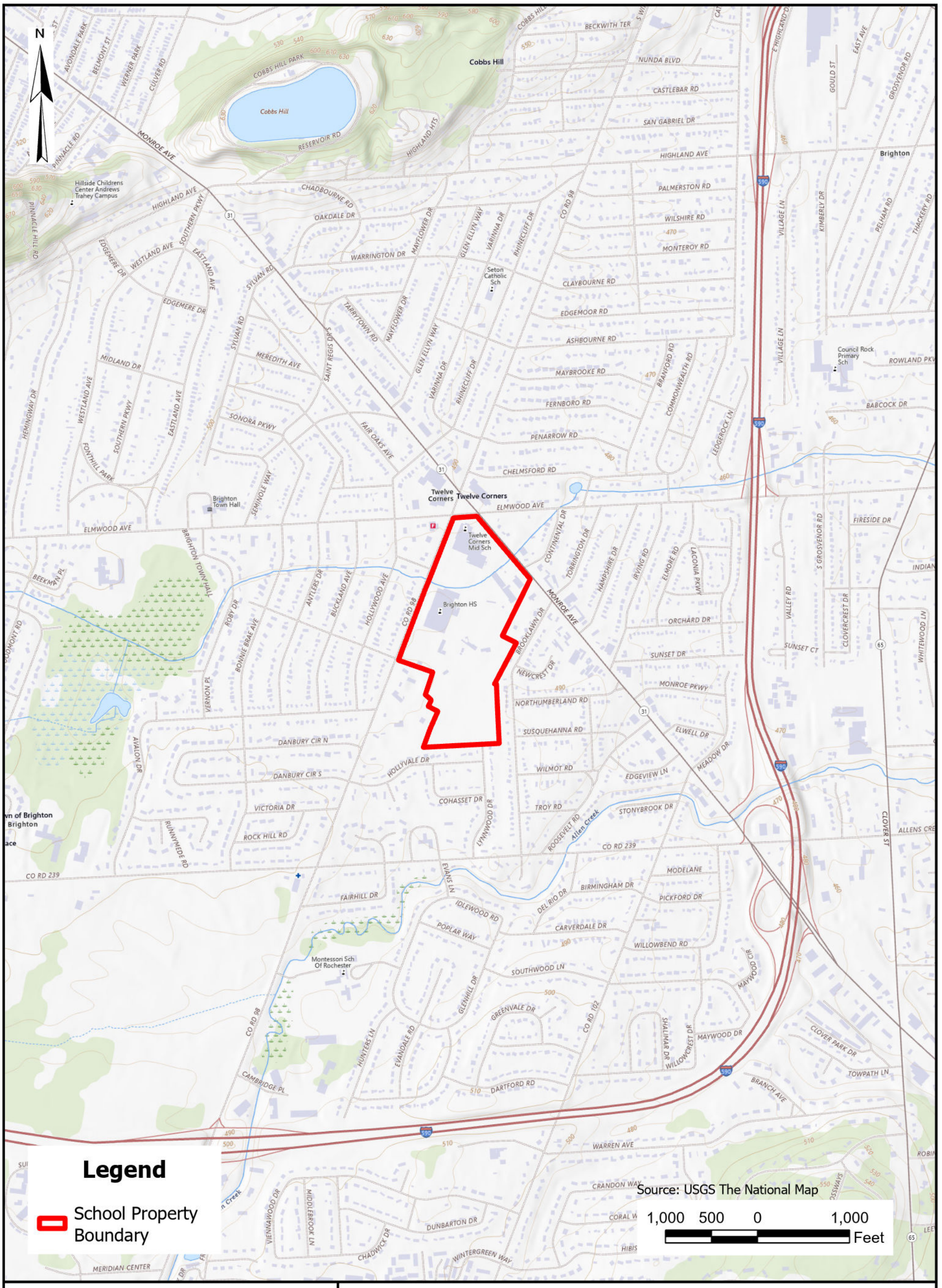
Exhibit 3 – Proposed Topsoil Sampling Locations

Appendix A

Exhibit 1 - Topographic Map

Exhibit 2 – Site Diagram

Exhibit 3 – Proposed Topsoil Sampling Locations



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2410 Walden Ave, Suite 100, Cheektowaga, NY 14225

Exhibit 1

TOPOGRAPHIC MAP

DRAWN BY: AHP	PROJECT No.: 1000034898
REVIEWED BY: AJK	DATE: 07/29/2026

Brighton Central School District - Environmental Services
2643 Elmwood Avenue, Rochester, NY 14618

Path: C:\Users\apitarresi\OneDrive - Terracon Consultants Inc\1000034898 Brighton CSD Environmental Services-ROC-26-Project - General\02 Site Information\GIS\Brighton CSD.aprx

N

Legend

School Property Boundary

Source: ESRI World Imagery

250 125 0 250 Feet

Exhibit 2

SITE DIAGRAM

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2410 Walden Ave, Suite 100, Cheektowaga, NY 14225

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N

Entrance

North

South

Source: ESRI World Imagery

250 125 0 250

Feet

Legend

- Planned Top Soil Stripping Areas
- Proposed Field Construction Area
- School Property Boundary
- VOC Grab Sample

Shaded areas are areas in which the composite samples will be collected

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2410 Walden Ave, Suite 100, Cheektowaga, NY 14225

Exhibit 3

PROPOSED TOP SOIL SAMPLING LOCATIONS

DRAWN BY: AHP	PROJECT No.: 1000034898
REVIEWED BY: AJK	DATE: 10/20/2026

Brighton Central School District - Environmental Services
2643 Elmwood Avenue, Rochester, NY 14618

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