Pre-Design Investigation Work Plan

Brighton Central School District

Site No. 828235

Brighton, New York

October 22, 2026

Terracon Project No. 1000034898

Prepared for:

Brighton Central School District
2643 Elmwood Avenue
Rochester, New York 14618

Prepared by:

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CERTIFICATION

I, Michele Patterson-Wittman, certify that I am currently a Qualified Environmental Professional as defined in 6 NYCRR Part 375 and that this Pre-Design Investigation Work Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10) and Green Remediation (DER-31).

Michele Patterson-Wittman, P.G.
No. 1776

10/22/2026
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1.0 Introduction

Terracon Consultants – NY, Inc. (Terracon) has prepared this Pre-Design Investigation (PDI) Work Plan (WP) as required in the Order on Consent (Index No. R8-20230608-134) executed between Brighton Central School District (BCSD) and the New York State Department of Environmental Conservation (NYSDEC) on July 10, 2026. The Site is not currently listed in the Registry of Inactive Hazardous Waste Disposal Sites in New York State and is instead identified as a "P" or potential site with a Site Number 828235. The WP was prepared for Brighton Central School District located in Brighton, New York (or "site"), identified as 2643 Elmwood Avenue in Rochester, NY. (**Exhibit 1** in **Appendix A**). The PDI WP will be implemented in accordance with the NYSDEC approved Interim Site Management Plan (ISMP) for the site.

The purpose of the proposed PDI WP is to provide confirmation and analytical data to further support the presumptive remedy requirements present in the Order on Consent. Work will include evaluation of existing vegetative cover system and potential impacts to groundwater.

2.0 Description of Site Conditions

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 BCSD.

2.2 Regulatory History and Previous Investigaiton

A Limited Site Investigation (LSI) titled "Limited Site Investigation, Brighton Central School District, 1150 S. Winton Road, Rochester, Monroe County, New York" dated February 18, 2026, was conducted for DiFiore Construction on behalf of BCSD, when historical fill materials were encountered during site clearing activities. The LSI included completion of 20 test pits throughout the sports field project construction area and identified historical fill material in 17 of the test-pits ranging in depth from 0.5 feet to 7 feet below ground surface (ft bgs). The fill materials consist of ash, cinders, glass, ceramic, and metal. Based on visual and olfactory observations six (6) test pit locations were selected for analytical analysis. The soil samples were submitted for NYSDEC Part 375 list volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), target analyte list (TAL) metals plus cyanide, PCBs, and pesticides/herbicides.

The soil sample results are summarized below:

- Several metals including arsenic, barium, lead and mercury were identified at concentrations exceeding NYSDEC Part 375 Restricted-Residential Soil Cleanup Objectives (RRSCOs). Specifically arsenic and lead.
- Several SVOCs including benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene, dibenzo(a,h)anthracene, indeno(1,2,3-cd)pyrene, and phenanthrene were identified at concentrations exceeding NYSDEC Part 375 Industrial Soil Cleanup Objectives (ISCOs).
- Herbicides, pesticides, and PCBs were not detected in the soil samples collected for analysis at concentrations above method detection limits.
- VOCs and cyanide were detected in the samples soil collected for analysis; however, concentrations were detected below RRSCOs.

Additional sampling was conducted under the direction of the NYSDEC to include resampling four of the test pit locations for Toxicity Characteristic Leaching Procedure (TCLP) metals and SVOCs. Soil sample analysis indicated lead was detected at concentrations exceeding 6 NYCRR Part 371 Maximum Concentrations of Contaminants for the Toxicity Characteristic Values for lead at two (2) locations.

Additionally, one (1) soil sample was collected from stockpiled topsoil materials onsite for NYSDEC Part 375 list VOCs, SVOCs, TAL metals plus cyanide, PCBs, and pesticides/herbicides. Topsoil sample analysis indicated metals, pesticides, PCBs and SVOCs were detected at concentrations below RRSCOs.

2.3 Regulatory Criteria

NYSDEC has applicable standards, criteria and guidance (SCG) values that will be used for this project. These goals are applicable when considering remedial alternatives. For purposes of the PDI, the following SCGs will be utilized:

- 6 NYCRR Part 375 "Environmental Remediation Programs" dated December 31, 2025.
- NYSDEC "DER-10 Technical guidance for Investigation and Remediation", dated May 2010 (Final DER-10).
- NYSDEC "Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1 – Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations", dated June 1998.

3.0 Proposed Investigation Activities

The following sections provide Terracon's approach to investigate the following:

- Evaluate existing vegetative cover system, which is based on shallow soil analytical data.
- Evaluate mobility of the contaminants presented in fill materials and their potential impact on groundwater at the site.

The proposed investigation activities will include the assessment of soil and groundwater and discussed in the sections below. Work will be conducted in general accordance with NYSDEC Division of Environmental Remediation (DER-10) Guidance and the NYSDEC approved ISMP.

Terracon and our drilling subcontractors will contact Dig Safely New York, a minimum of three business days prior to the commencement of the field activities. In addition, Terracon will complete a private utility locate to mark out identifiable utilities and clear the proposed investigation locations.

3.1 Soil Investigation Activities

Terracon proposes the advancement of up to 136 shallow soil borings in a comprehensive sampling grid of 75 feet by 75 feet as required in the Order on Consent. The 136 soil boring locations will be completed from ground surface to at least 2 feet below ground surface (bgs), with nine (9) additional locations continued deep from ground surface to up to 15 feet bgs, to facilitate monitoring well installation using direct-push and/or rotary auger drilling methods. Proposed soil boring locations are shown in **Exhibit 3** in **Appendix A**.

At each soil boring location, the soils will be visually inspected for the presence of fill materials, screened with a photoionization detector (PID) with a 10.6 eV lamp, and visually classified using the Unified Soil Classification System (USCS). Soil boring logs will be generated for each location. Additionally, observations of staining, odor and/or sheen will be noted. Shallow borings will be advanced to a depth of at least two (2) ft bgs. Deeper soil borings to facilitate monitoring well installation will be advanced to depths of approximately 15 ft bgs or into the groundwater interface, whichever is shallower.

Upon completion of the soil sample collection, excess soil cuttings will be returned to the subsurface in the general order it was removed. Excess soil cuttings will only be returned to the subsurface when historical fill material, visual or olfactory evidence is not present. Soil boring locations will be recorded electronically with a global positioning system (GPS) device.

3.1.1 Shallow Soil Sample Collection

The Order on Consent provided requirements for sampling, as listed below.

- 0 to 2 inches
- 2 to 12 inches
- 12 to 24 inches

Each soil boring will be sampled using direct-push drilling methods. Soil samples will be screened for the presence of fill materials. Soil samples will be collected from locations where fill materials are not present.

Shallow soil samples will be submitted to a New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP) certified laboratory for analysis of the following:

- TAL Metals by Method 6010/7470
- Target Compound List (TCL) semi-volatile organic compounds (SVOC) by Method 8270

Terracon will screen each soil sample with a PID and make visual/olfactory observations for potential impacts. Should the screening methods identify suspect materials, additional analysis may be required. Terracon will discuss findings with BCSD and NYSDEC to determine if further analytical analysis is necessary.

3.2 Groundwater Investigaiton Activities

Terracon will install nine (9) monitoring wells at the deeper soil boring locations. The monitoring wells will be installed to assist with assessing groundwater flow direction and groundwater quality. Proposed monitoring well locations are shown in **Exhibit 3**. Overburden groundwater is anticipated to be encountered at depths of 7 to 18 feet bgs. It should be noted that monitoring well installed near the new turf area should be considered an approximate location and may be installed at a later date given the ongoing and proposed construction in this area.

3.2.1 Monitoring Well Installation

Monitoring wells will be constructed with 2-inch diameter 0.010-inch minimum 5-foot machine slotted polyvinyl chloride (PVC) screen encapsulating the saturated zone with an appropriate length 2-inch PVC riser to extend to ground surface grade. The annulus around each well will be filled with silica sand filter pack from the bottom of the well to approximately one (1) foot above the top of the well screen. A well seal consisting of approximately two feet of hydrated bentonite will be placed above the sand pack. The

remainder of the annulus space will be filled with bentonite or grout. Monitoring wells will be finished with a locking plug and a flush mount curb box.

Following monitoring well completion each will be field surveyed to estimate the elevation of each monitoring well, as well as the ground surface elevation at each location.

Monitoring wells will be developed using surge and purge techniques no sooner than 24-hours after installation in accordance with NYSDEC protocols. Field parameters including pH, temperature, turbidity, dissolved oxygen, oxygen-reduction potential (ORP), and specific conductance will be measured as indicated in the ISMP. Development water will be containerized in 55-gallon drums and later characterized for proper disposal.

3.2.2 Groundwater Sample Collection

Following monitoring well installation and development activities, static water levels will be collected. The monitoring wells will be sampled using low-flow sampling techniques in accordance with ISMP and NYSDEC protocols. Groundwater samples will be submitted to a NYSDOH ELAP certified laboratory for analysis of the following as summarized in Table 1:

- TCL VOCs by Method 8260
- TCL SVOCs by Method 8270
- TAL Metals by Method 6010/7470 (both unfiltered and filtered samples)
- Per- and Polyfluoroalkyl Substances (PFAS) by Method 1633
- Polychlorinated Biphenyls (PCBs) by EPA Method 8082
- Pesticides by EPA Method 8081
- 1,4-dioxane by EPA Method 8270 SIM

3.3 Field Specific Quality Assurance/Quality Control Sampling

Pursuant to NYSDEC guidance and the ISMP, this work plan includes quality assurance procedures to be followed for sampling and analysis. Quality assurance/quality control (QA/QC) procedures required by the NYSDEC for the Site are documented in the Quality Assurance Project Plan (QAPP). The QAPP is included in the ISMP.

3.4 Investigation-Dervived Waste Management

Excess soil cuttings that cannot be replaced into boreholes will be containerized in 55-gallon drums and later characterized for proper disposal.

Non-dedicated drilling tools and equipment will be decontaminated between locations using potable water and a phosphate detergent, such as alconox®.

Purge water from well development and sampling will be temporarily containerized in 55-gallon drums for future characterization and disposal.

All investigation derived waste (IDW) will be secured on-site while awaiting disposal.

3.5 Schedule and Reporting to NYSDEC

Terracon will communicate with NYSDEC on the desired project schedule upon approval of the PDI Work Plan. Terracon is proposed to mobilize within two (2) weeks of work plan approval.

At the conclusion of this work, Terracon will provide a PDI Report summarizing field activities, analytical laboratory results and soil management documentation.

3.6 Health and Safety / Community Air Monitoring Plan (CAMP)

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 HASP, which is included in the ISMP. To safeguard and protect workers and the community, air monitoring as described in the CAMP in the approved ISMP will be performed during the ground-intrusive activities described in **Section 2.1** of this PDI Work Plan. CAMP is included in Appendix E of the NYSDEC approved ISMP.

4.0 Standard of Care

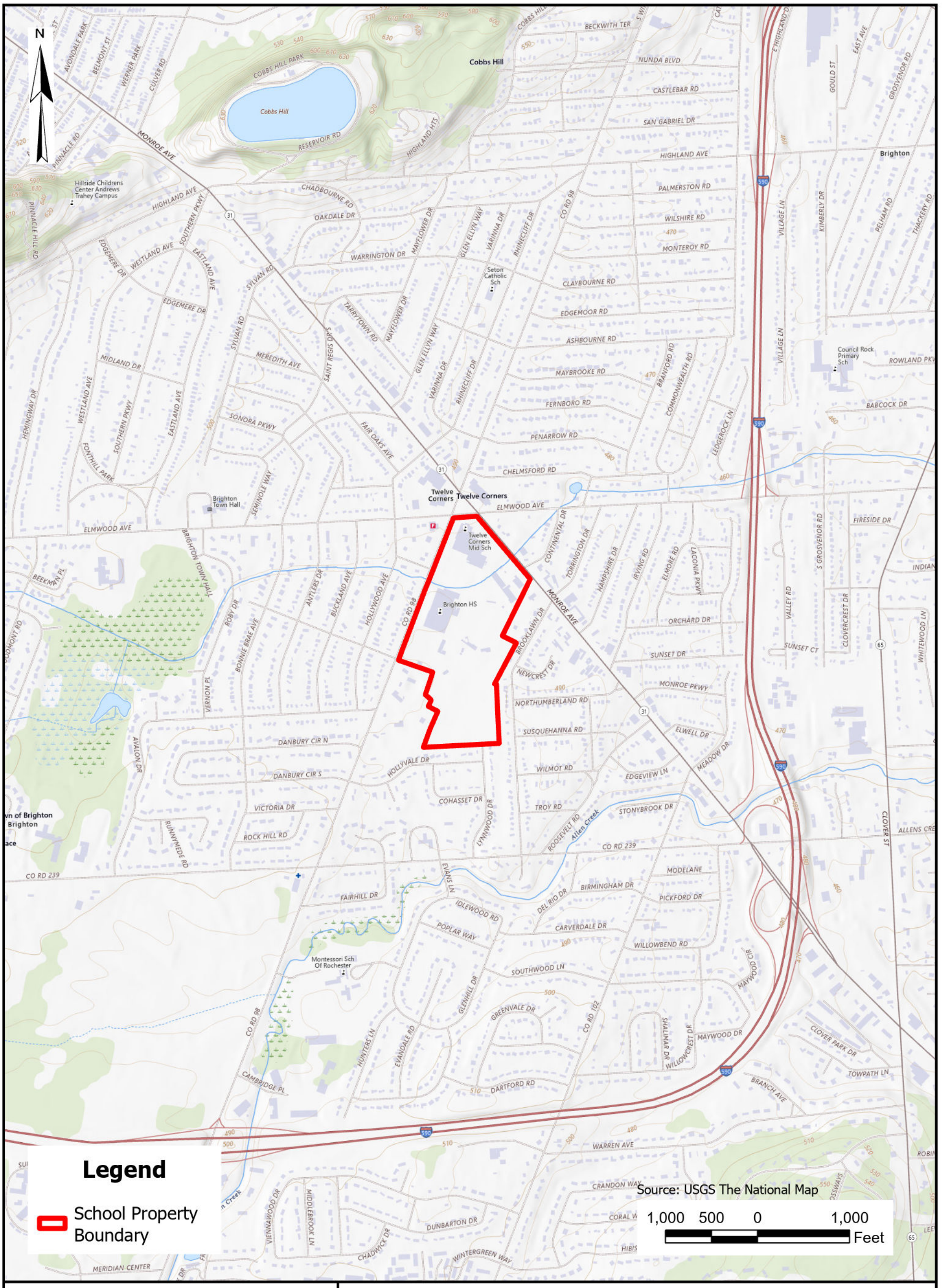
Terracon's services will be performed in a manner consistent with generally accepted practices of the profession undertaken in similar studies in the same geographical area during the same time. Terracon makes no warranties, either express or implied, regarding the findings, conclusions, or recommendations 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.

Appendix A

Exhibit 1: Topographic Map

Exhibit 2: Site Diagram

Exhibit 3: Proposed Investigation 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

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

Source: ESRI World Imagery

250 125 0 250
Feet

Legend

- Proposed Soil Boring/ Monitoring Well
- Proposed Shallow Soil Sample
- Previous Test Pit Locations with Fill
- Previous Test Pit Locations without Fill
- School Property Boundary
- Proposed Field Construction Area

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2410 Walden Ave, Suite 100, Cheektowaga, NY 14225

Exhibit 3

PROPOSED INVESTIGATION LOCATIONS

DRAWN BY: AHP	PROJECT No.: 1000034898
REVIEWED BY: AJK	DATE: 10/22/2026

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

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Appendix B

Table 1: Summary of Sampling and Analytical Program

Table 1
Summary of Sampling and Analytical Program
Pre-Design Investigation – Brighton Central School District | Brighton, NY
Terracon Project No. 1000034898

Sample Type	Matrix	TCL VOCs Method 8260	TCL SVOCs Method 8270	TAL Metals Method 6010/7470	PFAS Method 1633	PCBs Method 8082	Pesticides Method 8081
Shallow Soil Samples*							
Shallow Soil Samples (0-2 inches)	Soil	0	144	144	0	0	0
Shallow Soil Smaples (2-12 inches)	Soil	0	144	144	0	0	0
Shallow Soil Samples (12-24 inches)	Soil	0	144	144	0	0	0
Soil QA/QC Samples							
MS	Soil	0	21	21	0	0	0
MSD	Soil	0	21	21	0	0	0
Blind Duplicate	Soil	0	21	21	0	0	0
Rinsate Blank	Soil	0	0	0	0	0	0
Groundwater Samples							
Monitoring Wells	Water	8	8	8	8	8	8
Groundwater QA/QC Samples							
MS	Water	1	1	1	1	1	1
MSD	Water	1	1	1	1	1	1
Blind Duplicate	Water	1	1	1	1	1	1
Trip Blank	Water	1	0	0	0	0	0
Rinsate Blank	Water	0	0	0	1	0	0
Totals		**12**	**506**	**506**	**12**	**11**	**11**

Notes:
VOCs = Volatile Organic Compouds
SVOCs = Semi-Volatile Organic Compounds
TCL = Target Compound List
TAL = Target Analyte List
PFAS = Per and Polyfluoroalkyl Substances
PCBs = Polychlorinated Biphenlys
* = The number of soil samples shown represent the maximum number of anticipated samples and are subject to change based on field observations and if fill materials are present.