

May 28, 2026
Project No. 2001642

VIA EMAIL: michael.belveg@dec.ny.gov

Mr. Michael Belveg
NYSDEC, Division of Environmental Remediation
615 Erie Boulevard West
Syracuse, NY 13204

**Re: Revised Supplemental Remedial Investigation Work Plan
113 7th North Street Site
113 7th North Street, Liverpool, New York
NYSDEC Site No. C734152**

Dear Mr. Belveg:

This letter serves as the Revised Supplemental Remedial Investigation Work Plan (SRIWP) for the above-referenced site, which is being investigated under the New York State Department of Environmental Conservation (NYSDEC) Brownfields Cleanup Program (BCP) (Site No. C734152). The draft Remedial Investigation Report (RIR) was submitted in December 2024 and NYSDEC provided comments on December 9, 2025. NYSDEC identified a data gap due to restrictions on access to the adjacent property and requested that UniFirst (Applicant) submit an SRIWP for supplemental investigation within 60 days of receipt (February 9, 2026). NYSDEC extended this deadline to March 23, 2026, by NYSDEC via email dated February 9, 2026. Applicant submitted an SRIWP to NYSDEC on March 23, 2026, and received comments from NYSDEC in a letter dated April 28, 2026. NYSDEC requested that a revised SRIWP be submitted within 30 days of receipt of the comment letter (May 30, 2026).

The objectives of the SRIWP are to characterize the nature and extent of volatile organic compounds (VOCs):

- To the south/southeast toward Ley Creek and to the east toward Bear Trap Creek by installing and sampling groundwater monitoring wells in the rights-of-way along 7th North Street and Terminal Road.
- On the adjacent properties, 109 7th North Street (Sposato Flooring property), 107 7th North Street and 106 Terminal Road properties (Pilot Travel Center properties), by conducting soil, soil vapor and groundwater investigations, pending access.

The off-property portion of this SRIWP includes work at 109 7th North Street (Sposato Flooring), as well as at 107 7th North Street and 106 Terminal Road (together, Pilot Travel Center), and it will proceed upon execution of access by the single owner of those parcels and with NYSDEC's approval. The rights-of-way elements along Terminal Road and the far side of 7th North Street will proceed immediately upon SRIWP approval and agency permit issuance.

Applicant notes that any delay in executing the portions of this SRIWP on the adjacent properties (109 7th North Street, 107 7th North Street and 106 Terminal Road) is solely due to the downgradient property

owner's refusal to provide reasonable access for remedial investigation activities specified in the NYSDEC-approved RIWP and reiterated here. This access refusal has persisted despite Applicant's continued requests and its continued commitment to implement the SRIWP's off-property scope as soon as access is granted, and despite Applicant's cooperation in granting access to Sposato Flooring's tenant, Pilot, to perform DEC-directed petroleum spill investigation and remedial work on Applicant's property.

1. Background

The property consists of approximately 3.2 acres of developed land located at 113 7th North Street (with frontage on Luther Avenue and Old 7th North Street) in Liverpool, New York (Figure 1). The property is largely covered by structures and asphalt pavement and has been operated as an industrial laundry facility since the 1970s.

The Applicant operated in the former industrial laundry facility (at the location labeled "former laundry facility building" on Figure 1) from mid-1960s through 2022. Historically, tetrachloroethylene (PCE), the principal constituent of concern, had been used in the dry-cleaning process within the former facility building. The Applicant ceased its dry-cleaning operations and use of PCE by 1987 and does not store PCE at the Site.

Between 2020 and 2023, the Applicant constructed a new 55,700 square foot 1-story laundry building on the Property. GEI Consultants, Inc. (GEI) conducted preliminary subsurface investigations to support The Applicant's construction and proactively investigate and characterize the nature and extent of impacts potentially related to the former dry-cleaning operations, ultimately to support the remedial investigation under Environmental Conservation Law (ECL) Article 27, Title 14 (BCP). As described in prior submittals to NYSDEC, certain impacts to soil and groundwater were identified as a result, and the Applicant entered the BCP.

A remedial investigation was conducted between November 2021 and January 2024. The Revised Remedial Investigation Work Plan (RIWP) (GEI 2022) and addendum (GEI 2023) were approved by the NYSDEC on June 6, 2022, and October 30, 2023, respectively. This investigation included soil and soil gas sampling and groundwater monitoring throughout the Applicant's property and in the near-side right-of-way along 7th North Street. A RIR summarizing the findings of this investigation was submitted to NYSDEC in December 2024. As requested in an NYSDEC comment letter dated December 9, 2025, this SRIWP describes additional sampling to be pursued in the rights-of-way along Terminal Road and far side of 7th North Street, as well as on adjacent properties (if access is granted by the owner), to address downgradient and side-gradient (groundwater contours included in Figure 2) data gaps.

2. Supplemental RI Scope of Work

2.1. Overview

The SRIWP will be conducted in two phases:

1. The goal of Phase I is to achieve the SRIWP objective described in the NYSDEC comment letter "to confirm the nature and extent of Site-related contaminants of concern (COCs) and verify that COCs are not moving south, southeast, or east toward Bear Trap Creek or Ley Creek (Figure 3)." Figure 3 shows nearby sensitive receptors as well as ecological receptors. The SRIWP scope for this component includes additional off-property groundwater delineation in rights-of-way is as follows:
 - a. Install five new water table monitoring wells (MW17 to MW21) and one intermediate-depth monitoring well (MW18I) in the Terminal Road right-of-way.

- b. Install three new water table monitoring wells (MW14 to MW16) and one intermediate-depth monitoring well (MW15I) on the far side of the 7th North Street right-of-way.
- c. Sample groundwater from the ten new monitoring wells for VOCs

The new right-of-way wells are shown using purple symbols on Figure 1.

- 2. The goal of Phase II is to characterize conditions immediately downgradient from the Site, including the adjacent 109 7th North Street (Sposato Flooring) and 107 7th North Street/106 Terminal Road (Pilot Travel Center) properties, as discussed during the January 12, 2026, conference call, this adjacent-property component of the SRIWP includes the following iterative scope:
 - a. Conduct a well condition inventory of existing accessible wells on the 109 and 107 7th North Street properties (green and red symbols on Figure 1), including documentation of well construction, condition and groundwater water depth measurements¹.
 - b. Perform an elevation and location survey of select existing off-Site wells and develop comprehensive groundwater contour mapping for the combined 107, 109, and 113 7th North Street/106 Terminal Road properties (wells will be selected for survey based on location/distribution, well construction and condition, once determined during Item A.
 - c. Sample groundwater from up to eight existing off-Site monitoring wells (wells will be selected based on location/distribution, well depth and groundwater flow directions, once determined as part of Item b) and analyze for VOCs.
 - d. If warranted based on analytical results from the sampled existing off-Site wells (Item C), install up to six new water table monitoring wells at 107 7th North Street, 109 7th North Street, and/or 106 Terminal Road.
 - e. If additional monitoring wells are installed (Item D), field screen soil for VOCs and collect soil samples from approximately 8 feet below grade to the bottom of the boring during monitoring well installation and analyze for VOCs.
 - f. Concurrently with well installation, within the existing building on 109 7th North Street, perform a building inspection and product inventory, install two temporary vapor points, and collect soil vapor samples from beneath the floor slab for VOC analysis.
 - g. Sample groundwater from new monitoring wells installed on the off-Site properties (Item D) and analyze for VOCs¹.

This adjacent-property scope updates and replaces the RIWP (April 2022) scope. The modifications are based on the current understanding of Site conditions following completion of the RI on the Applicant's property and in the right-of-way along the near side of 7th North Street.

The Applicant's ability to complete this portion of the SRIWP relies upon obtaining permission and access from the adjacent property owner (one owner owns all three parcels) and operator of the Pilot Travel Center. As previously communicated with NYSDEC, access has not yet been secured despite continuing negotiations. The Applicant will keep NYSDEC apprised of any developments and progress regarding this matter.

¹ All accessible existing wells within the Site (113 7th North Street property) and the 7th North Street right of way will be also gauged on the same date.

As discussed with NYSDEC on January 12, 2026, this phased approach allows Applicant to achieve downgradient and side-gradient control through six new water-table wells in public rights-of-way while NYSDEC reviews and pre-approves the discrete adjacent-property investigation activities upon access, ensuring that the absence of private off-site access does not impede downgradient delineation toward Bear Trap Creek and Ley Creek.

Because this is an iterative approach, the Applicant will submit scope details to, and obtain approval from, the NYSDEC prior to implementing steps C (sampling subset of existing off-Site wells on the adjacent private properties) and D (installing new off-Site wells on the adjacent private properties).

Approximate proposed investigation locations (where currently known/scoped) are included in Figure 1.

Field work will proceed as detailed in the previously submitted and approved RIWP, including the Field Sampling Plan (FSP) in Appendix F and the Quality Assurance Project Plan (QAPP) in Appendix G. The Community Air Monitoring Plan (CAMP) will be implemented during ground-intrusive field activities (Appendix H of the RIWP).

2.2. Premobilization and Site Access

The selected drilling subcontractor will prepare its own Site-specific HASP meeting the minimum requirements of GEI's Site-specific HASP, which is included in Appendix I of the RIWP. Work will be performed in accordance with OSHA, state, and industry safety standards. On-Site personnel performing intrusive activities that have the potential to encounter impacted materials will have the requisite 1910.120 OSHA HAZWOPER training prior to intrusive activities and will be in a medical surveillance program. Also, Site-specific training will be given to personnel performing fieldwork at the Site daily, including a review of potential Site hazards, required PPE, and Site warning and evacuation procedures.

The Applicant's representatives will retain a New York State Licensed Land Surveyor to research and field-locate the right-of-way boundary along Terminal Road and the far side of 7th North Street (if necessary), with the goal of confirming that space is available for the planned work to be conducted fully within the rights-of-way. Adjustments may be made to allow for implementation of the scope as proposed and NYSDEC will be notified of such changes, if necessary. This surveyor will also survey the elevations and locations of the select existing off-Site wells planned for water level gauging.

The Applicant's representatives will notify the Onondaga County of its plans related to work within the rights-of-way and will apply for a "Work in the Right-of-Way" permit from the Onondaga County Department of Transportation and/or the Town of Salina, as required. Traffic controls will be employed during fieldwork as required by the permits.

An agreement to access the 109 7th North Street property has been sought from the property owner as part of the original RIWP, but has not yet been obtained, as previously discussed with the NYSDEC. Applicant will continue its good-faith efforts to secure access the 109 7th North Street property and also the 107 7th North Street and 106 Terminal Road properties (owned by the same individual as 109 7th North Street; Sposato), which will be incorporated into the discussions with the property owner. NYSDEC will be kept informed of progress by way of the Applicant's monthly reports and/or additional communications as necessary.

2.3. Utility Clearance

Each intrusive investigation location will be pre-marked with white paint prior to commencement of field activities and the driller will contact the New York State one-call center ("Dig Safely NY") to request that all utilities be located and marked prior to commencing subsurface work.

The Applicant's representatives have reached out to Onondaga County and Town of Salina officials to request available utility information within the work areas. This information will be used to adjust drilling locations as necessary.

The driller will utilize air-knife vacuum excavation to a depth of 6 feet at all investigation locations for underground utility protection. Field adjustments to the investigation locations may be made to avoid utilities, if encountered.

2.4. Groundwater Monitoring Well Installation and Development

The ten new permanent wells planned as part of the first portion of this SRIWP are identified as MW14, MW15S, MW15I, MW16, MW17, MW18S, MW18I, MW19, MW20, and MW21 (purple symbols on Figure 1). Additional monitoring wells may also be installed on the adjacent properties as outlined in Item 2 in Section 2.1 if/when access is granted by the owner. The quantity and locations of wells on adjacent properties will be based on the preliminary investigation activities to be performed on those properties. Once determined, the scope will be provided to NYSDEC for approval.

Drilling will be performed using hollow stem augers. Drilling equipment in contact with Site soil will be decontaminated between each sample location.

A GEI representative will be on Site full-time to coordinate and document the borings, screen soils using a photoionization detector (PID) via the jar headspace method, and to collect soil samples for laboratory analyses.

Soil descriptions will be logged using the Unified Soil Classification and recorded in boring logs. Soil will be screened continuously to the boring termination depth for total organic vapor (TOV) concentration using a PID equipped with a 11.7 electron volt (eV) bulb, and for visual and olfactory indications of environmental impacts (e.g., staining and odor).

The tops of the 10-foot screens of the water table monitoring wells will be set approximately 1 foot above the water table, which is anticipated to be approximately 5 feet deep. The intermediate wells will be screened approximately 25 to 35 feet below grade surface. Well construction will be similar to the other water table and intermediate monitoring wells installed on-Site but may be adjusted as needed based on field conditions, such as observed water table depth, observed stratigraphy and the presence, location, and thickness of NAPL, if encountered (which may be present due to Pilot-related conditions).

Monitoring well construction will consist of a 10-foot long, 2-inch diameter Schedule-40 polyvinyl chloride (SCH-40 PVC) 0.010-inch slotted well screen threaded to solid SCH-40 PVC riser pipe to the ground surface and a 1-foot sump. Chemically inert silica sand will be backfilled from the bottom of the sump to at least 1 foot above the top of the screen. A bentonite seal will be placed above the screen and sand pack.

Where possible, the bentonite seal will be a minimum of 24-inches thick, except in those instances where the top of the well screen is near to the ground surface. The remainder of the annular space will be filled with a

bentonite cement grout up to the ground surface. Monitoring wells will be finished with an expanding well cap and flush-mounted protective cover.

Following installation, monitoring wells will be developed and monitored for drawdown and recovery. Development will be performed by alternately surging and pumping for a maximum of 1 hour, or until the turbidity of the development water is less than 50 nephelometric turbidity units (NTUs), or until a maximum of 10 well volumes have been removed per the FSP (Appendix F of the RIWP). A field turbidity meter will be used to monitor NTU levels.

2.5. Soil Boring Installations and Soil Sampling

If/when monitoring wells are installed on adjacent properties, including the 109 7th North Street, 107 7th North Street and/or 106 Terminal Road properties, soil will also be sampled for VOC analysis. At these locations, the borings will be advanced to 20 feet using direct-push drilling equipment with 2- or 4-foot Macro-Core™ barrel samplers (and backfilled to the bottom of the well sump as needed). Samples will be collected at depths of 2 to 12 inches below grade surface, at the highest PID reading, at the most visually impacted interval based on field observation, and at the soil/groundwater interface in each soil boring. Samples will be sent to an Environmental Laboratory Approval Program (ELAP)-accredited laboratory for analysis of VOCs by EPA Method 8260. Samples will be collected and handled as described in the FSP (RIWP Appendix F) and QAPP (RIWP Appendix G). Quality assurance/quality control (QA/QC) samples will be collected according to the QAPP, including one trip blank per cooler, one equipment rinse blank, one set of matrix spike/matrix spike duplicate samples, and one blind duplicate at a frequency of 1 per 20 samples, as identified in the QAPP. Soil samples will be collected in laboratory-supplied containers and will be sealed, labeled, and placed in a cooler containing ice (to maintain a temperature of approximately 4 degrees Celsius) and taken directly to a local laboratory service center for processing by the laboratory.

Additional information regarding the methods to be used during the soil boring installations is included in the FSP.

2.6. Monitoring Well Inventory and Gauging

The Applicant's representatives will request documentation of construction details for the existing wells on the 107 7th North Street, 109 7th North Street, and 106 Terminal Road properties prior to gauging and surveying wells on these properties. The applicant's representatives will perform a physical inventory of accessible monitoring wells and recovery wells on these properties (green and red symbols on Figure 1). The accessible wells will also be gauged for total depth, depth to water, and depth to product (if any).

Based on the well construction details and gauging information, select wells on these properties will be surveyed by a licensed surveyor to identify the elevation (feet above mean sea level) and coordinate (NY State Plane) of the top of each well casing, so accurate groundwater contour maps including the UniFirst and off-site wells can be produced.

2.7. Monitoring Well Sampling

The ten new groundwater monitoring wells installed in rights-of-way as part of the first portion of this SRI (Figure 1) will be sampled as part of the next regularly scheduled sampling event² following installation and

² Regularly scheduled sampling events are conducted in accordance with the Interim Site Management Plan (ISMP) that was submitted to NYSDEC in September 2025.

development.³ If access has been granted to adjacent properties, groundwater samples will also be collected from select existing off-Site monitoring wells and new wells installed on those off-Site properties (if needed). The timing of off-Site property well sampling is dependent on property access and NYSDEC's approval of the work.⁴

Each monitoring well will be purged and sampled using low flow groundwater sampling procedures, as described in the FSP (Appendix F of the RIWP). Field parameters will be monitored and recorded during sampling including pH, oxidation reduction potential, specific conductance, dissolved oxygen, and temperature. The groundwater samples will be analyzed for VOCs by a NYSDOH ELAP-certified laboratory. QA/QC samples will be collected according to the QAPP, including one trip blank per cooler, one equipment rinse blank, one set of matrix spike/matrix spike duplicate samples, and one blind duplicate at a frequency of 1 per 20 samples, as identified in the QAPP. Groundwater samples will be collected in laboratory-supplied containers and will be sealed, labeled, and placed in a cooler containing ice (to maintain a temperature of approximately 4 degrees Celsius) and taken directly to a local laboratory service center for processing by the laboratory.

2.8. Soil Vapor and Indoor Air Sampling

Three soil vapor points will be installed inside the building on 109 7th North Street (Sposato Flooring). One point will be placed in the office/waiting area, one on the showroom floor, and one in the warehouse area of the building (Figure 4). The specific locations will be selected after UniFirst's representatives are given access to the building but will be placed as close to the center of the slab as possible to avoid edge effects. Additionally, six exterior soil vapor samples will be collected to characterize nature and extent of contamination in the paved areas between the UniFirst and Sposato Flooring buildings and the Sposato Flooring building and the main Pilot service building (Figure 4).

Sub-slab soil vapor samples will be collected consistent with the New York State Department of Health's Guidance for Evaluating Soil Vapor Intrusion in the State of New York (October 2006), including performing a building inspection and product inventory and use of a tracer gas to monitor the integrity of the soil vapor probe seal. Samples will be collected for a duration of 8 hours from points inserted no more than 2 inches into the sub-slab material, using summa canisters and analyzed at an NYSDOH ELAP approved laboratory for VOCs via TO-15.

Three indoor air samples will also be collected within close proximity to the three soil vapor points installed inside the building on 109 7th North Street (Sposato Flooring). Indoor air samples will be collected consistent with the New York State Department of Health's Guidance for Evaluating Soil Vapor Intrusion in the State of New York (October 2006), including performing a building inspection and product inventory. An outdoor ambient air sample will be collected concurrently to indoor air samples. Samples will be collected for a duration of 8 hours using summa canisters placed at approximate breathing height and analyzed at an NYSDOH ELAP approved laboratory for VOCs via TO-15.

³ To allow conditions in the surrounding formation to stabilize, groundwater samples will be collected no sooner than two weeks following installation and development.

⁴ Again, the quantity and locations of off-Site property wells that will be sampled will be based on the preliminary investigation activities to be performed on those properties. Once determined, the scope will be provided to NYSDEC for approval.

Soil vapor and indoor air samples will be collected during heating season. The laboratory will be responsible for achieving the appropriate reporting limit for each analyte.

2.9. Survey

A New York State Licensed Land Surveyor will survey monitoring wells installed as part of the SRI. The elevation of each monitoring well will be determined to ± 0.01 foot. All horizontal locations will be referenced to the appropriate New York State Plane NAD83 coordinate system and all vertical data to the North American Vertical Datum (NAVD 88), per NYSDEC requirements.

2.10. Investigation Derived Waste

Investigation-derived waste, including excess soil cuttings, well development fluids, and purge water will be drummed, labeled, and disposed in accordance with the procedures described in the FSP (RIWP Appendix F).

3. Schedule

The drilling and well installation component of the work to be performed within the rights-of-way (Item 1 in Section 2.1) is anticipated to take place beginning June 15, 2026. Groundwater sampling (including existing and new right-of-way monitoring wells) is anticipated to occur in early July 2026. This schedule is subject to change based on the timing of agency approval of this SRIWP.

The schedule for the portion of the SRI work to be conducted on adjacent properties (Item 2 in Section 2.1) will be dependent on adjacent property owners granting access, as well as NYSDEC's approval of the iterative components as the work progresses.

4. Closing

Please review and provide comments or approval by June 3, 2026, if possible, such that the work can be executed within the schedule identified in Section 3. In the meantime, please contact Kirsten Myers at 917.301.2465 with any questions or to discuss.

Sincerely,

GEI CONSULTANTS, INC.



Kirsten Myers, P.E.
Project Manager/Senior Engineer



Ileen Gladstone, P.E.
Senior Vice President

Appendices

Figure 1	Proposed SRIWP Investigation Locations
Figure 2	March 2026 Groundwater Contour
Figure 3	Nearby Sensitive and Ecological Receptors
Figure 4	Soil Vapor and Indoor Air Sample Locations

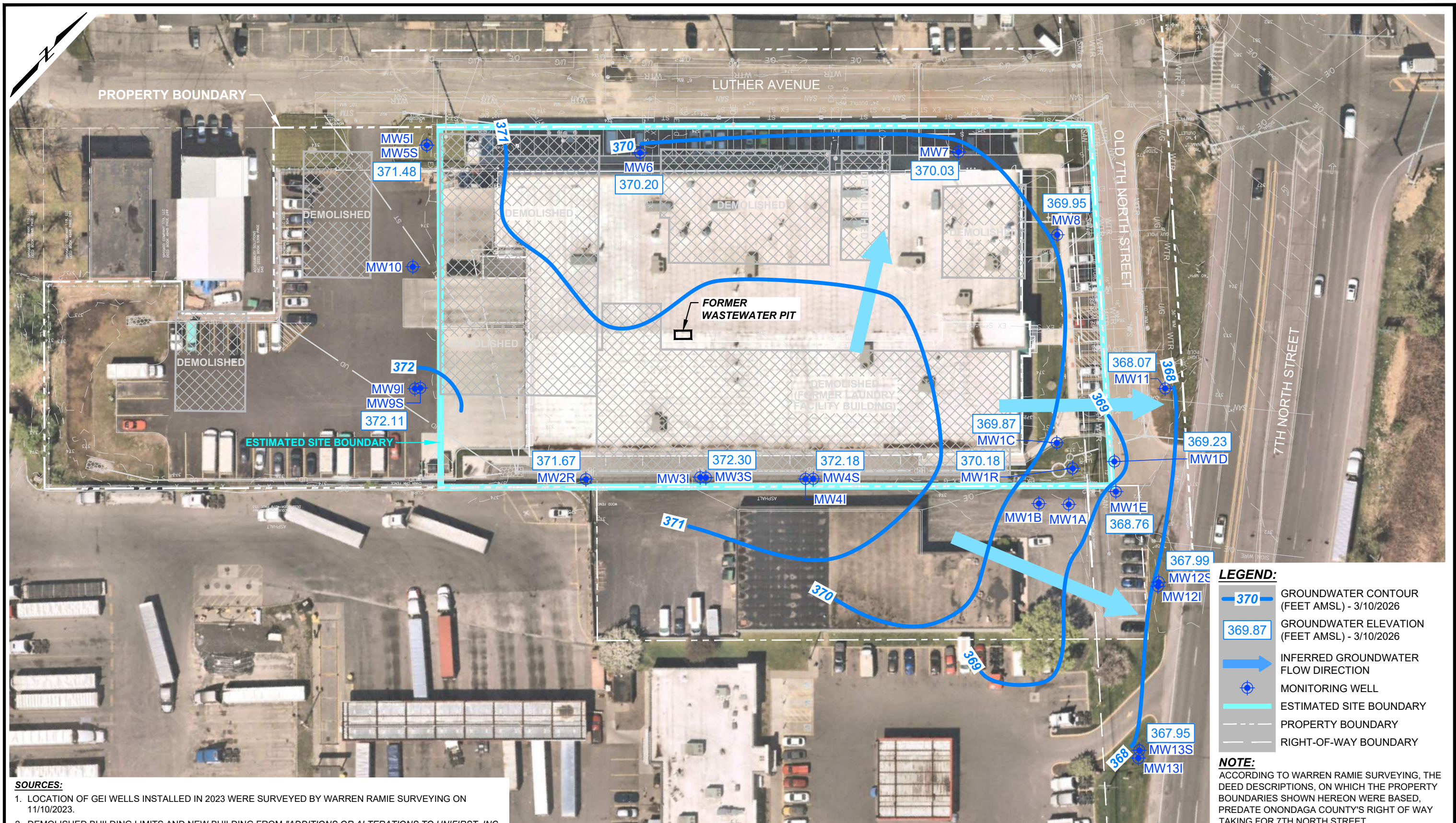
cc: Johnathan Robinson, NYSDOH
Catherine Malagrida, UniFirst Corporation

KM/ED:ag

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Figure 1 Proposed SRIWP Investigation Locations

Figure 2 March 2026 Groundwater Contour



- SOURCES:**
1. LOCATION OF GEI WELLS INSTALLED IN 2023 WERE SURVEYED BY WARREN RAMIE SURVEYING ON 11/10/2023.
 2. DEMOLISHED BUILDING LIMITS AND NEW BUILDING FROM "ADDITIONS OR ALTERATIONS TO UNIFIRST, INC. NEW FACILITY, OLD 7th NORTH STREET LIVERPOOL, NEW YORK, SITE PHASING PLAN," SHEETS L-2 REV. 12 DATED 07.05.22. AND L2.1 REV 4 DATED 11.05.19 . PREPARED BY KEPLINGER FREEMAN ASSOCIATES.
 3. SURVEY OF PROPERTIES SOUTH OF SITE BY WARREN RAMIE, PROVIDED IN A FILE NAMED "WRS 7th North Street Boundary 08.15.23.dwg".
 4. WELLS MW-1A, MW-1B, MW-1C, MW-1D & MW-1E FROM FIGURE 2: AREA WIDE DIAGRAM, PREPARED BY SOVEREIGN CONSULTING, INC., DATED 4/24/2024.
 5. NEARMAP AERIAL ©2024 NEARMAP, IMAGERY DATED 05/07/2024, ACCESSED ON 08/15/2024.

- LEGEND:**
- 370 — GROUNDWATER CONTOUR (FEET AMSL) - 3/10/2026
 - 369.87 GROUNDWATER ELEVATION (FEET AMSL) - 3/10/2026
 - ➔ INFERRED GROUNDWATER FLOW DIRECTION
 - ⊕ MONITORING WELL
 - ESTIMATED SITE BOUNDARY
 - - - PROPERTY BOUNDARY
 - - - RIGHT-OF-WAY BOUNDARY

NOTE:
ACCORDING TO WARREN RAMIE SURVEYING, THE DEED DESCRIPTIONS, ON WHICH THE PROPERTY BOUNDARIES SHOWN HEREON WERE BASED, PREDATE ONONDAGA COUNTY'S RIGHT OF WAY TAKING FOR 7TH NORTH STREET.

Supplemental Remedial Investigation Work Plan
113 7th North Street
Liverpool, New York

Unifirst Liverpool
Liverpool, New York

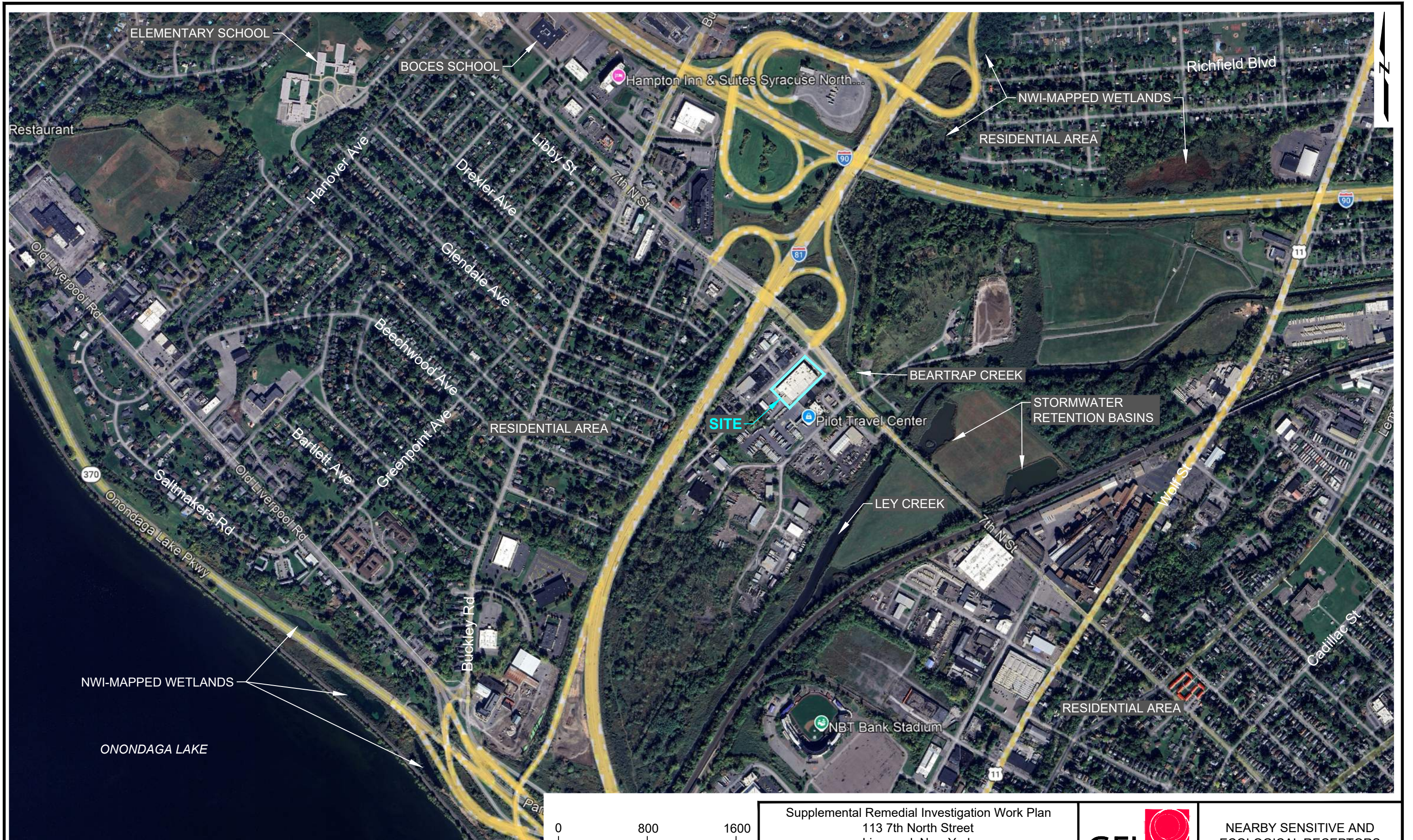


GROUNDWATER ELEVATION
SUMMARY
3/10/2026

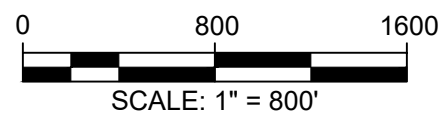
Project 2001642 May 2026

Fig. 2

Figure 3 Nearby Sensitive and Ecological Receptors



SOURCE:
GOOGLE EARTH PRO AERIAL ©2026, IMAGERY
DATED 10/11/2025, ACCESSED ON 05/11/2026.



Supplemental Remedial Investigation Work Plan
113 7th North Street
Liverpool, New York

Unifirst Liverpool
Liverpool, New York



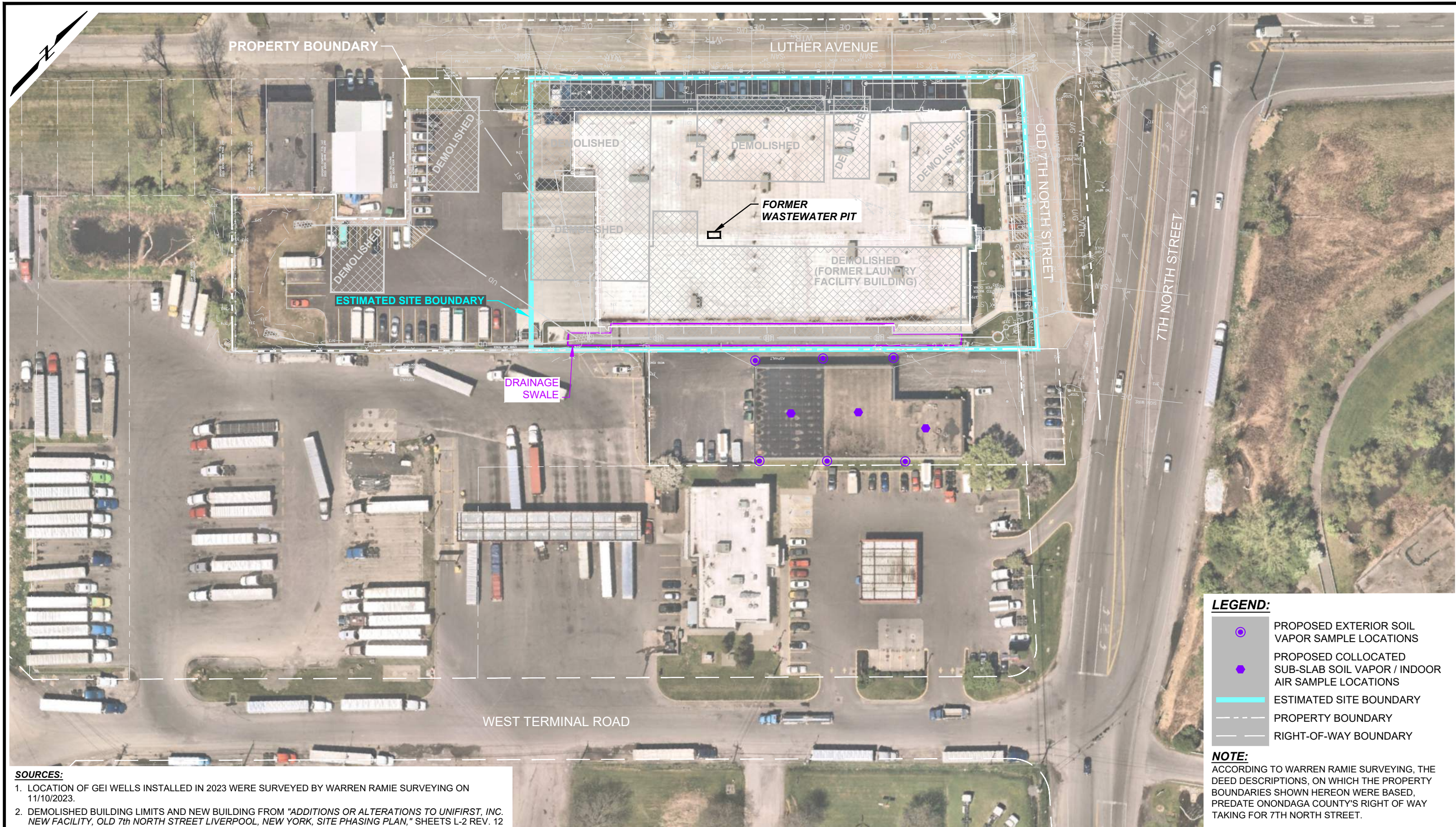
NEARBY SENSITIVE AND
ECOLOGICAL RECEPTORS

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Fig. 3

Figure 4 Soil Vapor and Indoor Air Sample Locations



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5. NEARMAP AERIAL ©2024 NEARMAP, IMAGERY DATED 05/07/2024, ACCESSED ON 08/15/2024.
6. ONONDAGA COUNTY, NY, TOWN OF SALINA TAX MAP, SECTION MAP 86, ACCESSED VIA: <https://onondaga.gov/rpts/tax-maps/>.

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SCALE: 1" = 80'

Supplemental Remedial Investigation Work Plan
113 7th North Street
Liverpool, New York

Unifirst Liverpool
Liverpool, New York



PROPOSED SOIL VAPOR AND
INDOOR AIR LOCATIONS

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Fig. 4