Engineering
Architecture
Environmental
Planning

LABELLA Associates, P.C.

300 State Street, Suite 201, Rochester, NY 14614

Phone 585.454.6110
Fax 585.454.3066
www.labellapc.com

May 7, 2013

Ms. Charlotte Theobald
Division of Environmental Remediation
NYS Dept. of Environmental Conservation ~ Region 8
6274 East Avon-Lima Road
Avon, New York 14414

Re: Soil Reuse Sampling Plan
Monoco Oil, BCP Site #C828137
75 Monroe Avenue, Pittsford, New York
LaBella Project No. 210259

Dear Ms. Theobald:

On behalf of Pittsford Canalside Properties, LLC (PCP), LaBella Associates, P.C. (LaBella) is pleased to submit this letter which presents a sampling plan for reuse of soil at the former Monoco Oil facility (the Site) located at 75 Monroe Avenue, Village of Pittsford.

Based on the mass excavation being completed at the Site to remove petroleum impacted soils, significant backfill material is required. Rather than importing backfill materials, it is proposed that two areas of the site be pre-characterized and if acceptable be utilized for backfill materials. The details of the two (2) areas are described below:

- **Berm Area** – The berm area we are proposing to sample is a ~600' long section of the berm along the canal property line. This area is approximately 3,100 cubic yards of material and is shown on the attached figure. Three (3) test pits (TP-28, TP-29 and TP-30) were advanced in this area during previous Remedial Investigation (RI) work. The test pits were advanced up to ~9.5' below ground surface and no evidence of impairment was observed. Soil samples were not submitted from test pits TP-28 and TP-30 based on the lack of evidence of impairment. A sample submitted for laboratory analysis from TP-29 was analyzed for the 'full-suite' of parameters and reported to contain no contaminants of concern at concentrations that exceed the Restricted Residential Use SCOs. In addition, two (2) surface soil samples were collected from this area (SS-3 and SS-4) was collected from this area during the RI and was reported to contain the Semivolatile Organic Compound (SVOC) Benzo(k)fluoranthene at a concentration equal to the Restricted Residential Soil Cleanup Objective (SCO), which is 1 parts per million (ppm).
- **Biocell Area** – The second area we are proposing to sample is a portion of the USEPA biocell shown on the attached figure. This area is approximately 4,400 cubic yards of material. Evidence of impairment was not observed within test pits advanced within this area during the RI (TP-26, TP-27 and TP-31) to the proposed depth of excavation (4' bgs). It should be noted that only TP-27 had soil samples submitted for analysis and the sample depth (8.0-9.3 ft. bgs) was below the proposed excavation depth; however, the sample collected did not identify VOCs or SVOCs above the Unrestricted Use SCOs. The depth of the biocell soils is clearly delineated with a poly liner and will ensure that only the biocell soils are sampled and excavated during potential future reuse.

In order to pre-characterize the materials, it is proposed that test pits will be excavated in these areas in order to evaluate the soil for impacts and collect characterization samples. The Berm Area test pits will include 11 test pits excavated at approximately 60 ft. intervals along the berm and the Biocell Area test pits will be excavated using an approximately 50-ft. (north-south) by 60-ft. (east-west) grid spacing. The approximate locations of the test pits are shown on the attached Figure.

During the test pitting work comprehensive field screening will be conducted in order to ensure that evidence of impairment is not present. This field screening will include evaluating the material types (soil, fill etc.), observing for staining, odors, etc. and field screening with a Photoionization Detector (PID). The test pits will be excavated at least 1-ft. deeper than the planned excavation depth for backfill. Based on the volumes of material proposed for use as backfill, in accordance with NYSDEC DER-10 and the approved IRM Work Plan, the following sampling is proposed as part of the test pitting program:

Berm Area

- Eleven (11) discrete samples for analysis of United States Environmental Protection Agency (USEPA) Target Compound List (TCL) Volatile Organic Compounds (VOCs) plus Tentatively Identified Compounds (TICs) using USEPA Method 8260; and,
- Five (5) composite samples (4:1 composites) for analysis of
    - USEPA TCL SVOCs plus TICs using USEPA Method 8270,
    - Total Analyte List (TAL) Metals using USEPA Method 6010 and 7471,
    - Total cyanide using USEPA Method 9012A,
    - Polychlorinated Biphenyls (PCBs) using USEPA Method 8082, and
    - Pesticides using USEPA Method 8081.

Biocell Area

- Twelve (12) discrete samples for analysis of USEPA TCL VOCs plus TICs using USEPA Method 8260; and,
- Six (6) composite samples (4:1 composites) for analysis of
    - USEPA TCL SVOCs plus TICs using USEPA Method 8270,
    - TAL Metals using USEPA Method 6010 and 7471,
    - Total cyanide using USEPA Method 9012A,
    - PCBs using USEPA Method 8082, and
    - Pesticides using USEPA Method 8081.

It should be noted that if more than one type of fill material is encountered in a test pit then a sample of each type of fill will be collected and analyzed. For example, if ash and demolition debris are encountered in the same test pit, one sample of each will be collected/analyzed from that test pit. In addition, the laboratory will be an Environmental Laboratory Approval Program (ELAP) certified lab and all data will be provided in ASP Category B Deliverables package, a Data Usability Summary Report (DUSR) will be completed and the required NYSDEC Electronic Data Deliverable (EDD) packages will be provided. It should be noted that the DUSR and EDD will be completed after the material has been utilized as backfill.

The test pits will be approximately 10 ft. in length and extend at least 1-ft. below the planned excavation depth. The soil for sampling will be collected in accordance with the approved IRM Work Plan. The excavated materials will be placed back into the test pit in the order removed while awaiting the laboratory results.

The sampling locations will be incorporated into GIS mapping and will be spaced evenly across both areas to be sampled. The proposed sampling locations are shown on the attached figure. Each discrete VOC sampling location and each composite sampling location (i.e., each of the 4 locations per composite sample) will be recorded with a GPS to document the location in the event that impacts above the Restricted Use Soil Cleanup Objectives (SCOs) are identified. The locations will also be flagged or staked in the field. With this approach, each area will be characterized separately and may be handled differently based on the characterization testing.

In the event that the sampling results indicate the materials are acceptable for reuse (and NYSDEC authorizes reuse), the backfill material will also be field screened (visual, olfactory and PID measurements) as it is generated. This further measure will allow for identifying any materials that are inconsistent with the materials identified during the test pitting characterization work. In the event that any materials are identified that are

inconsistent with the test pitting evaluation, these materials will be segregated and not utilized as backfilling without NYSDEC approval.

This sampling will be completed on March 8, 2013. If you have any questions, please do not hesitate to contact me directly at (585) 295-6611.

Respectfully Submitted,

LABELLA ASSOCIATES, P.C.

Dan P. Noll, PE
Project Manager

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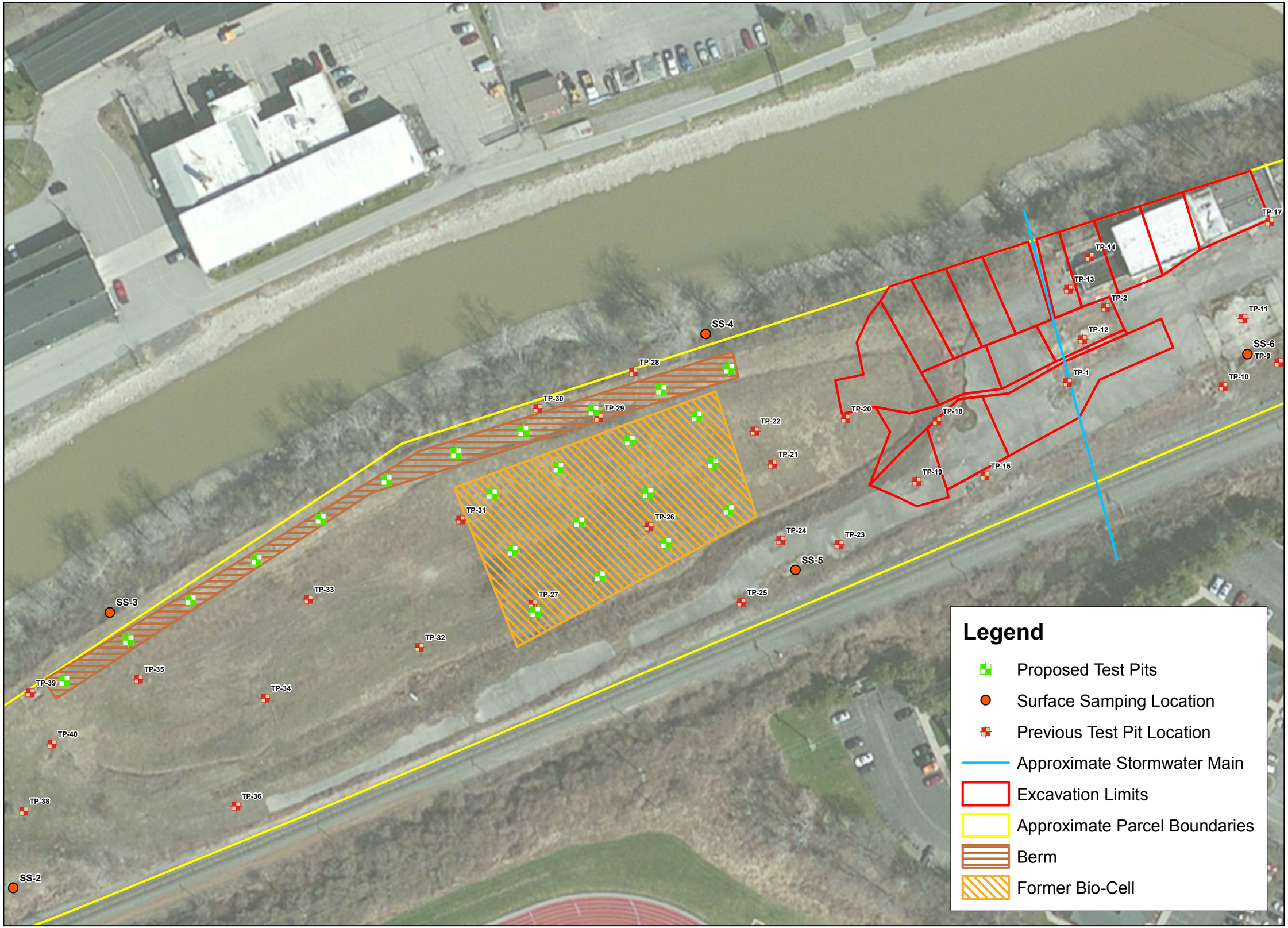

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300 STATE STREET
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P: (585) 454-6110
F: (585) 454-3066
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Former Monoco Oil
BCP Site #C828137

75 Monroe Avenue
Pittsford, New York

EXCAVATION AREAS AND CONFIRMATION SAMPLES

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