LABELLA Associates, D.P.C.
Engineering
Architecture
Environmental
Planning

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March 13, 2014

Charlotte Theobald
NYS Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414

Re: Additional Interim Remedial Measure Investigation
Former Monoco Oil
75 Monroe Avenue, Pittsford, New York
Brownfield Cleanup Program Site #C828137
LaBella Project No. 213647

Dear Ms. Theobald:

The purpose of this letter is to outline activities LaBella Associates, D.P.C. ("LaBella") intends to complete associated with the New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP) Site (BCP ID No. C828137) located at 75 Monroe Avenue, Pittsford, New York, hereinafter referred to as the "Site."

The activities that will be completed at the Site are intended to complete the work outlined in the NYSDEC-approved Interim Remedial Measures (IRM) Work Plan. In addition, due to apparent petroleum impacted soils that were encountered in January 2014 during a geotechnical investigation at the Site additional work is also proposed to complete the Remedial Investigation (RI) for the Site. The results obtained during these additional tasks will be combined with all other Site data in order to complete the RI Report.

Task 1: Post-IRM Groundwater Monitoring

The field activities associated with the IRM Work Plan have been completed with the exception of the Post-Source Removal Groundwater Monitoring task (Section 6.6). The IRM Work Plan indicates that subsequent to the completion of the remedial excavations, four (4) overburden groundwater monitoring wells will be installed downgradient of the IRM excavations in order to evaluate groundwater conditions following IRM soil excavation activities.

The Post-IRM groundwater monitoring wells will be installed in the locations shown on Figure 1 (designated monitoring wells IRM-MW-1 thru IRM-MW4) in accordance with Section 6.6.1 of the IRM Work Plan. These locations were chosen as worst-case locations based on field screening of confirmatory sidewall soil samples during the initial IRM work. The pertinent worst-case sidewall samples from the IRM are shown on Figure 1for reference.

Sampling of the groundwater monitoring wells will be conducted in accordance with Section 6.6.2 of the IRM Work Plan. The four (4) wells installed downgradient of the IRM excavations will be sampled for the constituents listed in Section 6.6.2 of the IRM Work Plan. The additional three (3) wells will be sampled and analyzed for the following:

- Total Compound List (TCL) & CP-51 Volatile Organic Compounds (VOCs) plus Tentatively Identified Compounds (TICs) using United States Environmental Protection Agency (USEPA) Method 8260;
- TCL & CP-51 Semivolatile Organic Compounds (SVOCs) and plus TICs using USEPA Method 8270C; and,
- Total Analyte List (TAL) Metals using USEPA Method 6010 and 7471.

Results of the Post-IRM groundwater monitoring will be document in the Remedial Investigation Report and IRM Construction Completion Report.

Task 2: Completion of Remedial Investigation

Soil Delineation

In January 2014 LaBella conducted test pits as part of characterizing soils for reuse as clean material and Foundation Design conducted geotechnical testing of soils via test pitting near the footprints of proposed development buildings at the Site. A LaBella representative was onsite during the test pitting activities to conduct air monitoring in accordance with the NYSDEC-approved Community Air Monitoring Plan (CAMP) for the Site and to field screen excavated soils for evidence of impairment.

The locations of test pits completed as part of the re-use sampling work and the soil borings completed are shown on Figure 2 and Figure 3 illustrates the locations of test pits with impacts identified in the Geotechnical evaluation. In addition, test pits where evidence of petroleum impacts were identified are also indicated on Figures 2 and 3. Evidence of petroleum impacts includes petroleum odors, staining and/or elevated PID readings.

In order to investigate these additional areas identified as containing evidence of petroleum impairment LaBella intends to advance additional soil borings and test pits while completing Step #3 of the IRM Work Plan Addendum #2 fieldwork. This is intended to be a dynamic work strategy (consistent with the Triad Approach) that will include field decisions based on the actual conditions encountered. NYSDEC will be consulted with each field decision throughout the program (e.g., moving or adding testing locations to evaluate the extent of contamination if gross contamination is encountered). Specifically, four (4) areas of additional testing are proposed to evaluate the evidence of impairment encountered. The location of the proposed test pits and soils borings are shown on Figure 1 which also includes a summary of the test pits with petroleum impacts observed from both the Geotechnical evaluation and soil re-use sampling work. The testing locations shown do not indicate specific locations but rather show areas were additional testing points will be added as warranted in the field based on data obtained at the time of the work. the work will continue until the nature and extent of impacts from each of these areas is defined (vertically and horizontally). It should be noted that the impacts identified in TP-15 are not identified for further evaluation since other test pits (Geotechnical test pits) were completed in this area and were clean and the impacted material in TP-15 was a solid tar like substance and already appears to be limited in extent.

If impacts are identified in soils in these locations subsequent depths will be field screened for vertical delineation. Samples will be collected and field screened with increasing depth until field screening indicates that there is not the potential for impacts or until bedrock is encountered.

Additional "step-out" locations will be added to the soil boring investigation based on the results of the field screening within the initial soil borings. Step-out investigative soil boring locations will be chosen in the field. Step-out sampling will continue until field screening results indicate that impacts are no longer present in order to fully delineate the horizontal and vertical extent of petroleum impacts in these areas. Soil samples from each boring will be collected from the 'worst case' location, the groundwater interface and the bottom of the boring. It should be noted that the anticipated remedial approach will be excavation and off-site disposal and therefore, not all borings will be analyzed for contaminants. Rather, the above sample collection will be completed and then a sub-set of samples will be submitted for laboratory analysis. Specifically, the outermost step-out samples will be collected and submitted for laboratory analysis of the following constituents of concern:

- TCL & CP-51 VOCs plus TICs using USEPA Method 8260, and
- TCL & CP-51 SVOCs plus TICs using USEPA Method 8270,

In addition up to three (3) worst-case impacted soil samples will be analyzed to characterize the waste based on the requirements of the landfill.

NYSDEC will be contacted throughout the work and subsequent to completing field activities in order to discuss the extent of laboratory sampling and confirm that an acceptable level of sampling has been completed to complete the Remedial Investigation.

The sampling locations will be incorporated into GIS mapping. All samples collected for laboratory analysis will be submitted to an ELAP certified laboratory and the analytical data package will be Category B. A Data Usability Summary Report (DUSR) will be prepared and the data will be submitted to the Department in an electronic data deliverable (EDD) that complies with the Department's Electronic Data Warehouse Standards. The information gathered during this investigation will be presented in the IRM Construction Completion Report, Remedial Investigation Report, and the Remedial Alternatives Analysis.

Groundwater Delineation

Subsequent to completing the above soil delineation work, additional groundwater monitoring wells will also be installed to complete the RI in the following locations which are also shown on Figure 1.

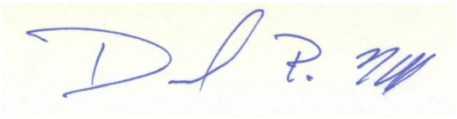
- IRM-MW-5: In the area of former groundwater monitoring well RIW-4. This area was reported to contain petroleum and chlorinated Volatile Organic Compounds (VOCs) during a November 2001 groundwater sampling event.
- IRM-MW-6: Downgradient of apparent petroleum odors observed during geotechnical test pitting conducted by Foundation Design in January 2014.
- IRM-MW-7: Along the northern property line in the western portion of the site downgradient of apparent petroleum odors encountered during environmental test pitting.

The locations of IRM-MW-6 and IRM-MW-7 may be altered slightly based on the field observations made during the above work; however, any deviations from the locations shown will be discussed with NYSDEC for approval prior to moving well installation locations.

If you have any questions, or require additional information, please do not hesitate to contact me at (585) 295-6611.

Sincerely,

LABELLA ASSOCIATES, D.P.C.



Daniel P. Noll, P.E.
Project Manager

DPN/SRD/lk

cc: Bryan Powers – Canalside Properties, LLC (e-copy only)
Mark Sergott – NYSDOH (e-copy only)
James Mahoney – NYSDEC (e-copy only)
John Frazer – MCHD (e-copy only)

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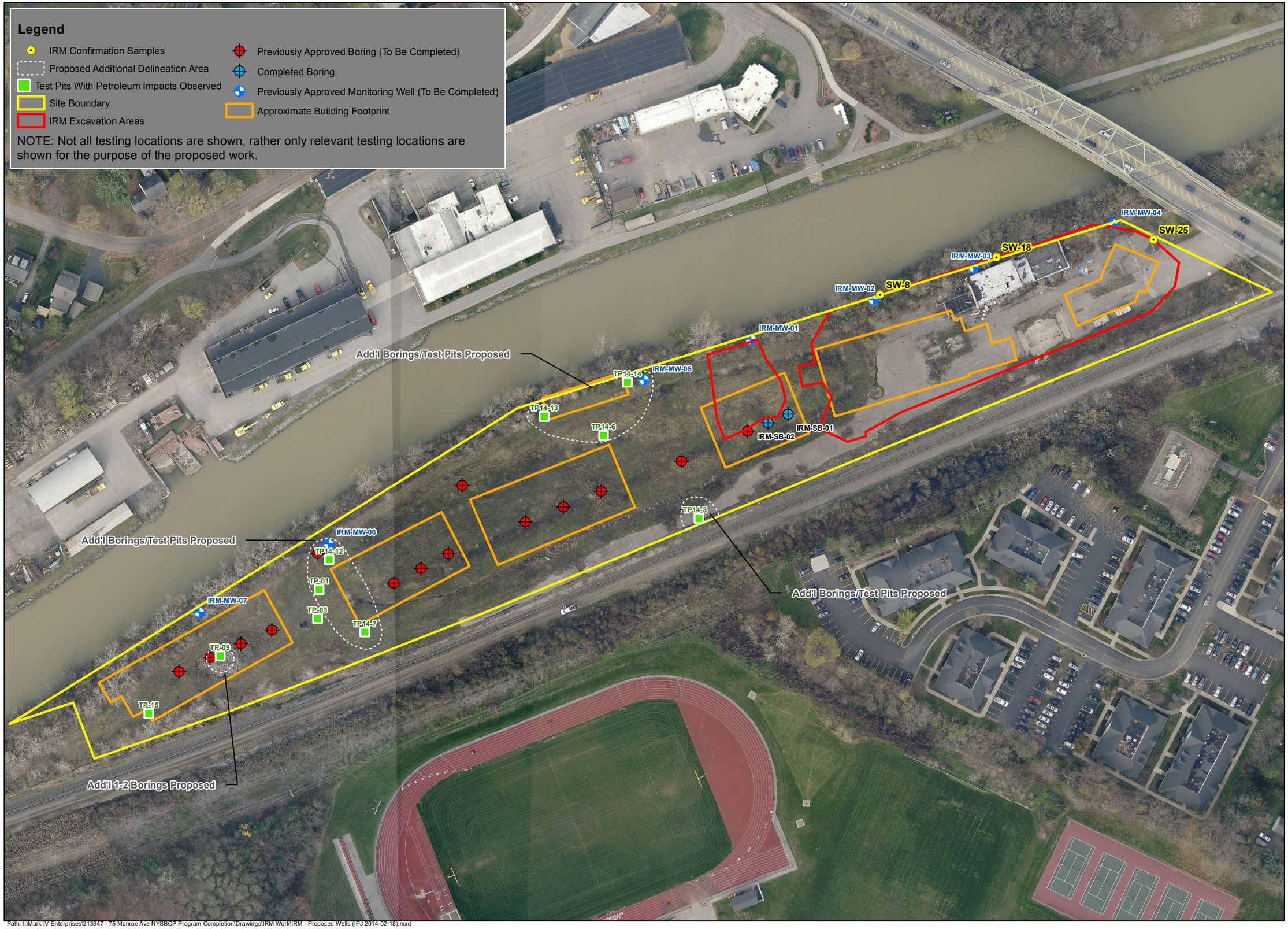
ATTACHMENTS

Legend

- IRM Confirmation Samples
- Proposed Additional Delineation Area
- Test Pits With Petroleum Impacts Observed
- Site Boundary
- IRM Excavation Areas
- Previously Approved Boring (To Be Completed)
- Completed Boring
- Previously Approved Monitoring Well (To Be Completed)
- Approximate Building Footprint

NOTE: Not all testing locations are shown, rather only relevant testing locations are shown for the purpose of the proposed work.



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PROPOSED MONITORING WELL LOCATIONS

N
W E
S

0 60 120
Feet
1 inch = 120 feet

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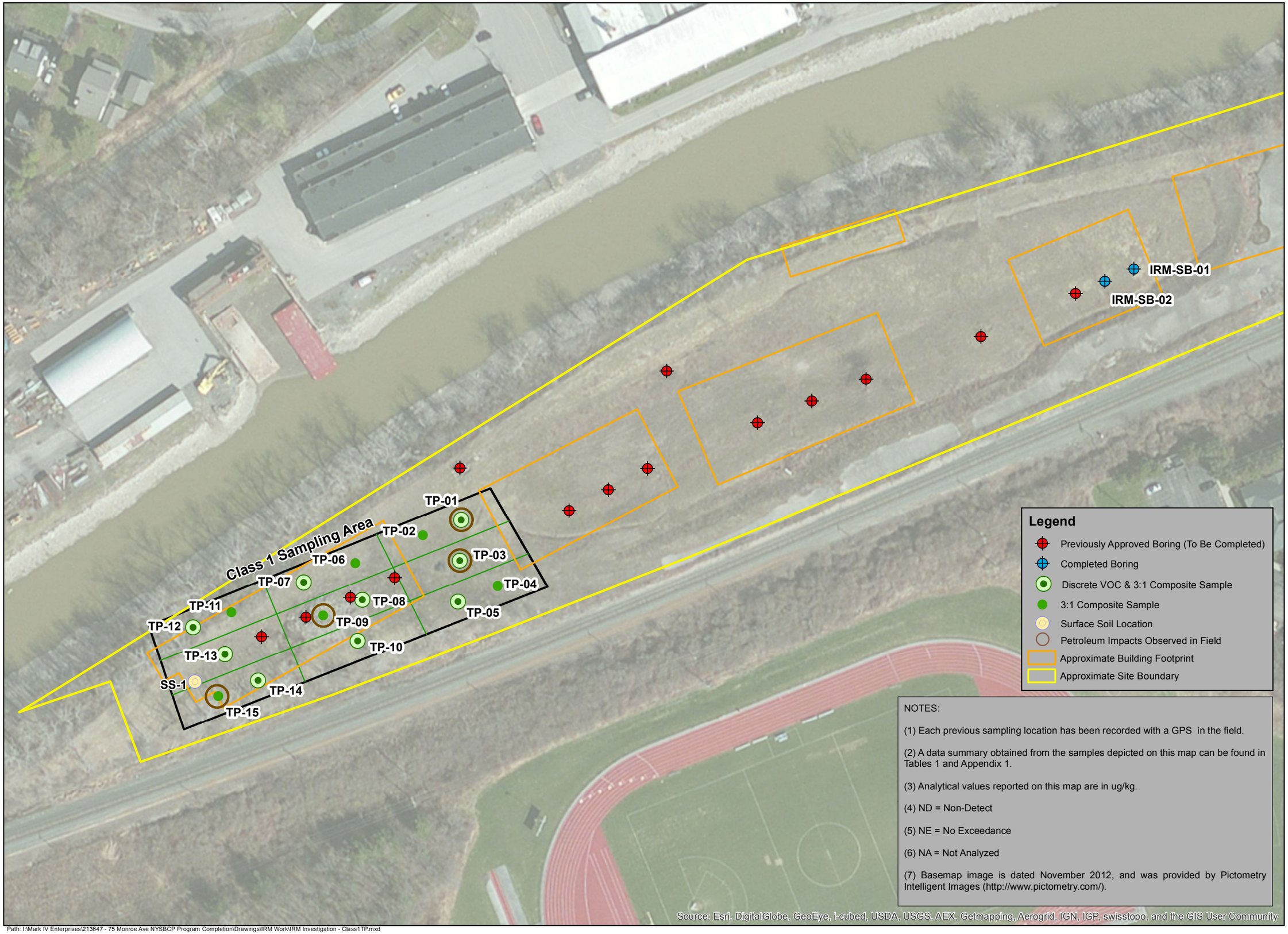
FIGURE 1

Path: I:\Mark IV Enterprises\213647 - 75 Monroe Ave NYSBCP Program Completion\Drawings\IRM Work\IRM - Proposed Wells (IPJ 2014-02-18).mxd



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REUSE AND IRM SAMPLING LOCATIONS

N
W E
S

0 50 100
Feet

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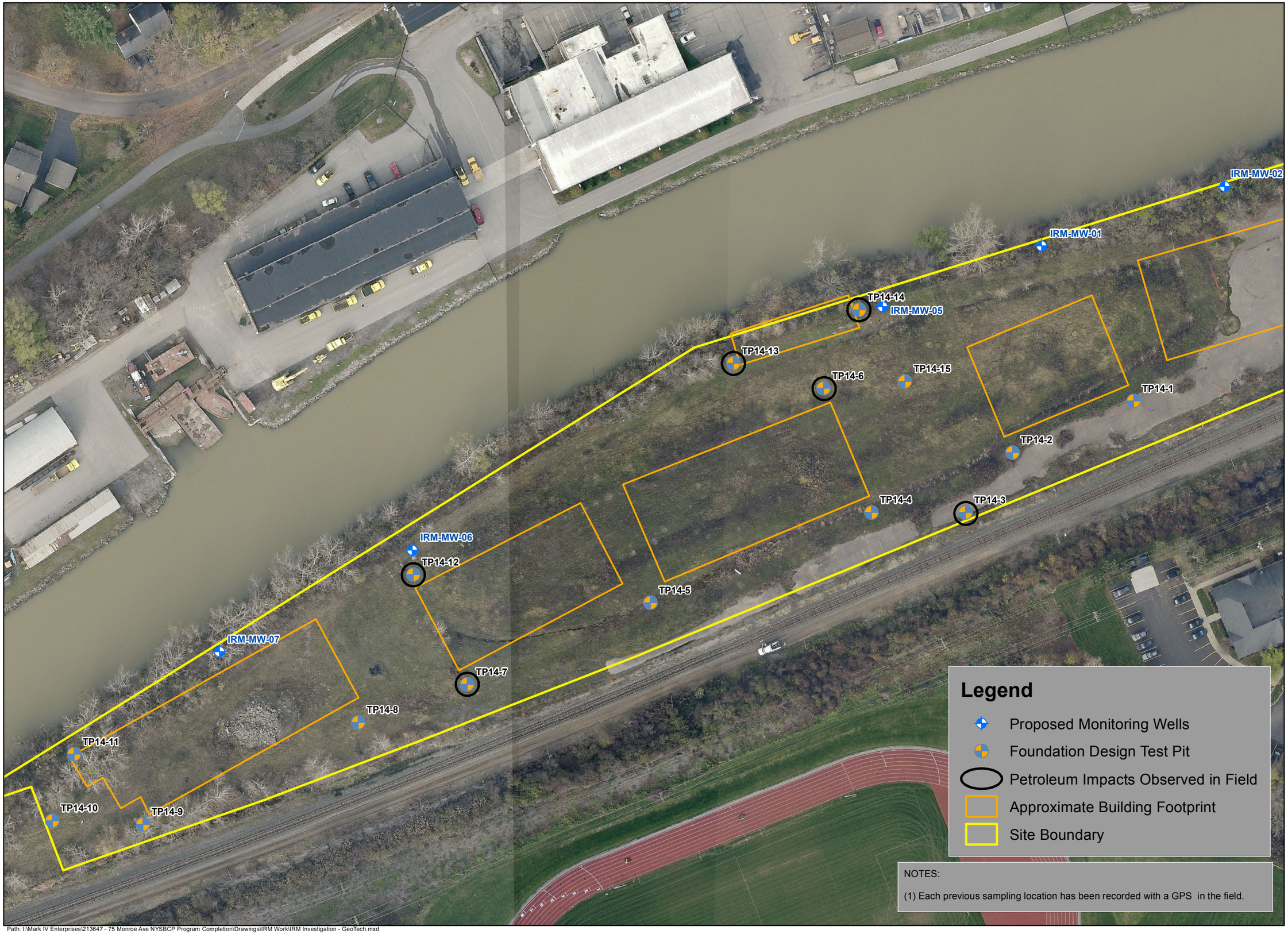
FIGURE 2

Path: I:\Mark IV Enterprises\213647 - 75 Monroe Ave NYSBCP Program Completion\Drawings\IRM Work\IRM Investigation - Class1TP.mxd



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Pittsford, New York

FOUNDATION DESIGN GEOTECHNICAL TEST PIT LOCATIONS

N
W E
S

0 40 80
Feet
1 inch = 80 feet

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FIGURE 3

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