

October 1, 2015

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

**RE: Corrective Measures Plan
Monoco Oil
NYSDEC Site # C828137
NYSDEC Spill #1506383
LaBella Project # 213647**

Dear Ms. Theobald:

LaBella Associates, D.P.C. ("LaBella") is pleased to submit this Corrective Measures Plan (CMP) associated with the New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP) Site (VCP ID No. C828137) located at 75 Monroe Avenue, Pittsford, New York, hereinafter referred to as the "Site." As requested by NYSDEC, this CMP is being submitted due to the temporary staging of petroleum impacted soil on the BCP Site from the adjacent Canal Corporation property during the installation of a storm sewer pipe. A NYSDEC Spill was called in on September 16, 2015 and NYSDEC Spill File #1506383 was assigned. This CMP was developed based on the NYSDEC email dated September 30, 2015 (received at 4:18 pm) and NYSDEC DER-10.

Corrective Measures Plan

- **Description of Non-Compliance Incident** – In a letter dated March 30, 2015, the NYSDEC required that material from the adjacent parcel not be imported to the Site. Due to conditions at the time of removal, the material was temporarily staged on the BCP parcel until it was sent for off-site disposal. The material was staged on and covered with two layers of 6-mil poly sheeting in a manner consistent with the excavation and staging of impacted on-site soils that were removed during various Interim Remedial Measures (IRMs) at the Site. The impacts are petroleum related (based on visual and olfactory observations) and appear to be petroleum impacts that previously migrated from the BCP Site toward the Canal (i.e., prior to the IRMs). The location of the staged soil was surveyed with a Carlson S320 survey-grade Global Positioning System (GPS) and is shown on the attached figure. As shown on the attached figure, the stockpile consisted of an approximate 18-ft. by 15-ft. pile of petroleum impacted soil.
- **Cause of Incident** – As indicated above, conditions at the time of removal did not allow direct loading of the material into trucks.

- Corrective Measures Completed to Date – The material that was temporarily staged on-site was removed on September 30, 2014. As noted above, the soil was placed on and covered with 2 layers of poly sheeting. Although the soil was contained/covered with poly, at the time of the removal/transport to the landfill additional soil from beneath and in proximity to the stockpile was also removed as a precautionary measure. Specifically, approximately 3-4 inches of soil beneath the stockpiled material and soil within approximately 5-ft. of the stockpile was removed with the soil. The material was shipped to the Waste Management High Acres Landfill under profile #115559NY. A total of 82.62 tons of material was disposed of. A summary report from the landfill is attached. Copies of the landfill receipts will be included in the Corrective Measures Report.
- Corrective Measures Proposed – The following additional Corrective Measures are proposed:
 - Although the soil was contained on and covered by poly sheeting, to document the conditions subsequent to the removal of the material, soil samples will be collected from the following locations:
 - beneath where the material was staged,
 - around the perimeter of the staging area, and
 - the area where the material was loaded into trucks.

The area of soil staging was approximately 223 square feet (based on GPS measurements or roughly 15-ft. by 15-ft.) and the area where loading occurred extended approximately 15-ft. to the east of the staging area. Accounting for a buffer of 10-ft. on all sides, this equates to an area of approximately 1,670 sq. ft. and a perimeter of about 167 linear ft. These areas are shown on the attached figures. Based on NYSDEC DER-10, the following soil sampling is proposed:

- six (6) 'sidewall' samples from the perimeter of the area of disturbance.
- Three (3) 'bottom' samples from the area of disturbance
- In order to select the areas of sampling, field screening will be completed. The field screening will consist of observing the area defined above for evidence of impacts. Specifically, the area will be assessed for staining, odors and screened with a photoionization detector (PID). The screening will be completed over the entire area and readings will be recorded approximately every 5-ft. on center. In the event any staining, odors or PID readings are observed, the soil samples will be collected from the location of impacts. It should be noted that similar screening was previously completed at the time of removal and no evidence of impacts was observed.
- The soil samples will be collected from the top 3-inches of surface soil. The samples will be collected in laboratory supplied bottleware and analyzed for the following parameters:
 - United States Environmental Protection Agency (USEPA) Target Compound List (TCL) and NYSDEC CP-51 Volatile Organic Compounds (VOCs) using USEPA Method 8260 including up to 20 Tentatively Identified Compounds (TICs);
 - USEPA TCL and NYSDEC CP-51 Semi-VOCs (SVOCs) using USEPA Method 8260 including up to 20 Tentatively Identified Compounds (TICs); and,
 - USEPA Target Analyte List (TAL) Metals using USEPA Methods 6010 and 7471.

- Based on the number of samples proposed, one duplicate and one Matrix Spike/Matrix Spike Duplicate will be collected for Quality Assurance/Quality Control purposes. The laboratory report will be provided in an Analytical Services Protocol (ASP) Category B Data Package and a Data Usability Summary Report (DUSR) will also be completed.
- Subsequent to receiving the laboratory data and the DUSR, a Corrective Measures Report will be submitted to NYSDEC documenting the results.

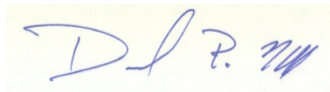
If deemed acceptable to NYSDEC, the sampling work will be completed within 3 business days of NYSDEC approval. The Corrective Measures Report will be provided to NYSDEC within 30-days of the fieldwork.

In the event that impacts are observed in the field during the field screening or upon receipt of the analytical data (i.e., soil results indicate concentrations above the Part 375-6 Restricted Residential Soil Cleanup Objectives), a supplemental Corrective Measures Plan will be submitted to NYSDEC that includes procedures for completing such work. In this event, the supplemental CMP will be submitted to NYSDEC within 1-week of determining actions are required.

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

Sincerely,

ABELLA ASSOCIATES, D.P.C.

A handwritten signature in blue ink, appearing to read 'D.P. Noll', is shown on a light yellow background.

Daniel P. Noll, P.E.
Project Manager

DPN/lk

Attachments

cc: S. DiMarzo (Pittsford Canalside Properties)
R. Hull (Underberg & Kessler)
F. Sowers (NYSDEC)
J. Mahoney (NYSDEC)
M. Zamiarski (NYSDEC)
F. Ricotta (NYSDEC)
B. Schilling (NYSDEC)
M. Cruden (NYSDEC)
M. Sergott (NYSDOH)
J. Deming (NYSDOH)
G. Senecal (LaBella)
S. Davis (LaBella)

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Former Monoco Oil
BCP Site #C828137

75 Monroe Avenue
Pittsford, New York

SITE



0 125

Legend

- Approximate Site Boundary
- Loading Area
- Canal Excavated Soil
- 10-ft buffer

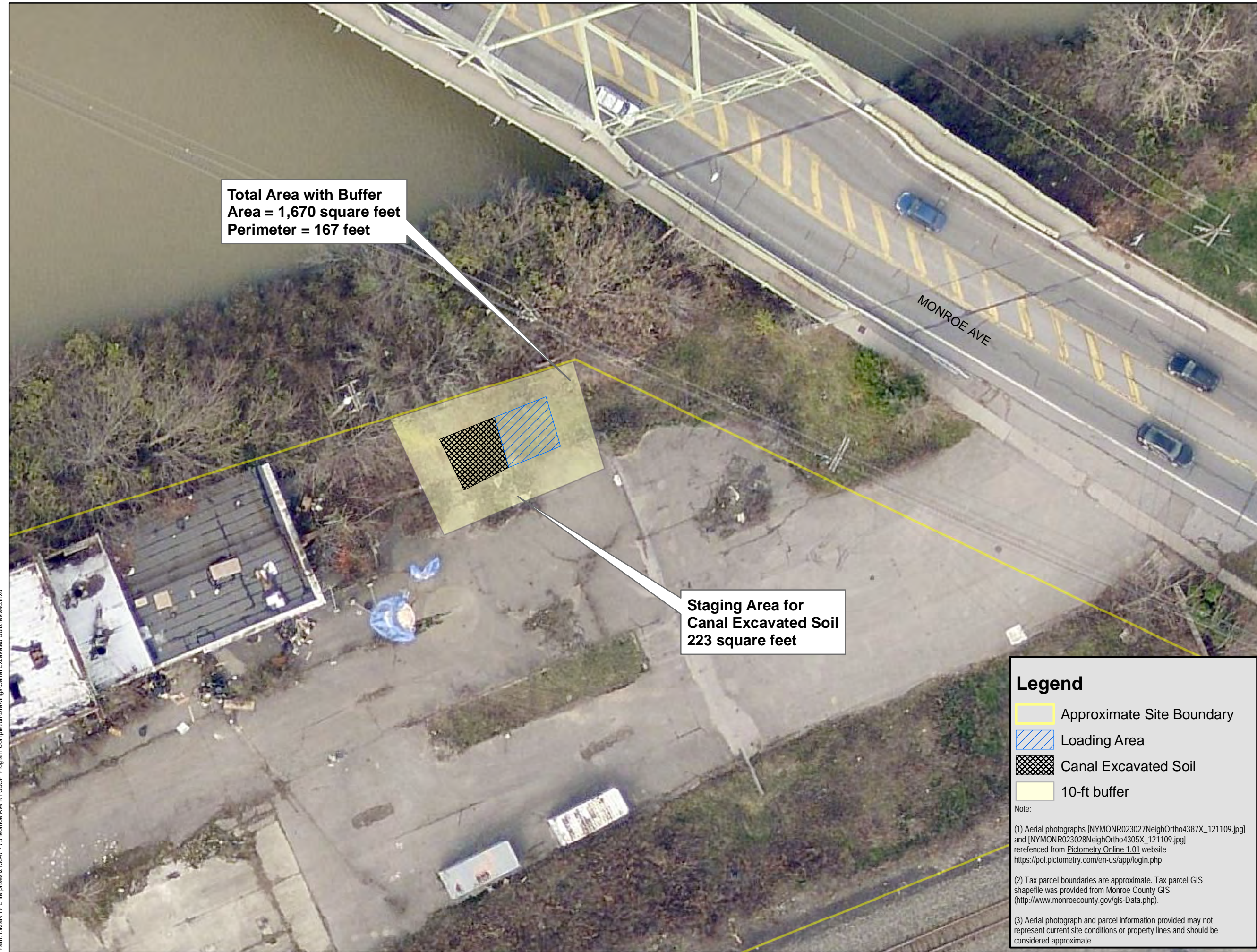
Note:

- (1) Aerial photographs [NYMONR023027NeighOrtho4387X_121109.jpg] and [NYMONR023028NeighOrtho4305X_121109.jpg] referenced from Pictometry Online 1.01 website <https://pol.pictometry.com/en-us/app/login.php>
- (2) Tax parcel boundaries are approximate. Tax parcel GIS shapefile was provided from Monroe County GIS (<http://www.monroecounty.gov/gis-Data.php>).
- (3) Aerial photograph and parcel information provided may not represent current site conditions or property lines and should be considered approximate.

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[213647]
[FIGURE 1]

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Total Area with Buffer
Area = 1,670 square feet
Perimeter = 167 feet

Staging Area for
Canal Excavated Soil
223 square feet

Legend

- Approximate Site Boundary
- Loading Area
- Canal Excavated Soil
- 10-ft buffer

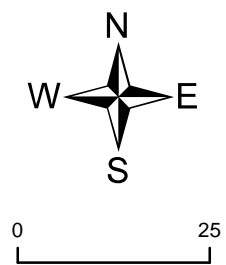
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Former Monoco Oil
BCP Site #C828137

75 Monroe Avenue
Pittsford, New York

CANAL EXCAVATED SOIL



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[213647]

[FIGURE 2]