



January 28, 2025

Pittsford Canalside Properties LLC
Steve DiMarzo
301 Exchange Boulevard
Rochester, NY 14608

Re: Former Monoco Oil Redevelopment:
Off-site Excavation Strategies
Monoco Oil Site
Site No.: C828137
Pittsford, Monroe (C)

Dear Mr. DiMarzo:

The New York State Department of Environmental Conservation (Department) has completed a review of the letter (Letter) dated January 9, 2025 detailing the Off-Site Excavation Strategies at the Former Monoco Oil Site (Site) located at 75 Monroe Avenue, Pittsford, Monroe County. Based on a review of the Letter, the Department has the following comments and concerns.

1. The Department understands that the off-site parcel in question is landlocked and must be accessed by going through the Site. With that said, the Department understands that all precautions, housekeeping measures, engineering, and administrative controls will be taken to prevent the distribution of the off-site soil/fill material co-mingling with the Site's soil/fill material. Note – failure to prevent co-mingling of off-site soil/fill material with on-site soil/fill material could result in additional excavation and sampling to be completed during the Site's development.
2. It is indicated that poly sheeting will be used to prevent co-mingling. The Department strongly suggests a more robust sheeting material such as woven geotextile material or similar to prevent breakthrough and co-mingling.
3. While the Site's Site Management Plan (SMP) and the associated conditions presented in the Department's conditional approval for the Site's Change of Use notification apply to the Site the SMP and conditions can be implemented for the off-site parcel. The implementation of the Site's SMP and associated conditions would also be another means to prevent the co-mingling of the off-site and on-site soil/fill material.
4. The Department understands that the Article 15 permit for the Site will be submitted for the project file prior to the start of the off-site parcel fieldwork activities or at a minimum as soon as issued.
5. The Site's SMP provides details associated with the implementation of the Community Air Monitoring Plan (CAMP) during ground intrusive activities. The Department understands that during ground intrusive activities on- and off-site the CAMP will be implemented.
6. While the addition of an absorbent amendment may be used for too wet excavated soil/fill material, another option is lined trucks to control the release of the free liquids to the environment. If excavated soil/fill material is too wet to be transported off-site, a staging area will be constructed

with a sump to collect all dewatering material. The staging area will be constructed such that no liquids or soil/fill material will be co-mingled or contact the Site's surface. See the Site's SMP and conditional approvals for additional details.

7. It is indicated that any free-flowing liquids will be containerized, characterized, and disposed off-site as needed. The Department understands that containerized liquids will be disposed in accordance with all applicable local, State, and Federal regulations. The Department also understands that all trucks hauling material will be registered and permitted by the Department.
8. The Department understands that during the excavation and loadout of the off-site parcel's soil/fill material none of that material will contact or will be co-mingled with Site's existing surface/subsurface soils.
9. The Department understands that during loadout the transporting vehicles will be free of extraneous off-site soil/fill material (will be deconned). No off-site fill material will contact the Site's existing surface/subsurface soils.
10. Any soil/fill material staged on the Site will have precipitation and wind erosion control measures implemented as indicated in the Site's SMP.

Please place a copy of the January 9, 2025 letter along with this letter in the Site's document repository prior to the implementation of any field work activities associated with these documents. Provide electronic notification to the Department that the material has been placed in the document repository.

If you have any questions, need additional forms, or need further assistance with the Site, please contact me at 585-226-5354 or e-mail: charlotte.theobald@dec.ny.gov.

Sincerely,



Charlotte Theobald
Project Manager

ec:

Dan Noll (Labella)
Jen Gillen (Labella)
Alex Brett (Labella)
Justin Deming (NYSDOH)
Mark Sergott (NYSDOH)
Starr O'Neil (MCHD)
David Pratt (NYSDEC)

January 9, 2025

Ms. Charlotte Theobald
NYSDEC, Region 8
6274 East Avon-Lima Road
Avon, New York 14414

RE: Former Monoco Oil Redevelopment: Off-Site Excavation Strategies

Former Monoco Oil BCP: C828137
75 Monroe Avenue, Pittsford, New York
LaBella Project #2232102

Dear Ms. Theobald,

This letter is meant to outline excavation strategies specific to construction along property lines during the upcoming redevelopment work by the Volunteer (Pittsford Canalside Properties) at the former Monoco Oil Site (C828137) located at 75 Monroe Avenue, Pittsford, New York, hereinafter referred to as the "BCP Site". The BCP Site received Certificate of Completion in December 2016 and the Site Management Plan (SMP) was approved by the Department in December 2016.

While the SMP, institutional/engineering controls and other BCP-specific requirements apply to the BCP Site, the development work calls for earthwork across and slightly outside of the BCP boundaries. Examples of this work include utility installations extending northeast, towards Monroe Avenue, as well as construction of a retaining wall, a building and minor utility work along the narrow strip of land between the northwestern BCP boundary and the Erie Canal (refer to Figure A). The canal parcel is limited in area, bordered by the Erie Canal and essentially landlocked, meaning any material excavated from this area will have to be transported through the BCP Site for ultimate disposal at a landfill.

Based on site constraints (particularly along the canal) and the development plan, the Volunteer has identified several scenarios in which material from off-site may require *temporary* movement to the BCP Site. Any such movement would be temporary for loading or emergency staging purposes and would not be for final placement of material. Furthermore, although any staging of off-site material is not intended to be done on the BCP Site (e.g., material excavated from the canal parcel will be staged on the canal parcel prior to disposal), emergency scenarios could arise which would necessitate temporary staging of off-site material on the BCP Site.

Below are several scenarios in which material may be temporarily moved across the BCP Site as part of the disposal process. Each scenario includes a summary of controls which will be implemented to prevent cross-contamination. Scenario 1 is the intended approach



for managing these unique site constraints during earthwork but Scenarios 2 and 3 have also been identified as contingencies in the event site conditions requirement emergency management of material (e.g., unexpected slumping of materials along the canal). Note that based on the extensive investigation and remediation completed under the BCP prior to the Department's issuance of Certificate of Completion, impacted materials are generally not anticipated to be encountered but a LaBella representative will be on-site during any earthwork to implement the Community Air Monitoring Program (CAMP) and screen soils in accordance with the SMP.

With all scenarios, due care will be taken when moving excavation equipment between the BCP Site and any adjacent properties to prevent tracking material between the properties. Furthermore, if any excavated material is deemed to be too wet for loading, an absorbent amendment such as wood chips, concrete or similar will be added to the material to prevent leakage from trucks during/following loading. Any free-flowing liquids will be containerized, characterized and disposed of properly off-site as needed. Finally, all trucks transporting soil/fill material will be properly permitted in accordance with the SMP and have either tight-fitting opaque covers that are secured on the sides and/or back, or opaque covers that are locked on all sides.

Scenario 1 (anticipated scenario): Material excavated from the canal parcel will be direct-loaded into trucks which will be staged on the BCP Site. When loading trucks, poly sheeting will be placed on the ground between the dump trailer and the BCP boundary to intercept any material which could drop from the excavator bucket while loading the truck. Any material which falls onto the poly sheeting during loading will be periodically placed in one of the trucks for off-site disposal.

Scenario 2 (contingency): Although not intended, excavated material from the canal parcels may need to be temporarily staged on the BCP Site. For instance, this scenario could arise if the bank becomes destabilized and staging on the more stable BCP Site is required to prevent material from entering the canal and/or creating an unsafe situation. In this unlikely scenario, any material moved to the BCP Site will be staged on poly sheeting and covered with poly sheeting at the end of the working period. The material (as well as any poly sheeting utilized) will be loaded into trucks for landfill disposal at the earliest possible opportunity. In the event any staged material is impacted, following disposal of the material and poly sheeting, a LaBella representative will screen the material which was located beneath the poly sheeting. If any evidence of impairment (i.e., PID readings above 5 ppm, suspect staining or odors) is encountered, the material will be over excavated and properly disposed of off-site. A work plan is being submitted under separate cover to outline final cover system components and sampling requirements.

Scenario 3 (contingency): Although not anticipated, slumping of material from the BCP Site could happen during excavation on the adjacent parcels. Any material which inadvertently moves off the BCP Site onto the adjacent parcels (e.g., during excavation for the retaining wall along the canal) will be over excavated and loaded into trucks for landfill disposal, using the process described in Scenario 1. If any of material which moves from the BCP Site



to an adjacent property displays evidence of impairment, the material will be over excavated, properly disposed of off-site and confirmatory samples will be collected.

Please do not hesitate to reach out with any questions about excavation strategies during redevelopment of the Former Monoco Oil Site. We are looking forward to collaborating with the Department as the project moves forward.

Respectfully submitted,

LaBella Associates

Jennifer Gillen, PG
Principal-in-Charge