



January 28, 2025

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

Re: Final Cover Management &
Well Decommissioning Work Plan
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 Final Cover Management and Well Decommissioning Work Plan (Work Plan) dated January 8, 2025 for the Former Monoco Oil Site (Site) located at 75 Monroe Avenue, Pittsford, Monroe County. Based on the information presented in the Work Plan, the Work Plan is conditionally approved with the following comments and concerns.

1. The Department understands that any soil material imported to the Site will be sampled as per DER-10 Table 5.4(e)10 for the full suite of analytical parameters including PFAS and 1,4-dioxane. A request to import form with all supporting documentation will be submitted to the Department project manager for review and approval as per the Site's SMP.
2. The sampling frequency for the existing Site cover material for reuse as cover at the Site will be 2 composites samples per 1,000 cubic yards.
3. The Department understands that evidence of impairment is based on odor, PID reading above 5 ppm, or visual (e.g., staining).
4. The Department understands that the existing cover system soils will be sampled at a frequency of 2 composites per 1,000 cubic yards. With respect to the sampling of the stockpiled soil cover material after final placement, if the material exceeds the PFAS and/or 1,4-dioxane SCOs all the material sampled to make the composite sample(s) will need to be over excavated to ensure complete removal of the impacted soil cover material, containerized, characterized, and disposed off-site at a permitted landfill facility in accordance with all applicable local, State, and Federal regulations. The trucks transporting the material will be in compliance with the Site's SMP and associated conditions of the change of use approvals. The PE of record or a direct report to the PE of record will need to be on-site to oversee the excavation activities, implement the CAMP and/or Special CAMP for the movement of all soil material (e.g. excavation, load-out), document the removal depths and areal extent, and placement of soil cover material that meets the Site's SCOs for all constituents – sampled existing Site soil cover material or imported soil cover material. For this reason, we strongly advise that the stockpiled soil be sampled prior to final placement.

5. The Department understands that the cover system restoration will also be in accordance with the change of use conditional approvals.
6. The Department is granting the request for monitoring wells IRM-MW-01 to IRM-MW-07 to be decommissioned. The Department is also requesting that upon completion of the Site's development an evaluation is conducted to determine if any monitoring wells should be re-installed due to subsurface conditions/impairment encountered during development.

Please place a copy of the January 8, 2025 Work Plan 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 or 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,

A handwritten signature in cursive script that reads "Charlotte B. Theobald".

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 8, 2024

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

Re: Final Cover Management and Well Decommissioning Work Plan
NYSDEC BCP Site #C828137
75 Monroe Avenue, Pittsford, NY
LaBella Project No. 2232102

Dear Ms. Theobald:

LaBella Associates, D.P.C. (LaBella) is pleased to submit this Final Cover Management and Well Decommissioning Work Plan for the Former Monoco Oil property located at 75 Monroe Avenue, Town of Pittsford, Monroe County, New York, herein after referred to as the "Site". The Site is enrolled in the New York State Department of Environmental Conservation's (NYSDEC's) Brownfield Cleanup Program (BCP), (NYSDEC Site Code #C828137).

INTRODUCTION

The Site is comprised of an approximately 7.386 acre tax parcel which is currently vacant. Remediation at the Site was conducted through the Brownfield Cleanup Program and included excavation of impacted soils, backfill with clean fill, and installation of a product monitoring trench and site cover system. Although source areas were removed, there is a potential for localized, residual contamination to be encountered at the Site during earthwork.

The Site is planned for development with seven (7) apartment buildings, a clubhouse/restaurant and several garage/storage buildings. The first phase of this development project is slated to commence in early 2025 and will consist of the construction of three (3) of the apartment buildings.

Based on the anticipated construction, the NYSDEC has requested this work plan to detail the management of the cover system based on changes to NYSDEC technical guidance since the Certificate of Completion (COC) was issued on December 6, 2016. There is currently a cover system at the Site consisting of 2-ft of clean soil; however, at the time of COC, analysis for emerging contaminants (i.e., PFAS and 1,4-dioxane) was not required. Although historical operations at the Site (i.e., petroleum distribution) are not a typical source of PFAS or 1,4-dioxane releases, technical guidance documents issued by the NYSDEC since the COC would require sampling for these compounds. As such, the NYSDEC has requested sampling of the final cover system for emerging contaminants.

In addition to management of the final cover system, the work plan outlines the decommissioning of the product monitoring trench, which was approved by the NYSDEC in the Site Management Periodic Review Report Response letter dated May 10, 2024. Additionally, some remaining monitoring wells are also proposed for decommissioning in this work plan.



This work plan is intended to supplement and not replace the Site Management Plan (SMP) and associated documents such as the Excavation Work Plan and Community Air Monitoring Plan.

FINAL COVER MANAGEMENT WORK PLAN

The existing cover system consists of a minimum of 2-ft clean soil cover encompassing the entirety of the Site (see Figure 1 attached). The cover system construction varied by area, as shown in the SMP and FER. Some portions of the cover consist of areas where IRM excavations occurred, and clean material was backfilled for at least the top 2-ft. In other areas, samples were collected and analytical results indicated that the top 2-ft of material could remain in place as it met the criteria to be used as cover material. Lastly, in areas in which concentrations did not meet comparison criteria, clean soil meeting import criteria was brought to the Site and a 2-ft layer was placed on top of a demarcation layer consisting of orange snow fencing.

Existing Cover Material Excavation and Staging on Site

During construction, existing cover material that is planned for reuse will be excavated and staged per the Excavation Work Plan. Existing cover material that is excavated will be staged directly on soil of an area of the site where other existing cover material remains in place, or it will be staged on poly if existing cover material in the planned staging area has already been removed. Cover material in areas where demarcation layers are present will be excavated down to the top of the demarcation layer and staged for later use. Existing cover material in areas where demarcation does not exist due to material being left in place based on it meeting testing criteria will be excavated down to 2-ft bgs or shallower to prevent mixing or comingling with material below the 2-ft cover.

LaBella shall provide oversight of the existing cover material excavation and staging activities as well as provide guidance to the contractors on cover material depths and locations. LaBella will screen material for VOCs using a photoionization detector (PID) as well as for a visual and/or olfactory indications of impacts. If materials exhibit any evidence of impacts, they will be staged and handled separately per the excavation work plan.

Existing Cover Material Reuse on Site

While much of the final cover system will consist of impervious surfaces (e.g., concrete building slabs, asphalt parking surfaces), redevelopment plans call for portions of the Site to be left as green space. Per the SMP, any green space will have at least 2-ft of approved cover material. Whether this material consist of existing cover material which will be reused on-site or imported material, the cover material will be sampled for 1,4-dioxane via USEPA 8270 SIM and for PFAS via USEPA Method 1633. Note that re-used cover material will not be sampled for other parameters in DER-10 5.4 as that testing was completed as part of the original cover system approval and construction. However, any material imported to the Site will be subject to full DER 5.4 testing in addition to emerging contaminant testing. Note that if the existing cover material is planned for use below other Site cover material, it will be handled per the Excavation Work Plan and NYSDEC approval letters.

The soil will be sampled at a frequency of 1 composite sample of PFAS and 1,4-dioxane for every 1000 cubic yards of material to be reused as cover. Upon receipt of analytical results for the staged existing cover material, the 1,4-dioxane results will be compared to the NYCRR Part 375-6.8 Soil Cleanup Objections (SCOs) for Restricted Residential Use and PFAS results will be compared to the April 2023 Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS) soil guidance values (SGVs) for anticipated Site use for Restricted Residential. The results will be provided to the NYSDEC project manager for approval of the material as Site cover. Note that re-used cover material may be placed in its intended final location prior to sampling for emerging



contaminants. However, the cover system will not be considered complete until testing is completed and the NYSDEC has approved the material for cover.

Staged existing cover material that does not meet the SCOs or SGVs or does not meet the approval of the NYSDEC to be used as Site cover material will be reused below Site cover assuming that it does not exhibit any evidence of impairment, or it will be characterized and transported off-site for disposal at a NYSDEC Part 360 Landfill.

Existing Cover Material Remaining in Place

Some existing cover material is anticipated to remain in place rather than be excavated. Existing soil cover that remains will not be analytically tested in areas where a new cover system (i.e., impervious surface such as asphalt or concrete or an additional 2-ft of clean soil approved by the NYSDEC) will be placed over the existing material.

For existing cover material that is intended to be left in place, material sampling, comparison to SGVs and the requirements for NYSDEC approval will be the same as those outlined in the previous Section (“Existing Cover Material Reuse on Site”).

Excess Existing Cover Material

Excess existing cover material that will not be able to be used as Site cover or beneath cover at the Site will be staged for characterization and off-site disposal at a NYSDEC Part 360 landfill unless an off-site beneficial use can be determined.

Cover System Restoration

As part of the redevelopment work, the cover system will be restored in accordance with the Excavation Work Plan. Prior to placement of any new soil cover material, a demarcation layer will be placed (note that a demarcation layer will not be placed under impervious surface cover materials, only soil).

Community Air Monitoring

The Site Community Air Monitoring Plan (CAMP) in the SMP will be implemented during all ground intrusive work at the Site, which includes disturbing the existing Site cover material.

Wind and Erosion Control

Control of erosion and dust will be achieved by adequately covering staged soil piles using poly sheeting as well as using water on haul roads and utilizing gravel on roadways to provide a stable, clean and dust-free road surface.

WELL DECOMMISSIONING WORK PLAN

In anticipation of the upcoming Site development project and in response to NYSDEC approval, the vertical monitoring points for the product monitoring trench will be decommissioned. The product monitoring trench was installed in 2013 as part of Interim Remedial Measure (IRM) activities. Specifically, during the Large IRM Excavation, non-aqueous phase liquid (NAPL) was observed along the southern property boundary. However, complete excavation of this area was not possible due to the presence of the railroad tracks on the southern adjacent property. To prevent migration of any



remaining NAPL at the southern adjacent property onto the remediated areas of the Site, the product monitoring trench was installed.

The trench is approximately 20-ft below ground surface and consists of pea stone approximately 360-ft in length. The pea stone layer is 2-ft in width and 2-ft in height at an elevation of 463 to 465-ft above mean sea level. A four-inch slotted PVC pipe extends horizontally throughout the entirety of the trench. There are three nested pairs of risers associated with the trench and each pair includes one 4-inch solid PVC pipe with is directly connected to the horizontal slotted PVC pipe in the trench as well as one corrugated slotted riser that extends to the bottom of the pea stone trench.

The product monitoring trench riser information is provided in the table below:

Well ID		Diameter/Material	Stick-up Height (feet)	Total Depth of Well (feet bgs)
Pair 1	PVC 1	4" Solid PVC	4.0	17.60
	Corrugated 1	4" Slotted Corrugated	3.88	20.27
Pair 2	PVC 2	4" Solid PVC	4.90	17.71
	Corrugated 2	4" Slotted Corrugated	2.93	16.60
Pair 3	PVC 3	4" Solid PVC	6.85	19.83
	Corrugated 3	4" Slotted Corrugated	7.0	20.15

Monitoring of the trench for NAPL was conducted during ten (10) separate events between 2017 and 2024; NAPL or other indications of impairment were not identified in the trench during any of those events and the NYSDEC approved the elimination of the trench in 2024.

In addition to the product monitoring trench risers, several monitoring wells remain at the Site which are unused and should be decommissioned. The wells included IRM-MW-01 through IRM-MW-07 (i.e., seven monitoring wells) all located along the northern boundary of the Site.

Well ID	Diameter/Material	Screen Length (feet)	Well Depth (feet bgs)
IRM-MW-01	2" PVC	10	16
IRM-MW-02	2" PVC	10	24
IRM-MW-03	2" PVC	10	24
IRM-MW-04	2" PVC	10	24
IRM-MW-05	2" PVC	10	20
IRM-MW-06	2" PVC	10	22
IRM-MW-07	2" PVC	15	31

The vertical trench monitoring point risers and the monitoring wells will be decommissioned in general accordance with NYSDEC Commissioner Policy 43 (CP-43) by grouting them in-place. Grout will be mixed per the CP-43 guidance and will be placed in the wells or points from the bottom up using a tremie pipe. Upon grouting, the locations will be observed for any potential settling of grout within the risers. The monitoring points and wells will be cut approximately 2-ft below existing grade to not disturb soils beneath the site cover. Any groundwater displaced during placement of the grout will be containerized. Decommissioning locations are shown on Figure 2.

Decommissioning activities will be documented and completed in accordance with NYSDEC CP-43, including the completion of well decommissioning logs. Decommissioning logs and all other supporting documentation will be provided in the Site's subsequent Periodic Review Report or Construction Completion Report whichever occurs first.



It is not anticipated that CAMP monitoring will be needed during the decommissioning process; however, if soils are anticipated to be disturbed or other Site activities are occurring at the Site that disturb soil, then CAMP monitoring will be implemented.

CERTIFICATION

I Daniel Noll certify that I am currently a NYS registered professional engineer or Qualified Environmental Professional as defined in 6 NYCRR Part 375 and that this Work Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

Signature

1/8/2025

Date



081996

PE #

SIGNATURES

If you have any questions about the work plan please do not hesitate to contact me at 585-770-2552.

Respectfully submitted,

LaBella Associates

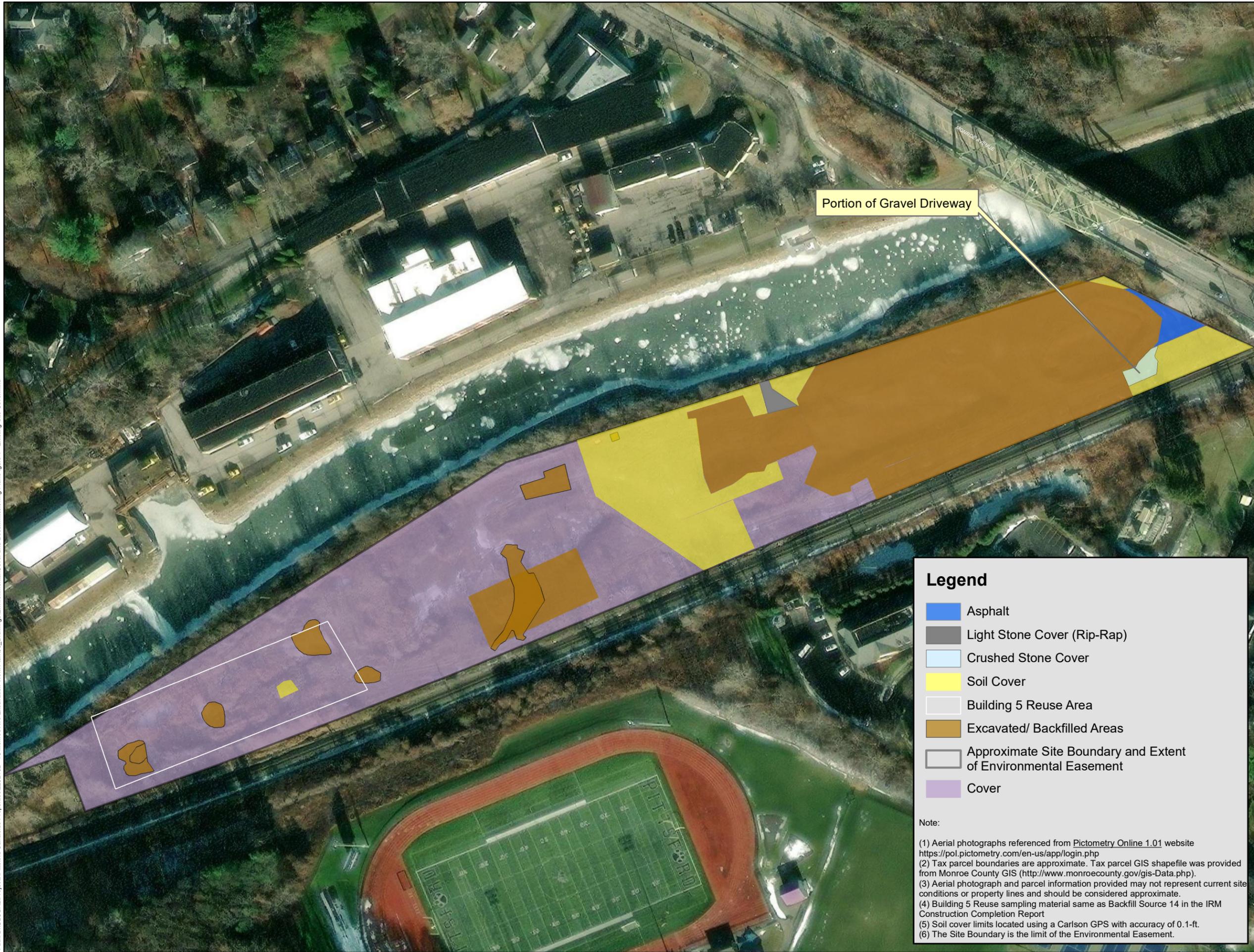
Alex Brett
Environmental Engineer

B:\GLOBAL\Projects\Pittsford Canalside Properties\2232102 - 75 Monroe Ave Excavation Work Plan\11_Reports\Cover and Decommissioning WP\LTR.2024-12-20_2232102_Cover and Decommissioning WP.docx



FIGURE

Path: B:\GLOBAL\Projects\Pittsford Canalside Properties\2232102 - 75 Monroe Ave Excavation Work Plan\06 Drawings\Environmental\Cover and Decommissioning Plan\Figure 1 - Existing Site Cover.mxd



Portion of Gravel Driveway

Legend

- Asphalt
- Light Stone Cover (Rip-Rap)
- Crushed Stone Cover
- Soil Cover
- Building 5 Reuse Area
- Excavated/ Backfilled Areas
- Approximate Site Boundary and Extent of Environmental Easement
- Cover

Note:

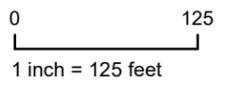
- (1) Aerial photographs referenced from Pictometry Online 1.01 website <https://pol.pictometry.com/en-us/app/login.php>
- (2) Tax parcel boundaries are approximate. Tax parcel GIS shapefile was provided from Monroe County GIS (<http://www.monroecounty.gov/gis-Data.php>).
- (3) Aerial photograph and parcel information provided may not represent current site conditions or property lines and should be considered approximate.
- (4) Building 5 Reuse sampling material same as Backfill Source 14 in the IRM Construction Completion Report
- (5) Soil cover limits located using a Carlson GPS with accuracy of 0.1-ft.
- (6) The Site Boundary is the limit of the Environmental Easement.



Final Cover Management and Well Decommissioning Work Plan

Former Monoco Oil BCP Site #C828137

75 Monroe Avenue
Pittsford, New York



Existing Site Cover

Date: 1/7/2025
Drawn By: ABRETT

[2232102]

[FIGURE 1]

**Final Cover Management and
Well Decommissioning Work
Plan**

Former Monoco Oil
BCP Site #C828137

75 Monroe Avenue
Pittsford, New York



0 130
1 inch = 130 feet

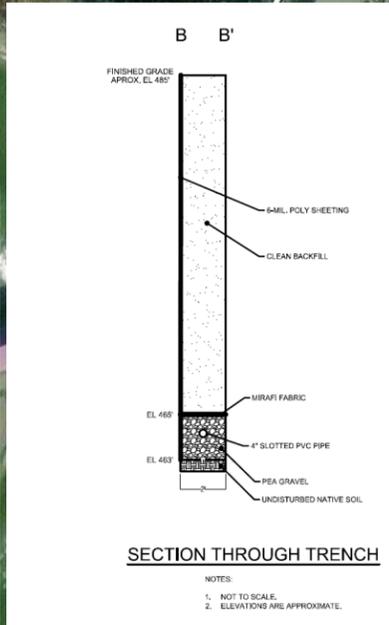
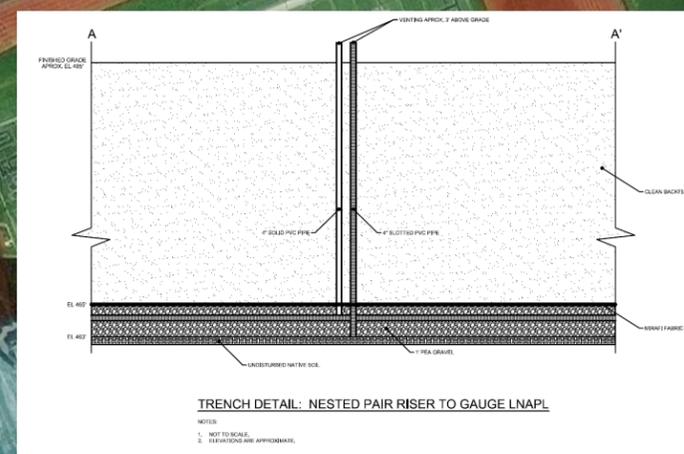
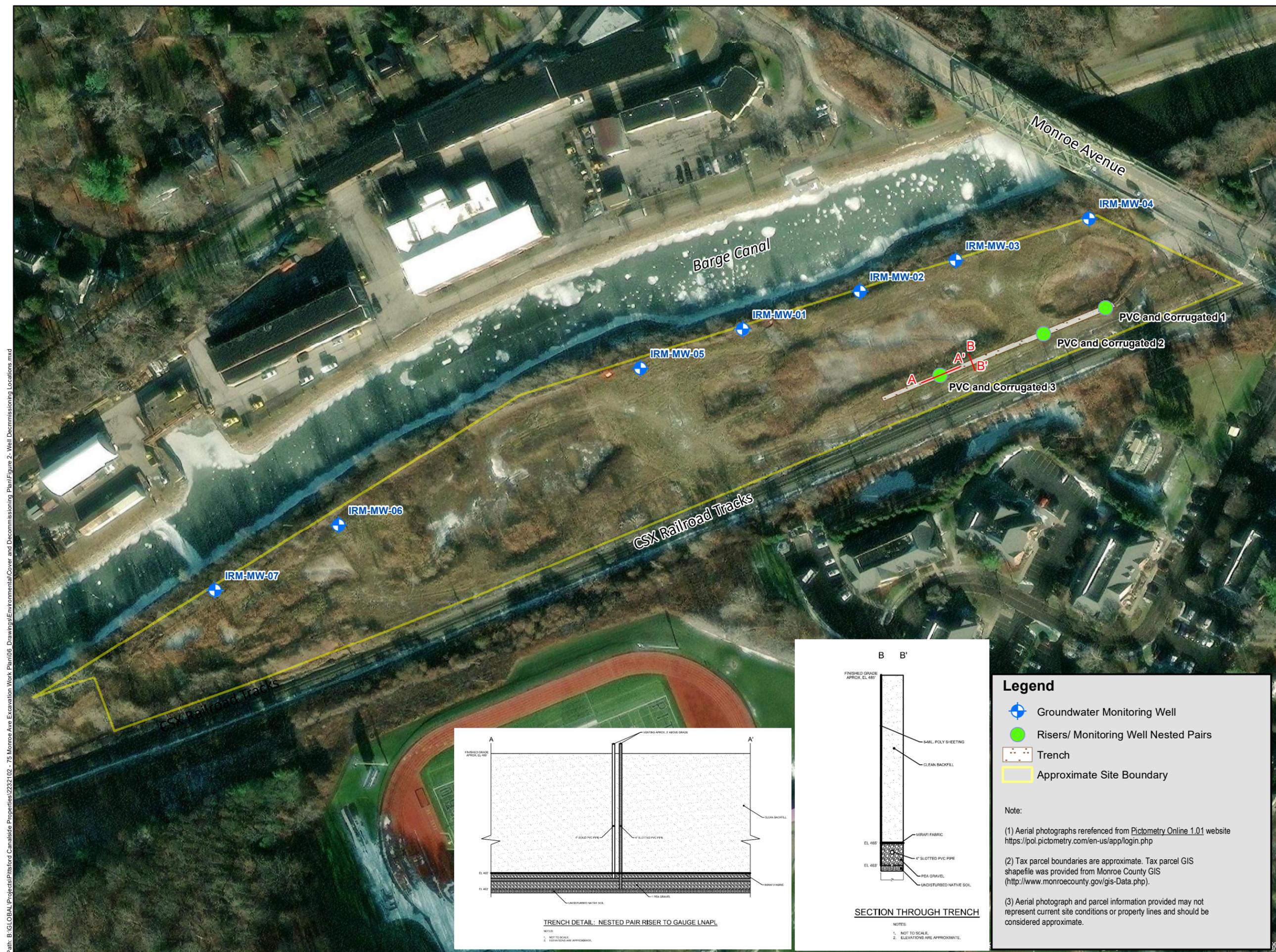
**Well Decommissioning
Locations**

Date: 1/7/2025

Drawn By: ABRETT

[2232102]

[FIGURE 2]



Legend

- Groundwater Monitoring Well
- Risers/ Monitoring Well Nested Pairs
- Trench
- Approximate Site Boundary

Note:

(1) Aerial photographs referenced from [Pictometry Online 1.01](https://pol.pictometry.com/en-us/app/login.php) 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.

Path: B:\GLOBAL\Projects\Pittsford Canal Side Properties\2232102 - 75 Monroe Ave Excavation Work Plan\06 Drawings\Environmental\Cover and Decommissioning Plan\Figure 2 - Well Decommissioning Locations.mxd