DECISION DOCUMENT

3750 Monroe Avenue Associates
Brownfield Cleanup Program
Rochester, Monroe County
Site No. C828187
September 2022

Prepared by
Division of Environmental Remediation
New York State Department of Environmental Conservation

DECLARATION STATEMENT - DECISION DOCUMENT

3750 Monroe Avenue Associates
Brownfield Cleanup Program
Rochester, Monroe County
Site No. C828187
September 2022

Statement of Purpose and Basis

This document presents the remedy for the 3750 Monroe Avenue Associates site a brownfield cleanup site. The remedial program was chosen in accordance with the New York State Environmental Conservation Law and Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (6 NYCRR) Part 375.

This decision is based on the Administrative Record of the New York State Department of Environmental Conservation (the Department) for the 3750 Monroe Avenue Associates site and the public's input to the proposed remedy presented by the Department.

Description of Selected Remedy

The elements of the selected remedy are as follows:

1. Remedial Design
A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follows:

- Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;
- Reducing direct and indirect greenhouse gases and other emissions;
- Increasing energy efficiency and minimizing the use of non-renewable energy;
- Conserving and efficiently managing resources and materials;
- Reducing waste, increasing recycling, and increasing reuse of materials which would otherwise be considered a waste;
- Maximizing habitat value and creating habitat when possible;
- Fostering green and healthy communities and working landscapes which balance ecological, economic, and social goals;
- Integrating the remedy with the end use where possible and encouraging green and sustainable re-development; and,
- Additionally, to incorporate green remediation principles and techniques to the extent feasible in the future development at the site, any future on-site buildings will include, at a minimum, a 20-mil vapor barrier/waterproofing membrane on the foundation to improve energy

efficiency as an element of construction.

2. Excavation
All exposed soils (soils not covered by pavement, concrete, paved surface parking areas, sidewalks, building foundations and building slabs.) in the upper foot which exceed the commercial Soil Cleanup Objectives (SCOs) will be excavated and transported off-site for disposal. Approximately 392 cubic yards of semi-volatile organic compound (SVOC) contaminated soil will be removed from the lawn area on the west side of the building and along the northern site boundary adjacent to the creek.

3. Backfill
Clean fill meeting the requirements of 6 NYCRR Part 375-6.7(d) will be brought in to replace the excavated soil and establish the designed grades at the site.

4. Cover System
A site cover will be required to allow for commercial use of the site in areas where the upper one foot of exposed surface soil will exceed the applicable soil cleanup objectives (SCOs). Where a soil cover is to be used it will be a minimum of one foot of soil placed over a demarcation layer, with the upper six inches of soil of sufficient quality to maintain a vegetative layer. Soil cover material, including any fill material brought to the site, will meet the SCOs for cover material for the use of the site as set forth in 6 NYCRR Part 375-6.7(d). Substitution of other materials and components may be allowed where such components already exist or are a component of the tangible property to be placed as part of site redevelopment. Such components may include, but are not necessarily limited to: pavement, concrete, paved surface parking areas, sidewalks, building foundations and building slabs.

5. In-Situ Chemical Reduction
In-situ chemical reduction (ISCR) will be implemented to treat chlorinated volatile organic compounds in groundwater. A chemical reducing agent will be injected into the subsurface to destroy the contaminants in an approximately 8,500 square foot area located in the parking lot on the western portion of the site as a barrier to control contaminant migration from sources under the building. The chemical reducing reagent will be delivered via direct-push methods from 5 to 25 feet below existing ground surface. Further description of the method and depth of injections will be determined during the remedial design. Monitoring will be conducted for contaminants of concern upgradient and downgradient of the barrier. The treatment zone will be monitored for dissolved oxygen and oxidation/reduction potential.

6. Vapor Migration
The on-site building contains a sub-slab depressurization system (SSDS) previously installed as an interim remedial measure (IRM) to mitigate vapors from entering the building from soil and groundwater. The SSDS will continue to operate.
Any building redevelopment or new construction on the site will be required to have a SSDS or other acceptable measures to mitigate the migration of vapors into the building from soil and/or groundwater.

7. Institutional Controls

Imposition of an institutional control in the form of an environmental easement for the controlled property which will:

- Require the remedial party or site owner to complete and submit to the NYSDEC a periodic certification of institutional and engineering controls in accordance with Part 375-1.8(h)(3);
- Allow the use and development of the controlled property for commercial use or industrial use as defined by Part 375-1.8(g), although land use is subject to local zoning laws;
- Restrict the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the New York State Department of Health (NYSDOH) or Monroe County DOH; and,
- Require compliance with the NYSDEC-approved Site Management Plan.

8. Financial Assurance

3750 Monroe Avenue Associates LLC shall post financial assurance pursuant to the requirements of 6 NYCRR 373-2.6(l) using one or more of the financial instruments in 6 NYCRR 373-2.8 in the amount of the cost projection for completing the remedy. Financial assurance must include all remedial activities for the site that have not been implemented, including addressing sources under the building if the building is demolished or becomes accessible in the future. The financial assurance will be subject to adjustment for inflation as provided for in 6 NYCRR Part 373-2.8(f).

9. Site Management Plan

A Site Management Plan is required, which includes the following:

a. An Institutional and Engineering Control Plan that identifies all use restrictions and engineering controls for the site and details the steps and media-specific requirements necessary to ensure the following institutional and/or engineering controls remain in place and effective:

Institutional Controls: The Environmental Easement discussed in Section 7 above.
Engineering Controls: The soil cover discussed in item 4 above, the ISCR barrier discussed in item 5, and the sub-slab depressurization system Interim Remedial Measure discussed in item 6.

This plan includes, but may not be limited to:

- an Excavation Plan which details the provisions for management of future excavations in areas of remaining contamination;
- a provision should redevelopment occur to ensure no soil exceeding protection of groundwater concentrations will remain below storm water retention basin or infiltration structures;
- a provision for removal or treatment of the source areas located under and adjacent to the building if and when the building is demolished or becomes vacant;
- descriptions of the provisions of the environmental easement including any land use, and/or groundwater use restrictions;
- a provision that should a building foundation or building slab be removed in the future, a cover system consistent with that described in Section 3 will be placed in any areas where the upper one foot of exposed surface soil exceed the applicable SCOs;

- provisions for the management and inspection of the identified engineering controls;
- maintaining site access controls and Department notification; and,
- the steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.

b. A Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:
- monitoring of groundwater, surface water, soil vapor, and indoor air to assess the performance and effectiveness of the remedy;
- a schedule of monitoring and frequency of submittals to the Department; and,

c. An Operation and Maintenance (O&M) Plan to ensure continued operation, maintenance, inspection, and reporting of any mechanical or physical components of the active vapor mitigation systems. The plan includes, but is not limited to:
- procedures for operating and maintaining the systems; and,
- compliance inspection of the systems to ensure proper O&M as well as providing the data for any necessary reporting.

Declaration

The remedy conforms with promulgated standards and criteria that are directly applicable, or that are relevant and appropriate and takes into consideration Department guidance, as appropriate. The remedy is protective of public health and the environment.

9/22/22 Michael Cruden

Date

Michael Cruden, Director
Remedial Bureau E

DECISION DOCUMENT

3750 Monroe Avenue Associates
Rochester, Monroe County
Site No. C828187
September 2022

SECTION 1: SUMMARY AND PURPOSE

The New York State Department of Environmental Conservation (the Department), in consultation with the New York State Department of Health (NYSDOH), has selected a remedy for the above referenced site. The disposal of contaminants at the site has resulted in threats to public health and the environment that would be addressed by the remedy. The disposal or release of contaminants at this site, as more fully described in this document, has contaminated various environmental media. Contaminants include hazardous waste and/or petroleum.

The New York State Brownfield Cleanup Program (BCP) is a voluntary program. The goal of the BCP is to enhance private-sector cleanups of brownfields and to reduce development pressure on "greenfields." A brownfield site is real property, where a contaminant is present at levels exceeding the soil cleanup objectives or other health-based or environmental standards, criteria or guidance, based on the reasonably anticipated use of the property.

The Department has issued this document in accordance with the requirements of New York State Environmental Conservation Law and 6 NYCRR Part 375. This document is a summary of the information that can be found in the site-related reports and documents.

SECTION 2: CITIZEN PARTICIPATION

The Department seeks input from the community on all remedies. A public comment period was held, during which the public was encouraged to submit comment on the proposed remedy. All comments on the remedy received during the comment period were considered by the Department in selecting a remedy for the site. Site-related reports and documents were made available for review by the public at the following document repositories:

DECInfo Locator - Web Application
https://gisservices.dec.ny.gov/gis/dil/index.html?rs=C828187

Pittsford Community Library
24 State Street
Pittsford, NY 14534
Phone: 585-248-6275

Pittsford Town Court

3750 Monroe Avenue
Pittsford, NY 14534
Phone: 585-248-6238

Receive Site Citizen Participation Information By Email

Please note that the Department's Division of Environmental Remediation (DER) is "going paperless" relative to citizen participation information. The ultimate goal is to distribute citizen participation information about contaminated sites electronically by way of county email listservs. Information will be distributed for all sites that are being investigated and cleaned up in a particular county under the State Superfund Program, Environmental Restoration Program, Brownfield Cleanup Program and Resource Conservation and Recovery Act Program. We encourage the public to sign up for one or more county listservs at http://www.dec.ny.gov/chemical/61092.html

SECTION 3: SITE DESCRIPTION AND HISTORY

Location: The 3750 Monroe Avenue Associates site is located at 3750 Monroe Avenue in a suburban area. The BCP site is a 9.37-acre area within a larger 42-acre tax parcel (Site Tax Parcel).

Site Features: The site is developed with two masonry, slab-on-grade, commercial buildings that comprise approximately 6.38-acres of the BCP site. The remainder of the BCP site is utilized as a parking lot on the west side of the building, and an unnamed tributary of Allen Creek that runs from east to west and forms part of the northern boundary of the BCP site. The remainder of the Site Tax Parcel includes additional parking areas and a large undeveloped area in the northern part of the property.

Current Zoning and Land Use: The on-site buildings are subdivided and leased to tenants for commercial and industrial use. The Site Tax Parcel is bounded by Monroe Avenue to the southwest, a Rochester Gas and Electric (RG&E) transmission line to the northeast, vacant property and a developed commercial property southeast, and several residential properties with apartment complexes to the northwest.

Past Use of the Site: Prior to 1956 the site was used for agricultural purposes. The building was primarily used for plating and printing operations from 1956 to at least 1979 and has since been used for various industrial and commercial purposes including printing. Some of these operations included degreasing processes that used chlorinated solvents.

Historical records indicate the former presence of a cyanide wastewater treatment process, degreasing operations that used chlorinated solvents, metal plating, a 2,000-gallon gasoline underground storage tank, transformers, and hazardous waste storage areas.

In 1980, the facility submitted a RCRA Part A permit application and obtained interim status for a drum storage area and a landfill; however, a landfill never operated. Based on this, the property is subject to EPA's RCRA Corrective Action program.

The current owner acquired the property in 1985. An environmental assessment completed in 2012 by the current owner identified some potential environmental concerns based on the property's manufacturing history. A follow-up investigation completed by the owner in 2012 did not find an underground tank but did detect elevated levels of chlorinated solvents in the soil and groundwater. Based on this information, the owner notified the State and submitted an application to enter into the Brownfield Cleanup Program.

Site Geology and Hydrogeology: The nearest surface water body is an unnamed tributary of Allen Creek, which is located along the BCP site's northern boundary and runs across the middle of the Site Tax Parcel from east to west. Groundwater flow at the BCP site is generally to be to the northwest, towards this drainage feature. Depth to water is approximately 4 feet below ground surface.

Soils at the BCP site consist mainly of Schoharie silt loam (approximately 90%) and Canandaigua Silt Loam (approximately 10%). The Schoharie series consists of very deep, moderately well drained soils formed from clayey sediments. Saturated hydraulic conductivity is moderately high or high in the mineral surface and subsurface and low to moderately high in the subsoil and substratum. The Canandaigua series consists of very deep, poorly and very poorly drained soils formed in silty sediments.

A site location map is attached as Figure 1.

SECTION 4: LAND USE AND PHYSICAL SETTING

The Department may consider the current, intended, and reasonably anticipated future land use of the site and its surroundings when evaluating a remedy for soil remediation. For this site, alternatives that restrict the use of the site to commercial use (which allows for industrial use) as described in Part 375-1.8(g) were evaluated in addition to an alternative which would allow for unrestricted use of the site.

A comparison of the results of the Remedial Investigation (RI) to the appropriate standards, criteria and guidance values (SCGs) for the identified land use and the unrestricted use SCGs for the site contaminants is available in the RI Report.

SECTION 5: ENFORCEMENT STATUS

The Applicant under the Brownfield Cleanup Agreement is a Participant. The Applicant has an obligation to address on-site and off-site contamination. Accordingly, no enforcement actions are necessary.

SECTION 6: SITE CONTAMINATION

6.1: Summary of the Remedial Investigation

A remedial investigation (RI) serves as the mechanism for collecting data to:

- characterize site conditions;
- determine the nature of the contamination; and
- assess risk to human health and the environment.

The RI is intended to identify the nature (or type) of contamination which may be present at a site and the extent of that contamination in the environment on the site, or leaving the site. The RI reports on data gathered to determine if the soil, groundwater, soil vapor, indoor air, surface water or sediments may have been contaminated. Monitoring wells are installed to assess groundwater and soil borings or test pits are installed to sample soil and/or waste(s) identified. If other natural resources are present, such as surface water bodies or wetlands, the water and sediment may be sampled as well. Based on the presence of contaminants in soil and groundwater, soil vapor will also be sampled for the presence of contamination. Data collected in the RI influence the development of remedial alternatives. The RI report is available for review in the site document repository and the results are summarized in section 6.3.

The analytical data collected on this site includes data for:

- groundwater
- surface water
- soil
- sediment
- soil vapor
- indoor air
- sub-slab vapor

6.1.1: Standards, Criteria, and Guidance (SCGs)

The remedy must conform to promulgated standards and criteria that are directly applicable or that are relevant and appropriate. The selection of a remedy must also take into consideration guidance, as appropriate. Standards, Criteria and Guidance are hereafter called SCGs.

To determine whether the contaminants identified in various media are present at levels of concern, the data from the RI were compared to media-specific SCGs. The Department has developed SCGs for groundwater, surface water, sediments, and soil. The NYSDOH has developed SCGs for drinking water and soil vapor intrusion. For a full listing of all SCGs see: http://www.dec.ny.gov/regulations/61794.html

6.1.2: RI Results

The data have identified contaminants of concern. A "contaminant of concern" is a contaminant that is sufficiently present in frequency and concentration in the environment to require evaluation for remedial action. Not all contaminants identified on the property are contaminants of concern. The nature and extent of contamination and environmental media requiring action are summarized below. Additionally, the RI Report contains a full discussion of the data. The contaminants of concern identified at this site are:

trichloroethene (TCE)
cis-1,2-dichloroethene
1,2-dichloroethane
vinyl chloride

benzo(a)pyrene
benzo(a)anthracene
benzo(b)fluoranthene

The contaminants of concern exceed the applicable SCGs for:

- groundwater
- soil
- soil vapor intrusion

6.2: Interim Remedial Measures

An interim remedial measure (IRM) is conducted at a site when a source of contamination or exposure pathway can be effectively addressed before issuance of the Decision Document.

The following IRM has been completed at this site based on conditions observed during the RI.

Soil Vapor Intrusion Mitigation

A soil vapor intrusion evaluation was completed in July 2014. Trichloroethene (TCE) was detected in the indoor air at concentrations up to 19 micrograms per cubic meter ($\mu g/m^3$), exceeding the 2015 NYSDOH New Ambient Air Guideline for TCE of 2 $\mu g/m^3$ in indoor air. Based on these results, it was determined that mitigation measures were needed in the on-site building to address current and potential indoor air contamination of volatile organic compounds associated with soil vapor intrusion.

The first phase of construction of the IRM was completed in April 2015. The system had to be expanded to meet design specifications and final construction was completed in December 2015. In total, the IRM included construction of a sub-slab depressurization system consisting of 58 extraction points and 4 fans.

Post construction testing verified that the system was effectively depressurizing the slab and indoor air concentrations of TCE were reduced to concentrations below the 2015 New Ambient Air Guideline. Construction details and post construction testing results are provided in the document entitled Construction Completion Report Sub-Slab Depressurization System Installation, dated June 2019.

6.3: Summary of Environmental Assessment

This section summarizes the assessment of existing and potential future environmental impacts presented by the site. Environmental impacts may include existing and potential future exposure pathways to fish and wildlife receptors, wetlands, groundwater resources, and surface water. The RI report presents a detailed discussion of any existing and potential impacts from the site to fish and wildlife receptors.

Nature and Extent of Contamination: Based upon investigations conducted to date, the primary contaminants of concern include trichloroethene (TCE) and associated degradation products.

Surface Soil - SVOCs were detected above the Protection of Public Health SCOs for Commercial Use in soil to the west and north of the site building. VOCs were not detected in surface soils above Unrestricted Use SCOs.

Subsurface Soil - TCE is found in soil at depths of approximately 6 to 12 feet below ground, with the highest concentrations located under the center-west portion of the building. Concentrations of TCE found on site (up to 16 mg/kg) exceed the soil cleanup objective (SCO) for the protection of groundwater (0.47 mg/kg), but do not exceed the Protection of Public Health SCO for Commercial use (200 mg/kg). TCE did not exceed Unrestricted Use SCOs in samples taken on-site near the site boundary. Therefore, data does not indicate any off-site impacts in soil related to this site.

Groundwater - TCE and its associated degradation products are found in groundwater at the BCP site, significantly exceeding groundwater standards (typically 5 µg/L), with a maximum TCE concentration of 130,000 µg/L. The TCE plume in the shallow groundwater zone (to depths of about 16 feet) appears to have migrated from under the on-site building to the BCP site boundary about 340 feet northwest of the building. Based on one deeper well (18 to 23 feet) located approximately mid-plume, the TCE concentrations appear to be decreasing with depth. Four groundwater monitoring wells were installed and sampled offsite to the north/northwest. No exceedances of VOCs were observed in any of the samples off-site, indicating impacts do not appear to be migrating off-site.

Soil Vapor/Indoor Air - TCE was detected in the indoor air samples throughout the building at levels exceeding the 2015 NYSDOH New Ambient Air Guideline for TCE of 2 µg/m^3. A sub-slab depressurization system was installed as an IRM starting in 2014. Post-mitigation indoor air testing results were below the 2015 New Ambient Air Guideline. TCE was not detected in soil vapor samples collected along the northeastern site boundary. Data does not indicate any off-site impacts in soil vapor related to this site.

Surface Water/Sediment - TCE was detected in each of the surface water samples ranging from 1.2 µg/L to 32 µg/L, which are below the surface water quality standards. VOCs in sediment were either nondetect or below NYSDEC Class A Freshwater Sediment Guidance Values. Metals were detected in sediment samples above Class B sediment guidance values; however, these do not appear to be site related. Based on this data, the site does not appear to be a potential impact to fish and wildlife.

6.4: Summary of Human Exposure Pathways

This human exposure assessment identifies ways in which people may be exposed to site-related contaminants. Chemicals can enter the body through three major pathways (breathing, touching or swallowing). This is referred to as *exposure.*

Direct contact with contaminants in the soil is unlikely because the majority of the site is covered with buildings and pavement. People are not coming into contact with the contaminated groundwater because the area is served by a public water supply that is not affected by this contamination. Volatile organic compounds in the groundwater may move into the soil vapor (air spaces within the soil), which in turn may move into overlying buildings and affect the indoor air quality. This process, which is similar to the movement of radon gas from the subsurface into the indoor air of buildings, is referred to as soil vapor intrusion. A sub-slab depressurization system (a system that ventilates/removes the air beneath the building) has been installed in the onsite building to prevent the indoor air quality from being affected by the contamination in soil vapor beneath the building. Environmental sampling indicates soil vapor intrusion is not a concern for off-site structures. People may come in contact with contaminants present in the shallow stream.

6.5: Summary of the Remediation Objectives

The objectives for the remedial program have been established through the remedy selection process stated in 6 NYCRR Part 375. The goal for the remedial program is to restore the site to pre-disposal conditions to the extent feasible. At a minimum, the remedy shall eliminate or mitigate all significant threats to public health and the environment presented by the contamination identified at the site through the proper application of scientific and engineering principles.

The remedial action objectives for this site are:

Groundwater

RAOs for Public Health Protection

- Prevent ingestion of groundwater with contaminant levels exceeding drinking water standards.
- Prevent contact with, or inhalation of volatiles, from contaminated groundwater.

RAOs for Environmental Protection

- Restore ground water aquifer to pre-disposal/pre-release conditions, to the extent practicable.
- Prevent the discharge of contaminants to surface water.
- Remove the source of ground or surface water contamination.

Soil

RAOs for Public Health Protection

- Prevent ingestion/direct contact with contaminated soil.
- Prevent inhalation of or exposure from contaminants volatilizing from contaminants in soil.

RAOs for Environmental Protection

- Prevent migration of contaminants that would result in groundwater or surface water contamination.
- Prevent impacts to biota from ingestion/direct contact with soil causing toxicity or impacts from bioaccumulation through the terrestrial food chain.

Surface Water

RAOs for Public Health Protection

- Prevent surface water contamination which may result in fish advisories.

RAOs for Environmental Protection

- Prevent impacts to biota from ingestion/direct contact with surface water causing toxicity and impacts from bioaccumulation through the marine or aquatic food chain.

Sediment

RAOs for Public Health Protection

- Prevent surface water contamination which may result in fish advisories.

RAOs for Environmental Protection

- Prevent impacts to biota from ingestion/direct contact with sediments causing toxicity or impacts from bioaccumulation through the marine or aquatic food chain.

Soil Vapor

RAOs for Public Health Protection

- Mitigate impacts to public health resulting from existing, or the potential for, soil vapor intrusion into buildings at a site.

SECTION 7: ELEMENTS OF THE SELECTED REMEDY

The alternatives developed for the site and the evaluation of the remedial criteria are presented in the Alternative Analysis. The remedy is selected pursuant to the remedy selection criteria set forth in DER-10, Technical Guidance for Site Investigation and Remediation and 6 NYCRR Part 375.

The selected remedy is a Track 4: Restricted use with site-specific soil cleanup objectives remedy.

The selected remedy is referred to as the Permeable Reactive Barrier, limited excavation, and site management remedy.

The elements of the selected remedy, as shown in Figures 3 and 4, are as follows:

1. Remedial Design

A remedial design program will be implemented to provide the details necessary for the construction, operation, optimization, maintenance, and monitoring of the remedial program. Green remediation principles and techniques will be implemented to the extent feasible in the design, implementation, and site management of the remedy as per DER-31. The major green remediation components are as follows:

- Considering the environmental impacts of treatment technologies and remedy stewardship over the long term;
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- Reducing waste, increasing recycling, and increasing reuse of materials which would otherwise be considered a waste;
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- Fostering green and healthy communities and working landscapes which balance ecological, economic, and social goals;
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7. Institutional Controls
Imposition of an institutional control in the form of an environmental easement for the controlled property which will:
- Require the remedial party or site owner to complete and submit to the NYSDEC a periodic certification of institutional and engineering controls in accordance with Part 375-1.8(h)(3);
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- Restrict the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the New York State Department of Health (NYSDOH) or Monroe County DOH; and,
- Require compliance with the NYSDEC-approved Site Management Plan.

8. Financial Assurance
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Institutional Controls: The Environmental Easement discussed in Section 7 above.
Engineering Controls: The soil cover discussed in item 4 above, the ISCR barrier discussed in item 5, and the sub-slab depressurization system Interim Remedial Measure discussed in item 6.

This plan includes, but may not be limited to:

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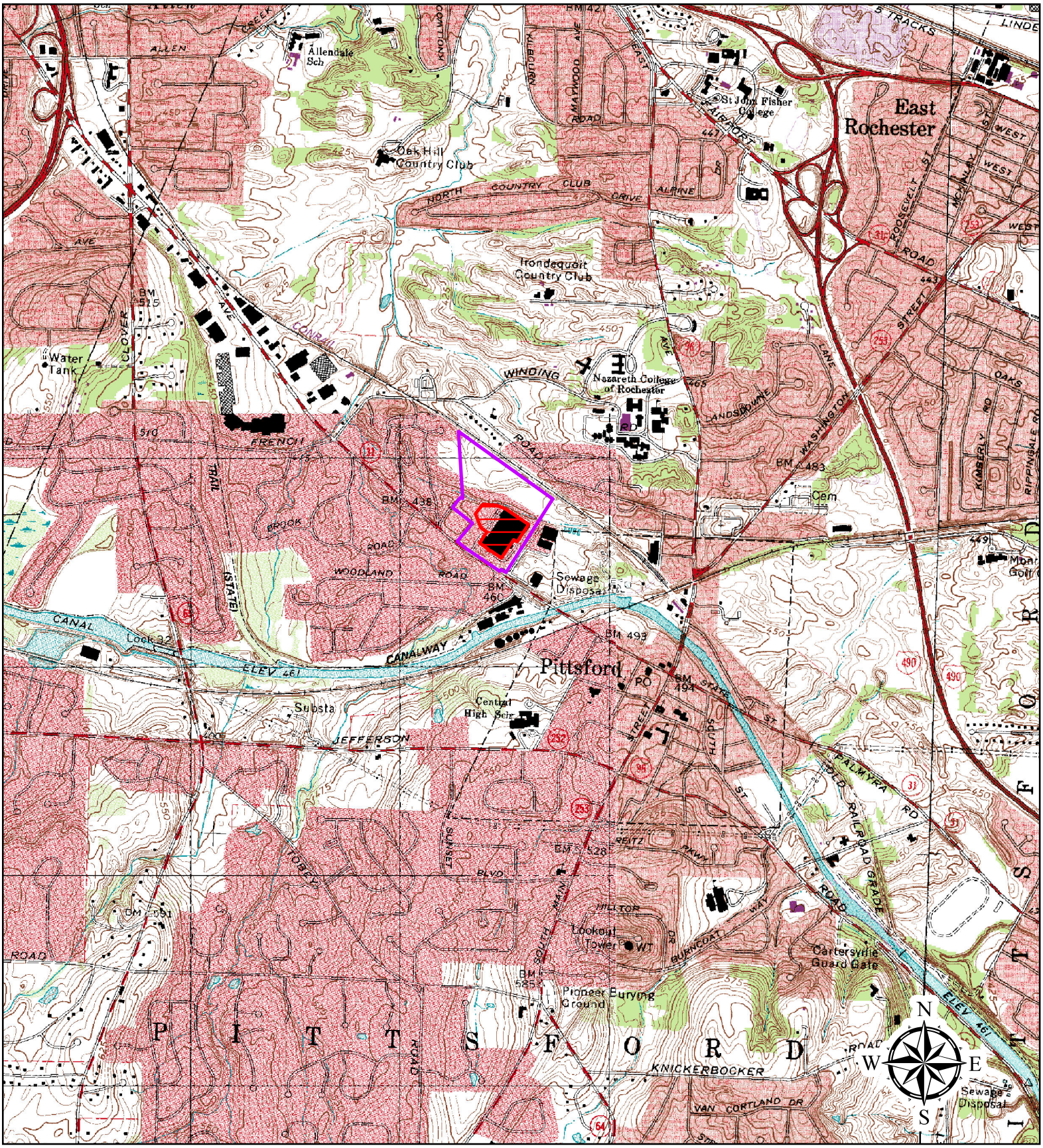
- a provision should redevelopment occur to ensure no soil exceeding protection of groundwater concentrations will remain below storm water retention basin or infiltration structures;
- a provision for removal or treatment of the source areas located under and adjacent to the building if and when the building is demolished or becomes vacant;
- descriptions of the provisions of the environmental easement including any land use, and/or groundwater use restrictions;
- a provision that should a building foundation or building slab be removed in the future, a cover system consistent with that described in Section 3 will be placed in any areas where the upper one foot of exposed surface soil exceed the applicable SCOs;
- provisions for the management and inspection of the identified engineering controls;
- maintaining site access controls and Department notification; and,
- the steps necessary for the periodic reviews and certification of the institutional and/or engineering controls.

b. A Monitoring Plan to assess the performance and effectiveness of the remedy. The plan includes, but may not be limited to:
- monitoring of groundwater, surface water, soil vapor, and indoor air to assess the performance and effectiveness of the remedy;
- a schedule of monitoring and frequency of submittals to the Department; and,

c. An Operation and Maintenance (O&M) Plan to ensure continued operation, maintenance, inspection, and reporting of any mechanical or physical components of the active vapor mitigation systems. The plan includes, but is not limited to:
- procedures for operating and maintaining the systems; and,
- compliance inspection of the systems to ensure proper O&M as well as providing the data for any necessary reporting.



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ROCHESTER, NY 14614
P: (585) 454-6110
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www.labellapc.com

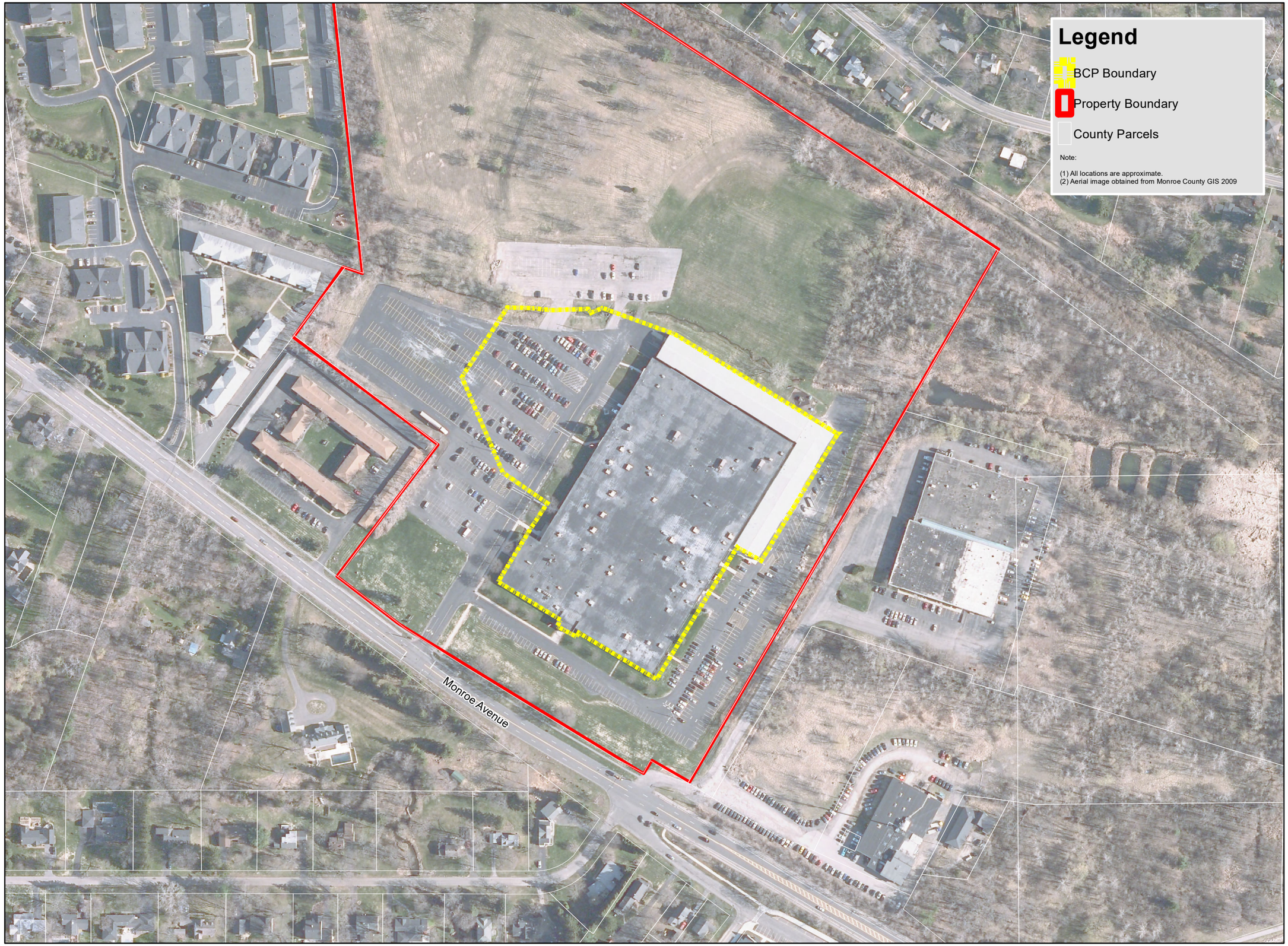
FIGURE 1
SITE LOCATION MAP
Interim Site Management Plan
C828187
3750 Monroe Avenue
Pittsford, New York

Legend

- BCP Boundary
- Site Tax Parcel Boundary

Scale:
1:24,000

Path: J:\Norry Management Corp\213131 - BCP Application 3750 Monroe Ave\Drawings\ISMP\Figure 1 USGS.mxd



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Remedial Alternatives Analysis Report

NYSDEC Site # C828187
3750 Monroe Avenue
Town of Pittsford
Monroe County
New York

3750 Monroe Avenue Associates, LLC

Site Location Map

N
W E
S

0 200

1 inch = 200 feet
Intended to print on 11" x 17".

213131

FIGURE 2

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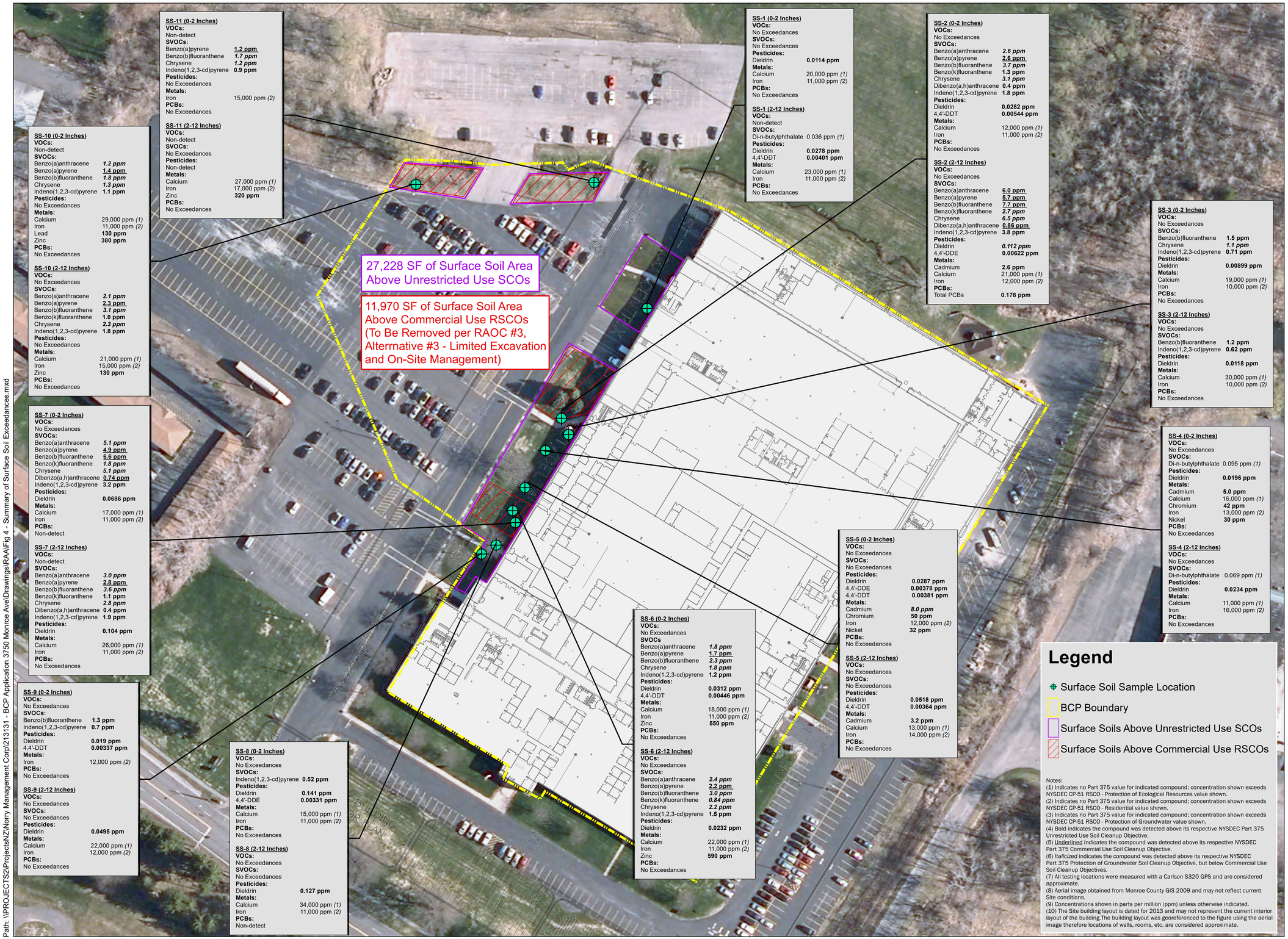

Path: \\PROJECTS2\Projects\NZ\Norry Management Corp\213131 - BCP Application 3750 Monroe Ave\Drawings\RAA\Fig 4 - Summary of Surface Soil Exceedances.mxd

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Remedial Alternatives Analysis Report

NYSDEC Site # C828187
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Town of Pittsford
Monroe County
New York

3750 Monroe Avenue Associates, LLC

Summary of Surface Soil Exceedances

N
W E
S

0 50 100

1 inch = 50 feet

Intended to print on 11" x 17".

213131

FIGURE 3

GPMW-11
GPMW-20
RIMW-13
GPMW-18
GP-10/MW-03
RIMW-4
RIMW-17
RIMW-2
GPMW-21
GPMW-16
GPMW-12
RIMW-10
GPMW-22
RIMW-12
GPMW-17
GPMW-14
RIMW-9
RIMW-20
GPMW-23
RIMW-11
GPMW-24
GPMW-27
RIGP-18
GPMW-15
GPMW-25

Legend

- Interpreted Contour Lines
- RI Overburden Soil Boring / Monitoring Well
- RI Overburden Soil Boring / Monitoring Well (Off-Site)
- LaBella 2013 Soil Boring/ Groundwater Monitoring Well
- LaBella 2015 Soil Boring/ Groundwater Grab Sample
- Proposed Permeable Reactive Barrier (Injection Point)
- Site Building
- BCP Boundary
- Property Boundary

Notes:
(1) Outdoor RI Soil Borings, RI Monitoring Wells, RI Soil Gas Points, RI Sediment Samples,RI Surface Water Samples, and Labella 2013 Monitoring wells were located using an EOS Positioning Systems Arrow Gold GPS. RI Surface Soil Samples were located using a Carlson S320 GPS. Indoor sample locations were measured from SIte features and are considered approximate.
(2) Aerial image obtained from Monroe County GIS 2009 and may not represent current Site features.
(3) The Site building layout was from 2013 and may not represent the current interior layout of the building. The building layout was georeferenced to the figure using the aerial image therefore locations of walls, rooms, etc. are considered approximate.
(4) Contours developed using Surfer version 14.0, natural neighbor method to represent the latest VOC plume based on the latest groundwater data from each well.
(5) Casing elevations and groundwater elevations are displayed in feet.
(6) Wells included in development of the groundwater contours are labeled with casing and top of groundwater elevation.
(7) Interpreted Lines are lines modified or added to the Surfer model.
(8) Although the 2018 GPMW-11 data came back as non-detect, it can be infered the 5-50ppb total VOC contour line follows the path of the stream as there were low concentrations of total VOCs detected in surface water in 2017.

Total VOCs (ppb)

- 40000 - 50000
- 30000 - 40000
- 20000 - 30000
- 10000 - 20000
- 5000 - 10000
- 1000 - 5000
- 500 - 1000
- 100 - 500
- 50 - 100
- 5 - 50

Path: \\PROJECTS2\Projects\NZ\Norry Management Corp\213131 - BCP Application 3750 Monroe Ave\Drawings\IRAA\Fig 9 - PRB on Figure 8.mxd

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Remedial Alternatives Analysis Report

NYSDEC Site # C828187
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Town of Pittsford
Monroe County
New York

3750 Monroe Avenue Associates, LLC

Proposed Remedy
(In Situ Chemical Treatment)
Permeable Reactive Barrier

N
W E
S

0 15 30
1 inch = 20 feet
Intended to print on ARCH D

213131

FIGURE 4