NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8
6274 East Avon-Lima Road, Avon, NY 14414-9516
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May 10, 2021

Mr. Lewis Norry
3750 Monroe Avenue Associates, LLC
c/o the Cabot Group
130 Linden Oaks
Rochester, New York 14625

Dear Mr. Norry:

Subject: 3750 Monroe Avenue, Site #C828187
Remedial Investigation Work Plan Addendum – Off-Site Investigation
April 22, 2021
Town of Pittsford, Monroe County

The New York State Departments of Environmental Conservation (NYSDEC) and Health; (the Departments), have completed their review of the document entitled *"Remedial Investigation Work Plan Addendum – Off-Site Investigation"* (the Work Plan) dated April 22, 2021 and prepared by LaBella Associates, D.P.C. for the 3750 Monroe Avenue site located in the Town of Pittsford, Monroe County. In accordance with 6 NYCRR Part 375-1.6, the Departments have determined that the Work Plan, with modifications, substantially addresses the requirements of the Brownfield Cleanup Agreement. The modifications are outlined as follows:

1. Field activities will start within 30 days of the date of this letter. The Departments understand that drilling is currently scheduled to begin on May 17, 2021.
2. Additional off-site investigation activities will be completed, as necessary based on the investigation results, to define the extent of contamination in all media and evaluate potential exposure pathways.
3. The Work Plan deliverable(s) will either be a revised Remedial Investigation Report (the October 2019 RI Report referenced in the Work Plan was disapproved), another Remedial Investigation Work Plan Addendum, or both. The deliverable(s) will be submitted to the Departments by July 31, 2021, unless a modified schedule is approved by the Departments.
4. The EDDs will be submitted to NYSDEC within 120 days of sample collection.

With the understanding that the Departments' modified Work Plan is agreed to, the Work Plan is hereby approved. Please notify me at least seven days in advance of the start of field activities.

If 3750 Monroe Avenue Associates, LLC chooses not to accept the approved modified Work Plan, you are required to notify this office within 20 days after receipt of this letter. In this event, I suggest a meeting be scheduled to discuss your concerns prior to the end of this 20-day period.

Please contact me via email at frank.sowers@dec.ny.gov if you have questions or concerns on this matter.

Sincerely,

Frank Sowers, P.E.
Professional Engineer 1

ec:

Dan Noll	Dudley Loew
David Pratt	Dan Tucholski
Mirza Begovic	Jared Pristach
Dan O'Brien	Justin Deming
Michael Cruden	Wendy Kuehner

April 22, 2021

Mr. Frank Sowers
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414

RE: Remedial Investigation Work Plan Addendum – Off-Site Investigation
3750 Monroe Avenue
Town of Pittsford, New York 14534
NYSDEC BCP Site No. C828187
LaBella Project No. 213131

Dear Mr. Sowers,

LaBella Associates, D.P.C. ("LaBella") is submitting this Remedial Investigation Work Plan Addendum on behalf of 3750 Monroe Avenue Associates, LLC, for activities intended to occur at 3750 Monroe Avenue, in the Town of Pittsford, New York (Monroe County Parcel ID 151.13-1-22; hereinafter referred to as the "Property"). This Work Plan has been prepared to satisfy the NYSDEC's request for an off-site investigation to occur on the Property, outside of the existing Brownfield Site limits (NYSDEC BCP Site No. C828187; hereinafter referred to as the "Site"). Refer to Figure 1 for a depiction of the Property and Site boundaries.

PROJECT BACKGROUND

A Remedial Investigation (RI) was conducted from 2016-2019 which built upon previous investigations completed at the Site from 2012-2015. The RI concluded that a chlorinated volatile organic compound (CVOC) plume exists on the Site, originating beneath the central-western portion of the building and extending to the northwest. Refer to the Remedial Investigation Report, dated October, 2019, for a complete description of findings.

Based upon the findings of the previous investigations and the RI, additional action to assess the CVOC plume beyond the limits of the BCP Site were requested by the NYSDEC. Such request was made in a letter dated February 4, 2021 and reiterated in a letter dated March 25, 2021. This Work Plan is intended to satisfy this request.

SCOPE OF WORK

Additional off-site investigation tasks will occur in accordance with the procedures outlined in the Remedial Investigation Work Plan (RIWP, dated March 2016), approved by the NYSDEC in October, 2016 (with modifications). Applicable elements of the community air monitoring plan (CAMP), Quality Control Program (QCP), and Health and Safety Plan (HASP) included among the RIWP will be implemented during this work.

The following sections detail the tasks that shall occur specific to this off-Site investigation:

Task 1: Groundwater Monitoring Well Installation & Groundwater Sampling

Two (2) groundwater monitoring wells will be installed on the Property but off of the Site, to the west (see Figure 2 – Off-Site Investigation Locations). For ease of future reference the locations have been

assigned the following identifications: OSMW-1 and OSMW-2 ("Off-Site Monitoring Well").

A *Dig Safely New York* stakeout will be conducted at the Property to locate subsurface utilities in the areas where the investigation will take place.

The drilling and installation of soil borings and monitoring wells will be performed using a rotary drill rig which will have sufficient capacity to perform 4 1/4-inch inside diameter (ID) hollow-stem auger drilling in the overburden and retrieve Macrocore or split-spoon samples.

Soils from the borings will be continuously assessed for visible or olfactory indications of impairment, and/or indication of detectable volatile organic compounds (VOCs) with a photo ionization detector (PID). Headspace field screening to determine the presence of VOCs in soil will occur according to the following procedure:

- Soils from core will be inserted into an airtight glass jar and/or disposable polyethylene bag, and the container will be sealed;
- After sealing the container, the soils will be shaken or kneaded for 10-15 seconds to release volatiles into the headspace of the sealed container;
- The PID inlet will be inserted into the headspace of the airtight container to screen soil samples for VOCs.

No analytical sampling of soils will occur, unless obvious indications of impairment are observed.

Based on previous investigations, it is estimated that soil borings to install groundwater monitoring wells will be advanced to an approximate depth of 20 to 25 feet below existing ground surface.

Each groundwater monitoring well will be completed with a 10-foot section of 0.010-slot well screen connected to an appropriate length of solid PVC well riser to complete the well. Each annulus will be sand-packed with granular backfill that is chemically and texturally clean, inert, siliceous, and of appropriate grain size for the screen slot size and the host environment. A minimum 2-foot thick seal of tamped bentonite pellets will be placed directly on top of the sand pack. Upon completion of the bentonite seal, the well may be grouted with a non-shrinking cement grout mix to be placed from the top of the bentonite seal to the ground surface. Upon completion of the well, a suitable cap shall be installed to prevent material from entering the well. The well riser shall be protected by a flush mounted road box set into a concrete pad. A concrete pad, sloped away from the well, shall be constructed around the flush mount road box at ground level. All soil cuttings removed from the well locations will be properly containerized in 55-gallon drum(s) and treated as investigation-derived waste (IDW). After containerization, soil cuttings will be transported onto the BCP site for storage, characterization/profiling, and staging prior to off-Site disposal.

After completion of the well, but not sooner than 24 hours after grouting is completed, development will be accomplished using pumping, bailing, or surge blocking. During development, water will be removed throughout the entire water column by periodically lowering and raising the pump intake (or bailer stopping point). Development water will be properly contained in a 55-gallon drum on-site and treated as IDW until the results of chemical analysis of samples are obtained (for appropriate future disposal). Purge water drums will be transported onto the BCP site for storage, characterization/profiling, and staging prior to off-Site disposal.

The development process will continue until a stabilization of pH, specific conductance, temperature, and turbidity (goal of <50 NTUs) of the discharge is achieved for three consecutive intervals following the removal of a minimum of ten well volumes. In the event that limited recharge does not allow for the recovery of ten well volumes, the well will be allowed to stabilize to conditions deemed representative of groundwater conditions.

The groundwater in the newly installed monitoring wells will be allowed to stabilize for at least 24-hours following development. Water levels will be measured to within 0.01 feet prior to purging and

sampling. Purging will be completed prior to active sampling using low-flow sampling methods and equipment (i.e. peristaltic pump or bladder pump). During purging, the following parameters will be recorded:

- Date;
- purge start time;
- weather conditions;
- PID reading immediately after the well cap is removed;
- presence of NAPL, if any, and approximate thickness;
- pH;
- dissolved oxygen;
- temperature;
- specific conductance;
- depth of well;
- depth to water;
- estimated water volume;
- purge end time; and,
- volume of water purged.

Monitoring wells will be purged until the pH, conductivity, temperature, and turbidity of the water being pumped from the well have stabilized with a turbidity goal of <50 NTUs. Once achieved, groundwater samples will be collected using the same low-flow methods.

Groundwater samples will be collected into laboratory-supplied certified-clean containers with appropriate preservative, placed on ice, and submitted for laboratory analysis of the following:

- United States Environmental Protection Agency (USEPA) Target Compound List (TCL) VOCs using USEPA Method 8260.

For Quality Assurance / Quality Control (QA/QC) purposes, an additional sample will be collected from one of the wells and submitted as a blind field duplicate. An additional sample will also be collected for use as a Matrix Spike / Matrix Spike Duplicate (MS/MSD).

All samples will be sent under standard Chain of Custody procedures to a New York State Department of Health (NYSDOH) Environmental Laboratory Accreditation Program (ELAP) certified laboratory with a standard turnaround request (5 to 7 business days).

Task 2: Report

Upon the completion of all field activities and receipt of analytical results, a letter report intended to be an addendum to the October 2019 RI Report will be provided. Key elements of the letter report shall include:

- Summary of field activities, observations, and notes (boring logs, well development logs, CAMP data, etc.);
- A map depicting investigation locations;
- Laboratory analysis report;
- Summary table comparing analytical results to applicable laboratory standards;
- Data Usability Summary Report (DUSR); and,
- Electronic Data Deliverable (EDD) submission.

CERTIFICATION & CLOSING

I, Daniel P. Noll, certify that I am currently a NYS registered professional engineer 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).

Daniel P. Noll	4/14/21	081996		
Name	Date	P.E. #	Signature	Seal

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

Respectfully submitted,

LABELLA ASSOCIATES, D.P.C.

Daniel P. Noll, PE
Project Manager

Attachments

Figure 1 – Property & BCP Site Boundary
Figure 2 – Off-Site Investigation Locations

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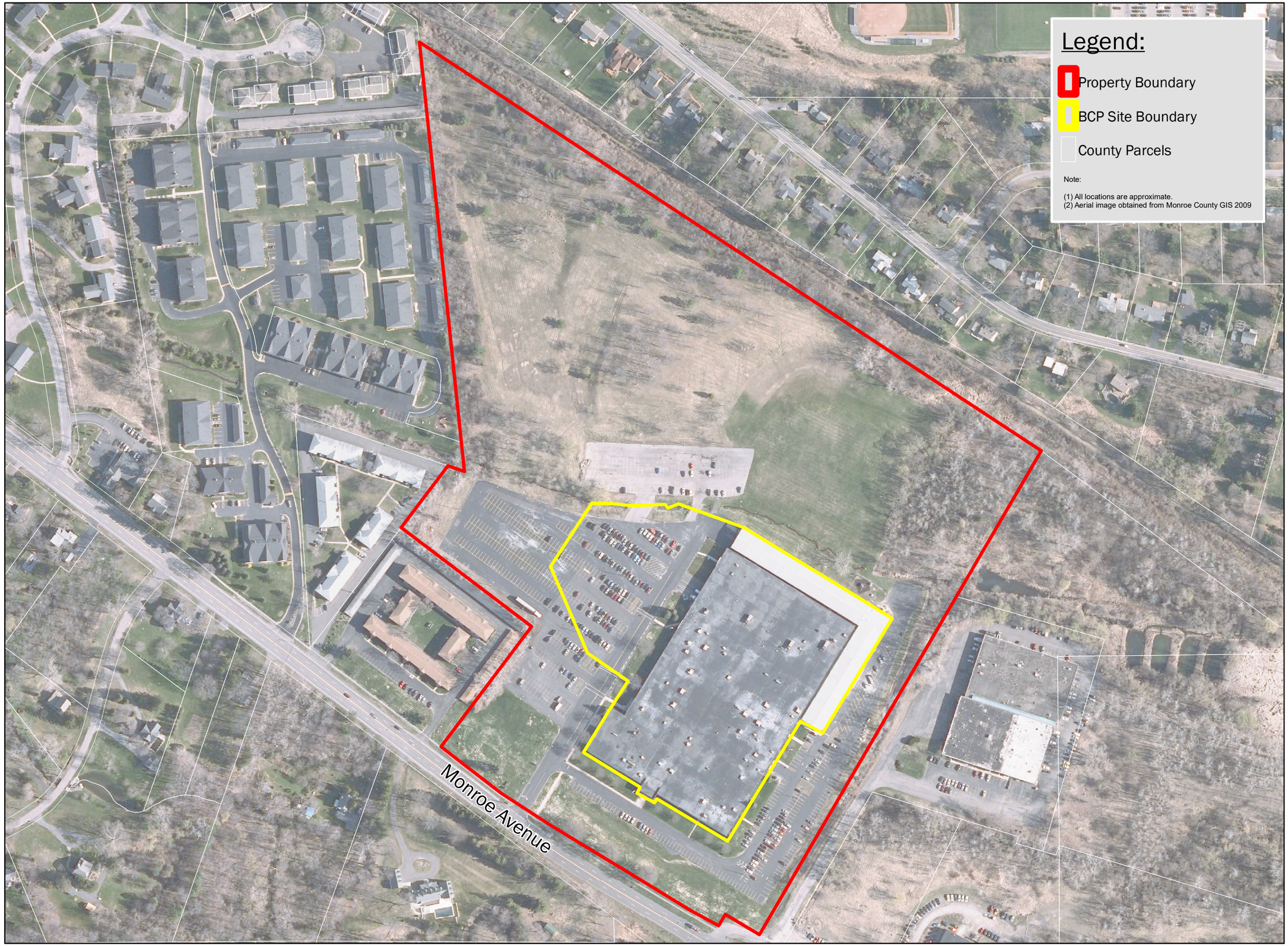

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Off-Site Investigation

BCP Site No. C828187
3750 Monroe Avenue
Pittsford, New York

3750 Monroe Avenue
Associates, LLC

Property &
BCP Site Boundary

N
W E
S

0 220

1 inch = 220 feet
Intended to print on 11" x 17".

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FIGURE 1

Path: J:\Norry Management Corp\213131 - BCP Application 3750 Monroe Ave\Drawings\Off-Site Investigation (April 2021)\Fig 1 - Property & Site.mxd

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Off-Site Investigation

BCP Site No. C828187
3750 Monroe Avenue
Pittsford, New York

3750 Monroe Avenue
Associates, LLC

Off-Site Investigation
Locations

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W E
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0 60

1 inch = 60 feet
Intended to print on 11" x 17".

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FIGURE 2

Path: J:\Norry Management Corp\213131 - BCP Application 3750 Monroe Ave\Drawings\Off-Site Investigation (April 2021)\Fig 2 - Off-Site Investigation Locations.mxd