

August 29, 2025

Mackenzie Rees, P.E.  
Environmental Engineer  
New York State Department of Environmental Conservation  
Region 8 Division of Environmental Remediation  
6274 East Avon-Lima Road, Avon, New York 14414

**Re: Remedial Investigation Work Plan Addendum, NYSDEC Site #C828231  
91 Leighton Avenue Rochester, New York 14609**

Dear Ms. Rees:

Lu Engineers has prepared this Remedial Investigation Work Plan (RIWP) Addendum to specify work proposed to obtain additional soil and groundwater data to more fully establish the nature and extent of subsurface impairment at the subject Site. It is understood as specified in recent correspondence with your office, that additional delineation of chlorinated volatile organic compounds (CVOCs) in soil and groundwater will be necessary to obtain NYSDEC approval of RI efforts.

This document is intended to specify the additional RI sampling and testing effort necessary to complete the RI process, which will follow the methods and procedures further specified in the approved RIWP for this Site dated November 2024.

### **Objective and Scope**

This proposed supplemental investigation effort is intended to address comments received the NYSDEC on July 22, 2025. The planned additional work effort will include further evaluation of the nature and extent of subsurface impairment associated with the subject property. The purpose for this work is to strengthen the basis for determining the most appropriate remedial approach for the subject property, if required.

### **Field Investigation**

A total of four (4) additional groundwater monitoring wells will be installed and sampled in the northern, central and southern areas of the Site as indicated on the attached Figure 1. The wells located to the northwest and the southern area of the Site will be overburden wells (see Proposed Overburden Well Detail), while the wells located to the northeast and the central area of the Site shall be drilled as bedrock wells (see Proposed Bedrock Well Detail). All work will be completed in compliance with the approved RIWP and all applicable regulatory standards and protocols. As further described in the RIWP, the following investigation tasks will be undertaken:

#### **Geophysical Survey**

Ground Penetrating Radar (GPR) will be used to verify subsurface conditions to the extent possible, prior to conducting subsurface sampling and testing.

#### **Subsurface Investigation and Drilling**

Subsurface investigation work completed to date will be augmented by additional soil and groundwater sampling and testing. This work will be completed using soil borings with continuous soil sampling to access subsurface soils for photoionization detector (PID) screening and analytical sampling.

This effort will follow the geophysical survey work and will be initiated only after full utility clearance has been established through the Underground Facilities Protective Organization (UFPO). Community air monitoring will be conducted as required during ground intrusive activities in accordance with NYSDOH requirements.

Four (4) new monitoring wells will be installed at the locations indicated on the attached Figure 1. The monitoring wells will be screened using 10 foot screen sections as requested by NYSDEC from approximately five (5) to (up to) 20 feet below grade and constructed in a manner generally consistent with existing Site wells in accordance with all applicable regulatory requirements and protocols as specified in the approved RIWP for this project. Well Construction Details for both overburden and bedrock monitoring wells are attached for reference.

Soil samples will be obtained during this process as summarized below. Investigation-derived wastes including well purge water, soil cuttings and related materials other than trash will be staged in drums for future management and/or disposal.

Wells will be developed 48 hours after installation. Groundwater sampling will take place following well development in accordance with the approved RIWP including the four (4) new wells as well as MW-03 and MW-04.

Well elevations will be surveyed to the existing Site-specific datum and groundwater elevations measured throughout the Site to confirm groundwater flow patterns beneath the property. Slug testing will be completed to verify hydraulic conductivity and the wells will be sampled as summarized below.

#### Laboratory Analysis

As described in the project Quality Assurance Project Plan (QAPP), sampling of environmental media will be conducted in accordance with all applicable protocols and regulatory requirements. Samples of environmental media will be analyzed as specified in the following table:

**Table 1. Proposed Sampling and Analysis Summary**

Sample Type	Sample Location	Analytical Parameter	Reporting Level	No. of Field Samples	Field Duplicates	Blanks		MS/MSD	Total
						Equip.	Trip		
Subsurface Soil	Proposed Monitoring Well Borings	EPA Method 8260	Category B (Level IV)	4	1	1	n/a	1/1	8
Groundwater	Proposed Monitoring Wells	EPA Method 8260		6	1	1	1	1/1	9
Total:				10	2	2	1	4	16

#### Reporting

The RI report currently under development, will include descriptions of supplemental field activities, field screening and analytical findings.



**RIWP Amendment Approval**

If any questions or concerns must be addressed prior to approval, we would request an opportunity to discuss this project and subject RIWP Addendum at your convenience to ensure that the proposed additional RI effort will fully address NYSDEC concerns.

Respectfully,

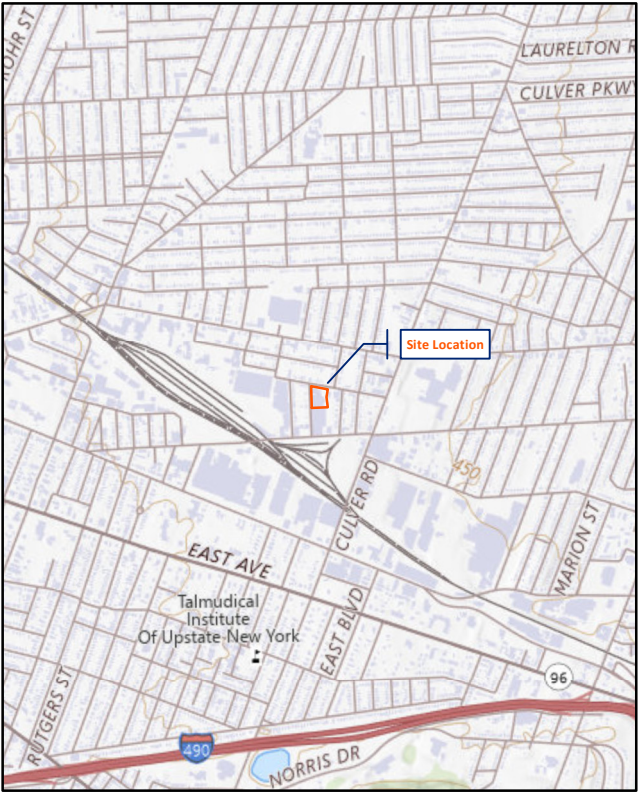
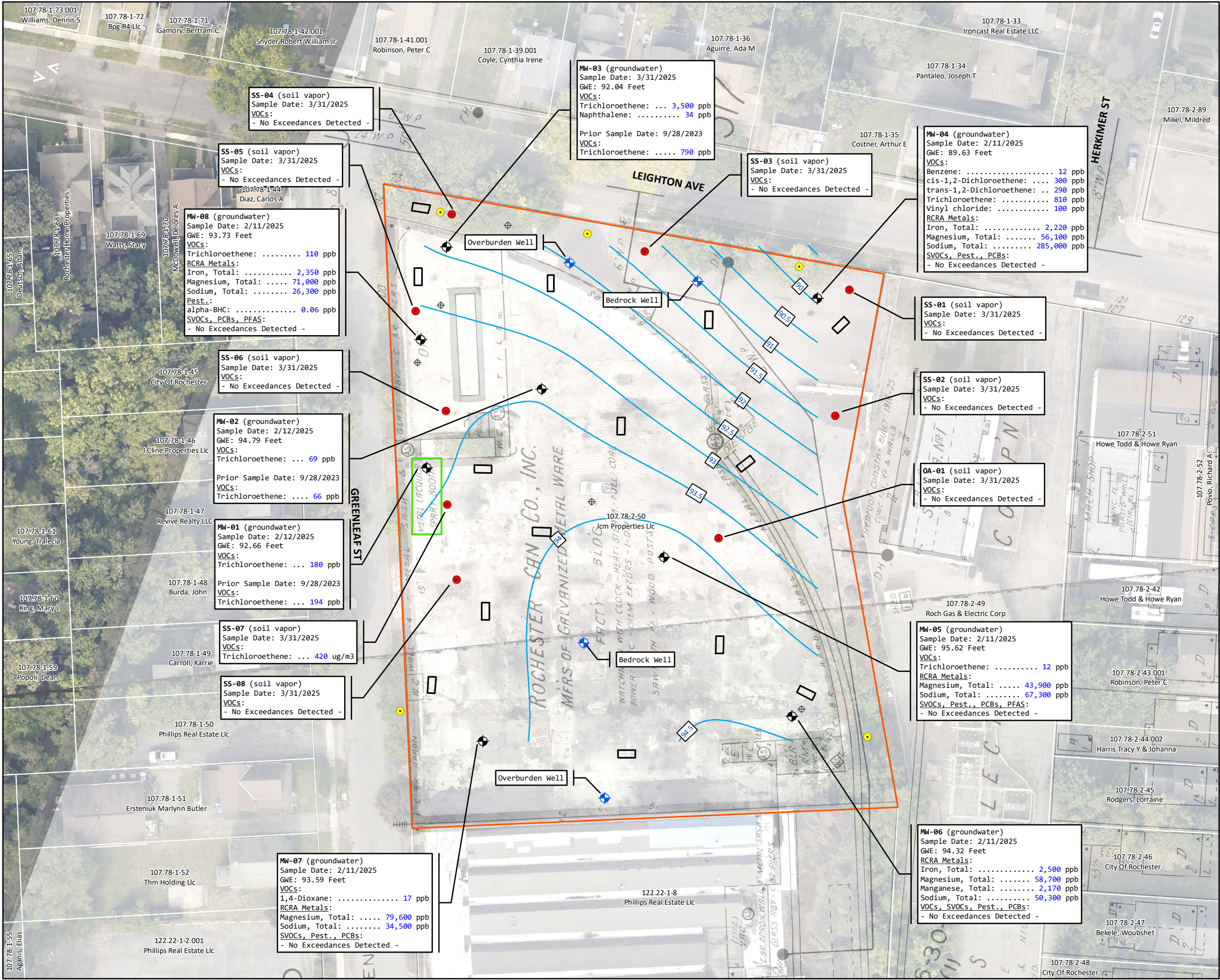


Gregory L. Andrus, P.G.  
Investigation/Remediation Group Leader

Enclosed:        Figure 1  
                      Generic Well Construction Details







**Figure 1:**  
Proposed Monitoring Well Locations

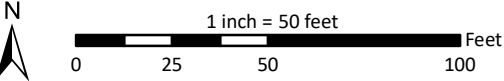
**Project:**  
Leighton Avenue Site  
Remedial Investigation

**Location:**  
91 Leighton Avenue  
City of Rochester, Monroe County, NY

- Legend**
- |  |                                  |  |                    |
|--|----------------------------------|--|--------------------|
|  | Existing Bedrock Monitoring Well |  | Site Boundary      |
|  | Existing Geoprobe Well           |  | Test Pit Location  |
|  | Proposed Well Locations          |  | Former Spray Booth |
|  | SVI Sample Points                |  | GW Contour Lines   |
|  | Surface Soil Sample Points       |  |                    |

**Note:**

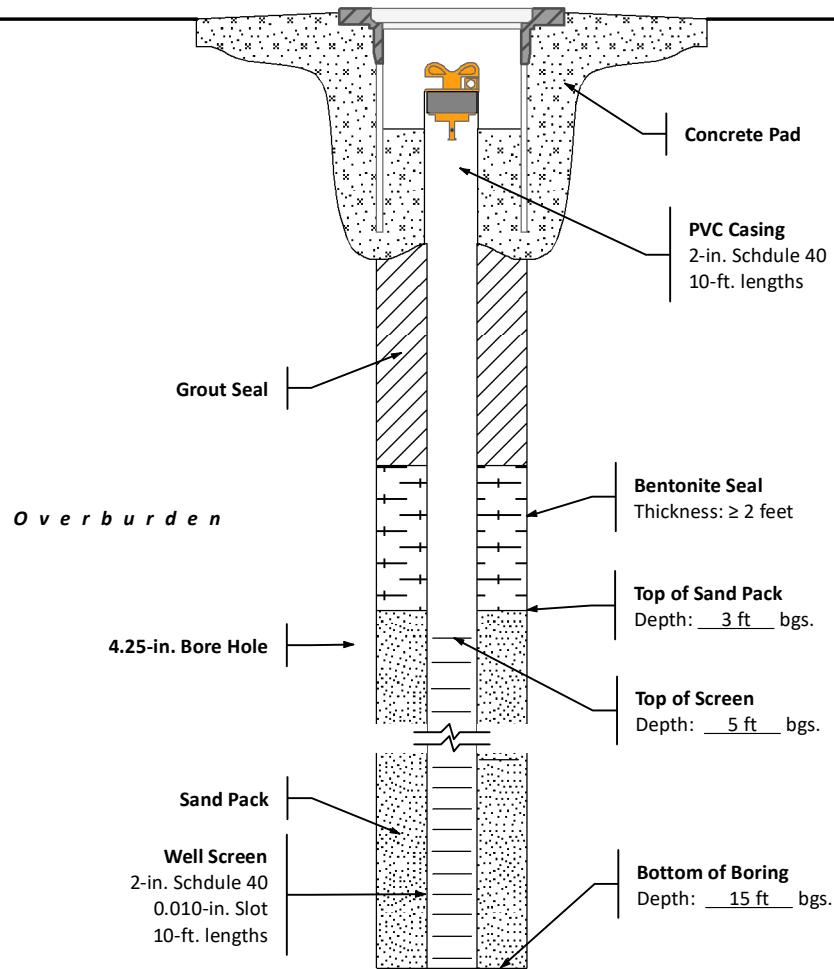
- Results depicted as "blue" indicates an exceedance of NYS AWQS.
- Groundwater contour interval is equal to 0.5 feet.
- Groundwater elevations taken on 5/13/2025.



Drawn/Checked By: MGA/GLA
Lu Project Number: 50527-05
Date: August 2025
Notes: <ul style="list-style-type: none"><li>1. Coordinate System: NAD 1983 (2011) State Plane NY Central FIPS 3102 Feet</li><li>2. Orthoimagery (September 2023) downloaded from Pictometry</li><li>3. Scale: 1:600 (original document size 11"x17")</li></ul>



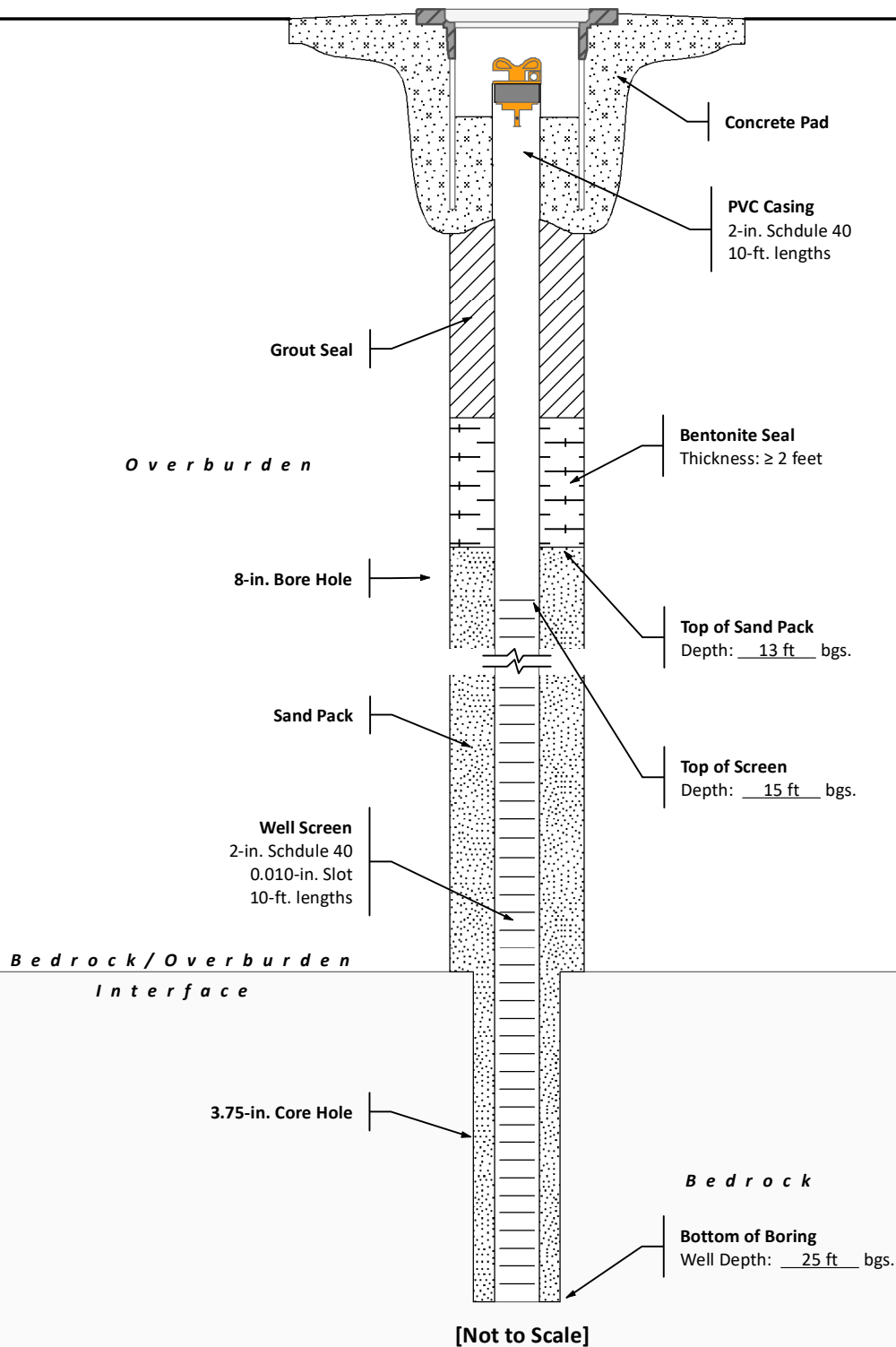
## Proposed Overburden Monitoring Well Diagram



[Not to Scale]

\*Note: All depths approximate; Elevation measured from top of casing relative to arbitrary benchmark (100', MW-01)

## Proposed Bedrock Monitoring Well Diagram



\*Note: All depths approximate; Elevation measured from top of casing relative to arbitrary benchmark (100', MW-01)