



September 10, 2013

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

Re: Andrews Street Site  
300, 304-308 and 320 Andrews Street, and 25 Evans Street  
Rochester, New York  
ERP Site No. E828144

Dear Ms. Theobald:

On behalf of the City of Rochester (City), this letter is intended to provide details on the evaluation of existing cover material at the above-referenced property (Site) that can be considered part of an interim cover system engineering control that would meet regulatory requirements for restricted residential use. A Project Locus Map is enclosed as Figure 1. For restricted residential use, DER-10 (Technical Guidance for Site Investigation and Remediation, dated May 3, 2010) indicates that the upper two feet of a soil cover system must meet the applicable contaminant-specific soil cleanup objectives as set forth in 6 NYCRR 375-6.7(d)(1), which is the lower of the protection of groundwater soil cleanup objectives (SCOs) or the Restricted residential use SCOs. Information evaluated to date concerning whether the upper two feet of earthen material at the Site can be considered for use in a soil cover system is summarized below:

- Day Environmental, Inc. (DAY) has reviewed analytical laboratory results for: soil samples included in the At-Grade and Sub-Grade Demolition Phase Environmental Report dated August 2011, soil samples collected to date as part of the remedial investigation; and soil samples collected to date as part of interim remedial measures (IRMs). Based on this review, it has been determined that there is not adequate soil data from a 0 to 2 foot depth interval that can be used to show the upper two feet of material at the Site meets the applicable contaminant-specific soil cleanup objectives for all constituents of concern as set forth in 6 NYCRR 375-6.7(d)(1).
- Review of the At-Grade and Sub-Grade Demolition Phase Environmental Report dated August 2011, documents that the former basements of two demolished buildings were backfilled with imported stone meeting DER-10 requirements for restricted residential use from the bottom of the excavations to the existing ground surface. The enclosed Figure 2 shows the footprints of the two former basements. In addition, during rough grading that was part of the demolition work, a layer of imported stone that meets DER-10 requirements for restricted residential use was placed from the existing ground to unknown (and likely varying) depths.
- Excavations for former IRM areas (designated as IRM-01 through IRM-06) were backfilled in a manner so that imported crushed stone meeting DER-10 requirements for restricted residential use was present from the existing ground surface to depths of two feet or more. The enclosed Figure 2 shows these six former IRM areas.

In summary, cover material that meets DER-10 requirements for restricted residential use with thickness of two feet or greater exists within the footprints of the two former building basements and the six former IRM areas. The thickness of imported stone on the former basements and former IRM areas was documented and verified by DAY; thus, further evaluation of the cover material is not required in these areas.

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Although cover material that meets DER-10 requirements for restricted residential use is present at the ground surface outside the footprints of the two former building basements and the six former IRM areas, its thickness is unknown. [Note: Demolition specifications indicated that placement of 4-inches of imported stone in non-building/basement areas was the minimum, and observation made for some of DAY's previous remedial investigation subsurface test borings appear to support this. However, further evaluation of the cover material thickness in these areas is warranted.]

In order to evaluate the thickness of this cover material (imported crushed stone) outside the footprints of the two former building basements and the six former IRM areas, it is proposed that 37 test locations (designated as CS-01 through CS-37) be excavated with a mini-excavator or backhoe (refer to Figure 2). DAY will use the procedures outlined in Section 10.3 of the document titled "Municipal Assistance for Environmental Restoration Projects, Procedures Handbook" dated July 2004 when retaining a subcontractor to provide the labor and equipment needed to excavate the test locations. Initially, a global positioning system (GPS) or swing ties from existing site features (e.g., monitoring wells) will be used to mark out the 37 test locations. At each location, the mini-excavator or backhoe will be used to excavate through the imported stone to a maximum of two feet if imported stone is encountered, or until site soil or fill is encountered, whichever is less. No collection or analysis of soil/fill samples is proposed. DAY will measure and record the thickness of the imported stone at each test location. The data will then be entered into the geographic information system (GIS), which will be used to assist in evaluating required cut/fill volumes. This information will be used in the design of an interim cover system meeting DER-10 requirements for restricted residential use.

The scope of work outlined in this letter will include implementation of provisions and requirements set forth in the site-specific Health and Safety Plan (HASP), Community Air Monitoring Plan (CAMP), and Quality Assurance Project Plan (QAPP) that were provided as appendices in the August 2011 Remedial Investigation/Remedial Alternatives Analysis (RI/RAA) Work Plan.

This proposed cover material evaluation scope is being provided for regulatory review and approval. As you are aware, this project has a rigid schedule tied to funding with City Bonds, and an expedited review and approval would be greatly appreciated.

If there are any questions, please contact this office.

Very truly yours,  
Day Environmental, Inc.

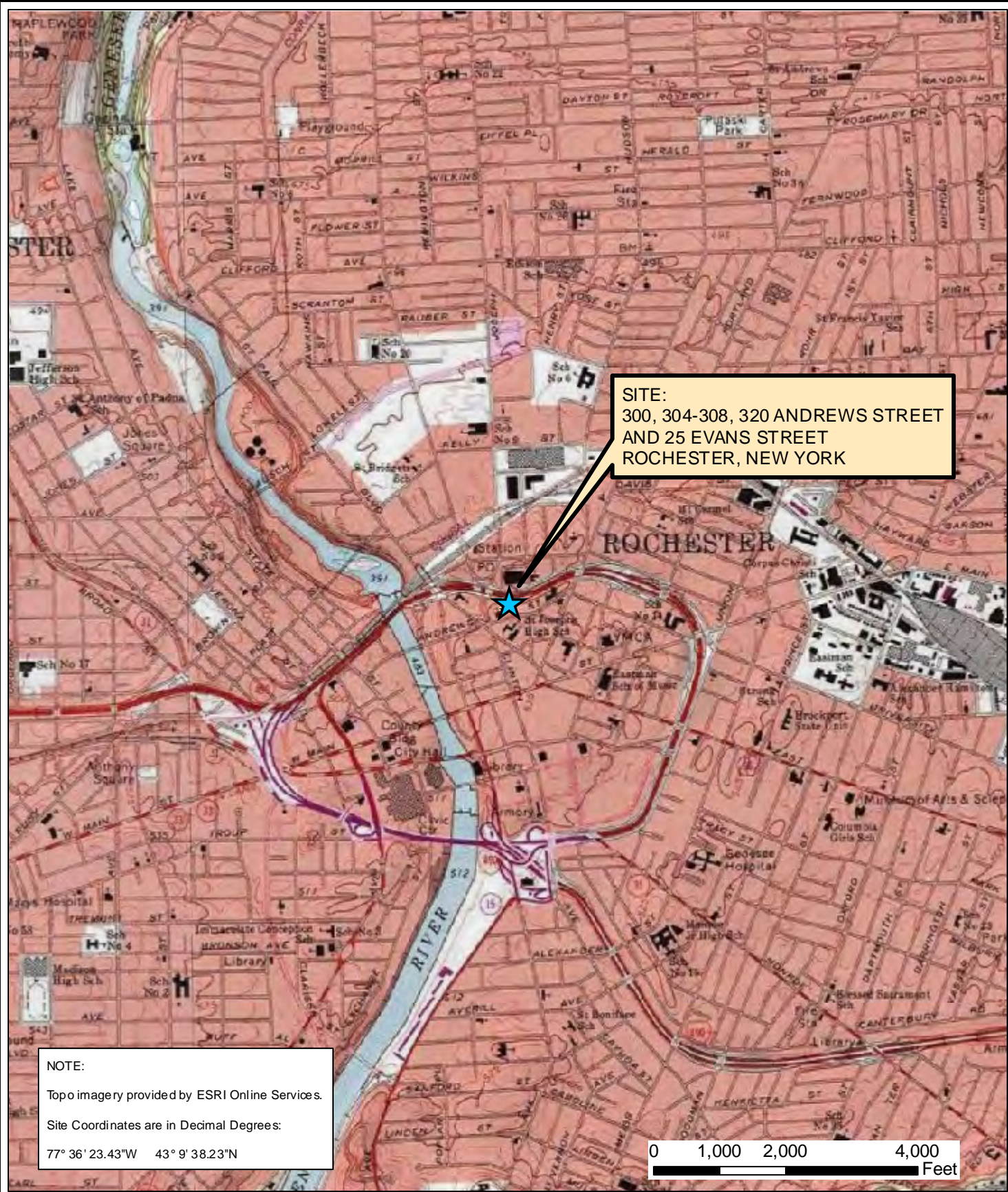


Jeffrey A. Danzinger  
Project Manager

Enclosures – Figure 1 and Figure 2

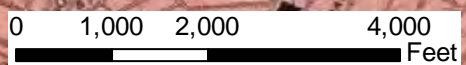
cc: Joseph Biondolillo, City of Rochester DEQ – electronic copy

JD7314 / 4355S-10



**SITE:**  
 300, 304-308, 320 ANDREWS STREET  
 AND 25 EVANS STREET  
 ROCHESTER, NEW YORK

**NOTE:**  
 Topo imagery provided by ESRI Online Services.  
 Site Coordinates are in Decimal Degrees:  
 77° 36' 23.43"W 43° 9' 38.23"N



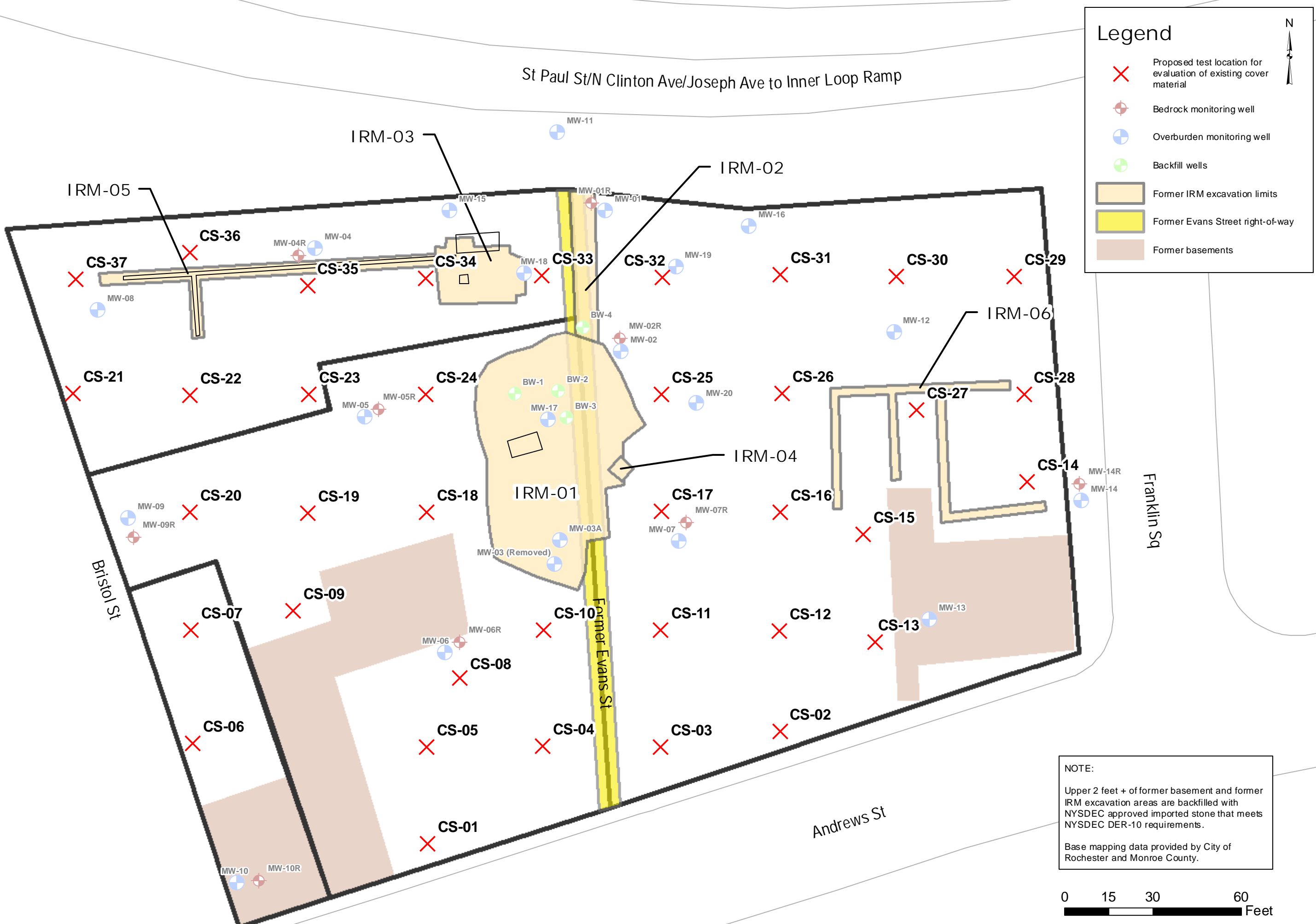
Date	10-01-2012
Drawn By	CPS
Scale	AS NOTED

**day**  
**DAY ENVIRONMENTAL, INC.**  
 Environmental Consultants  
 Rochester, New York 14606  
 New York, New York 10016-0701

Project Title	300, 304-308, 320 ANDREWS STREET AND 25 EVANS STREET ROCHESTER, NEW YORK (NY SDEC SITE NO.: E828144)
Drawing Title	ENVIRONMENTAL RESTORATION PROJECT Project Locus Map

Project No.	4355S-10
	FIGURE 1

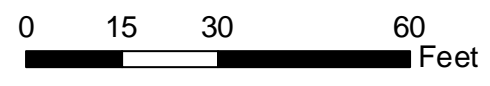
Map document path: E:\GIS\B\_Mapping\Andrews\_Street\4355S-10\Rocky - A Andrews Street\Supplemental\_RL\Workplan\4355S-10 - Test Pl\Plan.mxd  
Last date document was saved: 10 Sep 2013



### Legend

- ✗ Proposed test location for evaluation of existing cover material
- ⊕ Bedrock monitoring well
- ⊕ Overburden monitoring well
- ⊕ Backfill wells
- Former IRM excavation limits
- Former Evans Street right-of-way
- Former basements

**NOTE:**  
Upper 2 feet + of former basement and former IRM excavation areas are backfilled with NYSDEC approved imported stone that meets NYSDEC DER-10 requirements.  
  
Base mapping data provided by City of Rochester and Monroe County.



DESIGNED BY	JAD	DATE	09-2013
DRAWN BY	CPS	DATE DRAWN	09-2013
SCALE	AS NOTED	DATE ISSUED	09-05-2013

**day**  
**DAY ENVIRONMENTAL, INC.**  
Environmental Consultants  
Rochester, New York 14606  
New York, New York 10170

Project Title  
300, 304-308, 320 ANDREWS STREET  
AND 25 EVANS STREET  
ROCHESTER, NEW YORK

ENVIRONMENTAL RESTORATION PROJECT NYSDEC SITE NO.: E828144  
Drawing Title

Proposed Test Locations for Evaluation of Existing Cover Material

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Project No.  
4355S-10

**FIGURE 2**