



Site Management Periodic Review Report and IC/EC Certification (2025)

Front Street Former MGP Site (V00073-8)
City of Rochester, Monroe County, New York

Submitted to:

New York State Department of Environmental Conservation
Division of Environmental Remediation (BURC)
625 Broadway
Albany, New York

Submitted by:

NEU-VELLE, LLC
10 Jones Avenue
Rochester, New York 14608

On behalf of:

Rochester Gas & Electric
3 CityCenter Bldg, 5th Floor
180 South Clinton Avenue
Rochester, New York 14604

December 2025

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1. Executive Summary

NEU-VELLE, LLC (NEU-VELLE) conducted the Site Management Periodic Review Report (PRR) and IC/EC Certification submittal for the Rochester Gas and Electric Corporation (RG&E) Front Street Former Manufactured Gas Plant (MGP) Site, located at 84 Andrews Street in the City of Rochester, Monroe County, New York (hereinafter referred to as the “Site”) (Figure 1). The Site was formerly in the New York State (NYS) Voluntary Cleanup Program (VCP) as Site No. V00073-8, which was administered by the New York State Department of Environmental Conservation (NYSDEC). In April of 2003, RG&E entered into a Multi-site Voluntary Cleanup Agreement (MSVCA), most recently amended in December of 2014 (index number B8-053598-07), with the NYSDEC to conduct a remedial program for the Site as well as other RG&E MGP Sites. The VCP was terminated by the NYSDEC as part of a statewide mandate in 2018. The Site is currently governed by the requirements of the NYSDEC approved Site Management Plan (SMP) dated May 2018.

Further, prior to the 2003 MSVCA, RG&E entered into a separate Voluntary Cleanup Agreement (VCA) for the Site in March of 1998, under which RG&E conducted an Interim Remedial Measure (IRM) to address coal tar seeps. The IRM consisted of installation of gunite (a spray-applied concrete) over the river side of the existing river wall (River Wall) and removal of accumulated impacted gravel/sediment from in front of the River Wall. A figure showing the Site location and boundaries of the Site is provided in Figure 2. The boundaries of the real property comprising the Site are more fully described in the metes and bounds description that is part of the Deed Restrictions attached in Appendix C of the SMP.

The remedial work at the Site was completed in two (2) phases. The initial phase of remedial work was conducted in 2013 and 2014. However, during that work, additional MGP impacted soil was discovered outside the planned remedial excavation limits. This additional impacted soil was addressed in a supplemental remediation conducted in 2017.

After completion of the remedial work at the Site, some residual contamination was left at the Site, which is hereafter referred to as “remaining residual contamination.” Institutional and Engineering Controls (ICs and ECs) have been incorporated into the Site remedy to control exposure to the remaining residual contamination to ensure protection of public health and the environment. The Deed Restrictions which have been imposed on the Site, and recorded with the Monroe County Clerk, require compliance with this SMP and all the ECs and ICs placed on the Site in the SMP.

After completion of the remedial work at the Site, the SMP was implemented.

NEU-VELLE found that each component of the SMP was complied with during this reporting period:

- ICs/ECs have been in place and effective, and
- Inspections were performed as required.

Based upon the inspections and compliance with the SMP, the Site remedy continues to meet the remedial objectives set forth. RG&E will continue to conduct the annual inspections and groundwater monitoring in accordance with the letter dated December 1, 2023, in which NYSDEC approved the cessation of analytical sampling at MW-2 and MW-10S and a reduction in analytical sampling of wells to a five-quarter (15 month) frequency. The SMP will be revised accordingly.

2. Site Overview

2.1 Site Description

The Site is located at the corner of Front Street and Andrews Street in the City of Rochester, Monroe County, New York with the U.S. Postal address of 84 Andrews Street, Rochester, NY 14604. The Site is located in a predominantly commercial area of downtown Rochester, is approximately 1.8 acres in size, and has the tax map identification number of 106.78-1-19. A Site Location map is presented as Figure 1. The boundaries of the Site and the metes and bounds description for the Site are shown on the survey map provided in Appendix C of the SMP. The owner of the Site is RG&E.

The Site consists of a predominantly vacant, fenced-in parcel covered with crushed stone. The former MGP plant buildings and the former RG&E operations facility building (which occupied the Site after the MGP) were previously demolished. An RG&E-owned communications and control building, associated with operation of the adjacent Central Avenue Dam and located on the northeast corner of the Site, is the only structure present at the Site. Subsurface utilities, including gas, electric and a combined storm and sanitary sewer overflow tunnel (owned by Monroe County) are located beneath the Site. The Site is bordered by the Inner Loop Expressway to the north, by Andrews Street to the south, by the Genesee River to the east, and Front Street to the west. The Site is zoned commercial.

2.2 Site Remedial Program Summary

A comprehensive discussion of the investigation and remedial history of the Site prior to 2013 can be found in Section 2 of the SMP.

The most recent remedial work at the Site was completed in two (2) phases, beginning in 2013. The initial phase of remedial work at the Site was conducted in 2013 and 2014; however, work was stopped in 2014 due to the discovery of additional MGP impacted soil outside the planned remedial excavation limits. The remedial activities are documented in the Construction Completion Report (CCR)(Arcadis, 2016) and included the excavation of soil containing MGP-related products in surface soil and subsurface soil [including non-aqueous phase liquid (NAPL)], and removal and treatment of groundwater encountered during excavation. The initial phase of the remedy included the following major components:

- Removal of the concrete slab and the cantilevered portion of the former RG&E operations facility building.
- Removal of approximately 2,400 cubic yards of surface material.
- Removal of approximately 12,750 cubic yards of subsurface soil (some entrained with NAPL).
- Off-Site disposal of excavated materials at a permitted landfill and/or thermal treatment facility.
- Removal and disposal of the UST and petroleum-impacted soil on the north end of the Site that was left in place during the 2000 IRM.

- Treatment and discharge of approximately 225,000 gallons of construction water to the publicly operated treatment works (POTW) operated by Monroe County.
- Backfill of excavated areas with previously excavated soil that met the Site re-use criteria and/or with clean imported fill.
- Placement of a groundwater amendment (IXPER® 75C as manufactured by Solvay Chemicals, Inc.) mixed with backfill in the saturated zone during backfill.
- Placement of approximately 550 cubic yards of CLSM adjacent to (on the land side) of the river wall during backfill.
- Repair and/or replacement of portions of the River Wall that collapsed during excavation.
- Pressure grouting of portions of the rock ledge foundation of the River Wall to seal in any residual NAPL that may be present in the ledge foundation.
- Placement of a crushed stone interim surface cover (stone minimum 12-inch thick over a geotextile fabric) at the Site.

The additional impacted soil detected during the initial phase of the remedy was addressed in a supplemental remediation conducted in 2017. The supplemental remedial activities are documented in the Final Engineering Report (FER) prepared by NEU-VELLE. The supplemental remedy included the following major components:

- Removal of portions of the remaining concrete slab from the former RG&E operations facility building.
- Removal of approximately 140 cubic yards of the previously placed surface cover material (crushed stone over geotextile fabric).
- Removal of approximately 2,100 cubic yards of subsurface soil.
- Off-Site disposal of excavated materials at a permitted landfill and/or thermal treatment facility.
- Off-Site disposal of approximately 3,300 tons of previously excavated soil (excavated during the 2013/2014 remediation) that was temporarily staged pending re-use evaluation at the RG&E East Station property.
- Treatment and discharge of approximately 102,000 gallons of construction water to the POTW operated by Monroe County.
- Backfill of excavated areas with previously excavated soil that met the Site re-use criteria and/or with clean imported fill.
- Placement of a groundwater amendment (IXPER® 75C as manufactured by Solvay Chemicals, Inc.) mixed with backfill in the saturated zone during backfill.
- Placement of approximately 96 cubic yards of CLSM adjacent to (on the land side) of the River Wall during backfill.
- Cleaning, inspection, and repair of approximately 1,700 square-feet of the gunite applied to the river side of the River Wall during the 1998 IRM.

- Removal of vegetation and repair of a portion of the River Wall that had collapsed (adjacent to excavation cell B9/B10).
- Application of approximately 1,768 square-feet of new gunite to the river side of the River Wall south of the “southern gunite application area” installed during the 1998 IRM.
- Installation of a storm water infiltration basin and associated catch basins (two) to collect storm water at the Site and allow it to infiltrate into the subsurface.
- Placement of approximately 2,390 tons of crushed stone to replenish the interim Site cover material in excavated areas and to promote appropriate drainage at the Site.

2.2.2 Remaining MGP Contamination

After completion of the remedial work at the Site, some residual contamination was left at the Site, which is hereafter referred to as “remaining residual contamination.” Institutional and Engineering Controls (ICs and ECs) have been incorporated into the Site remedy to control exposure to the remaining residual contamination to ensure protection of public health and the environment. The Deed Restrictions which have been imposed on the Site, and recorded with the Monroe County Clerk, require compliance with this SMP and all the ECs and ICs placed on the Site in the SMP.

2.2.3 Site Management Plan

After completion of the remedial work at the Site, the SMP was implemented. The SMP, dated May 2018, provides the following:

- Institutional Controls, as detailed in Section 4 of this PRR
- Engineering Controls:
 - Maintain the existing Interim Site Cover
 - as detailed in Section 4 of this PRR
- Site Inspections:
 - Annually
- Monitoring and Sampling:
 - The following eight (8) groundwater monitoring wells will be gauged and sampled: OW-102, MW-1, MW-1D, MW-2, MW-8S, MW-9S, MW-9D, and MW-10S.
 - Groundwater sampling and gauging will occur twice per year (spring and fall) for three (3) years following Remediation (i.e., fall of 2017 through spring of 2020). After three (3) years, the monitoring results will be reviewed with NYSDEC to evaluate the need for continued monitoring, the wells to be monitored and/or the frequency of monitoring events. Note, NYSDEC approved groundwater sampling and gauging to be performed on an annual basis moving forward, starting in April 2021, for a three (3) year period.
 - In a letter dated December 1, 2023, NYSDEC approved the cessation of analytical sampling at MW-2 and MW-10S and a reduction in analytical sampling of wells to a five-quarter (15 month) frequency. The SMP will be revised accordingly.

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- Maintenance:
 - As required based upon Site inspections
- Reporting:
 - Periodic Review Report – to be submitted annually to NYSDEC

3. Remedy Performance Evaluation

The remedial performance is evaluated via the annual visual inspection of the following at the Site:

- the Interim Site Cover;
- the River Wall; and
- the storm water infiltration system.

The annual inspection of the Site was performed by NEU-VELLE, on July 22, 2025, and visual observations and photographs were collected during this inspection. The existing ECs at the Site were observed to be in good condition. There were no noticeable signs of significant deterioration of the Interim Site Cover. The Site and area outside of the west gate has been used as an equipment and material staging area for various non-Site-related construction activities in the City of Rochester. Silty sediment has accumulated across much of the central portion of the Site from these material staging areas and activities. A cleanup of these sediments and the staged areas will be needed following the conclusion of the construction activities, and the gravel cover system may require additional gravel in some areas.

The *2025 River Wall, Annual Site-wide, and Storm Water Infiltration System Inspection Report*, prepared by NEU-VELLE and dated December 2, 2025, is included as Appendix A of this PRR.

The remedial performance is periodically evaluated via the gauging and sampling of six (6) on-Site groundwater monitoring wells (OW-102, MW-1, MW-1D, MW-8S, MW-9S, and MW-9D). Although a groundwater sampling event was not completed during the current reporting period (November 2, 2024 to November 2, 2025), a groundwater sampling event (the 11th Post-Remediation Groundwater Sampling Event) was completed in November 2025. The results of this most recent sampling event are pending and will be presented in a forthcoming report under separate cover.

4. IC/EC Plan Compliance

4.1 IC/EC Requirements

ICs include the following:

- The property may be used for Restricted-Residential use as that term is defined in 6 NYCRR Part 375-1.8(g)(2)(ii), Commercial Use as that term is defined in 6 NYCRR 375-1.8(g)(2)(iii), or Industrial Use as that term is defined in 6 NYCRR 375-1.8(g)(2)(iv), as may be consistent with local zoning laws;
- All ECs must be operated and maintained as specified in this SMP unless the owner first obtains permission to discontinue such controls from the NYSDEC;
- The owner of the Site shall provide a periodic certification, prepared and submitted by a professional engineer or environmental professional acceptable to the NYSDEC, which will certify that the institutional and engineering controls put in place are unchanged from the previous certification, comply with the SMP, and have not been impaired;
- The use of groundwater underlying the Site is prohibited without necessary water quality treatment as determined by the NYSDOH or the Monroe County Department of Health to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval to do so from the Department.
- Groundwater and other environmental or public health monitoring, if any, must be performed as defined in this SMP unless the owner first obtains permission to discontinue such monitoring from the NYSDEC;
- Data and information pertinent to Site management must be reported at the frequency and in a manner as defined in this SMP;
- Where remaining residual contamination remains at the Site, all construction, use or occupancy of the Site that results in the disturbance or excavation of the Site which threatens the integrity of the engineering controls or which results in unacceptable human exposure to contaminated soils must be conducted in accordance with this SMP;
- Monitoring to assess the performance and effectiveness of the remedy must be performed as defined in this SMP;
- Operation, maintenance, monitoring, inspection, and reporting of any mechanical or physical component of the remedy shall be performed as defined in this SMP; and
- Vegetable gardens and farming on the Site are prohibited.

The Site ECs outlined in the SMP are as follows:

- **Site Cover:** In accordance with the Decision Document, when the Site is redeveloped, the redevelopment scenario for the Site (e.g., installation of pavement, structures, minimum of 2' of soil cover etc.) must meet the requirements for permanent cover material set forth in 6 NYCRR Part 375-6.7(d). In the interim, exposure to potential remaining residual contamination at the Site is prevented by an Interim Site Cover system placed over the Site. This Interim Site Cover system is comprised of a minimum of 12 inches of clean crusher run gravel above a geotextile demarcation layer. Figure 2 presents the location of the Interim Site Cover system (i.e., property boundary). The geotextile fabric also functions as a demarcation layer between the 12" layer of crushed stone and the remaining residual contamination. The interim Site cover covers the entire Site and serves as a temporary cap following implementation of the remedy. In accordance with the Decision Document, when the Site is redeveloped, the redevelopment scenario for the Site (e.g., installation of pavement, structures, a minimum of 2 feet of soil cover etc.) must meet the requirements for cover material set forth in 6 NYCRR Part 365-6.7(d). The quality and integrity of the Interim Site Cover system will be inspected at defined, regular intervals in accordance with this SMP unless and until the Site is redeveloped with a permanent cover system acceptable to NYSDEC and/or the subsurface soil with concentrations of remaining residual contamination is no longer present at the Site.
- **Excavation Work Plan (EWP):** as provided in Appendix B of the SMP, the EWP outlines the procedures required to be implemented in the event the cover system is breached, penetrated, or temporarily removed, and any underlying potential remaining residual contamination is disturbed. Procedures for the inspection of this cover are provided in the Monitoring and Sampling Plan included in Section 4 of the SMP. Procedures for maintenance or repair of the cover are provided in in the Operation and Maintenance Plan (Section 5 of the SMP). Any work that involves a breach of the Interim Site Cover system and/or potential contact with residual remaining residual contamination at the Site will require development of a task specific excavation work plan that meets the minimum generic requirements of the EWP, as well as a Health and Safety Plan (HASP) and associated Community Air Monitoring Plan (CAMP) approved by the NYSDEC and NYSDOH.

As specified in the SMP, the Interim Site Cover system is to be inspected annually. In addition, the River Wall on the eastern boundary of the Site and the Site's Storm water infiltration system will also be inspected annually.

4.2 IC/EC Compliance

The NYSDEC-approved SMP is in place. All required inspections were performed in accordance with the SMP. All Site restrictions have been complied with during this reporting period.

4.3 IC/EC Certification

The IC/EC Certification is included in Appendix B of this PRR.

5. Inspection Plan Compliance

5.1 Inspection Requirements

The inspection requirements as specified in the SMP are presented in Section 3.

5.2 Inspection Compliance

The inspections were conducted in accordance with the SMP.

6. Conclusions and Recommendations

Each component of the SMP was complied with:

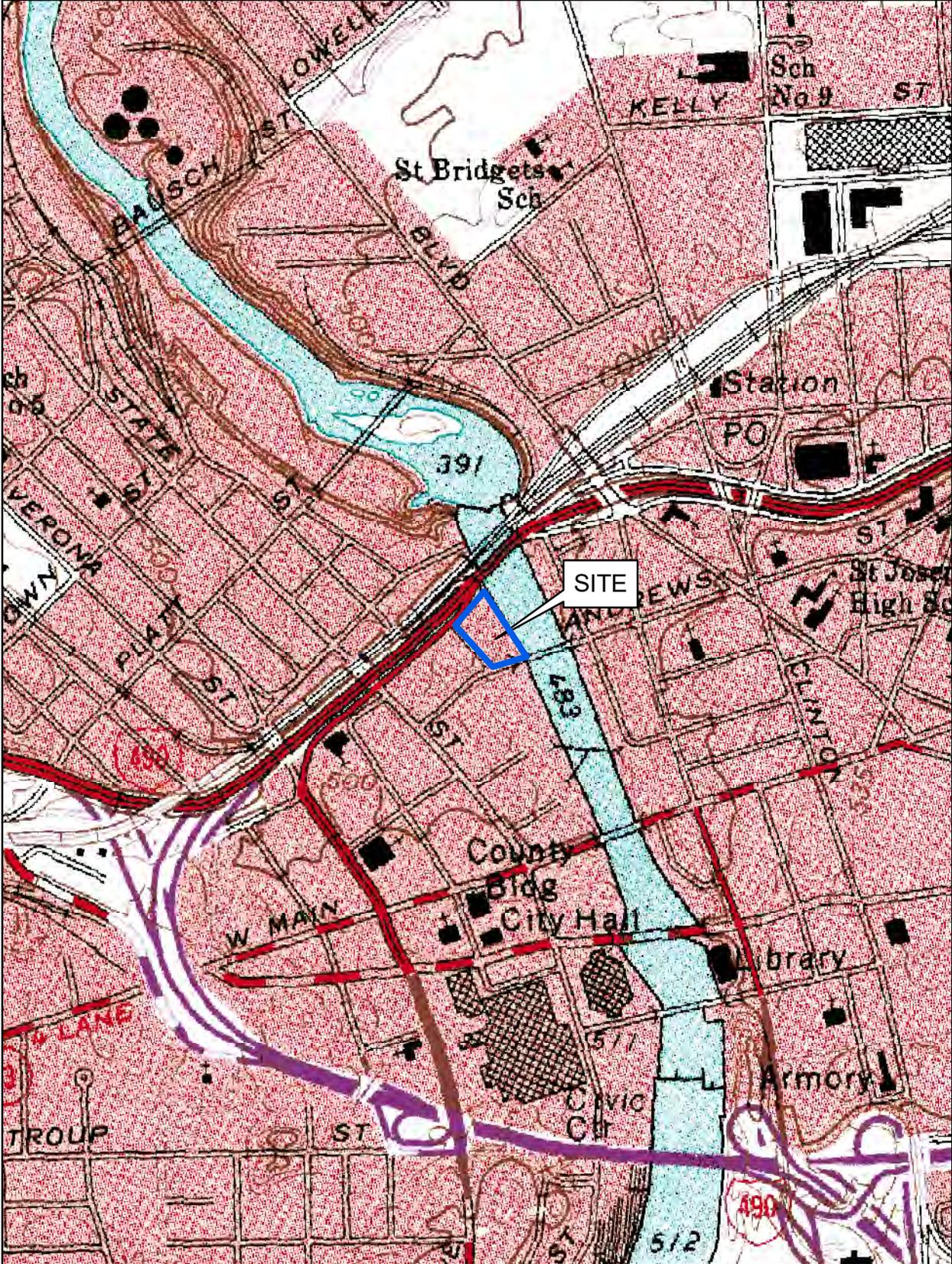
- ICs/ECs have been in place and effective, and
- Inspections were performed as required.

Based upon the inspections and compliance with the SMP, the Site remedy continues to meet the remedial objectives set forth. RG&E will continue to conduct annual inspections of ECs and groundwater monitoring on a five-quarter (15-month) frequency.

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Figures

FIGURE 1



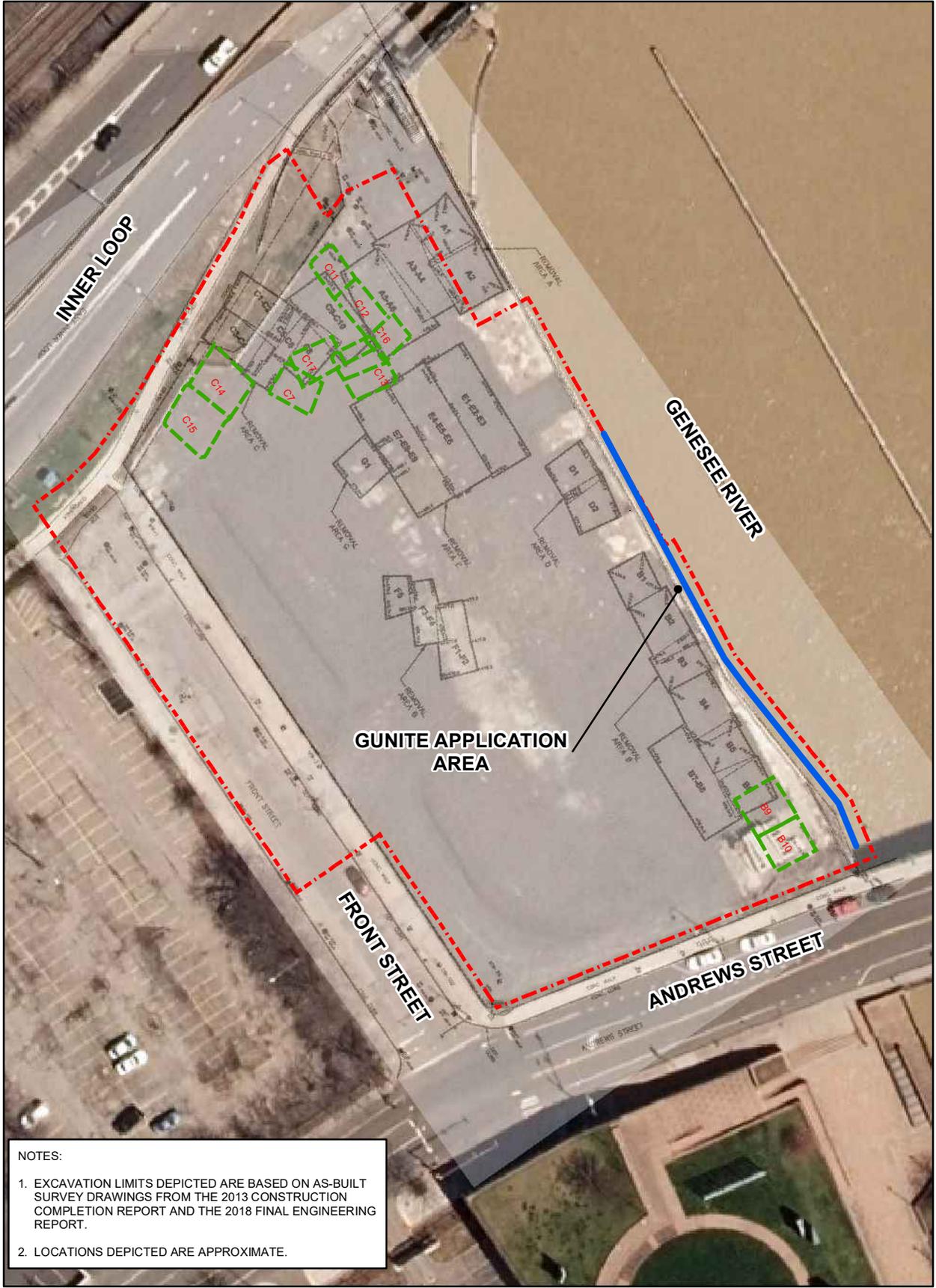
SITE LOCATION

- NOTES:
- 1. U.S.G.S. TOPOGRAPHIC MAP OF ROCHESTER, NY.
 - 2. NOT TO SCALE

RG&E
FRONT STREET MGP SITE
ROCHESTER, NEW YORK



FIGURE 2



NOTES:

1. EXCAVATION LIMITS DEPICTED ARE BASED ON AS-BUILT SURVEY DRAWINGS FROM THE 2013 CONSTRUCTION COMPLETION REPORT AND THE 2018 FINAL ENGINEERING REPORT.
2. LOCATIONS DEPICTED ARE APPROXIMATE.

- Legend**
-  APPROXIMATE SITE LIMIT
 -  APPROXIMATE SUPPLEMENTAL EXCAVATION LIMITS
 -  APPROXIMATE LIMITS OF GUNITE APPLICATION

SITE LAYOUT



Site Management Periodic Review
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Appendix A

2025 River Wall, Annual Site-wide, and Storm Water Infiltration System Inspection Report



December 2, 2025

Mr. Gerald Pratt, P.G.

New York State Department of Environmental Conservation
Division of Environmental Remediation
Section Chief, Remedial Bureau C, 12th Floor
625 Broadway
Albany, New York 12233-7014

Subject: 2025 River Wall, Annual Site-wide, and Storm Water Infiltration System Inspection Report
RG&E Front Street Former MGP Site
Corner of Front and Andrews Street
City of Rochester, Monroe County, New York
NYSDEC Site #V00073-8

Dear Mr. Pratt:

On behalf of Rochester Gas and Electric Corporation (RG&E), NEU-VELLE, LLC (NEU-VELLE) completed the 2025 River Wall, Annual Site-wide, and Storm Water Infiltration System Inspection in accordance with the requirements outlined within the Site Management Plan (SMP) for the Front Street former Manufactured Gas Plant (MGP) Site located at the corner of Front and Andrews Street, Rochester, New York (the "Site").

River Wall Inspection Activities

The River Wall is located within the RG&E Front Street former MGP Site along the eastern boundary of the property at the corner of Front and Andrews Street in Rochester, NY. The River Wall consists of stacked stone and mortar wall sections between concrete columns. The River Wall foundation (stacked stone) is constructed on an existing bedrock shelf. Prior to conducting the River Wall inspection on July 22, 2025, a tailgate safety meeting was held by RG&E, NEU-VELLE, and GEI to review the work activities, potential hazards, and implementation of safety measures/procedures during the River Wall inspection process.

NEU-VELLE worked with GEI to provide a drone [small Unmanned Aircraft System (sUAS)] and operator/pilot to assist with the inspection. The use of the drone eliminated the need for placing workers above the river and therefore increased the overall safety of performing the River Wall inspection.

River Wall inspection procedures consisted of visually inspecting the River Wall in areas where Gunitite applications were previously installed for evidence of non-aqueous phase liquid (NAPL), tar seeps, or other MGP-related impacts on the river side of the River Wall.

The River Wall Gunite areas are summarized as follows:

- Northern Gunite Application Area – Gunite installed during the 1998 IRM north of Column 2.
- Southern Gunite Application Area – Gunite installed during the 1998 IRM between Column 8 and Column 13 and Gunite installed during the Supplemental Remedial Action in 2017 between Column 13 and the Andrews Street Bridge.

Based on visual observations of where NAPL seeps were historically observed on the River Wall, the inspection focused on the following locations:

- interfaces between the River Wall and stacked stone foundation;
- between the foundation and bedrock shelf; and
- on the bedrock shelf and horizontal seams in the face of the River Wall.

The River Wall inspection form and photographs are provided in **Attachment A** of this report. **Attachment B**, River Wall Inspection drawing, was utilized during the inspection to reference the concrete column locations. Below are specific observations made during the River Wall inspection:

- North of Column 1 (northern Gunite application area) – There was fine sediment and a small amount debris (mostly wood) present on the lower bedrock shelf. The Gunite application and newer section of River Wall are in good condition. No impacts observed from visual inspection of sediment in the area.
- Column 1 to 2 (northern Gunite application area) – Sediment is present. No observed impacts. Some minor Gunite erosion observed. No repairs warranted and/or recommended for the Gunite at this time.
- Column 2 to 3 – Sediment is present on the lower bedrock shelf. No MGP-related impacts were observed.
- Column 3 to 4 - (new cast-in-place concrete wall section) – Sediment is present on lower bedrock shelf. No MGP-related impacts were observed.
- Column 4 to 8 – Sediment is present on the lower bedrock shelf. Some erosion/scouring of lower foundation wall was observed proximal to (south of) column 4.
- Column 8 to Andrews Street Bridge – (southern Gunite application area) – Sediment is present on the lower bedrock shelf. No major debris and no visual or odor of MGP-related impacts were observed. Gunite was in good condition and without damage. Several woody shrubs are growing out of cracks in wall between columns 8 and 9 and near column 11.

Overall, the general River Wall conditions observed on July 22, 2025 were consistent with the previous reporting. While a general loss of mortar and stone was observed at several locations along the River Wall, groundwater weeping through the wall did not contain visual indications of MGP-related impacts. The Gunite in both the Northern and Southern Gunite Application Areas was generally intact and in good condition, with some isolated areas of minor deterioration in the Northern Gunite Application Area (as noted above). MGP-related impacts were not observed in the sediment present on the lower bedrock shelf, on the face of the River Wall, or the stacked stone foundation at the base of the River Wall.

Site-Wide Inspection Activities

NEU-VELLE completed the annual Site-wide inspection on July 22, 2025. The Interim Site Cover was observed to be in good condition with no apparent breaches or erosion of the cover observed. There was no noticeable settling of excavation cell areas observed. Vegetation growth (weeds) observed along the perimeter fence line and on the east side of the Site along the River Wall should be controlled to minimize spreading. No evidence of MGP-related impacts was noted at the surface. No major Site deficiencies were noted during the inspection. The Site and area outside of the west gate has been used as an equipment and material staging area for various non-Site-related construction activities in the City of Rochester. Currently there are only staged materials in the southeast portion of the Site. Some silty sediment has accumulated across the central portion of the Site from these material staging areas and activities. A cleanup of these sediments and the staged areas will be needed following the conclusion of the construction activities, and the gravel cover system may require additional gravel in some areas. A large crane was staged on-site at the time of the inspection. This occurs periodically at the Site, and it is understood that this crane is used to remove debris from the Genesee River channel. The Site-wide inspection form and photographs are included within **Attachment C**.

Storm Water Infiltration System Inspection Activities

NEU-VELLE completed the storm water infiltration system inspection on August 4, 2025. The storm water infiltration system consists of two storm water catch basins (north and south) and one central infiltration basin. Upon inspection of the north and south basins, there was standing water with some accumulation of sediment observed. The central basin was visually dry and clean with no accumulation of sediment observed. No major deficiencies were noted during the inspection. The storm water infiltration system inspection form and photographs are provided as **Attachment D**.

Please feel free to contact me at (585) 478-1666 or Jeremy Wolf of RG&E at (585) 450-7957 with any questions or concerns.

Sincerely,



Kyle R. Miller, PG
NEU-VELLE, LLC

Attachments:

- Attachment A – River Wall Inspection Form and photographs
- Attachment B – River Wall Inspection Drawing
- Attachment C – Site-wide Inspection Form and photographs
- Attachment D – Storm Water Infiltration Inspection Form and photographs

Cc: Mr. Jeremy Wolf, RG&E

Attachment A
River Wall Inspection & Photographs



Appendix G2
River Wall Inspection Form
RG&E Front Street MGP Site
Rochester, New York

Date: 7/22/2025
 Time: + 11:00
 Weather Conditions: Partly Cloudy
 Temperature: + 74° F
 Precipitation: NONE
 Personnel/Company: Neu-Velle LLC + GEI (sUAS + operator/pilot)
 Signature(s): [Signature]

Observation Areas	Has ownership of the property changed since the last inspection?	Inspection performed during seasonal low flow (dry season)? If not, explain why.	Visual observation of seeps or tar deposits on face or base of gunite application area?	Soil/sediment accumulated at base of river wall? If yet, are there apparent impacts of sheen, odor, tar-like materials, etc. within the soil/sediment?	Photographs taken?
Between Columns 1 and 2	NO	YES	NONE OBSERVED	YES, BUT NO MGP IMPACTS OBSERVED	YES
Between Columns 2 and 3					
Between Columns 3 and 4					
Between Columns 4 and 5					
Between Columns 5 and 6					
Between Columns 6 and 7					
Between Columns 7 and 8					
Between Columns 8 and 9					
Between Columns 9 and 10					
Between Columns 10 and 11					
Between Columns 11 and 12					
Between Columns 12 and 13					
Between Columns 13 and 14					

Additional Comments:

Notes:
 1. Columns are identified on the attached Figure.

Attachment A – Front St. 2025 River Wall Inspection Photograph Log
Front Street Former MGP Site - Rochester, New York- July 22, 2025



View Along the River Wall – Viewing North/Downstream of Column 12

Attachment A – Front St. 2025 River Wall Inspection Photograph Log



Downstream end of River Wall - North/Downstream of Column 1 and Near Groundwater Monitoring Wells "MW-9S" & "MW-9D"



Area Between Columns 1 & 3

Attachment A – Front St. 2025 River Wall Inspection Photograph Log



Area Between Columns 2 & 3



Vicinity of Columns 4 & 5

Attachment A – Front St. 2025 River Wall Inspection Photograph Log



Area Between Columns 6 & 7



Vicinity of Columns 7 & 8

Attachment A – Front St. 2025 River Wall Inspection Photograph Log



Vicinity of Columns 8 & 9



Vicinity of Columns 9, 10, and 11

Attachment A – Front St. 2025 River Wall Inspection Photograph Log



Vicinity of Columns 11 & 12



Upstream End of Front St. River Wall – Vicinity of Columns 12 & 13

Attachment A – Front St. 2025 River Wall Inspection Photograph Log



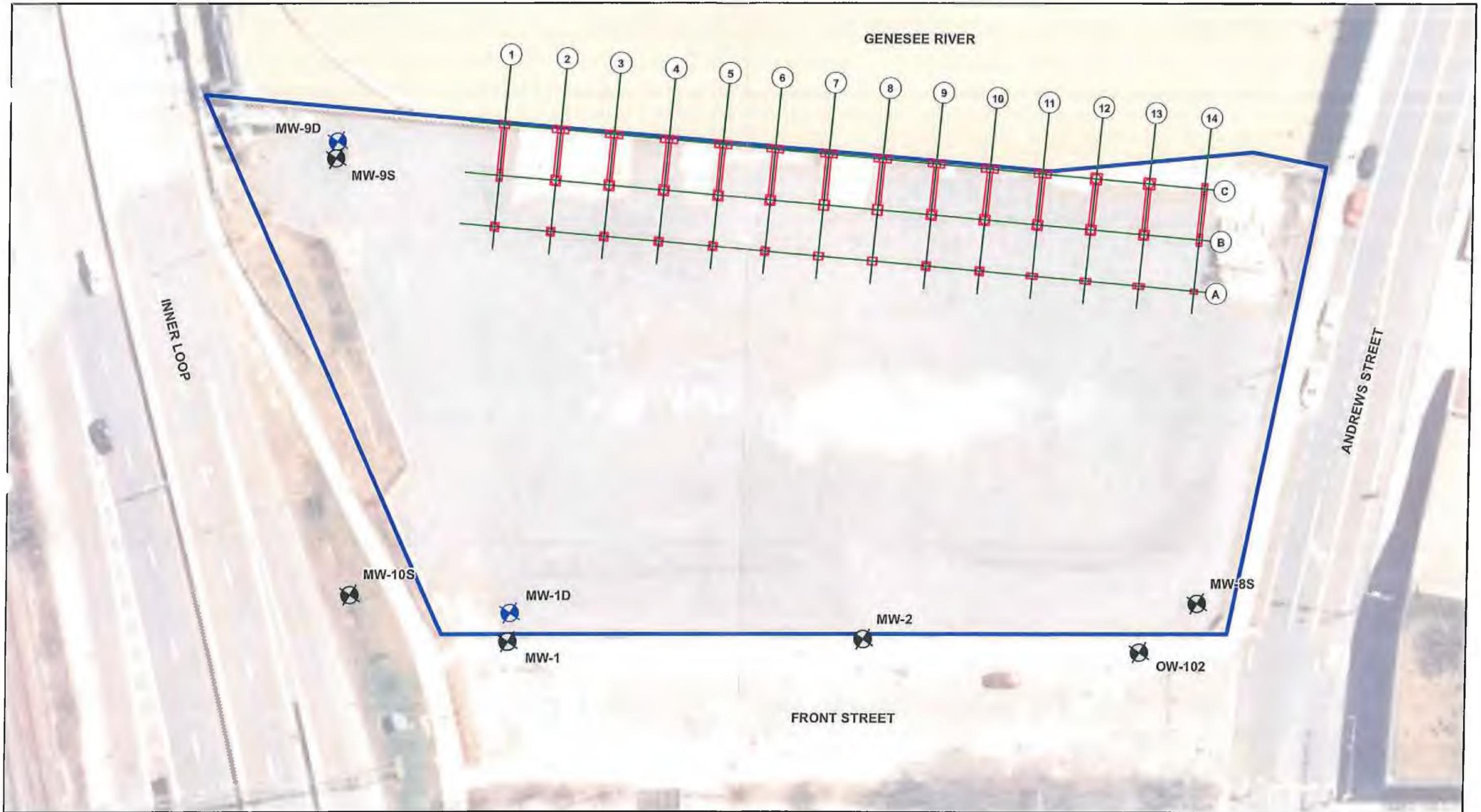
Viewing South/Upstream of Column 14



Southern End of Front St. River Wall as it Meets the Andrews St. Bridge

Attachment B
River Wall Inspection Drawing





LEGEND

-  SHALLOW GROUNDWATER MONITORING WELL
-  DEEP GROUNDWATER MONITORING WELL
-  SITE BOUNDARY
-  FOUNDATIONS
-  COLUMN LINE OF FORMER OPERATIONS FACILITY BUILDING

NOTES:

1. PROPERTY BOUNDARY PER LABELLA ASSOCIATES, P.C. DEED RESTRICTION SURVEY DATED FEBRUARY 10, 2018.
2. MONITORING WELL AND FOUNDATION LOCATIONS ARE APPROXIMATE.

APPENDIX G2

RIVER WALL INSPECTION

RG&E
FRONT STREET MGP SITE
ROCHESTER, NEW YORK



DATE PREPARED: APRIL 2018

Attachment C
Site-wide Inspection Form & Photographs





SITE-WIDE INSPECTION FORM

RG&E Front Street Site

Date: 7/22/2025 Time: ± 12:00
Weather Conditions: Partly cloudy, nice weather
Temperature: ± 75° F Precipitation: NONE
Personnel and Company: Kyle R. Miller Neu-Velle LLC
GEI (sUAS+operator/pilot)
Signatures: [Signature]

Has ownership of the property changed since the last inspection?

Yes No

Are Institutional Controls/Engineering Controls (IC/ECs) in place and effective?

Yes No

If not, explain why.

Are there any changes to the Site use that would affect the SMP or IC/ECs?

Yes No

Is the Site used for vegetable gardens or agricultural purposes?

Yes No



NEU-VELLE^{LLC}

Is native soil, the geotextile fabric demarcation layer, or other signs of MGP impact (sheens, staining, tar-like material) visible?

Yes / No

Is the site cover intact (i.e., no visible sign of excavations, erosion, damage)?

Yes / No

Is groundwater used as a potable water source?

Yes / No

Are there any site changes (either surface or subsurface) since the last inspection event?

Yes / No

A large crane (CP Ward) is staged near the center of the site. It is understood that this will be used to remove debris from the Genesee River.

Photographs taken?

Yes / No

Are there any fencing changes since the last inspection event?

Yes / No

Attachment C – Site-Wide Inspection Photograph Log

Front Street former MGP Site - Rochester, New York – July 22, 2025



Looking East Across the Site from the Main Gate on Front Street



Looking Southwest Across the Southwestern Portion of the Site

Attachment C – Site-Wide Inspection Photograph Log



Looking Northwest Across the Northern Portion of the Site



Looking North Across the Eastern Portion of the Site

Attachment C – Site-Wide Inspection Photograph Log



Looking South Across the Central Portion of the Site



Looking Southeast Across the Western Portion of the Site

Attachment C – Site-Wide Inspection Photograph Log



Looking South at the Southeastern Corner of the Site



Looking East at the Remaining Staged Construction Materials Located in the Southeastern Portion of the Site

Attachment C – Site-Wide Inspection Photograph Log



Looking West Across the Central Portion of the Site at the Main, Front Street Gate



Looking West Across the Northwestern Corner of the Site and the Northern Front Street Gate

Attachment D

Storm Water Infiltration Inspection Form and Photograph Log





STORM WATER INFILTRATION SYSTEM INSPECTION FORM

RG&E Front Street Site

Date: 8/4/2025 Time: ± 14:00
Weather Conditions: Hazy, winds are calm
Temperature: ± 85°F Precipitation: NONE
Personnel and Company: KYLE R. MILLER
NEU-VELLE, LLC
Signatures: K.R.M.

Has ownership of the property changed since the last inspection? Yes No

North Basin Measurements below from top of D.I. Iron
North basin integrity, recommended corrective actions: NONE 5.5 feet to top of Grate:
sediment
Thickness of accumulated sediment in north catch basin: 3.1 feet to top of standing water
Quantity removed for off-Site disposal and disposal facility: NONE (∴ 2.4 feet of standing water)

South Basin
South basin integrity, recommended corrective actions: NONE 5.4 feet to top of sediment
Thickness of accumulated sediment in north catch basin: 3.2 feet to top of standing water
Quantity removed for off-Site disposal and disposal facility: NONE (∴ 2.2 feet of standing water)

Central Basin
Central basin integrity, recommended corrective actions: NONE
Thickness of accumulated sediment in ~~north~~ ^{in central} catch basin: NONE observed
Quantity removed for off-Site disposal and disposal facility: NONE

Photographs taken? Yes No

Attachment D – Storm Water Infiltration System Inspection Photograph Log

Front Street Former MGP Site - Rochester, New York- August 4, 2025



Central basin- viewing northeast



Northern catch basin – viewing west

Attachment D – Storm Water Infiltration System Inspection Photograph Log



Southern storm water catch basin – viewing east



Interior of Central basin

Site Management Periodic Review
Report and IC/EC Certification (2025)
Front Street Former MGP Site (V00073-8)
City of Rochester, Monroe County, New York
December 2025

Appendix B

Institutional and Engineering Controls Certification Form



Enclosure 2
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form



	Site Details	Box 1	
Site No.	V00073		
Site Name RGE - Front St.			
Site Address: Front and Andrews Streets		Zip Code: 14614	
City/Town: Rochester			
County: Monroe			
Site Acreage: 1.800			
Reporting Period: November 02, 2024 to November 02, 2025			
		YES	NO
1. Is the information above correct?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
If NO, include handwritten above or on a separate sheet.			
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.			
5. Is the site currently undergoing development?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
		Box 2	
		YES	NO
6. Is the current site use consistent with the use(s) listed below? Industrial		<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Are all ICs in place and functioning as designed?		<input checked="" type="checkbox"/>	<input type="checkbox"/>
IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.			
A Corrective Measures Work Plan must be submitted along with this form to address these issues.			
_____ Signature of Owner, Remedial Party or Designated Representative		_____ Date	

Description of Institutional Controls

<u>Parcel</u>	<u>Owner</u>	<u>Institutional Control</u>
106.780-0001-019.000	Roch Gas & Electric Corp	Ground Water Use Restriction Landuse Restriction Site Management Plan O&M Plan IC/EC Plan Site Management Plan O&M Plan

An institutional control in the form of deed restrictions will be placed onsite that (a) land use is subject to local zoning laws, the remedy allows the use and development of the controlled property to restricted residential use (b) restricts the use of groundwater as a source of potable water or process water, without the necessary water quality treatment as determined by the NYSDEC and NYSDOH, (c) requires compliance with an NYSDEC-approved site management plan (SMP); and (d) requires the remedial party or site owner to complete and submit to the NYSDEC a periodic certification of institutional and engineering controls in accordance to Part 375-1.8(h)(3)

Developing an SMP that would consist of (a) an excavation plan, detailing appropriate soil handling and management protocols for any excavation below the soil cover at the site in the future; (b) a monitoring plan to assess site groundwater and outline inspection of the cover system and the gunite wall; (c) identification of site use restrictions; (d) fencing, signage, and security requirements to control site access (as necessary); (e) a potential requirement that the site developer place additional clean fill meeting the 6NYCRR Part 375-6 restricted use soil cleanup objectives appropriate for the intended site use; and (f) provisions for a soil vapor intrusion study depending on the site future use and/or requirements for proposed new buildings at the property to be designed with a vapor barrier and sub-slab ventilation.

Description of Engineering Controls

<u>Parcel</u>	<u>Engineering Control</u>
106.780-0001-019.000	Fencing/Access Control Cover System Fencing/Access Control

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the Engineering Control certification;

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

X

2. For each Engineering control listed in Box 4, I certify by checking "YES" below that all of the following statements are true:

(a) The Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

(d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

X

IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. V00073

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1,2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Albert G. Lyons Jr at Lyons Engineering, DPC
10 Jones Ave
Rochester, NY 14608
print name print business address

am certifying as Owner Representative (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.

Albert G Lyons Jr
Signature of Owner, Remedial Party, or Designated Representative
Rendering Certification

12/1/25
Date

EC CERTIFICATIONS

Box 7

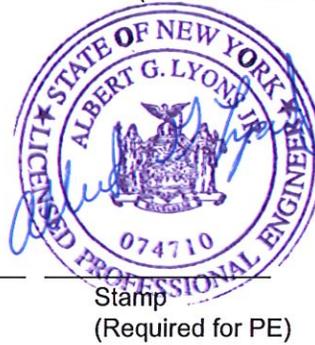
Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Albert G. Lyons, Jr at Lyons Engineering, DPC
10 Jones Ave
Rochester, NY 14608
print name print business address

am certifying as a for the Owner representative
(Owner or Remedial Party)

Albert G. Lyons, Jr
Signature of , for the Owner or Remedial Party,
Rendering Certification



12/1/25
Date