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May 7, 2007

Ms. Charlotte Theobald  
NYS Department of Environmental Conservation  
Division of Environmental Remediation  
6274 East Avon-Lima Road  
Avon, New York 14414-9519

**RE: Revised Remedial Design Investigation Work Plan – RAOC3  
Former Davidson Collision Site  
399 Gregory Street  
Site No. C828091  
City of Rochester, Monroe County**

Dear Charlotte:

On behalf of the City of Rochester (City), please find enclosed this revised Remedial Design Investigation (RDI) Work Plan for Remedial Area of Concern 3 (RAOC 3) prepared by Stantec for the former Davidson Collision Site located in the City of Rochester, Monroe County, New York. The Work Plan for the requested Perimeter Soil Vapor Survey is presented under separate cover.

### **Background**

The Davidson Collision Site (Site No. 828091) is located at 399 Gregory Street and was operated as an auto body shop from the early 1960s until it went out of business in March 1993.

Previous environmental studies that have been completed at the 399 Gregory Street Site include the following:

September 1991 Phase II Investigation;  
August 1995 Preliminary Site Assessment Report;  
March 2003 Site Investigation Report; and  
September 2006 Remedial Investigation (RI) and Alternatives Analysis Report (AAR).

In reviewing prior New York State Department of Environmental Conservation (NYSDEC) data, RAOC 3 was identified at the MW-105 location where DEC reported metals impacted soil (arsenic, beryllium, cadmium, nickel and selenium) in a 6-8 ft. bgs sample were above Recommended Soil Cleanup Objectives (RSCOs). In addition four of the five metals (excluding cadmium) were not within two standard deviations of their mean concentrations. This boring

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was located on the City property slightly east of AOC 1 along the common property line with 10 Cayuga Street, which is owned by Mr. John Trickey. However, the horizontal and vertical limits of the metals impacts to the soil in the area of MW-105 were not delineated. Therefore, a DPI consisting of a one-day Geoprobe program to further delineate the impacted zone was recommended. Based upon field observations, up to eight (8) soil samples were recommended to be collected from the advancement of Geoprobe borings and submitted for laboratory analysis to assess the potential extent of remedial measures. As requested, the soil analytical results will be compared to the new Part 375 soil cleanup objectives for proposed commercial use.

**Scope of Work**

A total of eight (8) Geoprobe® soil borings (B-218 through B-225) are proposed to be completed in order to delineate potential metals impacts to the soil in the area of MW-105. It is proposed to conduct the four initial borings at distances of 10 ft. to the north, east, south and west of MW-105, followed by four borings rotated 45 degrees at distances of 20 ft. to the northeast, southeast, southwest, and northwest, respectively. Proposed soil boring locations are presented on Figure 1. It is proposed to collect samples at depths of 0-4 and 4-8 feet. The exact locations of the borings will be determined in the field in consultation with the DEC. Individuals performing the work will do so in accordance with the HASP presented in the Remedial Investigation Work Plan (RIWP).

Prior to initiating the drilling program, the Underground Facilities Protective Organization (UFPO) will be contacted to locate publicly owned utilities. In addition, any additional drawings or knowledge of the location of underground utilities, both public and private, at the property will be requested prior to the commencement of drilling. It is understood that the City access agreement for the 10 Cayuga Street parcel is still in effect and will we contact the owner, Mr. Trickey, to apprise him of the proposed program prior to commencement.

Borings will be advanced with the use of small-diameter, direct push Geoprobe® drilling methods. Stantec anticipates that the soil borings will extend to 8 ft. below the ground surface.

Soil samples will be collected on a continuous basis during the completion of the Geoprobe soil borings. Composite samples will be containerized from the 0-4 ft. and 4-8 ft. bgs intervals. Soil sampling equipment will be decontaminated between samples with a liquinox and potable water wash followed by a potable water rinse. Borings will be drilled to the target depth or refusal, whichever is encountered first. Each soil sample will be screened with a calibrated photoionization detector (PID) for the presence of volatile organic vapors. Specifically, portions of each sample will be placed in individual sealed containers. The volatile organic vapors that accumulate within the headspace of the containers will be screened for volatile organic vapors using the PID. Soil samples will also be visually evaluated for indications of staining, oils, fill, etc. Based upon visual observations and PID readings, it is understood that soil samples may need to be collected for VOC and SVOC analyses.

If no evidence of potential impacts is observed, cuttings will be returned to the borehole and the borehole will be grouted to the surface. If evidence of potential impacts is observed (i.e. elevated PID readings, visual staining, oils, fill, etc.), the drill cuttings will be contained and stored on-site in a secured 55-gallon drum for subsequent disposal and the boring will be grouted to the ground surface.

Each Geoprobe soil boring will be surveyed for horizontal control using a GPS unit or taped from existing site features.

The eight (8) soil samples from the inner ring of four borings (0-4 ft. and 4-8 ft. bgs from each boring) are proposed to be submitted for laboratory analysis of the five metals of concern (arsenic, beryllium, cadmium, nickel, and selenium) using SW846 analytical methods. Soil samples will be composites of the sampled interval. One duplicate sample will be submitted and analyzed for QA/QC purposes. The balance of the samples from the outer ring of samples will also be submitted to the laboratory but will be put on hold. All samples will be submitted within 48 hours to Chemtech in Mountainside, New Jersey, for one week turnaround times. Contingent on the results from the initial eight samples, samples from the outer ring of four samples will be analyzed for the metals of concern. As a result, a maximum of 16 samples may be analyzed after the second round of analysis is completed.

When the remedial program is implemented, it is understood that the confirmatory samples from this area will need to be analyzed using ASP protocols with Category B deliverables and will need to undergo a data usability review.

### Reporting

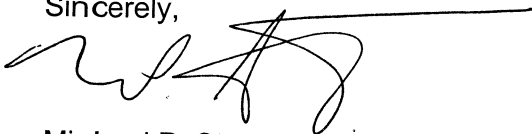
Following receipt of the laboratory data, a letter report will be prepared. The report will describe the field observations recorded at the time of sampling, the sampling procedures followed, and the analytical results. Copies of boring logs and laboratory analytical reports will be appended. Copies of the report will be submitted to the NYSDEC, NYSDOH and MCDOH.

### Schedule

Stantec intends to conduct the fieldwork contingent on receipt of approval to proceed from the NYSDEC; coordination of a suitable date with the City, Mr. Trickey, NYSDEC, NYSDOH, and MCDOH; and drilling contractor availability. We will endeavor to provide 10-day advance notice prior to the start of the field work. The fieldwork is expected to take one to two days to complete and will be coordinated to occur consecutively with the requested perimeter soil vapor survey. The two rounds of laboratory analysis are expected to take approximately two weeks. A letter report will be prepared and forwarded to the NYSDEC and other agencies within approximately two weeks of receipt of the laboratory data.

Please do not hesitate to call should you have any questions or require further information.

Sincerely,



Michael P. Storonsky  
Senior Associate

Attachment:

Figure 1 – Proposed Soil Boring Locations

c: Melissa Menetti (NYSDOH – Troy)  
Joseph Albert (MCDOH – Rochester)  
Mark Gregor (City of Rochester)  
File