



November 20, 2015

**Mr. Frank Sowers**

Environmental Engineer 2  
NYSDEC  
Division of Environmental Remediation  
6274 East Avon-Lima Road  
Avon, NY 14414

RE: Portion of Former Vacuum Oil Refinery, Brownfield Cleanup Program # C828190  
Crushed Concrete Access Road Construction Plan

FILE: 11862/61157

Dear Frank:

On behalf of the City of Rochester, O'Brien & Gere (OBG) would like to provide the New York State Department of Environmental Conservation (NYSDEC) with information pertaining to the proposed use of crushed concrete to cover the surface of a access road at the Portion of Former Vacuum Oil Refinery BCP Site (Site). The proposed access road will be used by subcontractors, City Division of Environmental Quality (DEQ) staff, and OBG to better access the center of the Site during wet or inclement weather, and to reduce mud on vehicle or equipment tires.. The approximate area of the access road is depicted on the attached Figure.

### SOURCE AND ANALYTICAL TESTING

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According to the City, the crushed concrete is currently staged at the City Operations facility (110 Colfax Street) and was generated primarily by Water Bureau water main projects, residential demolition projects (after completing asbestos abatement), and from concrete sidewalk replacement projects completed by the City. This material will be accessed to the Site by City Department of Environmental Services (DES) staff via 10 wheel dump trucks.

It is expected that 400-500 cubic yards of material will be needed for the access road cover. Following Table 5.4(e)10 of NYSDEC's DER-10, the following sampling and analysis will be conducted:

- 5 discrete samples for Target Compound List (TCL) volatile organic compounds (VOCs)
- 2 composite samples for TCL semi-volatile organic compounds (SVOCs), inorganics (6NYCRR Part 375-listed metals plus cyanide), polychlorinated biphenyls (PCBs), and pesticides. Each composite sample will be prepared from 3-5 discrete samples across the source material.

The sampling will be performed by City DEQ staff and delivered to a National Environmental Laboratory Accreditation Program (NELAP) certified laboratory for analysis. The laboratory will incorporate their standard QA/QC into the analyses. Additional QA/QC samples will not be collected. The laboratory will provide a Category B deliverable package for record purposes. However, the data will not be validated or entered into the EQUIS database for the site.

As discussed between NYSDEC and City DEQ representatives, City DEQ has reviewed the sources of material and the process utilized by the City to evaluate materials for asbestos containing materials (ACM). Based on this



review, it is the City's opinion that its procedures for evaluating and abating suspect ACM prior to demolitions, and addressing ACM as part of other standard operating procedures by City DES and City Water Bureau during either project design evaluations and/or in the field (should suspect ACM be encountered as a result of encountering non-City utilities that might contain ACM) are sufficient. Based on the above information, it is the City's position that further sampling of the material for ACM is not warranted.

The samples will be collected from the processed staged pile(s) intended to be used for the construction of the access road. City DES will be instructed to access material only from the pile(s) that have been undergone testing.

## SCHEDULE

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Construction of the access road is proposed to begin subsequent to receipt of analytical results and discussion with the NYSDEC. Analytical sampling will potentially occur during the week of November 23, 2015 and/or week of November 30, 2015. Construction will begin following receipt of the analytical results.

## DESIGN AND OVERSIGHT

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The construction of the access road will be completed by a 40-hour-OSHA-trained subcontractor, and oversight will be provided by City DEQ staff and/or OBG staff.

A layer of geotextile fabric will first be placed on the ground surface. This fabric will be useful as a demarcation layer in the event that remedial investigation (RI) sampling needs to occur below the access road.

City DES trucks will likely back on the Site from Flint Street and remain on crushed concrete at all times to prevent encountering the Site surface soils. The subcontractor will utilize a front end loader and bulldozer (or other suitable construction equipment) to move and track over the crushed concrete, constructing the access road from Flint Street southward toward the tax parcel identified as 13 Cottage Street. The access road is proposed to be constructed from 4 to 8 inches in thickness and approximately 10 feet wide. The access road will be constructed to avoid or minimize the need to relocate current proposed sample locations.

## DECONTAMINATION PROCEDURES

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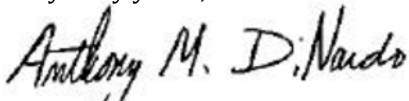
City DES trucks will not come in contact with the Site ground surface, and will remain on crushed concrete at all times. Therefore, these trucks will not require decontamination when leaving the Site.

The subcontractor, City DEQ, and OBG will follow the decontamination procedures described in the October 2015 RI Work Plan (and already in place for vehicles, equipment, and personnel leaving the Site) if personnel or equipment comes into contact with Site soils.

The access road is anticipated to remain at the Site for the duration of the RI and potentially remain as part of future development.

If you have any questions regarding this plan, please contact me at 585-295-7707 or via email at [Anthony.DiNardo@obg.com](mailto:Anthony.DiNardo@obg.com)


Very truly yours,



O'BRIEN & GERE ENGINEERS, INC.

**Anthony M. DiNardo, P.E.**

Sr. Project Engineer



Attachments:

Figure 1 – Proposed Access Road

Cc: Bridget Boyd, NYSDOH  
Joseph Biondolillo, City of Rochester  
Mark Gregor, City of Rochester  
Doug Crawford, P.E., OBG  
Deb Wright, CPG, OBG



FIGURE 1



INVESTIGATIVE DERIVED WASTE (IDW) IS PROPOSED TO BE STORED IN THIS LOCATION. TEMPORARY STAGING OF IDW MAY OCCUR ON OTHER AREAS OF THE SITE UNTIL A SUITABLE TIME TO TRANSPORT TO THE IDW AREA. (i.e., 55-GALLON DRUMS STAGED ON PALETS NEAR (OR MORE) DECONTAMINATION AREAS; PURGE WATER STAGED IN DRUMS NEAR MONITORING WELLS, ETC.).

PERSONNEL AND VEHICULAR DECONTAMINATION AREA

(IF OR MORE DECONTAMINATION AREAS WILL ALSO BE SITUATED ON SITE AND LOCATIONS WILL BE DISCUSSED WITH THE NYSDEC PRIOR TO CONSTRUCTION.)

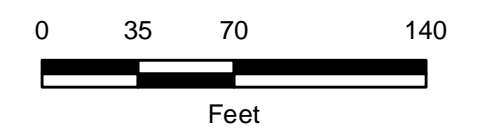
LEGEND

- PROP\_SAMP\_LOCS-2015-rev10...**
- SB-100, SS-100, SV-100, GW-100: PROPOSED COMBINED SAMPLE LOCATION (SS, GW, SB AND/OR SV)
  - GW-101: PROPOSED GROUNDWATER SAMPLE LOCATION
  - OVR-131/ BED1-105: PROPOSED NESTED BEDROCK INTERFACE MONITORING WELL - 5
  - OVR-106: PROPOSED OVERBURDEN MONITORING WELL - 25
  - SB-129: PROPOSED SOIL BORING - 76
  - SS-114: PROPOSED SURFACE SOIL SAMPLE - 54
  - TP-149: PROPOSED TEST PIT - 52
  - Blue circle: PROPOSED INITIAL SURVEY POINT (CITY LAND SURVEY DEPARTMENT)
  - Red dashed line: EXISTING MULTI-USE TRAILS
  - Yellow outline: BROWNFIELD CLEANUP PROGRAM SITE LIMITS (APPROXIMATELY 15.4 ACRES)
  - Orange dashed outline: FORMER VACUUM OIL REFINERY SITE (APPROXIMATE)
  - Black hatched area: PROPOSED PATHS/LANES TO BE CLEARED TO FACILITATE ADVANCEMENT OF SOIL BORINGS, EXCAVATION OF TEST PITS, AND INSTALLATION OF GROUNDWATER MONITORING WELLS (APPROXIMATELY 3 ACRES, 15' WIDE/ 15' TALL)
  - Red hatched area: NOT PART OF CITY OF ROCHESTER BROWNFIELD CLEANUP PROGRAM SITE; HOWEVER, THESE PARCELS ARE BEING INVESTIGATED BY OTHER ENTITIES.

CITY OF ROCHESTER  
BROWNFIELD CLEANUP PROGRAM  
REMEDIATION INVESTIGATION  
WORK PLAN  
PORTION OF FORMER VACUUM OIL REFINERY

1, 13, 31, 69, AND 75 COTTAGE STREET;  
100 RIVERVIEW PLACE;  
102 VIOLETTA STREET; AND PORTION OF  
1320 S. PLYMOUTH AVENUE  
ROCHESTER, NEW YORK

PROPOSED ACCESS ROAD



NOTES:

1. LOCATIONS OF PARCEL BOUNDARIES ARE APPROXIMATE.
2. SOME SHAPEFILES OBTAINED FROM LABELLA ASSOCIATES, P.C. IN 2008/2009.
3. INFORMATION SOURCES:
  - DATA SUMMARY PACKAGE, FORMER VACUUM OIL REFINERY SITE - 15 FLINT STREET, OCTOBER 2008, LABELLA ASSOCIATES, P.C.
  - SUBSURFACE INVESTIGATION SUMMARY REPORT, FORMER VACUUM OIL COMPANY REFINERY AREA, JANUARY 12, 2009, ROUX ASSOCIATES, INC.
  - PHASE I ENVIRONMENTAL SITE ASSESSMENTS 1, 13, 31, 69, AND 75 COTTAGE STREET, 100 RIVERVIEW PLACE, 102 VIOLETTA STREET, AND 1315 S. PLYMOUTH AVENUE; ROCHESTER, NEW YORK, DECEMBER 2012, O'BRIEN & GERE.
  - 2012 AERIAL IMAGERY OBTAINED FROM NYS GIS CLEARINGHOUSE.
4. CLEARING OF VEGETATION AND TREES LESS THAN 12 INCHES IN DIAMETER WILL BE PERFORMED AS NECESSARY TO ACCESS PROPOSED SAMPLE LOCATIONS.
5. ADDITIONAL SUBSURFACE SOIL SAMPLES WILL BE COLLECTED FROM SELECT GROUNDWATER MONITORING WELL INSTALLATION LOCATIONS (NOT DEPICTED).
6. IF RECEIVED BY O'BRIEN & GERE, ADDITIONAL SAMPLE LOCATIONS AND ANALYTICAL DATA FOR BROWNFIELD OPPORTUNITY AREA (BOA) WORK BEING IMPLEMENTED BY THE CITY OF ROCHESTER IN THE FLINT STREET RIGHT-OF-WAY AND CITY-OWNED LAND NORTH OF FLINT STREET; AND THE 5 FLINT STREET/15 FLINT STREET REMEDIATION INVESTIGATION BEING PERFORMED BY OTHER ENTITIES WILL BE EVALUATED AND THE PROPOSED SAMPLE LOCATIONS DEPICTED HEREIN MAY BE MODIFIED IF WARRANTED.
7. EXISTING MULTI-USE TRAIL SHAPEFILE PROVIDED BY GENESSEE TRANSPORTATION COUNCIL, LOCATED IN ROCHESTER, NEW YORK ON MAY 28, 2015.

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NOVEMBER 2015  
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