Environmental Management Plan

Location:

Center City Courtyard
(Former Rotary Site)
141, 139, 133, 129, 119, 103, and 99 West Main Street, 10 and 16 South Washington Street, and 19 South Plymouth Avenue
Rochester, New York 14614

Prepared for:

CSD Housing, LLC
642 Kreag Road, Suite 301
Pittsford, NY 14534

LaBella Project No. 2221127

February 2023 – Revised September 19, 2023

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Common Acronyms / Abbreviations

ACM – Asbestos Containing Material
bgs – Below Ground Surface
CAMP – Community Air Monitoring Plan
CCD – Center City District
CP – Commissioner's Policy
DEC – (New York State) Department of Environmental Conservation
DER – (NYSDEC) Division of Environmental Remediation
DEQ – (City of Rochester) Department of Environmental Quality
EMP – Environmental Management Plan
ESA – Environmental Site Assessment
ft bgs – Feet Below Ground Surface
HASP – Health and Safety Plan
NYSDEC – New York State Department of Environmental Conservation
NYSDOH – New York State Department of Health
NYSDOL – New York State Department of Labor
PAH – Poly-Aromatic Hydrocarbon
PID – Photo-Ionization Detector
REC – Recognized Environmental Condition
ROW – Right-of-Way
SGMP – Soil and Groundwater Management Plan
SMP – Site management Plan
SVOC – Semi-Volatile Organic Compound
TBD – To Be Determined
UST – Underground Storage Tank
VOC – Volatile Organic Compound

1.0 INTRODUCTION

This Environmental Management Plan (EMP) was developed on behalf of CSD Housing, LLC to address environmental considerations associated with planned redevelopment work at the former Rotary Site; comprised of ten (10) parcels in the City of Rochester, Monroe County, New York, herein after referred to as the Site (see Figures 1 and 2).

The Site totals approximately 1.34 acres and is bound by West Main Street to the north, South Plymouth Ave to the east, West Broad Street to the south, and South Washington Street to the west. The Site presently consists of asphalt surface parking lots and concrete sidewalks.

The utilization of an EMP is intended to allow CSD Housing, LLC to complete the project efficiently while maintaining compliance with applicable Rules and Regulations. The EMP is designed to allow both known and unknown areas of concern to be addressed during construction without significant delays to the project. A Soil and Groundwater Management Plan (SGMP) was developed for the Site and approved by the NYSDEC in 2010; however, the SGMP includes only petroleum-related considerations. This EMP supplants the 2010 SGMP and provides guidance concerning the characterization and management of subsurface impacted soil, groundwater, infrastructure, and man-made industrial derived fill materials (urban fill) generated during upcoming redevelopment activities at the Site.

The proposed development work includes earthwork associated with the construction of a new apartment building. Earthwork is expected to occur to varying depth across the majority of the Site.

LaBella Associates, D.P.C. (LaBella) will assist in the implementation of the EMP on behalf of CSD Housing, LLC. LaBella will provide the appropriately trained and experienced staff to be present on-site during earthwork and redevelopment activities that disturb or have the potential to disturb fill materials and Impacted Media. LaBella will provide the necessary reporting and closure documents to memorialize the construction activities as detailed in Section 11.0 of this Plan.

2.0 SITE DESCRIPTION AND BACKGROUND

2.1 Site Description and Surrounding Properties

The Site consists of the following ten (10) tax parcels, in the City of Rochester, Monroe County, New York:

Street Address	Parcel ID	Approximate Size / Area (Acres)
141 West Main Street	121.30-1-11	0.06
139 West Main Street	121.30-1-12	0.03
133 West Main Street	121.30-1-13	0.03
129 West Main Street	121.30-1-14	0.11
119 West Main Street	121.30-1-15	0.17
103 West Main Street	121.30-1-18	0.14
99 West Main Street	121.30-1-19	0.07
10 South Washington Street	121.30-1-10	0.06
16 South Washington Street	121.30-1-16	0.20
19 South Plymouth Avenue	121.30-1-17	0.24

In addition to the above parcels, the Scott Alley right-of-way (ROW) (a 15'-wide ROW bisecting the Site from north to south) and the Melvin Alley ROW (a 22'-wide ROW bisecting the western half of the Site from west to east and intersecting the Scott Alley ROW) will be abandoned and incorporated into the

new Site. By including the area of the former ROWs to the above parcel areas, the total Site area equals approximately 1.34 acres.

The Site presently consists of asphalt surface parking lots and concrete sidewalks.

The Site is located in an urban setting, in the Center City District (CCD) of the City of Rochester. The CCD is intended to foster a vibrant, safe, twenty-four-hour Center City by encouraging residential development while retaining and further developing a broad range of commercial, office, institutional, public, cultural and entertainment uses and activities. The proposed development is consistent with this purpose and goal.

2.2 Site Background

Based on available historical records, the Site was first developed prior to 1892 and has been utilized for a variety of commercial and manufacturing purposes, including numerous uses of potential environmental concern. Among other uses, portions of the Site have at various times been used as gasoline filling stations, automotive service/repair, dry cleaners, and printing/photo shops.

Municipal records list the installation and removal of numerous gasoline, waste oil, and fuel oil USTs between 1956 and 2010.

Surrounding properties appear to have been utilized for a variety of industrial, commercial, educational, religious, and residential, purposes.

2.3 Previous Environmental Reports

The following environmental reports were previously prepared for the Site by LaBella.

Report Title	Report Date	LaBella Project No.
Phase I ESA	May 2007	207367.01
Phase II ESA	February 2008	207367
Remedial Action Report	April 2010	209645
Soil and Groundwater Management Plan	April 2010	209645
Phase I ESA	September 2021	2212099

Refer to the following subsections for a summary of significant findings of each report. The text of each document is included in Appendix 1.

2.3.1 Summary of May 2007 Phase I ESA

At the time of the 2007 Phase I ESA, the Site was in use as a public parking lot, and the following Recognized Environmental Condition (REC) was identified:

"Inactive and Closed NYSDEC Spills at the Site associated with the historic use and presence [or] former presence of gasoline tanks."

Based on the findings of the Phase I ESA, additional investigation was deemed warranted.

2.3.2 Summary of February 2008 Phase II ESA

A Phase II ESA was completed to conduct an evaluation of subsurface conditions to assess potential impacts from the historical uses of the Site. The scope of the Phase II ESA included:

- A geophysical survey to assess for buried magnetic anomalies indicative of possible USTs or other subsurface conditions of concern.
- A test pit investigation to further assess significant magnetic anomalies identified by the geophysical survey. A total of thirteen (13) test pits were completed at the Site.
- A direct-push soil boring investigation to further assess subsurface soil conditions. A total of nineteen (19) soil borings were completed at the Site.

- Installation of bedrock monitoring wells to assess groundwater conditions. A total of five (5) bedrock wells were installed at the Site.

The Phase II ESA found a UST and petroleum-contaminated soil and groundwater, alongside fill material across much of the Site. NYSDEC Spill No. 0708687 was assigned to the Site, based on the findings of the Phase II ESA. A remedial action was deemed warranted.

2.3.3 Summary of April 2010 Remedial Action Report

The Remedial Action Report details the tank closure and soil excavation activities associated with the UST discovered by the Phase II ESA, as well as three additional USTs immediately adjacent. In addition to the proper decommissioning of the four USTs, approximately 1,290 tons of petroleum-impacted soil and 300 tons of 'clean overburden' was removed from the northeast portion of the Site. The soil was disposed off-site at a NYSDEC Part 360 permitted landfill. Confirmation soil samples were collected to document the effectiveness of the remedial activities.

Based on the work completed, no further remediation was deemed warranted and the NYSDEC closed Spill No. 0708687.

2.3.4 Summary of April 2010 Soil and Groundwater Management Plan

Upon completion of the remedial activities and due to the inability to access all impacted material, a Soil and Groundwater Management Plan (SGMP) was prepared for the Site. The SGMP provides guidance for proper management of impacted material that may be encountered during potential future construction-related excavation and development at the Site. Note that the SGMP was limited to petroleum impacts which could be encountered during future earthwork and did not include guidance regarding additional impacted material such as urban fill.

2.3.5 Summary of September 2021 Phase I ESA

At the time of the 2021 Phase I ESA, the Site was developed as asphalt-paved parking lot and concrete sidewalks. Controlled RECs (CRECs) were identified associated with known petroleum contamination addressed by SGMPs at the Site and adjacent properties.

Based on the findings of the Phase I ESA, additional investigation was not deemed warranted; however, it was noted that known residual petroleum impacts are present throughout the Site and as such, all future ground intrusive work be performed in accordance with the SGMP.

2.3.6 Summary of Environmental Observations During Geotechnical Assessments

A geotechnical assessment was performed at the Site in February 2022. LaBella provided environmental monitoring during the advancement of eight (8) test pits at the Site in connection with the geotechnical assessment. The following table summarizes observations made during the oversight of the test pits. The location of geotechnical test pits completed in February 2022 are included on Figure 3.

Summary of PID Readings, Odors, and Staining Observations (February 2022)

Test Pit / Location ID	Approximate Sample Depth(ft bgs)										
	0	1	2	3	4	5	6	7	8	9	10
TP-01	0	0	0	0	0	0	0	0	0	0	--
TP-02	0	0	0	0	0	0	0	0	0	--	--
TP-03	0	0	0	0	0	0	0	0	--	--	--
TP-04	0	0	0	0	0	0	0^	--	--	--	--
TP-05	0	0	0	0	0	0	0	0	0	0	--
TP-06	0	0	0	0^	0	0	0	0	--	--	--
TP-07	0	--	--	--	--	--	--	--	--	--	--
TP-08	0	0	0	0	0	0	0	0	0	--	--

Table Notes:

1. *All PID readings were collected utilizing a Minirae 3000 photoionization detector and are expressed in parts per million, rounded to the nearest whole number.*
2. *The PID screening is performed as a method of determining general presence of VOCs in soil. The readings obtained provide only an indication of the relative levels of VOC presence in the soil and is not considered to be a direct quantization of actual soil VOC concentration.*
3. *"--" denotes boring not completed to above-listed depth (bedrock/refusal) or method resulted in no recovery at specified depth.*
4. *"^" denotes a subsurface feature (possible UST) observed at specified depth.*
5. *No petroleum odors and/or staining observed.*

Subsurface features (including possible UST(s)) were identified in Test Pits TP-04 and TP-06 completed February 2022. The features/tanks did not contain any liquids, and no field evidence of impairment (PID response, odors, or staining/discoloration) were observed in the vicinity of the features. It's unclear whether these features were associated with historical operations at the Site or if they had been used as fill material at some point. The features remain left in place.

Further geotechnical assessment was performed at the Site in January 2023. LaBella provided environmental monitoring upon the encountering of petroleum-impacted material during test soil borings advanced during the assessment. The impacted material was highly weathered and appears to be residual contamination that the SGMP was designed to address as encountered. The following table summarizes observations made during the oversight of the geotechnical test borings. The location of geotechnical test borings completed in January 2023 are included on Figure 3.

Summary of PID Readings, Odors, and Staining Observations (January 2023)

Boring / Location ID	Approximate Sample Interval (ft bgs)											
	0-2	2-4	4-6	6-8	8-10	10-12	12-14	14-16	16-18	18-20	20-22	22-24
B23-2	--	--	--	--	0	0	0	0	--	--	--	--
B23-4	--	--	--	--	7	11	116*	78*	458*	1100*	1600*	167*
B23-4A	--	--	128*	11	--	--	--	--	--	--	--	--
B23-9	--	0	0	0	0	--	--	--	--	--	--	--
B23-11C	--	--	--	--	240*	690*	172*	57*	--	--	--	--
B23-13B	--	--	--	--	--	0	0	0	4	317*	14	--
B23-17			3	2	4	--	--	--	--	--	--	--
B23-18A	--	--	10	2	--	--	--	--	--	--	--	--

Table Notes:

1. *All PID readings were collected utilizing a Minirae 3000 photoionization detector and are expressed in parts per million, rounded to the nearest whole number.*
2. *The PID screening is performed as a method of determining general presence of VOCs in soil. The readings obtained provide only an indication of the relative levels of VOC presence in the soil and is not considered to be a direct quantization of actual soil VOC concentration.*
3. *"--" denotes boring not completed to above-listed depth (bedrock/refusal) or method resulted in no recovery at specified depth.*
4. *"*" denotes a petroleum odor and/or staining observed.*

3.0 OBJECTIVE

The purpose of this EMP is to supplant the 2010 SGMP. It includes not only the petroleum-related considerations from the SGMP but also provides guidance concerning the characterization and management of subsurface impacted soil, groundwater, infrastructure, and man-made industrial derived fill materials (urban fill) generated during upcoming redevelopment activities at the Site.

In accordance with 6 NYCRR Part 360.2(a), discarded materials containing ash and cinders (referred to as urban fill) is considered by the NYSDEC to be a solid waste that cannot be treated as Construction

and Demolition solid waste, due to the nature of its origin as a solid waste derived from an industrial source.

3.1 Applicability of Environmental Management Plan

This EMP applies to any Developer, Contractor, Utility Contractor, and Municipal Agency that disturbs the subsurface at the Site.

3.2 Roles and Responsibilities

The following table outlines the roles and responsibilities for environmental management and oversight triggered by earthwork involving impacted media:

Company / Role	Personnel / Title	Responsibilities
CSD Housing, LLC (Owner / Developer)	Whitney McClary Development Director wmcclary@csdhousing.com 585-545-6562	Provide project information and interface with LaBella and regulatory agencies regarding the implementation of the EMP.
LaBella Associates, D.P.C. (Environmental Engineer / Consultant)	Jennifer Gillen, PG VP, Environmental Operations Manager jgillen@labellapc.com 585-295-6648 Drew Brantner Project Manager dbrantner@labellapc.com 585-287-9089	Provide regulatory agency interface and guidance to field personnel throughout project. Provide a final report verifying compliance with this EMP and documenting all excavation, reuse, and waste disposal activities.
	TBD Environmental Technician	Provide on-site oversight to observe and document the implementation of the EMP. Daily discussion with Contractor and/or Construction Manager. Provide guidance on the segregation, staging, and sampling of excavated materials and conduct community air monitoring.
TBD (Contractor)	TBD	Excavate, segregate, and stage materials in accordance with the EMP, and alert LaBella in the event that unknown evidence of impairment is encountered.
NYSDEC (Regulatory Agency)	Michael Zamiarski, PE Regional Spill Engineer mike.zamiarski@dec.ny.gov 585-226-5438	Manages the Site file / record at the NYSDEC office. **Must be notified prior to any site work that may involve the excavation of impacted material.** Must also be notified within two (2) hours of discovered contamination.
City of Rochester (Regulatory Agency)	Anne Spaulding Manager of Environmental Quality anne.spaulding@cityofrochester.gov 585-428-7474	Manages the Site file / record for the City of Rochester's Department of Environmental Quality (DEQ).

4.0 REGULATORY LIMITS, REGULATIONS, AND GUIDANCE

Regulatory agency standards and guidelines relevant to the Site and development project are summarized below. These include Federal hazardous waste regulations, various soil reference values promulgated by New York State agencies, New York State groundwater quality standards, and relevant regulations, standards, and guidelines for the removal of petroleum storage tanks. These documents and standards will be utilized to effectively implement the EMP.

4.1 Solid Waste Regulations

In accordance with 6 NYCRR Part 360.2(a) discarded materials containing ash and cinders (or referred to as urban fill) debris is considered by the NYSDEC to be a solid waste that cannot be treated as Construction and Demolition solid waste, due to the nature of its origin as a solid waste derived from an industrial source. The NYSDEC will not approve of the disposal of this material at Construction and Demolition debris landfills.

However the NYSDEC allows for materials containing urban fill to be relocated to other areas within the same site in accordance with 6 NYCRR Part 360.13(c) assuming they are appropriately capped. Alternatively, these materials can be disposed off-site in a New York State (NYS) Part 360 permitted landfill, pending waste characterization.

4.2 Hazardous Waste Regulations

As defined by the Resource Conservation and Recovery Act (RCRA), waste (e.g., excavated soil, fill materials, or building materials removed during deconstruction/renovation activities) can be classified as "hazardous waste" if it is one of the Federal "listed wastes" or if it possesses one of the four hazardous characteristics ("D" listed wastes): (1) ignitibility, (2) reactivity, (3) corrosivity, or (4) toxicity. The EPA has developed standard tests to measure these four characteristics. The three physical characteristics (ignitibility, reactivity and corrosivity) are tested using numerical standards of measurement.

The fourth characteristic, toxicity, the one most frequently exceeded by contaminated soils and fills, is tested using the Toxicity Characteristics Leaching Procedures (TCLP), which provides an estimate of the concentrations of contaminants that would leach into groundwater if the material were disposed of in an environmentally unsecured landfill. To assess whether materials are hazardous wastes, representative composite samples of the material are collected and submitted to a laboratory for analysis.

Composite samples are representative samples of the material that are collected from multiple locations throughout the waste. The samples are analyzed by the laboratory in accordance with the United States Environmental Protection Agency (USEPA) test methods. If the results of the laboratory testing indicate that the physical or toxicity characteristics of the sample exceed the RCRA regulatory limits detailed in 40 CFR Part 261, the material is considered hazardous waste.

4.3 Reference Values

Reference values to assess environmental impacts will include the following documents and regulations:

Evaluation of Soil and Fills

- NYSDEC Commissioner Policy 51 (CP-51) Guidance Document: NYSDEC's Division of Environmental Remediation (DER) issued CP-51, "Soil Cleanup Guidance", in October 2010. CP-51 provides the framework and procedures for the selection of soil cleanup levels

appropriate for each of the remedial programs in the NYSDEC's DER. CP-51 replaces TAGM #4046, the Petroleum Site Inactivation and Closure Memorandum, and Sections III and IV of Spill Technology and Remediation Series (STARS) #1.

- NYSDEC DER-10: NYSDEC Division of Environmental Remediation: Technical Guidance for Site Investigation and Remediation dated May 2010 (DER-10) addresses guidance procedures applicable to site investigation and remediation activities. This document will be utilized to determine the appropriate sample frequency for any excavation closure sampling and all Quality Control/Quality Assurance protocols set forth by the Department.
- 6NYCRR Part 375-6.8: Regulations set for this section is typically used for NYSDEC remedial program sites such as inactive hazardous waste disposal sites, brownfield, or environmental restoration sites. The regulatory values in this section can be used to assess unrestricted and restricted use soil cleanup objectives. The standards contained within Part 375 are the most current regulatory guidance available for use. However, the NYSDEC typically only utilizes this set of guidance for projects administered by the NYSDEC Hazardous Waste Group.

Groundwater Reference Values

Reference values to assess groundwater impacts are included in NYSDEC's Technical and Operational Guidance Series (TOGS) 1.1.1 Groundwater Standards, dated June 1998 (and subsequent addendums). Other reference values exist for drinking water and effluent standards for waste water discharges to state water bodies; however, this EMP is not intended to manage these subjects or discharges.

New York State Guidance on Petroleum Storage Tanks

Removal of certain types of petroleum storage tanks is regulated by NYSDEC under 6 NYCRR Part 613, which requires that tanks out of use for 12 months or longer be closed in place or removed. Tank decommissioning procedures are included in 6YNCRR Part 613.3. Contaminated soils surrounding the tanks (if present), separate phase product on the water table, or contaminants dissolved in the groundwater must be removed.

Guidance for Evaluating Soil Vapor Intrusion

The NYSDOH provides guidance in the Guidance for Evaluating Soil Vapor Intrusion in the State of New York, dated October 2006 (and associated amendments), that presents the approach to identifying and addressing current and potential human exposures to contaminated subsurface vapors associated with known or suspected volatile chemical contamination. This guidance provides an overview of vapor intrusion issues, guidance on collecting data that can be used to identify current or potential human exposures, discusses data evaluation, and provides an overview of soil vapor intrusion mitigation methods and recommendations pertaining to their selection for use, installation and design, post-mitigation testing, operation, maintenance and monitoring, termination of operation, and annual certification. The NYSDEC provides additional guidance in *DER-13*, *Strategy for Evaluating Soil Vapor Intrusion at Remedial Sites in New York*, and the Environmental Protection Agency (EPA) provides additional guidance in the *Indoor Air Vapor Intrusion Mitigation Approaches.*

Excavation of Asbestos Containing Materials

The New York State Department of Labor (NYSDOL) provides the Industrial Code Rule 56 for guidance relating to hazards to the public safety and health during the removal, encapsulation, enclosure, repair, or disturbance of friable and non-friable asbestos, or any handling of asbestos material that may result in the release of asbestos fiber. The USEPA also provides guidance in Part 763-Asbestos.

5.0 ENVIRONMENTAL MANAGEMENT PLAN (EMP)

This EMP has been designed for all earthwork related activities at the Site (excavation, grading, etc.). with the potential to disturb contaminated media (i.e., petroleum impacted soil, urban fill, etc.). This EMP pertains to earthwork activities that will disturb the subsurface at the Site, as it is anticipated based on historical environmental investigations and observations at the Site that materials of environmental concern will be encountered during redevelopment activities. This EMP has included specific procedures and tasks to manage environmental concerns that include but are not limited to:

- identification of materials of environmental concern
- waste disposal
- health and safety plan
- relocation of soil on-site
- execution of EMP
- soil vapor intrusion
- waste management (e.g., handling, storage, etc.)
- regulated solid waste
- community air monitoring plan
- regulatory reporting requirements
- decontamination of equipment
- waste characterization

LaBella will work with the Client and the Contractor to implement this EMP. As noted previously, LaBella will be on-site full time during Site construction activities regarding soil disturbance and/or soil removal activities. This EMP has been designed for redevelopment and construction activities at the Site.

5.1 Context and Key Issues

Contaminated materials that exist in different media such as structures, utilities, soil, soil gas, and/or groundwater can present health risks to workers, the public, and the environment during construction and/or operation, if not properly managed. The Contractor will need to manage these materials in accordance with the applicable Rules and Regulations and clearly understand the waste characterization and disposal process so as not to compromise construction/operation schedules, budgets and long-term liability for CSD Housing, LLC. Even if no contaminated materials are discovered, appropriate due diligence must be exercised so that the proper documentation can be secured to reduce long-term liability for the project and/or the Site.

On-site media within the Site may be contaminated by historical uses and operations conducted at the Site and/or adjacent properties. Potential sources of contamination include primarily urban fill materials and petroleum impacted soil. However, other hazardous substances such as VOCs, SVOCs, fuel oils, solvents, metals, and/or ACM could be present. Upon the discovery of contamination, the NYSDEC must be notified within two (2) hours.

5.2 Potential Contaminants of Concern

The contaminants described in this section may be encountered at the Site. Refer to Section 2.3 for a summary of contaminants which have been or are suspected to be present at the Site.

Certain background concentrations can be expected from both natural and human sources. When concentrations exceed regulatory thresholds, an analysis of potential environmental health effects and the need for mitigation measures may be necessary.

Heavy Metals

Heavy metals are used in metal works, and can be present in paint, ink, petroleum products, coal ash, and mechanical waste fluids. Certain heavy metals can be toxic to humans at elevated concentrations and are often found in historical urban fill material (e.g. cinders and ash).

Volatile Organic Compounds (VOCs)

These include aromatic compounds such as benzene, toluene, ethylbenzene and xylenes, which are found in petroleum products, as well as chlorinated VOCs such as trichloroethene and tetrachloroethene, which are common ingredients in solvents and commercial cleaners. Naturally produced VOCs may also be present including methane and hydrogen sulfide, which are breakdown products of organic materials. Inhaling toxic VOC vapors can be a health hazard, and some VOCs can be flammable if the circumstances are suitable for combustion. In contrast to contaminants such as metals, PAHs, and PCBs, VOCs generate soil gas vapors that may be a source of exposure even if the source (e.g., VOC-impacted soil or groundwater) is not directly exposed. During construction, soil disturbance, or disturbance of VOC containing materials, VOCs could be released to the air and produce toxic or oxygen-deficient atmospheres.

Semi-volatile organic compounds (SVOCs)

These include poly-aromatic hydrocarbons (PAHs), which are common constituents of partially combusted coal or petroleum-derived products, such as waste oils, creosote, coal and coal ash, wood ash, and asphalt. The compounds are often found in historical urban fill and asphalt-covered areas. SVOCs and PAHs can pose a risk to human health.

Asbestos Containing Material

Asbestos Containing Material (ACM) are any material containing greater than one percent (1%) of asbestos, which is a naturally occurring fibrous mineral that was historically used in many applications for its fire resistance, noise insulation, and electrical insulation properties. Soil and solid waste contaminated with ACM can pose an inhalation health threat to humans.

5.3 Field Screening Methods

Visual, olfactory and instrument-based (i.e., PID) soil screening will be performed by LaBella during redevelopment activities that disturb the subsurface at the Site. Soil screening will be performed during all soil disturbance and/or removal work performed during redevelopment at the Site. The contractor will be responsible to alert LaBella if evidence of impairment is encountered. In the event that evidence of impairment is noted by the Contractor, a LaBella environmental professional will aid in the classification and management of the impacted material.

Soils will be segregated based upon previous environmental data and in-field soil screening results into material that requires off-site disposal, material that requires testing, material that can be returned to the subsurface, and material that can be used as “cover” soil.

5.4 Identification of Solid Waste Impacted Media

Based on the history and observations made as described in Section 2.3, urban fill materials are anticipated to be encountered at the Site during earthwork.

Solid waste or fill materials potentially present at the Site include but are not limited to ash and cinders. These fill materials are considered by the NYSDEC as solid waste that cannot be treated as Construction and Demolition (C&D) solid waste, due to the nature of its origin as a solid waste derived

from an industrial source. In accordance with 6 NYCRR Part 360.13(c), fill materials containing ash and cinders may be managed and placed into similar filled areas within the same site under appropriate cover. Alternatively, these materials can be disposed off-site in a New York State (NYS) Part 360 permitted landfill.

The presence of cinders, ash and other urban fill material can be visually identified during excavation. If questions arise during identification of the solid waste LaBella shall make the final determination, for the classification on how the spoils generated during the construction activities at the Site will be managed.

5.5 Identification of VOC Impacted Media

Petroleum impacted material has been previously identified at the Site, and is common where petroleum USTs exist (or existed). Due to the longtime dense urban setting, on-site or nearby historical use as dry cleaner, gas station, and automotive repair (among others) presents the risk that VOC Impacted Media may be encountered. VOC Impacted Media can be identified by the media exhibiting a chemical or petroleum-like odor, gray to black staining, and/or elevated readings of total VOCs on a Photo-Ionization Detector (PID). Groundwater impacted by VOCs may exhibit a petroleum or chemical odor or sheen. If questions arise during identification of VOC Impacted Media, LaBella will make the final determination for the classification on how the spoils generated during the construction activities at the Site will be managed.

The volatilization of contaminants present in VOC Impacted Media may represent a worker health and safety concern for construction workers at the Site.

5.6 On-Site Management of Solid Waste Impacted Media and VOC Impacted Media

Solid Waste Impacted Media that is excavated should not be used within two feet of the overburden groundwater table. Solid Waste Impacted Media may be relocated on-site as approved by the Engineer and in accordance with 6NYCRR Part 360.13, or legally disposed of off-site at a NYS Part 360 Landfill. The re-location of Solid Waste Impacted Media on-site will require approval by LaBella prior to final placement.

The staging of Solid Waste and Impacted Media shall be performed in a manner where it is segregated from non-Solid Waste Impacted Media (i.e. clean soils). Staging locations of Solid Waste Impacted Media should be reviewed with LaBella prior to staging, to prevent potential concerns related to placement, run-off, and/or cross-contamination.

Prior to excavating in areas where solid waste is anticipated, the Contractor shall remove the top layer of non–Solid Waste Impacted Media (i.e. topsoil, asphalt, etc.) as practicable and keep the material segregated from any Solid Waste Impacted Media. If the material is to be relocated for re-use on-site, the Solid Waste Impacted Media shall be directly placed in the fill area or placed on and covered with polyethylene sheeting pending final on-site placement.

Subsurface Solid Waste Impacted Media is not allowed to leave the Site without expressed written consent from LaBella.

If encountered, Solid (non-aqueous) VOC Impacted Media will be segregated from non-VOC Impacted Media into separate stockpiles and staged on and covered with one layer of 6-mil thick polyethylene sheeting at the end of each work day. The Contractor shall implement reasonable care to secure sheeting and maintain such stockpiles' integrity. VOC Impacted Media will then be tested for USEPA Target Compound List (TCL) and NYSDEC CP-51 list VOCs as well as CP-51 list SVOCs. If concentrations of VOCs and SVOCs are below are below the CP-51 Soil Cleanup Levels (SCLs), then the VOC Impacted

Media may be re-used on-site. Conversely, if concentrations of VOCs and SVOCs are above the NYSDEC CP-51 SCLS, then the VOC Impacted Media shall be disposed of at a NYCRR Part 360 Landfill (pending landfill approval). The 6 NYCRR Part 375-6.8(b) Restricted Use Soil Cleanup Objectives (RUSCO) for Restricted Residential Use may be used as guidance for petroleum and chemical compounds not included in CP-51 guidance document.

If necessary, liquid or aqueous VOC Impacted Media (i.e. groundwater) shall be pumped into a holding tank approved by LaBella. LaBella will assist the contractor to obtain a temporary discharge permit from the Municipality (if acceptable). This will include preparing paperwork, coordination with the Municipality, collection and analysis of samples and the following:

- The contractor shall collect, handle, filter or otherwise treat as necessary and properly dispose of VOC-impacted groundwater removed as needed for project construction. The Contractor shall conduct all tasks associated with these items in accordance with all Federal, State, County and local regulations.
- If additional analysis and testing is required as identified by the accepting Publically Owned Treatment Works (POTW), LaBella will collect samples from final or batch product collection. LaBella shall perform all required analyses at a laboratory approved by the New York State Department of Health Environmental Laboratory Approval Program (ELAP) for the intended analyses. LaBella shall provide a copy of the analysis report to the Contractor. No disposal shall occur prior to LaBella's receipt and acceptance of any laboratory reports and approval from POTW.
- In the event that off-site transportation of wastewater is necessary, a valid 6 NYCRR Part 364 Waste Transporter Permit shall be required. The contractor will also be required to provide all disposal documentation at an approved treatment storage and disposal facility to LaBella prior to disposal.

VOC Impacted Media shall not leave Site without expressed written consent from LaBella.

5.7 Management of Demolition and Solid Waste Material

Non-impacted demolition and solid waste material including any wood, metal scrap, drainage piping, masonry (e.g. concrete, block, bricks) or other miscellaneous solid waste, which are determined to be physically unacceptable for re-use shall be separately stockpiled for off-site disposal or recycling.

Impacted demolition and solid waste material that cannot be cleaned to the satisfaction of LaBella shall be staged on and covered with a minimum of one layer of 6-mil polyethylene sheeting pending waste characterization by LaBella. The Contractor shall secure the sheeting and maintain such stockpiles' integrity to the satisfaction of LaBella. Stockpiling locations shall be approved by LaBella. Impacted demolition and solid waste material will be disposed off-site disposal at a permitted NYCRR Part 360 Permitted landfill.

Cleaning of impacted demolition and solid waste material shall be by physical methods such as scraping, shaking, brushing, etc. Should the Contractor utilize methods which generate liquid waste streams or if liquid waste streams (e.g. oily water, pipes or sumps filled with sludge) are present that require removal, the Contractor is responsible for proper containerization and disposal of each waste stream. The contractor shall segregate each waste stream to the satisfaction of LaBella. Once impacted demolition and solid waste material is determined to be clean to the satisfaction of LaBella, the material can be managed in accordance with the EMP.

5.8 Management of Buried Asbestos-Containing C&D Debris

If buried asbestos-containing debris is encountered, the Contractor will be required to remove and dispose of the ACM in accordance with all applicable federal, state, and local laws and regulations. The removal of any ACM shall be completed by a licensed Asbestos Contractor with appropriately certified workers.

5.9 Management of Excavation Derived Water

If impacted groundwater at the project location is required to be pumped to advance earthwork activities, the Contractor shall pump the impacted groundwater into a holding tank and stage on-site pending off-site disposal. LaBella shall perform all characterization testing. If the water is determined by characterization testing to be suitable for discharge to the sewer, the Contractor shall be responsible for obtaining all applicable permits from the municipality.

5.10 Management of Orphan Underground Storage Tanks and Sub-Grade Structures

If orphan UST(s) or sub-grade structures are encountered by the Contractor, work shall stop immediately in the vicinity of the tank or structure and LaBella must be notified. LaBella will assess the condition of the tank or structure, where practicable. LaBella shall determine when it is practicable to resume work in the vicinity of the tank or structure. Tanks shall be decommissioned in accordance with 6NYCRR Part 613 and City of Rochester regulations.

The Contractor shall immediately notify LaBella upon any known environmental release from and/or encountered but not limited to any tank or sub-grade structure. LaBella shall notify CSD Housing, LLC of any known release. CSD Housing, LLC shall make the determination of any spill reporting requirements with 6NYCRR Part 613-2.4 and 6NYCRR 597.4 or any other local, state, or federal agency laws and regulations.

If a tank or sub-grade structure is damaged during discovery such that the contents of the structure are released, the Contractor shall provide the appropriately trained personnel and equipment to address the release. Possible action items include; sludges, non-aqueous liquids, or contaminated water shall be removed from the subsurface structure and the sludges or liquids shall be containerized by the Contractor, characterized by LaBella, and staged on-site pending off-site disposal.

Tanks and sub-grade structures may contain sludges, non-aqueous liquids, or contaminated water. To the extent feasible the Contractor shall avoid damaging such structures upon discovery. Based on the special nature of the work associated with the decommissioning and removal of tanks or sub-grade structures that contain regulated or hazardous wastes the removal of such structures will be completed by others (e.g. Specialty Environmental Contractor) as determined by LaBella. The subsurface structures will be decontaminated in accordance with NYSDEC CP-51, and the sludges or liquids containerized, characterized, and staged on-site pending off-site disposal. Coordination between the Contractor and Specialty Environmental Contractor will be completed by LaBella. The removal of any tank or sub-grade structures will be completed as soon as possible based on each discrete situation.

Demolition of non-suspect sub-grade structures (i.e. storm distribution boxes, etc.) will be the responsibility of the Contractor. During removal/decommissioning of the sub-grade structures LaBella shall evaluate the soils adjacent to each structure. All sub-grade structures shall be inspected by LaBella to determine suitability for reuse, recycling, or disposal in accordance with the Specifications.

LaBella shall be responsible for all testing and characterization of Impacted Media and demolition materials described in this Section.

5.11 Solid Waste and VOC Impacted Media Summary

The table below details requirements and re-use of Solid Waste and VOC Impacted Media at the Site. The handling and disposal requirements for ACM are found in NYSDOL Code Rule 56.

Table A – Material Classifications

Class of Material	Description	Screening Parameter	Management/ Re-use of Material Requirements
Class 1	Soil/Solid Waste Impacted Media including but not limited to construction and demolition debris, slag, ash, and cinders, etc.	PID readings up to 25 ppm without significant evidence of impairment (i.e. no significant odors or staining, etc.). Signs of regulated solid waste such as urban fill, construction and demolition debris, etc.	**Sample in accordance with NYCRR Part 360 Regulations** On-Site Reuse: Per section 360.13 of the BUD Regulations, material may be re-used on-site under at least 1 ft of Class 1 Material or imported 'clean' fill, or placed under exterior impervious surfaces (e.g. asphalt, concrete, etc.). Off-Site Reuse/Disposal: This material may be used off-Site in accordance with 6 NYCRR Part 360 provided the material is sampled in accordance with 6 NYCRR Part 360.13(e) Table 1 and in accordance with the appropriate reuse guidelines per 6 NYCRR Part 360.13(f) Table 2. If the sampling results do not meet the 6 NYCRR Part 360.13(f) Table 2 Fill Material Beneficial Use requirements, the material should be disposed at a NYCRR Part 360 landfill. NOTE: Off-Site reuse requires NYSDEC approval.
Class 2	Soil or Solid Waste Impacted Media containing VOC impacts that are above the NYSDEC CP-51 SLCs. The NYCRR Part 375-6.8(b) RUSCOs for Restricted Residential Use may be used for compounds not included in the CP-51 guidance document.	PID readings greater than 25 ppm and/or significant evidence of impairment (significant odors, staining, etc.).	On-Site Reuse: Cannot be re-used on-site. Must be staged on and covered with 6-mil polyethylene sheeting pending disposal at a NYS Part 360 landfill. Off-Site Reuse/Disposal: Shall be legally disposed of at a permitted NYCRR Part 360 landfill.

Class of Material	Description	Screening Parameter	Management/ Re-use of Material Requirements
Class 3	Solid waste physically unacceptable for re-use or recycling (e.g. lumber, refuse, metal scrap, large foundations, large pieces of concrete or brick unacceptable for reuse on-site, drainage piping, municipal waste)	No discernable odor or staining and PID readings less than 5 ppm. Visibly free of regulated solid waste such as urban fill, construction and demolitions debris, etc.	On-Site Reuse: Can be reused on-site if acceptable to developer. Off-Site Reuse/Disposal: Off-site disposal at NYCRR Part 360 permitted landfill. Requires LaBella approval. Visibly non contaminated solid waste such as steel, concrete and brick may be transported to a recycling facility.
Class 4	Layers of non-impacted soil and earth that do not contain evidence of impairment and do not appear to be associated with filling.	No discernable odor or staining and PID readings less than 5 ppm. Visibly free of regulated solid waste such as urban fill, construction and demolitions debris, etc.	On-Site Reuse: Per section 360.12 of the BUD Regulations, unrestricted use anywhere on the Site, if required or desired. Material can also be used on-site to cover Class 2 Materials. Off-Site Reuse/Disposal: This material may be used off-Site in accordance with 6 NYCRR Part 360 provided the material is sampled in accordance with 6 NYCRR Part 360.13(e) Table 1 and in accordance with the appropriate reuse guidelines per 6 NYCRR Part 360.13(f) Table 2. If the sampling results do not meet the 6 NYCRR Part 360.13(f) Table 2 Fill Material Beneficial Use requirements, the material should be disposed at a NYCRR Part 360 landfill.
Class 5	Impacted groundwater exhibiting visual or olfactory observations and/or determined by sampling and laboratory testing.	PID readings greater than 25 ppm and/or significant evidence of impairment (significant odors, sheen, free product, etc.).	On-Site Reuse: Not applicable. Off-Site Reuse/Disposal: Off-site disposal at permitted facility or via sanitary sewer with approval from Monroe County Pure Waters. Requires LaBella approval.
Asbestos Containing Material	Any material containing at least 1% of asbestos	Visual observation of suspect ACM confirmed by laboratory testing.	Shall be legally disposed of at a permitted NYS landfill in accordance with all applicable regulations.

A flow chart is attached to this EMP as Figure 4 to provide further guidance for reuse and disposal requirements in accordance with this EMP. However, LaBella shall make the final determination for the classification on how the spoils generated during the construction activities at the project location will be managed.

Upon disturbance of Impacted Media, the Contractor shall follow the procedures outlined in the following sections, as well as the Contractor's Site-Specific Health and Safety Plan.

5.12 Off-Site Disposal of Solid Waste and VOC Impacted Media

All Treatment, Storage and Disposal (TSD) facilities and waste transporters must provide evidence of applicable NYSDEC permits prior to handling, transporting, and/or receiving solid waste and VOC impacted media. Removal of any site materials shall be approved in writing by LaBella, including

submission of completed Waste Profiles and Waste Manifests for signature by an authorized representative of the Site owner.

Copies of all waste disposal manifests, and landfill receipts **shall be submitted to LaBella** by the Contractor within five (5) business days from which time the Solid Waste and VOC Impacted Media was removed from the site.

Solid Waste Impacted Media and solid (non-aqueous) VOC Impacted Media that cannot be re-used on-site in accordance with the conditions in the waste summary table shall be transported off-site by a NYS Part 364 permitted vehicles to a NYS Part 360 Permitted Landfill approved by LaBella. LaBella shall perform all characterization testing.

Liquid or non-aqueous VOC Impacted Media shall be legally disposed of at a location approved of by LaBella. LaBella shall perform all characterization testing.

The Contractor shall not dispose of Solid Waste or VOC Impacted Media, or any on-site derived subsurface material without expressed written permission from the Site owner and LaBella.

5.13 Waste Disposal Tracking

LaBella shall track the off-site disposal of each waste stream on an appropriate spread sheet tracking log to allow for accurate material quantification. Contractors are required to **submit waste disposal receipts to LaBella** within five (5) business days upon disposal from the Site.

All operators necessary for the removal and disposal of contaminated and hazardous impacted media shall comply with the applicable Federal, State, and local laws and regulations and policies. Waste disposal material shall not leave the Site without permission of LaBella. The Contractor shall provide LaBella and the Site owner with documentation that the receiving facility is permitted to receive the accepted waste and the waste transporter is permitted to haul such wastes. The Contractor shall be responsible for the safe and proper management of all wastes addressed herein in accordance with all State and Federal regulatory requirements, including, but not limited to:

- 6NYCRR 360 – Solid Waste Management Facilities
- 6NYCRR 364 – Waste Transporter Permits
- 6NYCRR 370 – Hazardous Waste Management System: General
- 6NYCRR 371 – Identification and Listing of Hazardous Wastes
- 29 CFR 1910.120 – Hazardous Operations and Emergency Response
- 40 CFR 260 – Hazardous Waste Management System: General
- 40 CFR 261 – Identification and Listing of Hazardous Wastes
- 40 CFR 100 to 179 – DOT Hazardous Materials Transport and Manifest System
- NYSDEC CP-51 – Soil Cleanup Guidance
- 6NYCRR Part 375-6 – NYSDEC Remedial Program Soil Cleanup Objectives

Waste Disposal procedures are categorized below.

<u>Non-Hazardous Impacted Media (Class 1 and 2 Material)</u>

Non-hazardous waste may be disposed of at a NYCRR Part 360 landfill and transported by a NYCRR Part 364 permitted waste hauler. Waste characterization sampling and analysis will be conducted by LaBella in accordance with the accepting NYCRR Part 360 landfill. This material must be removed from the Site within 60-days of being generated.

Non-Impacted Demolition and Solid Waste Material (Class 3 Material)

This material may be disposed off-site at a recycling facility in accordance with 6NYCRR 360 provided waste characterization sample results (if applicable) indicate the material is free of contaminants of concern or is below the 6NYCRR Part 375-6(a) Unrestricted Use Soil Cleanup Objectives for suspect contaminants of concern. Alternatively, this material can be disposed of at a NYCRR Part 360 Landfill.

Non-Impacted Soil and Fill Material (Class 4 Material)

This material may be used off-site as clean soil and fill material provided sample results are below the appropriate reuse guidelines per 6 NYCRR Part 360.13(f) Table 2. Non-impacted soil and fill material will be sampled in accordance with 6 NYCRR Part 360.13(e) Table 1. LaBella will provide the associated analytical data of the material being shipped and the relocation site to the Site owner or authorized representative at least 48 hours prior to any non-impacted material being removed from the Site.

Contaminated Water (Class 5 Material)

Contaminated water pumped from excavations shall not be discharged to the local sewer system unless all local and state requirements are met. All groundwater pumped from excavations shall be containerized on site and characterized by LaBella. Impacted groundwater shall be disposed off-site at a permitted TSDF consistent with NYSDEC 6NYCRR Part 360, 364, and 370. The onsite discharge of groundwater with contaminants of concern at concentrations above the NYSDEC TOGS 1.1.1 Groundwater Standards is a direct violation of the General Stormwater Permit.

Hazardous Waste Impacted Media

Any hazardous waste shall be disposed of in accordance with applicable Federal, State, and local regulations and requirements. This material must be removed from the Site within 90-days of being generated.

ACM Demolition Debris

ACM demolition debris excavated during redevelopment will be disposed of in accordance with NYSDOL Code Rule 56.

5.14 Waste Disposal Documentation

Removal or disposal of any site materials or items shall be approved in advance by LaBella, including submission of completed Waste Profiles and Waste Manifests for signature by the Site Owner or their designative representative. Copies of all waste disposal manifests, and receipts shall be submitted to LaBella by the Contractor within five (5) business days upon removal from the project location.

5.15 Follow-up / Confirmation Sampling

In the event that petroleum impacts or other impacts (other than typical urban fill material) are excavated, subsequent to removal of such impacts, post-excavation confirmatory soil samples will be collected in accordance with the requirements of NYSDEC DER-10 Section 5.4(b)(5).

5.16 Unknown Environmental Issues

If unknown subsurface environmental impacts are encountered, LaBella will determine procedures and protocols to manage any additional environmental impacts. It is the responsibility of the Contractor to alert LaBella if unknown subsurface environmental impacts are encountered, including the following:

- soils and/or groundwater with a VOC odor or sheen;
- soils containing solid wastes including demolition debris, ash, or cinders in areas not previously identified; and,
- soils containing evidence of VOC staining.

6.0 IMPLEMENTATION OF THE EMP

The EMP applies to all earthwork associated with the Project. However, implementation of the EMP will vary based on the specific activity being conducted. The EMP implementation guidelines associated with specific phases of the project are provided below.

6.1 Subsurface Excavations, Material Reuse, and Off-Site Disposal

LaBella will provide full time oversight of any subsurface disturbance, subsurface material reuse, and off-site disposal of subsurface materials. Oversight may not be required in the event the material being disturbed was previously imported to the Site under LaBella oversight or was previously screened by LaBella.

6.2 EMP Roles and Responsibilities

LaBella Associates:

The responsibilities of LaBella with regard to the EMP are as follows:

- Working with the Contractor, Construction Manager (CM) and Site owner to pre-determine off-site disposal locations.
- Working with CM and Site owner as necessary to characterize excavated material per Section 5.11 and to determine reuse and/or disposal of excavated material.
- Work with the Contractors to monitor excavations for evidence of environmental impairment.
- Assist the CM as to proper staging, covering, and containment of excavated materials as needed.
- Sampling, analysis, and any additional waste stream profiling as required by a receiving NYS Part 360 landfill.
- Assist the contractor to obtain a temporary discharge permit from the POTW, if needed. This will include preparing paperwork, coordination with the POTW, and collection and analysis of samples.
- Implementation of the Community Air Monitoring Plan (CAMP) for the Site during the disturbance or handling of subsurface impacted media or impacted solid waste (see Section 8.0).
- Implementation of the Health and Safety Plan (HASP) for LaBella personnel at the Site. Contractors and other personnel working at the Site are responsible for their own HASP (see Section 9.0).

Contractor:

The Contractor shall provide all labor, equipment, and materials necessary to perform the following work items as specified in this Section, including but not limited to:

- Coordination of utilities clearance (811 / *UDig NY* stakeout, etc.).
- Segregation of impacted media from non-impacted media.

- Dewatering of excavation, containerization of all removed wastewaters and discharge/disposal of said waters.
- Implementation of dust suppression measures as determined by LaBella or the CM.
- Loading, containerizing, and transportation of impacted media from the excavation area to an on-site staging area.
- The Contractor shall not remove any material from the project site without approval from LaBella.
- Decontamination of equipment in accordance with Section 7.0, if necessary.
- The Contractor shall be responsible for providing all necessary and legally required training for its workers, and if necessary OSHA 40-hour HAZWOPER training and respirator fit testing.
- The Contractor shall attend a meeting with the CM and LaBella to discuss Impacted Media management concerns. The Contractor shall coordinate the meeting.
- The Contractor shall coordinate the planned staging of Impacted Media with LaBella. Specific areas shall be designated for the staging of each type of impacted media so as to allow for a smooth work flow and minimize exposure routes to the public and the environment.
- The Contractor shall rely on the judgment of LaBella regarding the implementation of the EMP.
- The Contractor is solely responsible for the means, methods, techniques, sequences and procedures for all activities under the direct control of Contractor.
- The Contractor shall perform all work under this contract in accordance with all local, state and federal laws, regulations, and requirements including but not limited to New York State Department of Environmental Conservation, United States Environmental Protection Agency, United States Department of Transportation, and Occupational Safety and Health Administration.

7.0 DECONTAMINATION OF EQUIPMENT

All equipment used at the Site that comes in contact with any VOC Impacted Media, solid waste containing ash, cinders, etc. or other hazardous materials will require decontamination to remove soil and water residue from construction activities. The Contractor shall construct a temporary decontamination pad that will be used to decontaminate the earthwork related equipment.

The decontamination pad shall be constructed of two layers of 6-mil reinforced polyethylene sheeting (or equivalent), with a sump, for the purposes of collecting wash water. Wash water shall be stored in 55-gallon drums, storage tanks or incorporated into tanks for treatment and proper disposal as determined by LaBella. Accumulated sediments shall be legally disposed of in accordance with all applicable regulations at a location approved by the Site owner and LaBella.

The Contractor shall be responsible for all costs relating to legally disposing of the decontamination pad materials at a facility approved by the Site owner and LaBella. All permits and waste disposal manifests shall be submitted to LaBella for review and signature prior to shipment. All permits, waste disposal manifest, and receipts associated with decontamination pad materials disposal shall be submitted LaBella.

The Contractor shall provide potable water and high-pressure sprayers for decontamination activities.

Personal decontamination procedures shall follow the procedures set forth in the HASP and the Contractor shall supply a suitable container for disposal of personal protective equipment, such as a steel drum. Disposal of PPE is the responsibility of the Contractor.

8.0 COMMUNITY AIR MONITORING PLAN (CAMP)

The NYSDOH Generic Community Air Monitoring Plan (CAMP) and Fugitive Dust and Particulate Monitoring will be utilized for this EMP implementation and is included as Appendix 2. The CAMP describes required VOC vapor and/or particulate monitoring that will be conducted during activities that disturb the subsurface at the Site, unless the materials being disturbed were previously screened by LaBella or imported to the Site under LaBella oversight.

The intent of the CAMP is to provide for a measure of protection of the downwind communities from potential airborne releases of constituents of concern during activities that disturb the subsurface at the Site. As such, the CAMP specifies the potential air emissions, air monitoring procedures, and monitoring schedule.

If exceedances of the permissible exposure limits defined in the CAMP are identified by real-time monitoring, the Contractor will be required to implement dust and/or VOC suppression measures as directed by LaBella that may include the following methods:

- Apply water on exposed soil.
- Wetting equipment and excavation faces.
- Restricting vehicle speeds to <10 mph.
- Hauling material in properly tarped containers.
- Spraying water in buckets during excavation and dumping.
- Reducing size of open excavation area and/or number of open excavations.

The Contractor shall have an onsite designated water truck or other dust suppression system. The Contractor shall obtain any necessary permits for hydrant usage, etc.

9.0 HEALTH AND SAFETY PLAN (HASP)

This EMP contains a Site Specific HASP for the site developed by LaBella. This HASP is designated for LaBella personnel only. A copy of this HASP is included in Appendix 3.

The LaBella HASP is included as an example only. Each Contactor will need to develop and rely on their own HASP to manage health and safety issues associated with potential exposure to site chemicals of concern and any other potential issues.

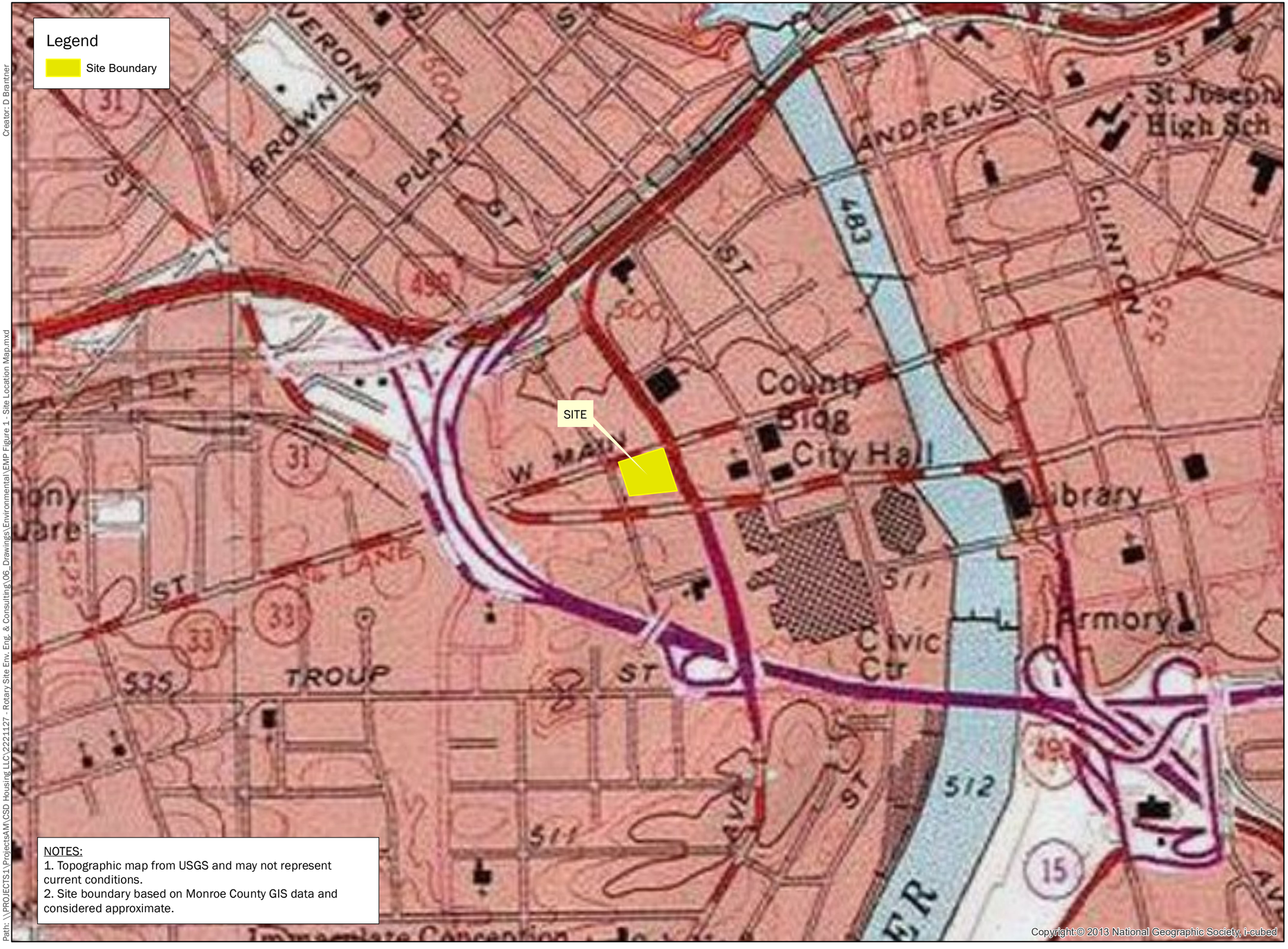
10.0 LABORATORY TESTING

All samples collected during the EMP will be submitted under chain of custody procedures to a New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP) certified laboratory for testing. All samples will be placed in laboratory supplied sample jars containing appropriate preservative, and placed in coolers with ice.

11.0 REPORTING

Following completion of the earthwork-related portions of the project, LaBella will develop a final Summary Report documenting all the excavation activities and waste disposal work completed. The Summary Report will document excavation materials generated, regulated solid waste, petroleum impacted soil and/or groundwater, asbestos containing materials, and any other impacted materials generated. The report will include mapping depicting the areas excavated to date, the extent of any regulated materials encountered and any sampling completed. The report will also include waste disposal documentation (weigh tickets, manifests), any laboratory data received, and updated waste stream tracking information/forms.

FIGURES



NOTES:
1. Topographic map from USGS and may not represent current conditions.
2. Site boundary based on Monroe County GIS data and considered approximate.

LaBella
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CSD HOUSING

FORMER ROTARY SITE
141, 139, 133, 129, 119, 103, and 99 W Main St
10 and 16 S Washington St
19 Plymouth Ave
Rochester, New York

N

0 500 Feet

1 inch = 500 feet

LaBella Project No. 2221127

Date: 2/10/2023

INTENDED TO PRINT AS 11" x 17"

SITE LOCATION MAP

FIGURE 1

Creator: D Brantner

Path: \\PROJECTS1\Projects\AM\CSD Housing LLC\2221127 - Rotary Site Env. Eng. & Consulting\06_Drawings\Environmental\EMP Figure 1 - Site Location Map.mxd

Creator: D Brantner

Path: \\PROJECTS1\Projects\AM\CSD Housing LLC\2221127 - Rotary Site Env. Eng. & Consulting\06_Drawings\Environmental\EMP Figure 2 - Site Plan.mxd

LaBella
Powered by partnership.

CSD HOUSING

FORMER ROTARY SITE
141, 139, 133, 129, 119, 103, and 99 W Main St
10 and 16 S Washington St
19 Plymouth Ave
Rochester, New York

N

0 35 Feet

1 inch = 35 feet

LaBella Project No. 2221127

Date: 2/10/2023

INTENDED TO PRINT AS 11" x 17"

SITE PLAN

FIGURE 2

NOTES:
1. Satellite orthoimagery obtained from New York State Clearinghouse and may not represent current conditions.
2. All locations are approximate.
3. 2010 Remedial excavation activities occurred to the maximum extent feasible in all directions. Soil excavation to the west was limited due to underground utilities in the Scott Alley right-of-way (ROW). Soil excavation to the north was limited due to the Main Street ROW.

W Main Street
S Washington Street
S Plymouth Ave
W Broad Street

TB-33 TB-1 TB-31 TB-32 TB-30 TB-8 TB-7 TB-6 TB-10 TB-22 TB-9 TB-20 TB-23 TB-5 TB-4 TB-3 TB-2 TB-19 TB-21
B23-4A B23-4 B23-2 B23-13B B23-9 B23-11C B23-18A B23-17
GP-1 GP-2 GP-5 GP-3 GP-4
CS1-W-17 CS2-N-8 CS3-E-8 CS4-E-8 CS5-W-15 CS6-S-15 CS7-S-15
MW-1 MW-5 MW-2 MW-4 MW-3
TP-01 TP-02 TP-12 TP-13 TP-03 TP-11 TP-10 TP-08 TP-1 TP-2 TP-3 TP-4 TP-07 TP-8 TP-5 TP-7 TP-6 TP-9 TP-04 TP-05 TP-06

Legend
- Site Boundary
- Site Parcel
- Test Pit Location (November 2007)
- Geoprobe Soil Boring (November 2007)
- Monitoring Well (December 2007)
- Former Underground Tank (Removed March 2010)
- Approximate Limits of Remedial Excavation (March 2010)
- Post Remedial Excavation Geoprobe Boring (March 2010)
- Confirmation Soil Sample (March 2010)
- Test Pit Location (February 2022)
- Geotech Test Boring (January 2023)

ENVIRONMENTAL INVESTIGATION CHRONOLOGY:
Spring 2007 - Phase I ESA
Winter 2007-2008 - Phase II ESA
Spring 2010 - Remedial Action (UST & Soil Removals)
Spring 2010 - Soil & Groundwater Management Plan Established
Fall 2021 - Phase I ESA

LaBella
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CSD HOUSING

SUMMARY OF ENVIRONMENTAL DATA (2007 - 2010)

FORMER ROTARY SITE
141, 139, 133, 129, 119, 103, and 99 W Main St
10 and 16 S Washington St
19 Plymouth Ave
Rochester, New York

NYSDEC Spill No. 0708687

N

0 35 Feet

1 inch = 35 feet

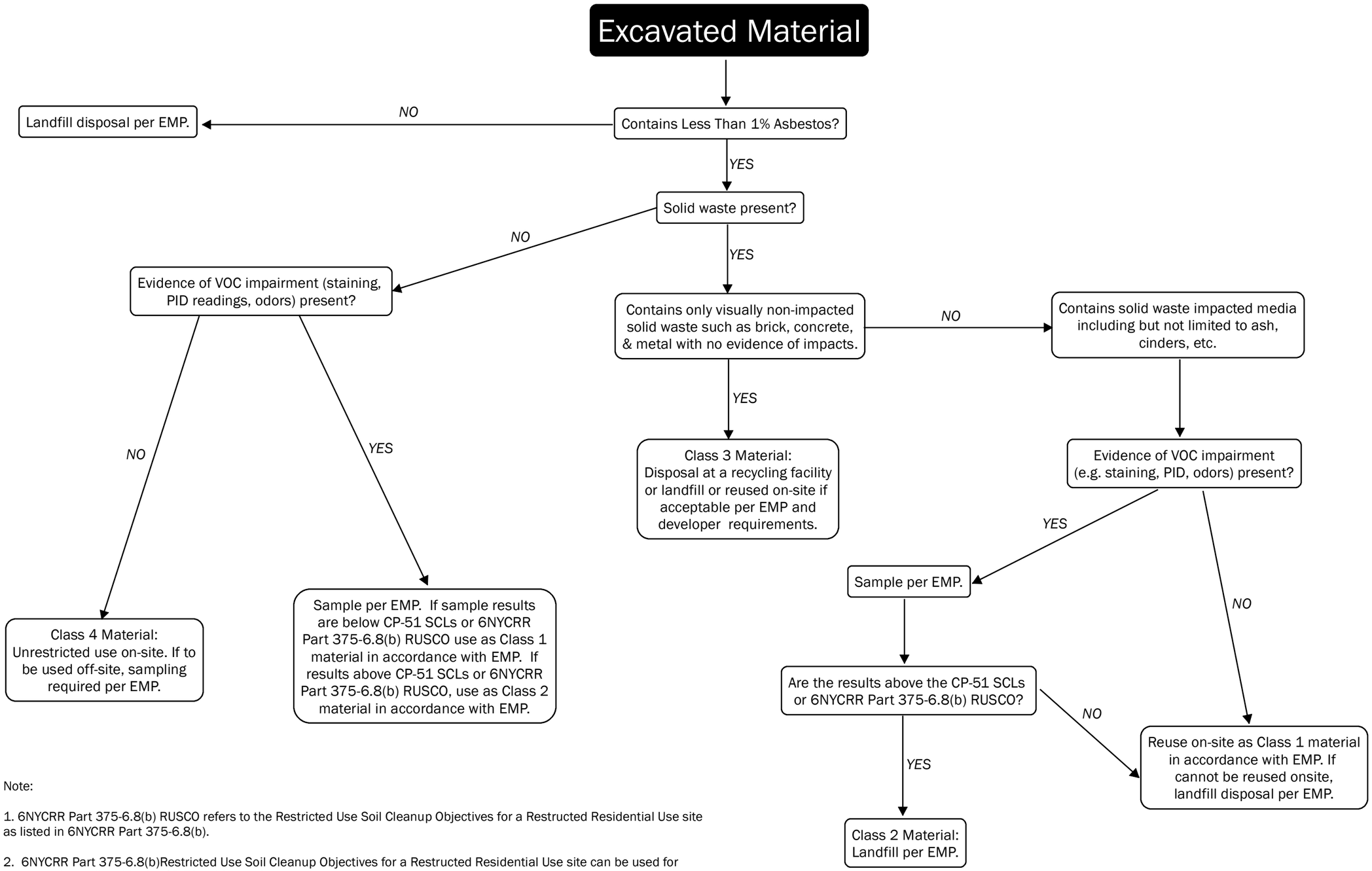
LaBella Project No. 2221127

Date: 2/15/2023
INTENDED TO PRINT AS 11" x 17"

HISTORIC ENVIRONMENTAL

FIGURE 3

Creator: A daSilva / D Brantner
Path: \\PROJECTS1\Projects\AM\CSD Housing LLC\2221127 - Rotary Site Env. Eng. & Consulting\06_Drawings\Environmental\EMP Figure 3 - Historic Environmental.mxd



Note:

1. 6NYCRR Part 375-6.8(b) RUSCO refers to the Restricted Use Soil Cleanup Objectives for a Restructed Residential Use site as listed in 6NYCRR Part 375-6.8(b).

2. 6NYCRR Part 375-6.8(b)Restricted Use Soil Cleanup Objectives for a Restructed Residential Use site can be used for compounds not listed in the CP-51 guidance document.

3. Refer to the Environmental Management Plan (EMP) for additional detail regarding the management of excavated material.

4. This flow chart was developed for use by LaBella personnel to manage the majority of fill anticipated to be encountered at the site and for discussion purposes with contractors. LaBella shall make the final determination for the classification and management of spoils.

LaBella
Powered by partnership.

PROJECT:
ENVIRONMENTAL MANAGEMENT PLAN
CENTER CITY COURTYARD
(FORMER ROTARY SITE)
ROCHESTER, NEW YORK

CLIENT:
CSD HOUSING, LLC

TITLE:
FLOW CHART FOR GUIDANCE OF REUSE AND DISPOSAL REQUIREMENTS

2221127

FIGURE 4

APPENDIX 1

Previous Environmental Reports

May 2007 Phase I ESA

February 2008 Phase II ESA

April 2010 Remedial Action Report

April 2010 SGMP

September 2021 Phase I ESA

May 1, 2007

Reinhard Gsellmeier, P.E.
Monroe County Department of Environmental Services
7100 City Place
Rochester, New York 14614

Re: Phase I Environmental Site Assessment
The Rotary Site
141, 139, 133, 129, 119, 103, and 99 West Main Street
10 and 16 South Washington Street and
19 South Plymouth Avenue
Rochester, New York
LaBella Project No. 207367.01

Dear Mr. Gsellmeier:

LaBella Associates (LaBella), has been contracted by Monroe County Department of Environmental Services to perform an All Appropriate Inquiry (AAI) Phase I Environmental Site Assessment (ESA) Report at 141, 139, 133, 129, 119, 103, and 99 West Main Street; 10 and 16 South Washington Street; and 19 South Plymouth Avenue, City of Rochester, Monroe County, New York, hereinafter referred to as the "Site."

It should be noted that:

- 141 West Main Street was previously addressed as 141, 143 and 145 West Main Street and 2,4,6, and 8 South Washington Street;
- 139 West Main Street was previously addressed as 137 and 139 West Main Street;
- 133 West Main Street was previously addressed as 133 and 135 West Main Street;
- 129 West Main Street was previously addressed as 127, 129 and 131 West Main Street;
- 119 West Main Street was previously addressed as 119, 121, 123, and 125 West Main Street;
- 103 West Main Street was previously addressed as 103, 105, 107, 109, 111, 113, 115, and 117 West Main Street;
- 99 West Main Street was previously addressed as 99 and 101 West Main Street and 5,7,9, and 11 South Plymouth Avenue;
- 10 South Washington Street was previously addressed as 10, 12, and 14 South Washington Street;
- 16 South Washington Street was previously addressed as 16 South Washington Street and 136, 142, 144. 150, 152, and 154 West Broad Street; and
- 19 South Plymouth Avenue was previously addressed as 19, 21 and 29 South Plymouth Avenue.

The findings of this report are based upon a preliminary assessment of the condition of the Site within the Scope of Work and objective described below as of the date of our Site observations and documentation review. This assessment was prepared according to the American Society for Testing and Materials (ASTM) Standard Practice E1527-05 to satisfy the due diligence requirements set for Monroe County Department of Environmental Services. The information contained in this Report is considered privileged and confidential and is intended solely for the use of Monroe County Department of Environmental Services, as it applies to the Site.

1.0 Executive Summary

Based on the Scope of Work, the information detailed herein, the known history of the Site and the current conditions relative to the Site, this assessment has revealed evidence of Recognized Environmental Conditions (RECs) in connection with the Site including, but not limited to the following Sections:

> **SECTIONS 5.1.15, 5.2, 5.3.6. 6.3.6 and 7.2- Inactive and Closed NYSDEC Spills at the Site associated with the historic use and presence of former presence of gasoline tanks at the following parcels:**

As detailed in Sections 5.1.15, 5.2, 5.3.6, 6.3.6, and 7.2, it appears that portions of the Site were historically utilized as gasoline stations. Closed NYSDEC Spills were identified at the Site associated with these former stations and are detailed below.

- 101-107 West Main Street and 99 West Main Street (i.e., currently 103 and 99 West Main Street)

According to the City of Rochester Street Directories, City of Rochester Plat Maps, and Sanborn Maps, 101-107 West Main Street, located on the northeastern portion of the Site, was utilized as a gasoline station from at least the late 1920s to the 1980s. Also, the City of Rochester Building Information System (BIS) records for 103 West Main Street include the rebuild of a concrete gasoline station in 1956; the construction of a four bay gasoline station in 1969; and the replacement of gasoline pumps and islands from 1974 to 1978, and 1980 to 1984. In addition, at least fifteen tanks were reportedly installed at the facility from at least the late 1950s to the late 1970s, and eight of the tanks were removed from the late 1970s to the late 1980s.

The City of Rochester Building Information System (BIS) Records indicate that a 2,000-gallon fuel oil tank was removed in 1994 and a 550-gallon waste oil tank was replaced with a 1,000-gallon tank in 1986.

According to the NYSDEC Spill Report Form #7981029, dated October 29, 1979, gasoline fumes were noted in the Mariner Hotel, which is located adjacent to the east of the Site, on the opposite side of South Plymouth Avenue. Hydrostatic tests identified product loss of approximately sixty gallons of gasoline originating from the Site. The tank was pumped out the fumes ceased in the hotel basement. In 1979, a new 4,000-gallon tank was reportedly installed at the Site. In addition, it was reported that four tanks were removed and no gas fumes were noted in the soil. The excavation was left open overnight to ventilate prior to the installation of two new tanks.

Based on the nature of the Closed NYSDEC Spill, the fact that this facility was a known filling station from at least the late 1920s to the late 1980s, the known presence of approximately eighteen tanks that have existed at the facility at one time and reported removal of ten of the tanks, and the lack of closure or removal reports for review for these tanks, there are apparent RECs at the 103 and 99 West Main Street portion of the Site at this time.

- 16 South Washington Street:

According to the City of Rochester BIS Records, 16 South Washington Street was also known as 150 West Broad Street and is located on the southwestern portion of the Site. In 1936, a canopy on a gasoline station was demolished. No other records regarding tank permits were recorded with the City of Rochester. According to the City of Rochester Street Directories, City of Rochester Plat Maps, and Sanborn Maps, 16 South Washington Street was utilized as a filling station from at least the late 1920s to the early 1950s. This portion of the Site was also identified as an oils room, associated with a former storage building located on the southwestern portion of the Site, addressed as 14 South Washington Street, which also appears to be a former address associated with 16 South Washington Street, in the early 1900s.

According to the City of Rochester Street Directories, 150 West Broad Street was identified as Tire Super Tread Company in the late 1930s.

According to NYSDEC Spill Report Form #0270428 and review of prior Phase I and Phase II ESA reports for this parcel, three subsurface investigations were conducted at the 16 South Washington Street portion of the Site from 1999 to 2002. Petroleum contaminated soil as well as wood and debris was encountered. It was recommended that the contaminated soil be removed as part of future construction of the Site.

Based on the nature of the Inactive NYSDEC Spill and review of prior Phase I and Phase II ESA reports, the fact that contaminated soil was identified on the southwestern portion of the Site in the vicinity of a known filling station, the lack of closure or removal reports for review, and the known former presence of approximately three tanks at this portion of the Site, there are apparent RECs at the 16 South Washington Street portion of the Site at this time.

- 19 South Plymouth Avenue

According to the City of Rochester Street Directories, 19 South Plymouth Avenue is located on the southeastern portion of the Site and was listed as vacant in the late 1940s and not listed from the early 1950s to the present. However, 21 South Plymouth Avenue, which appears to be a former address associated with 19 South Plymouth Avenue, was identified as a Marker Parking and service station from the late 1930s to the early 1940s. In addition, according to the 1938 and 1950 Sandborn Maps, the southeastern portion of the Site was addressed as 29 South Plymouth Avenue, which also appears to be a former address of 19 South Plymouth Avenue, and was utilized as an automobile parking garage with a filling station on the southeast corner of the Site. Six gasoline tanks were located along West Broad Street. The City of Rochester BIS records for 19-29 South Plymouth Avenue include the installation of four 2,000-gallon gasoline tanks and two pumps in 1955 and the demolition of a masonry gasoline station in 1969.

In addition, according to the historical information, this portion of the Site was also identified as a coal yard and Del Lack and West Railroad Company on the 1875 City of Rochester Plat Map and utilized by AM Zim Brich US Automobile on the 1910 City of Rochester Plat Map.

According to NYSDEC Spill Report Form #9314846, dated March 17, 1994, contaminated soil encountered while removing a 1,000-gallon tank.

Based on the nature of the Closed NYSDEC Spill, the fact that this facility was a known filling station from at least the 1930s to the 1960s, the lack of closure or removal reports for review, the known presence of approximately five other tanks at this facility, and the historical use of the parcel as a coal yard, there are apparent RECs at the 19 South Plymouth Avenue portion of Site at this time.

SECTIONS 5.2, 5.3.6 and 7.2- Past uses of the Site

As detailed in Sections 5.2, 5.3.6, the past uses of the Site have indicated RECs and are detailed below.

- 129-131 West Main Street (i.e., currently 129 West Main Street)

129-131West Main Street, located on the north central portion of the Site was utilized as Harley Davidson Motorcycle sales and service from at least the late 1920s to the early 1950s.

- 8 South Washington Street (i.e., currently 10 South Washington Street)

8 South Washington Street was identified as Deluxe Cleaners from the late 1950s to the early 1960s. According to information obtained from subsurface investigations conducted in 1999, it appears that soil borings were conducted around the outer perimeter of the building structure that formerly occupied this portion of the Site. Due to the dense nature of dry cleaning solvents, a concern remains based on the assumption that no soil borings or monitoring wells were advanced within the footprint of the former building.

- West Broad Street

It appears that Broad Street was a portion of the former Erie Canal until the mid 1920s. It is likely that unknown miscellaneous materials were utilized to fill the canal and may have a negative impact on the soil and groundwater present at the Site.

It should also be noted that building structures at 10 South Washington Street , 141 West Main Street, 139 West Main Street, and 133 West Main Street were demolished in 2003; a building structure at 129-131 West Main Street was demolished in 1987; a building structure at 119-125 West Main Street was demolished in 1993; 16 South Washington Street, was utilized as a gasoline station until the structure was demolished in 1936; and 19-29 South Plymouth Avenue was utilized as a public garage and a portion of the parking station was demolished and in 1969; the building structure at 103 West Main Street was demolished in the 1980s; and a building structure at 99 West Main Street was demolished in 1994. It was

not reported if the demolition debris from these former buildings have been removed from the Site. As such, it is possible that demolition debris may be present at the Site.

In addition, the following should be taken into consideration:

SECTIONS 2.5, 6.0 and 7.1- Limited On-Site Access, and Interview with Site Owner, Manager, Occupant or Representative

As detailed in Sections 2.5, 6.0, and 7.1., due to the Scope of Work for this assessment, access to the Site was limited and interviews with the Site Owner, Manager, Occupant, or Representative were not conducted. It is recommended that additional information be obtained regarding the current use of the Site by visually inspected the interior and interviewing the Owner, Manager, Occupant or Representative, if possible.

2.0 Introduction

2.1 Purpose

This investigation was requested to identify, to the extent feasible, Recognized Environmental Conditions in connection with the Site, including the identification of conditions indicative of releases and threatened releases of hazardous substances on, or in the vicinity of the Site. The AAI Phase I ESA Report was conducted in general conformance with the Scope and Limitations of ASTM Standard Practice E1527-05.

The term, Recognized Environmental Condition, is defined by ASTM as the presence or likely presence of any hazardous substances (as currently defined by the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) including pollutants and contaminates), petroleum or petroleum products (excluded from the definition of hazardous substance and controlled substances; or the presence of petroleum products as defined by the Resource Conservation and Recovery Act (RCRA), the Oil Pollution Act of 1990, and the Clean Water Act (CWA)) at the Site under conditions that indicate: an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures at the Site, or into the ground, groundwater or surface water of the Site.

The term is not intended to include "de minimis" conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of the appropriate regulatory agencies. Conditions determined to be de minimis are not RECs.

The term "data gap" means lack or inability to obtain information required by the standards and practices as defined in ASTM Standard Practice E1527-05 despite good faith efforts by the Environmental Professional.

The performance of ASTM Standard Practice E1527-05 is intended to reduce, but not eliminate, uncertainty regarding the potential for Recognized Environmental Conditions and the potential liability for contamination present in connection with the Site recognizing reasonable limits of time and cost. It is also intended to add protection from CERCLA liability for innocent landowner defense, bona fide prospective purchaser, contiguous property owners and grants who meet certain statutory requirements.

The objective of this AAI Phase I ESA was to determine, using our professional judgment, by means of the Scope of Work hereafter described:

1. A general description of the Site.
2. The current and historical usage of the Site and adjoining properties.
3. Whether RECs exist or have the potential to exist at the Site.
4. Whether Site conditions suggest further evaluation based on the presence or probable presence of such RECs.
5. Provide information which may assist the client in evaluating the fair market value of the Site.

According to ASTM E1527-05, no environmental site assessment can wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with a property. Performance of this practice is intended to reduce, but not eliminate, uncertainty regarding the potential for recognized environmental conditions in connection with a property, and this practice recognizes reasonable limits of time and cost.

2.2 Subsurface Risks/Unanticipated Hazardous Materials

This work for this Report has been performed in accordance with generally accepted environmental engineering practices for this region. The conclusion and recommendations of this report are based upon our opinion and judgment, and are dependent upon LaBella Associates, P.C.'s knowledge, information supplied by the present owner and managers of the Site, and data and information solicited from governmental agencies. LaBella Associates, P.C. makes no other warranty or representation, either expressed or implied, nor is one intended to be included as part of its services, proposals, contracts, or reports.

In addition, LaBella cannot provide guarantees, certifications, or warranties that the property is or is not free of environmental impairment without a subsurface investigation involving drilling, vapor analysis, laboratory soil analysis, groundwater monitoring well installation, and laboratory groundwater analysis. Even with such a program, the data and samples from any given soil boring or monitoring well will indicate conditions that apply only at that particular location, and such conditions may not necessarily apply to the general Site as a whole.

2.3 Scope of Work

The major components of an AAI ESA include a visual inspection of the Site and adjoining properties; interviews and review of documents from past and present owners, occupants, managers, representatives and neighbors to the extent necessary; interviews with tribal and local government agency representatives; review of tribal, local and state records relative to the Site; and a review of tribal, local, state and federal standard environmental record sources relative to the Site.

The findings and conclusions presented in this report are based on information gathered and limitations set forth in this report.

The Scope of Work performed in this assessment is limited to the areas described as follows.

1. An interview with the Owner, Manager, Occupant, or Representative of the Site was not conducted as part of the Scope of Work for this assessment at the direction of Monroe County Department of Environmental Services.

2. Interviews with and/or record reviews of each of the following to obtain information directly regarding environmental concerns at or in the immediate vicinity of the Site, which is available directly by file or through general knowledge of the individual being interviewed. Information sources include:

    a. United States Environmental Protection Agency (USEPA)
    b. New York State Department of Environmental Conservation (NYSDEC), Region (8); Division of Solid and Hazardous Waste, Division of Water, Legal Division
    c. Monroe County Environmental Management Council (MCEMC)
    d. City of Rochester Fire Marshall, Building Inspector, and Assessor
    e. Monroe County Health Department (MCHD)

3. Review of the following Federal, State, Local, and Tribal environmental records and databases to aid in the identification of conditions at or related to the Site and property, adjacent to or in the immediate vicinity of the Site, including:

    a. USEPA National Priority List (NPL) – 1.0 mile
    b. USEPA Delisted NPL – 0.5 mile
    c. USEPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) and Archived (No further Remedial Action Planned – NFRAP) CERCLIS Sites – 0.5 mile
    d. USEPA RCRA CORRACTS Treatment, Storage, and Disposal Facility Listing (TSD) – 1.0 mile
    e. USEPA RCRA non-CORRACTS TSD – 0.5 mile
    f. USEPA RCRA Large and Small Quantity Generator Listing – Site and immediate vicinity
    g. National Response Center Emergency Response and Notification System Listing (ERNS) – Site only
    h. Federal, State, Local and Tribal Institutional Controls/Engineering Controls and Land Use Restrictions- Site only
    i. NYSDEC Registry of Inactive Hazardous Waste Disposal Sites (IHWDS) (State and Tribal equivalent of NPL Sites) – 1.0 mile
    j. NYSDEC Registry of Brownfield Cleanup Program Sites (BCP), Voluntary Cleanup Program Sites (VCP), and Tribal equivalent Sites – 0.5 miles
    k. NYSDEC Hazardous Substance Waste Disposal Site Inventory (State and Tribal equivalent of CERCLIS Sites) – 0.5 mile
    l. NYSDEC Part 360 Permitted Solid Waste Disposal Facilities – 0.5 mile
    m. Local and Tribal Inventory of Waste Disposal Sites – 0.5 mile
    n. NYSDEC Listing of Registered Petroleum Bulk Storage Facilities (PBS), Chemical Bulk Storage Facilities (CBS) and Major Oil Storage Facilities (MOSF) – Site and immediate vicinity

o. Tribal Listing of Registered Petroleum Bulk Storage Facilities (PBS), Chemical Bulk Storage Facilities (CBS) and Major Oil Storage Facilities (MOSF) – Site and immediate vicinity
p. NYSDEC Listing of Active Spills and Leaking Storage Tanks – 0.5 miles
q. Tribal Listing of Active Spills and Leaking Storage Tanks- 0.5 mile
r. USGS Topographic Quadrangle Map Rochester East, New York
s. Generalized Groundwater Contour Map of Monroe County
t. US Department of Agriculture Monroe County Soil Survey
u. Sanborn Fire Insurance Maps
v. Aerial Photographs of the area
w. Local Plat Maps
x. Local Street Directories

Note: There do not appear to be any Native American Sovereign Territories in Monroe County. In accordance with ASTM 1527-05, Tribal records will only be reviewed if the subject Site falls on or within one mile of Native American Sovereign Territories. Therefore tribal government representatives were not contacted as part of this Phase I ESA AAI report.

4. Site visit on February 28, 2007 by Ms. Janet M. Bissi, CHMM of LaBella to photograph the Site and to visually identify areas of concern as defined in the agreement.

5. Completion of LaBella's AAI Phase I ESA Site Condition Report.

2.4 Significant Assumptions

As a result of the unavailability or lack of receipt of information the following assumptions were made in order to complete the Scope of Work in the time frame desired by Monroe County Department of Environmental Services:

- Groundwater flow direction in the vicinity of the Site was estimated based on review of area topographic maps and the Generalized Groundwater Contour Map of Monroe County prepared for the MCEMC. Determination of Site specific groundwater flow direction requires the installation of at least three groundwater monitoring wells, surveying the wells, and collecting groundwater elevation data (refer to Section 3.2).

As stated in the Agreement Monroe County Department of Environmental Services acknowledges these assumptions and hereby agrees to release and hold LaBella Associates harmless from any liability arising from or relating to any conclusions made or not made based on these assumptions.

2.5 Limitations and Exceptions of Assessment

ASTM E1527-05 expressly recognized the fact that no environmental site assessment can wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with a property. LaBella's work is intended to reduce, but not eliminate, uncertainty regarding the potential for Recognized Environmental Conditions in connection with the Site, and it's Scope of Work reflects a recognition of the reasonable limits of time and cost.

The work for this Report has been performed in accordance with generally accepted environmental engineering practices for this region. The conclusion and recommendations of this report are based upon LaBella's opinion and judgment, and are necessarily dependent information supplied by the individuals, entities, and agencies described in Section 2.3. LaBella Associates, P.C. makes no other warranty or representation, either expressed or implied, nor is one intended to be included as part of its services, proposals, contracts, or reports.

The actual presence of radon, lead-based paint, lead in drinking water, mold-related issues, electromagnetic frequencies, asbestos-containing building materials (ACBM), wetlands, cultural and historic resources, ecological resources, and endangered species are not included in the Scope of Work of this assessment. Additionally, regulatory compliance, industrial hygiene, health and safety, and indoor air quality are not included in the Scope of Work of this assessment.

It is further noted that due to post 9/11 terrorist related concerns, the NYSDEC has suspended the availability of petroleum bulk storage facilities, chemical bulk storage facilities, major oil storage facilities, and spills databases to the public. LaBella is utilizing existing databases of PBS, CBS, and MOSF prior to 2001, the NYSDEC website, and other research techniques to attempt to obtain this relevant and reasonably ascertainable environmental information for AAI Phase I ESA Reports.

The client should be aware that the lack of availability of the above referenced ASTM E1527-05 required databases may be considered a data gap and affect the findings and conclusions of this Phase I ESA report. This report will identify any specific data gaps and evaluate their significance.

The site visit was limited to visual observations of the perimeter of the property and other accessible areas only. Visual observations were limited at the time of the Site visit due to size, snow cover, and presence of cars in the parking lot area. The interior of the parking lot attendant booth was not visually inspected at the time of the site visit. Areas of the Site that were accessible for off-Site observation were left to the discretion of the Environmental Professional conducting the site visit. The fact that the property was only able to be visually inspected from the property line represents a data gap in this report.

See Conclusion (Section 8.0).

2.6 Special Terms and Conditions

Monroe County Department of Environmental Services and LaBella have agreed that the Scope of Work described under the Scope of Work, and the Limitations and Exceptions described in Section 2.5 above, are acceptable to you and that to the fullest extent permitted by law, LaBella Associates, P.C. shall not be liable to you for limiting its investigation to the Scope of Work described.

Based on the engagement and Scope of Work agreed upon, our evaluation of the Site is as presented herein.

2.7 User Reliance

Monroe County Department of Environmental Services may rely upon the findings of this report and should be aware of the agreed upon Scope of Work and the limitations associated with this Scope of Work.

3.0 Site Description

3.1 Site Location and Legal Description

The Site consists of ten parcels located at 141, 139, 133, 129, 119, 103, and 99 West Main Street; 10 and 16 South Washington Street; and 19 South Plymouth Avenue, City of Rochester, Monroe County, New York (see Figure 1).

141 West Main Street is a 0.055-acre parcel (tax account #121.300-1-011);
139 West Main Street is a 0.031-acre parcel (tax account #121.300-1-12);
133 West Main Street is a 0.031-acre parcel (tax account #121.300-1-13);
129 West Main Street is a 0.11-acre parcel (tax account #121.300-1-14);
119 West Main Street is a 0.16-acre parcel (tax account #121.300-1-15);
103 West Main Street is a 0.14-acre parcel (tax account #121.300-1-18);
99 West Main Street is a 0.06-acer parcel (tax account #121.300-1-18);
10 South Washington Street is a 0.061-acre parcel (tax account #121.300-1-010);
16 South Washington Street is a 2.05-acre parcel (tax account #121.300-1-16); and
19 South Plymouth Avenue is a 0.23-acre parcel (tax account #121.300-1-17).

Deed information for these parcels can be found at Monroe County Clerks Deed Book 9712 page 451 and 457.

It should be noted that:

- 141 West Main Street was previously addressed as 141, 143 and 145 West Main Street and 2,4,6, and 8 South Washington Street;
- 139 West Main Street was previously addressed as 137 and 139 West Main Street;
- 133 West Main Street was previously addressed as 133 and 135 West Main Street;
- 129 West Main Street was previously addressed as 127, 129 and 131 West Main Street;
- 119 West Main Street was previously addressed as 119, 121, 123, and 125 West Main Street;
- 103 West Main Street was previously addressed as 103, 105, 107, 109, 111, 113, 115, and 117 West Main Street;
- 99 West Main Street was previously addressed as 99 and 101 West Main Street and 5,7,9, and 11 South Plymouth Avenue;
- 10 South Washington Street was previously addressed as 10, 12, and 14 South Washington Street;
- 16 South Washington Street was previously addressed as 16 South Washington Street and 136, 142, 144. 150, 152, and 154 West Broad Street; and
- 19 South Plymouth Avenue was previously addressed as 19, 21 and 29 South Plymouth Avenue.

3.2 Site and Vicinity Characteristic

The Site is located within an urban area.

According to the 7.5 minute, Rochester East, New York quadrangle USGS Map, the Site consists of generally level land.

According to the USGS map, the nearest water body is the Genesee River, which is located approximately 1,300 feet to the east of the Site.

Based on interpretation of the USGS topographic map and the Generalized Groundwater Contour Map of Monroe County, groundwater flow at the Site appears to be to the northeast/east.

According to the U.S. Department of Agriculture, Monroe County Soil Survey (1973), soils at the Site consist mainly of Urban land. Urban land consists of areas that have been so altered or obscured by urban works and structures that identification of the soils is not feasible. Areas are mainly in the closely built-up parts of the city.

3.3 Present Ownership and Use

The Site is currently owned by Broad and Plymouth, LLC and utilized as a public parking lot.

3.4 Site Improvements

3.4.1 Structure and Improvements

The Site is an unimproved parcel utilized as a paved parking lot. A wood framed parking attendant booth is located on the eastern portion of the Site, adjacent to east of Scott Alley.

3.4.2 Roads

The Site is located on the south side of West Main Street, the west side of South Plymouth Avenue, the north side of West Broad Street, and the east side of South Washington Street. Marvin Alley is located on the southern portion of the parcel and Scott Alley is located on the eastern portion of the parcel.

3.4.3 Heating Source

According to information obtained as part of this assessment, the Site is currently undeveloped and therefore not heated. The parking attendant booth is likely heated with electric or natural gas.

As such, there are no apparent RECs relating to heating sources at the Site at this time.

3.4.4 Sanitary Sewer Disposal

According to information obtained as part of this assessment, the Site is currently undeveloped and therefore, sanitary waste is not generated at the Site.

As such, there are no apparent RECs relating to sanitary waste at the Site at this time.

3.4.5 Water Supply

According to information obtained as part of this assessment, the Site is currently undeveloped and therefore, this Site is not serviced with public or private water supplies.

As such, there are no apparent RECs relating to the water supply at the Site at this time.

3.5 Current Use of the Adjoining Properties

The Site is bordered by the following properties.

North: West Main Street and commercial properties beyond
South: West Broad Street and the Rochester Board of Education building beyond
East: South Plymouth Avenue and a parking lot beyond
West: Washington Street and an office building beyond

Property boundaries for the purpose of this assessment were determined by the property tax maps obtained from the PropertyInfo Website and visually estimated at the time of the site visit.

It appears that a railroad line may have been formerly located at or adjacent to the southern portion of the Site. The Monroe County Department of Environmental Services should be aware that railroad ties are commonly treated with chemicals, such as creosote, to prevent the wood from decaying. In addition, railroad ballast often contain elevated levels of heavy metals. These chemicals have been known impact soil and groundwater. There is no readily available information indicating that the railroad tracks adjacent to the Site have impacted the soil and groundwater at the Site.

The properties adjacent to the east and southeast of the Site are listed NYSDEC PBS and Closed Spill Sites and, as such, is discussed in detail in Section 5.1.

4.0 User Provided Information

In accordance with the ASTM E1527-05, a user is defined as the party seeking to complete an environmental site assessment of the property. If the user is aware of any specialized knowledge or experience that is material to recognized environmental conditions in connection with the property, it is the user's responsibility to communicate any information based on such specialized knowledge or experience to the environmental professional.

A copy of the User Questionnaire is included in Appendix 7.

4.1 Title Records

According to Mr. Gsellmeier, title records were not reasonably ascertainable as part of the Scope of Work of this assessment, and as such, were not provided and reviewed as part of this Phase I ESA report.

Mr. Gsellmeier, was not aware of any environmental cleanup liens, activity, or use limitations that have been filed or recorded under federal, state, tribal or local law.

According to the ASTM Standard Practice E1527-05, "the user should either engage a title company or title professional to undertake a review of reasonably ascertainable land title records and lien records for environmental liens or activity and use limitations currently recorded against or relating to the property or to negotiate such an engagement of a title company or title professional as an addition to the Scope of Work to be performed by the Environmental Professional."

4.2 Environmental Liens, or Activity and Use Limitations

Mr. Gsellmeier, was not aware of any activity use limitations (AULs), such as engineering controls, land use restriction, or institutional controls that are in place at the Site and/or have been filed or recorded in a registry under federal, tribal, state, or local law regarding the Site.

4.3 Specialized Knowledge or Experience

As the User of this ESA, Mr. Gsellmeier, was not aware of any specialized knowledge or experiences related to the property or nearby properties; such as being involved in the same line of business as the current or former occupants of the property or and adjoining property so that there would be specialized knowledge of the chemicals and processes used by this type of business.

Mr. Gsellmeier stated that the Site is currently utilized as a parking lot and it is possible that salt for deicing is utilized on Site. He also stated that minor amounts of petroleum contamination from leaking cars may also be present on Site.

4.4 Commonly Known or Reasonably Ascertainable Information

Mr. Gsellmeier, was not aware of commonly known or reasonably ascertainable information about the property that would help to identify conditions indicative of releases or threatened releases including: past use of the Site, specific chemicals currently or previously utilized, spills or chemical releases, or environmental cleanups regarding the Site.

4.5 Valuation Reduction for Environmental Issues

Mr. Gsellmeier, was aware that the purchase price being paid for the Site reasonably reflects the fair market value of the Site; and that there is not a difference in price because contamination is known or believed to be present at the Site.

4.6 The Degree of Obviousness of the Presence or Likely Presence of Contamination at the Property

As the User of this ESA, Mr. Gsellmeier, was not aware of any obvious indicators that point to the presence or likely presence of contamination at the property, based on knowledge and experiences related to the property.

4.7 Reasons for Performing Phase I

This Phase I Environmental Site Assessment was performed as part of a possible property acquisition and construction.

5.0 Records Review

5.1 Standard Environmental Record Sources – Federal and State

Federal, State, Local and Tribal environmental records were reviewed as a part of this assessment in accordance with ASTM 1527-05 standard. The following is a summary of the standard environmental record sources reviewed and includes the findings. Copies of the regulatory records documentation are included in Appendix 1.

Federal Lists and Most Recent Updates	**Search Radius**	**# of mapped facilities**	**Facility name, Approximate distance and direction from Site**	**Inferred groundwater flow**	**Recognized Environmental Condition at the Site**
5.1.1 NPL- December 14, 2006	1.0 mile	0	NA	NA	No, based on the lack of listed facilities.
5.1.2 Delisted NPL- January 10, 2007	0.5 mile	0	NA	NA	No, based on the lack of listed facilities.
5.1.3 CERCLIS- January 10, 2007	0.5 mile	1	Artco Industrial Laundries, Inc.; 333 West Main Street; 1,200 feet west of the Site.	Northeast/east and away from the Site.	No, based on the distance and groundwater flow away from the Site.
5.1.3 CERCLIS NFRAP- January 10, 2007	0.5 mile	1	Rochester Gas and Electric Beebee Station; 254 Mill Street; 2,200 feet northeast of the Site.	Northeast/east and away from the Site.	No, based on the distance and groundwater flow away from the Site.
5.1.4 RCRA CORRACTS- June 8, 2006	1.0 mile	1	Burroughs Corporation-RSP; 215 Tremont Street; 2,800 feet south/southwest of the Site.	Northeast/east and away from the Site.	No, based on the distance and groundwater flow away from the Site.
5.1.5 RCRA Non-CORRACTS TSD- June 8, 2006	0.5 mile	0	NA	NA	No, based on the lack of listed facilities.
5.1.6 RCRA Generators – June 8, 2006	Site and immediate vicinity	0	NA	NA	No, based on the lack of listed facilities.
5.1.7 ERNS- February 14, 2007	Site	0	NA	NA	No, based on the lack of listed facilities.
5.1.8 Institutional control/Engineering control registries- January 25, 2007	Site	0	NA	NA	No, based on the lack of listed facilities.

Note: *It should be noted that Federal listings for Engineering and Institutional Controls are not currently available in a searchable web-based database. However, Federal listings for Engineering and Institutional Controls were obtained from the EPA on January 25, 2007. As of the date of this report submission, updates to this listing have not been provided by the EPA.*

State and Tribal Lists and Most Recent Updates	**Search Radius**	**# of mapped facilities**	**Facility name, Approximate distance and direction from Site**	**Inferred groundwater flow**	**Recognized Environmental Condition at the Site**
5.1.8 Institutional control/Engineering control registries- Bi-Weekly	Site	0	NA	NA	No, based on the lack of listed facilities.
5.1.9 State and Tribal Equivalent NPL (IHWDS)- Bi-Weekly	1.0 mile	0	NA	NA	No, based on the lack of listed facilities.
5.1.10 NYSDEC and Tribal Registries of Brownfield Cleanup Program Sites (BCP), Voluntary Cleanup Program Sites (VCP)– Bi-Weekly	0.5 mile	3	Former Artco Industrial Laundries; 333 West Main Street; 1,200 feet west of the Site (BCP).	Northeast/east and away from the Site.	No, based on the distance and groundwater flow away from the Site.
			RG&E West Station; 254 Mill Street; 2,200 feet northeast of the Site (VCP).	Northeast/east and away from the Site.	No, based on the distance and groundwater flow away from the Site.
			RG&E Canal Street; 2,200 feet west of the Site (VCP)	Northeast/east and away from the Site.	No, based on the distance and groundwater flow away from the Site.
5.1.11 State and Tribal Equivalent CERCLIS (Hazardous Substance Sites)- 1998	0.5 mile	1	RG&E Front Street; 1,800 feet northeast of the Site.	Northeast/east and away from the Site.	No, based on the distance and groundwater flow away from the Site.
5.1.12 NYSDEC Part 360 Permitted Solid Waste Disposal Facilities – February 2006	0.5 mile	0	NA	NA	No, based on the lack of listed facilities.
5.1.13 Local Disposal Sites- March 2007	0.5 mile	5	MCEMC Site #183; Industrial waste; 1,500 feet northeast of the Site.	Northeast/east and away from the Site.	No, based on the distance and groundwater flow away from the Site.

State and Tribal Lists and Most Recent Updates	Search Radius	# of mapped facilities	Facility name, Approximate distance and direction from Site	Inferred groundwater flow	Recognized Environmental Condition at the Site
5.1.14 NYSDEC and Tribal Listings of Registered Petroleum Bulk Storage Facilities (PBS), Chemical Bulk Storage Facilities (CBS) and Major Oil Storage Facilities (MOSF) – 2000	Site and immediate vicinity	2	Old Rochester Hotel; 87-89 West Main Street; adjacent to the east of the Site	Northeast/east and away from the Site.	No, based on the fact that the one 10,000 gallon gasoline tank installed at an unlisted date was removed in 2000, there are no Active NYSDEC Spills listed associated with this PBS, and groundwater flow is away from the Site.
			Rochester City School District; adjacent to the south of the Site	Northeast/east and toward the Site.	No, based on the fact that the 10,000 gallon diesel UST installed in 1977 was removed in 1992 and there are no NYSDEC Spills listed associated with this PBS.
5.1.15 NYSDEC and Tribal Listings of Active Spills and Leaking Storage Tanks - Weekly	0.5 mile*	7 Active; 3 Inactive; and 17 Closed.	140, 146, and 150 West Broad Street; Site (i.e., currently 16 South Washington Street) (1 Inactive)	NA	Yes, refer to Section 5.1.15.
			Former Cumberland Farms; Site (i.e., currently 19 South Plymouth Avenue) (1 Closed)	NA	Yes, refer to Section 5.1.15.
			Gulf Oil; Site (i.e., currently 99 and 103 West Main Street) (1 Closed)	NA	Yes, refer to Section 5.1.15.

State and Tribal Lists and Most Recent Updates	Search Radius	# of mapped facilities	Facility name, Approximate distance and direction from Site	Inferred groundwater flow	Recognized Environmental Condition at the Site
5.1.15 NYSDEC and Tribal Listings of Active Spills and Leaking Storage Tanks – Weekly (continued)			Plymouth and Broad; adjacent to the east of the Site (1 Closed)	Northeast/east and away from the Site.	No, based on the nature of the Spill and groundwater flow away from the Site.
			Bergman Associates; adjacent to the west of the Site (1 Closed)	Northeast/east and away from the Site.	No, based on the nature of the Spill and groundwater flow away from the Site.
			Rochester School District; adjacent to the south of the Site (1 Closed)	Northeast/east and away from the Site.	No, based on the nature of the Spill and groundwater flow away from the Site.
			130 and 150 South Plymouth Avenue; 900 feet southeast of the Site (2 Active; 2 Inactive and 8 Closed)	Northeast/east and away from the Site.	No, based on the nature of the spills, the distance and groundwater flow away from the Site.
			Former Refiners Gasoline Station; 1,200 feet west of the Site (2 Active and 5 Closed)	Northeast/east and away from the Site.	No, based on the distance and groundwater flow away from the Site.
			390 West Main Street; 1,300 feet west of the Site (1 Active)	Northeast/east and away from the Site.	No, based on the distance and groundwater flow away from the Site.
			DiSalvo (Anthony) Residence; 1,500 feet west of the Site (1 Active)	Northeast/east and away from the Site.	No, based on the distance and groundwater flow away from the Site.

State and Tribal Lists and Most Recent Updates	Search Radius	# of mapped facilities	Facility name, Approximate distance and direction from Site	Inferred groundwater flow	Recognized Environmental Condition at the Site
5.1.15 NYSDEC and Tribal Listings of Active Spills and Leaking Storage Tanks – Weekly (continued)			Route 490 Eastbound; unmappable; north of the Site (1 Active)	Northeast/east and away from the Site.	No, based on the distance and groundwater flow away from the Site

*Based on the dense urban area of the Site, as per ASTM Standard, the search radii for NYSDEC Active spill database has been reduced from 0.5-mile to 0.25-miles from the Site.

5.1.15 Leaking Underground Storage Tank and Spill Sites

Based on a visual observation of the area in the vicinity of the Site, the NYSDEC Listing of Active Spills in Region 8, and the City of Rochester, three closed spills, as defined by current NYSDEC regulations have been identified within a 0.25-mile radius of the Site that are considered to be RECs at the Site at this time. According to the NYSDEC Spills Website listing, this website is updated weekly. They are the following:

A.	140, 146, and 150 West Broad Street Spill #0270428	140, 146, and 150 West Broad Street, Rochester
B.	Former Cumberland Farms Spill #9314846	19 South Plymouth Avenue, Rochester
C.	Gulf Oil Spill #7981029	Plymouth Avenue, Rochester

These facilities are discussed herein, including: available information from the City of Rochester and the NYSDEC.

A. 140, 146 and 150 West Broad Street

This Spill was located on the southwestern portion of the Site; currently addressed as 16 South Washington Street.

According to the NYSDEC Spill Report Form, dated October 25, 2002, reportedly several subsurface investigations have been conducted at the facility. Reportedly, this facility was a gasoline station from the early 1920s through 1952. Three underground storage tanks formerly located at the Site included a 1,000-gallon tank and two 550-gallon tanks. There were no records indicating that these tanks were removed, however no tanks were encountered during subsurface investigation. The subsurface investigations have revealed the presence of low levels of petroleum contaminated soils. It was recommended that the soils be addressed at the time of future development.

Further information regarding prior Phase I and Phase II Investigations conducted at this portion of the Site is detailed in Section 5.2.

As such, it appears that petroleum contaminated soil exists on the southwestern portion of the Site.

According to the City of Rochester BIS Records, 16 South Washington Street was also known as 150 West Broad Street. In 1936, a canopy on a gasoline station was demolished. No other records regarding tank permits were recorded with the City of Rochester. According to the City of Rochester Street Directories, City of Rochester Plat Maps, and Sanborn Maps, 16 South Washington Street, was utilized as a filling station from at least the late 1920s to the early 1950s. This portion of the Site was also identified as an oils room, associated with a former storage building located on the southwestern portion of the Site, addressed as 14 South Washington Street in the early 1900s.

According to the City of Rochester Street Directories, 150 West Broad Street was identified as Tire Super Tread Company in the late 1930s.

Based on the nature of this NYSDEC Spill, the fact that it occurred on the southwestern portion of the Site in the vicinity of a known filling station that was present at the Site from at least the late 1920s to the early 1950s, the lack of closure or removal reports for review, and the known former presence of approximately three tanks at this facility and the presence of petroleum contaminated soils, there are apparent RECs regarding this Closed NYSDEC Spill listing at the Site at this time.

See Conclusion (Section 8.0).

B. Former Cumberland Farms

This Spill was located on the southeastern portion of the Site; currently addressed as 19 South Plymouth Avenue.

According to the NYSDEC Spill Report Form, dated March 17, 1994, contaminated soil was encountered while removing a 1,000-gallon underground fiberglass tank. Reportedly, the contaminated soil was excavated and removed from the Site. Results from the tank excavation sampling were submitted to the NYSDEC and were non-detectable. No further information was provided on the NYSDEC Spill Report Form. No Further Action is required by Spills. This Spill was closed by the NYSDEC on November 1, 1994.

According to the City of Rochester Street Directories, 19 South Plymouth Avenue was listed as vacant in the late 1940s and not listed from the early 1950s to the present. However, 21 South Plymouth Avenue was identified as a Marker Parking and service station from the late 1930s to the early 1940s. In addition, according to the 1938 and 1950 Sanborn Maps, the southeastern portion of the Site was addressed as 29 South Plymouth Avenue and utilized as an automobile parking garage with a filling station on the southeast corner. Six gasoline tanks were located along West Broad Street. Also, the City of Rochester BIS records for 19-29 South Plymouth Avenue include the installation of four 2,000-gallon gasoline tanks and two pumps in 1955 and the demolition of a masonry gasoline station in 1969.

Based on the nature of this NYSDEC Spill, the fact that it occurred on the southeastern portion of the Site in the vicinity of a known filling station from at least the late 1930s to the late 1960s, the lack of closure or removal reports for review, and the known presence of approximately five other tanks at this facility, there are apparent RECs regarding this Closed NYSDEC Spill listing at the Site at this time.

See Conclusion (Section 8.0).

C. Gulf Oil

This Spill was located on the northeastern portion of the Site; currently addressed as 99 and 103 West Main Street.

According to the NYSDEC Spill Report Form, dated October 29, 1979, gasoline fumes were noted in the Mariner Hotel, which is located adjacent to the east of the Site, on the opposite side of South Plymouth Avenue. Hydrostatic tests identified product loss of approximately sixty gallons of gasoline originating from the Site. The tank was pumped out the fumes ceased in the hotel basement. In 1979, a new 4,000-gallon tank was reportedly installed at the Site. In addition, it was reported that four tanks were removed and no gas fumes were noted in the soil. The excavation was left open overnight to ventilate prior to the installation of two new tanks. No Further Action is required by Spills. This Spill was closed by the NYSDEC on November 1, 1994.

According to the City of Rochester Street Directories, City of Rochester Plat Maps, and Sanborn Maps, 101-107 West Main Street (i.e., currently addressed as 103 West Main Street), located on the northeastern portion of the Site, was utilized as a gasoline station from at least the late 1920s to the 1980s. Also, the City of Rochester BIS records for 103 West Main Street include the rebuild of a concrete gasoline station in 1956, the construction of a four bay gasoline station in 1969; and the replacement of gasoline pumps and islands from 1974 to 1978 and 1980 to 1984.

The following table summarizes tank information for this facility obtained from the City of Rochester BIS Records:

Tank Size and number	Underground/ Aboveground	Product	Installation Date	Removal Date
(3) 3,000-gallon	Not listed	gasoline	1956	Not listed
(2) 2,000-gallon	Not listed	gasoline	1957	Not listed
(3) 4,000-gallon	Not listed	gasoline	prior to 1974	1979
(1) 2,000-gallon	Not listed	gasoline	Prior to 1974	1979
(1) 1,000-gallon	Underground	Fuel oil	Prior to 1974	Not listed
(1) 550-gallon	Not listed	Waste oil	Prior to 1974	Not listed

(1) 6,000-gallon	Not listed	Gasoline	Prior to 1979	1988
(2) 6,000-gallon	Not listed	Gasoline	1979	1988
(1) 1,000-gallon	Underground	Waste oil	Not listed	1988

In addition, the City of Rochester BIS Records indicate that a 2,000-gallon fuel oil tank was removed in 1994 and a 550-gallon waste oil tank was replaced with a 1,000-gallon tank in 1986.

Based on the nature of this NYSDEC Spill, the fact that it occurred at 99 and 103 West Main Street, in the vicinity of a known filling station from at least the late 1920s to the late 1980s, the known presence of approximately eighteen tanks that have existed at the facility at one time and reported removal of ten of the tanks, and the lack of closure or removal reports for review for these tanks, there are apparent RECs regarding this Closed NYSDEC Spill listing at the Site at this time.

See Conclusion (Section 8.0).

5.2 Additional Environmental Record Sources

5.2.1 Review of Previous Environmental Reports

A Phase I ESA for 133-139 West Main Street completed by the Sear-Brown Group, Inc. in 1999 stated that the Site was developed with a three-story, brick building with a basement, that was constructed prior ton 1875. One empty 275-gallon AST for fuel oil was observed in the northern portion of the basement. It was reported that this tank was formerly utilized as a fuel source for the boilers. It was also reported that municipal debris was observed on the southern portion of the building including wood, a five-gallon container of tar, bricks, aluminum cans, and other miscellaneous debris. It was recommended that the 275-gallon AST be removed as well as the miscellaneous debris. Based on the fact that this portion of the Site appeared to be undeveloped at the time of the site visit conducted in February 2007, the former presence of the miscellanies debris and AST does not appear to represent a remedial concern at the Site at this time.

A Phase I ESA and Limited Phase II ESA was conducted at 141 and 145 West Main Street and 6 and 8 South Washington Street (i.e., currently addressed as 141 West Main Street) by the Sear-Brown Group in 1999. It was reported that the parcel was improved at the time with a three-story, brick building with a basement, located north of 10-14 South Washington Street. It was concluded that 8 South Washington Street was utilized a dry cleaners from 1957-1966. It was unknown of whether dry cleaning activities occurred at the Site, or if it was utilized as a drop off/pick-up service. Four borings were advanced in this area and no impacted soil was observed. In addition, approximately twenty partially filled one-gallon containers of paint were observed in the southern portion of the basement. No leaks, spills, stains, or unusual odors were observed in the vicinity of the paint. Also, two empty 275-gallon ASTs for fuel oil were observed on the northeastern portion of the basement. It was recommended that the paint and other materials, including the two ASTs be removed and properly disposed of. It appears that the Sear Brown borings were conducted around the outer perimeter of the building structure that formerly occupied this

portion of the Site. Due to the dense nature of dry cleaning solvents, a concern remains based on the assumption that no soil borings or monitoring wells were advanced within the footprint of the former building.

A Phase I ESA and limited Phase II ESA was conducted for 129 and 131 West Main Street (i.e., currently 139 West Main Street), 10-14 South Washington Street (i.e., currently 10 South Washington Street), 140, 146, and 150 West Broad Street (i.e., 16 South Washington Street) in 1999 by the Sear-Brown Group, Inc. It was reported that 129 and 131 West Main Street, located on the northernmost of the parcel, is an asphalt paved parking lot. 10-14 South Washington Street was improved with a three-story brick building and 140, 146, and 150 West Broad Street was improved with a two-story building with a basement. It was reported that the buildings were constructed prior to 1875. It was also reported that a three-story brick building, adjoined the 10-14 South Washington Street building to the north with an asphalt paved parking lot to the east.

It was concluded that seven one-gallon containers of paint and one 5-gallon container of roof sealer and one 5-gallon container of roof tar were observed at 140 West Broad Street. No leaks, spills, stains, or odors were observed. In addition, seventeen one-gallon containers o ammonium hydroxide, one 32 oz. container of linseed oil, and one ten pound bag of electrolyte battery fluid were also observed at 140 West Broad Street as well as a one quart container of waste oil was observed in the elevator room. The outside of the container appeared to be stained, but no staining was observed on the flooring. One empty 275-gallon AST was observed on the north eastern portion of 10-14 South Washington Street that was reportedly no longer utilized for heating oil storage and was observed to be empty. It was recommended that the containers and AST be removed from the Site prior to demolition. In addition, 16 South Washington Street was reportedly utilized a gasoline station from 1930s to 1952 on the southern portion of the Site and supplementary subsurface investigations were conducted and described below.

A Supplemental Phase II ESA for 150 West Broad Street (i.e., currently 16 South Washington Street) completed by the Sear-Brown Group, Inc. in 1999 stated that a former gasoline station was historically located on the southern portion of the Site and a limited subsurface investigation was conducted to evaluate the potential for subsurface contamination. Thirteen soil borings were advanced on the Site and slightly elevated headspace readings were noted in three of the borings and corresponded to petroleum odors and soil staining. Six of the borings were terminated based on refusal due to the presence of wooden obstruction, believed to be the wood floor from a former two story warehouse. Two soil borings were advanced in the area of the suspected former gasoline tanks and no tanks were encountered. Three semi-volatile organic compounds (SVOCs) were detected slightly above the NYSDEC soil guidance values. It was concluded that based on the slightly elevated concentrations of SVOCs and suspected wood flooring, further investigation was recommended in this area. Three additional borings and one piezometer were advanced in the vicinity of the former tanks, on the west side of 150 West Broad Street. No volatile organic compounds (VOC s) were reported above the NYSDEC guidance values. Eight SVOCs were detected above the NYSDEC guidance values.

A Petroleum Spill Reporting Letter to the NYSDEC completed by the Sear-Brown Group, Inc. dated 2002 for 140, 146, and 150 West Broad Street (i.e., 16 South Washington Street) reported that three subsurface investigations have been conducted at the parcel including a Phase I ESA and limited Phase II in August 1999, a Supplemental Phase II Investigation of 150 West Broad Street in August 1999, and recent investigations in 2002.

Investigations conducted in 2002 included groundwater sampling of one well to determine if the low level petroleum concentrations in he on site soils have impacted the groundwater. The results indicated low level detection of phenanthrene and did not appear to represent a significant concern. A geophysical survey was also conducted by Geomatrix Consultants, Inc. in January 2002 to assist in the location of potential USTs that may be present at the Site. The survey was focused on the western portion of the Site, in the area of the former tanks. Geophysical results indicated that no orphan USTs was encountered. It was concluded that low level petroleum residuals are believed to be present on Site and the presence of the affected soil does not present an environmental or human health concern at the Site. It was proposed that the impacted soil be removed at the time of future construction

Based on the fact that petroleum contaminated soil is known to be present on the southwestern portion of the Site at 16 South Washington Street, appears to represent at REC at the Site at this time.

See Conclusion (Section 8.0).

It should also be noted that asbestos containing building material and lead based paint were also noted as being present in the former buildings and it was recommended that pre-demolition surveys and abatement if necessary be conducted. At the time of the site visit conducted in February 2007, the Site appeared to be undeveloped and as such, the former presence of asbestos containing building material and lead based paint does not appear to be a REC at the Site at this tine.

5.3 Historical Use Information on the Property and Adjoining Properties

In accordance with ASTM Standard E1527-05, LaBella attempted to review the following sources of historical information as a part of this assessment.

a. Sanborn Fire Insurance Maps
b. Aerial Photography/USGS Topographic Maps
c. Historical Atlas and Plat Maps
d. City Directories
e. Building Inspector, Fire Marshal, and Assessor records
f. Property abstract

Due to the location of some Sites, not all historical records and maps may be publicly available or reasonably ascertainable for review.

The client should be aware that the lack of availability of the above referenced ASTM required databases may affect the findings of this Phase I ESA report and could be considered a data gap. Any data gaps identified are evaluated for their significance in this report.

5.3.1 Sanborn Fire Insurance Maps

Sanborn Fire Insurance Maps obtained Environmental Data Resources, Inc. were reviewed as part of this assessment.

According to the 1892 Sanborn Map, the eastern and southeastern portion of the Site was utilized as farmer's sheds and Warren and Co. Livery addressed as 99-117 West Main Street and 5-29 South Plymouth Avenue. The western portion of the Site was utilized as an ink factory at 125 West Main Street (i.e., currently addressed as 119 West Main Street), harvesting machines addressed as 129 and 131 West Main Street (i.e., currently addressed as 129 West Main Street), a liquor warehouse addressed as 10 and 12 South Washington Street (i.e., currently addressed as 10 South Washington Street), and a warehouse on the southwest portion of the Site (i.e., currently addressed as 16 South Washington Street).

According to the 1912 Sanborn Map, the northeast portion of the Site was addressed as 99 West Main Street and utilized as printing facility; the eastern portion of the Site was addressed as 15 South Plymouth Avenue (i.e., currently addressed as the northern portion of 19 South Plymouth Avenue) and utilized as a leather working facility and the southeastern portion of the Site was addressed as 25-33 South Plymouth Avenue (i.e., currently addressed as 19 South Plymouth Avenue) and utilized as a parking garage. An auto repair facility was also located on the southeastern portion of the Site (i.e., currently the southeastern portion of 19 South Plymouth Avenue), adjacent to the east of Scott Alley and north of West Broad Street. Furniture stores and warehouses were located on the northwestern portion of the Site addressed as 127-119 West Main Street (i.e., currently addressed as the western portion of 119 West Main Street and 192 West Main Street). A sausage factory was located on the northwestern portion of the Site, addressed as 6-8 South Washington Street (i.e., currently addressed as the southern portion of 141 West Main Street). The southwestern portion of the Site was addressed as 14 South Washington Street (i.e., currently addressed as 16 South Washington Street) and utilized as a storage building with an oils room on the western portion. The western portion of the Site was addressed as 10-12 South Washington Street (i.e., currently addressed as 10 South Washington Street) and utilized as a pharmacy.

According to the 1938 and 1951 Sanborn Maps, the northeast corner of the Site was addressed as 105 West Main Street (i.e., currently addressed as 103 West Main Street) and utilized as a gasoline station. Eight tanks were located in the central portion of the parcel. The southeastern portion of the Site was addressed as 29 South Plymouth Avenue (i.e., currently addressed as 19 South Plymouth Avenue) and utilized as an automobile parking garage with a filling station on the southeast corner. Six gasoline tanks were located along West Broad Street. The north central portion of the Site was addressed as 129-131 West Main Street (i.e., currently addressed as 129 West Main Street) and utilized as motorcycle sales and service. The southwestern portion of the Site was addressed as 16 South Washington Street was utilized as a gasoline station with two tanks on the northern portion of the parcel along Melvin Alley and one tank on the southern portion of the parcel along West Broad Street. 136, 142, 150, 152 and 154 West Broad Street (i.e., currently addressed as 16 South Washington Street) was utilized as a motor freight station and tire sales and service.

According to the 1971 Sanborn Map, the northeast portion of the Site was addressed as 105 West Main Street (i.e., currently addressed as 103 West Main Street) and utilized as a filling station. No gasoline tanks were identified. A parking garage was located on the southeastern portion of the Site (i.e., currently addressed as 19 South Plymouth Avenue). The northwestern portion of the Site (i.e., currently addressed as 129-141 West Main Street) appears to be utilized as a restaurant, stores and a parking lot (i.e., currently addressed as 119 West Main Street). The southwestern portion of the Site (i.e., currently addressed as 16 South Washington Street) appears to be utilized as Union Hall Restaurant and parking.

According to ASTM E1527-05, sanborn maps must be reviewed from at least 1880; however, the earliest sanborn map available for review was 1892.

Based on the fact that historical information has been obtained from other sources, it does not appear that the lack of review of these maps represents a significant data gap as of the date of this report submission.

Copies of the Sanborn Maps are included in Appendix 2.

5.3.2 Aerial Photography/USGS Topographic Maps

The following observations were made from the review of the historical aerial photographs obtained from TerraServer.com and the PropertyInfo Website.

Date of Photo	**Notes (include changes at the Site, disturbance, etc.)**
1938	The Site appears to be developed with several structures in a heavily developed area.
1951	The Site appears to be developed with structures on the north northeast, east, northwest and southwest portions. In addition, an apparent parking ramp is observed on the southeastern portion of the Site. Paved parking lots are observed on the remaining portions. The surrounding properties appear to be heavily developed.
1961	The Site appears to be developed with structures on the northeast, east, northwest and southwest portions. In addition, an apparent parking ramp is observed on the southeastern portion of the Site. Paved parking lots are observed on the remaining portions. The surrounding properties appear to be heavily developed.
1970	The Site appears to be developed with structures on the northeast, east, northwest and southwest portions. Paved parking lots are observed on the remaining portions. The surrounding properties appear to be heavily developed.
1975, 1988, 1993 and 1994	The Site appears to be developed with structures on the northeast, east, and northwest portions. Paved parking lots are observed on the remaining portions. The surrounding properties appear to be heavily developed.
1996 and 1999	The Site appears to be developed with structures on the northwest and southwest portions and paved parking lots are visible on the remaining portions of the Site. The surrounding properties appear to be heavily developed.
2006	The Site appears to be a paved parking lot. The surrounding properties appear to be heavily developed.

Copies of the aerial photographs are included in Appendix 3.

Review of the 15 minute 1893 and 1920 Rochester Northeast, New York quadrangle USGS Maps, no use, ownership, or development of the Site is identified. A portion of the Erie Canal is visible adjacent to the south of the Site.

Review of the 1978 7.5 minute, Rochester, New York quadrangle USGS Map, indicates that the Site is located near the center of the City of Rochester and is heavily developed. No use, ownership, or developed of the Site is identified.

5.3.3 Historical Atlases

Historical Plat Maps were reviewed at the Rochester Public Library.

According to the 1875 City of Rochester Plat Map, a coal yard and Del Lack and West Railroad Company was located on the southeast portion of the Site (i.e., currently addressed as 19 South Plymouth Avenue). The Erie Canal is visible south of the Site.

According to the 1888 and 1902 City of Rochester Plat Maps, the Site appeared to be utilized primarily for residential purposes. The Erie Canal is visible south of the Site.

According to the 1910 City of Rochester Plat Map, the Site appears to be utilized by AM Zim Brich US Automobile on the southeastern portion (i.e.,. currently addressed as 19 South Plymouth Avenue). The remaining portions of the Site appear to be utilized for residential or commercial purposes.

According to the 1918 and 1926 City of Rochester Plat Maps, the Site appears to be utilized as the Newell Building on the northeastern portion (i.e., currently addressed as 99 and 103 West Main Street), the Community Bank subdivision on the northwestern portion, Riley Company in the central portion, and Hills US Garage on the southeastern portion (i.e., currently addressed as 19 South Plymouth Avenue). The remaining portions of the Site appear to be utilized for residential or commercial purposes. The Erie Canal is visible south of the Site on the 1918 Plat Map and West Broad Street is visible south of the Site on the 1926 Plat Map.

According to the 1935 City of Rochester Plat Map, the Site appears to be utilized as Gulf gasoline station on the northeastern portion (i.e., currently addressed as 99 and 103 West Main Street), Hills garage on the southeastern portion (i.e., currently addressed as 19 South Plymouth Avenue); and Sinclair gasoline station on the southwestern portion (i.e., currently addressed as 16 South Washington Street). The remaining portions of the Site appear to be utilized for residential or commercial purposes.

According to ASTM E1527-05, historical atlases and maps should be reviewed dating back to 1860. Based on the fact that historical information has been obtained from other sources, it does not appear that the lack of review of these maps represents a significant data gap as of the date of this report submission.

5.3.4 City Directories

City of Rochester Directories were reviewed at the Rochester Public Library.

101 West Main Street (i.e., currently addressed as 99 West Main Street) was identified as a jewelry store from the late 1920s to the early 1930s; Doyle gas and oil company in the late 1930s; Gulf Corp. gasoline station from the early 1940s to the early 1950s; and not listed from the late 1950s to the present.

103 West Main Street (i.e., currently addressed as 103 West Main Street) was identified as the Newell Building from the late 1920s to the early 1930s as well as a printing facility in the late 1920s; and not listed from the late 1930s to the present.

105 West Main Street (i.e., currently addressed as 103 West Main Street) was identified as a clothing store in the late 1920s; a cigar shop in the early 1930s; not listed in the late 1940s to the early 1950s; identified as Archibald, David service station in the late 1950; D. Bellas gasoline station in the early 1960s; not listed from the late 1960 to the late 1970s; Morgan Stanwix Gasoline Station in the early 1980s; Downtown Gulf Station in the late 1980s; Downtown parking lot in the early 1990s; and not listed from the late 1990s to the present.

107 West Main Street (i.e., currently addressed as 103 West Main Street) was identified as Gloversville Glove Store from the late 1920s to the early 1930s; Cocilova Rich and Sons gasoline station from the late 1960s to the late 1970s and not listed from the early 1980s to the present.

111-113 West Main Street (i.e., currently addressed as 103 West Main Street) was identified as a hardware store from the late 1920s to the late 1930s; vacant in the early 1940s and not listed from the late 1940s to the present.

115 West Main Street (i.e., currently addressed as 103 West Main Street) was not listed in the late 1920s; identified as a barber and a dentist from the early 1930s to the early 1940s and not listed from the late 1940s to the present.

117 West Main Street (i.e., currently addressed as 103 West Main Street) was identified as Cash Auto Supply house in the late 1920s; a tailor from the early 1930s to the early 1940s and not listed from the late 1940s to the present.

119 West Main Street (i.e., currently addressed as 119 West Main Street) was identified as a furniture store in the late 1920s; vacant in the early 1930s; Levy Brothers Auction in the late 1930s; the Harley-Davidson Corporation Motorcycle shop from the early 1940s to the early 1950s; and not listed from the early 1960s to the present.

121 West Main Street (i.e., currently addressed as 119 West Main Street) was not listed in the late 1920s; listed as vacant in the early 1930s and not listed from the late 1930s to the present.

123 West Main Street (i.e., currently addressed as 119 West Main Street) was identified as a barber shop and dentist in the late 1920s; not listed from the early to late 1930s; identified as Harley Davidson Motorcycles in the early 1940s; not listed from the late 1940s to the early 2000s and as a residence in the 2006 directory.

125 West Main Street (i.e., currently addressed as 119 West Main Street) was listed as vacant from the late 1920s to the early 1930s; identified as Northern Heating Company in the late 1930s and not listed from the early 1940s to the present.

127 West Main Street (i.e., currently addressed as 129 West Main Street) was not listed from the late 1920s to the late 1930s; identified as Harley Davidson Motorcycles in the early 1940s; Hunter, Robert cigars in the late 1940s; and not listed from the early 1950s to the present.

129-131 West Main Street (i.e., currently addressed as 129 West Main Street) was identified as Harley Davidson Motorcycles from the late 1920s to the late 1930s; Christies Specialty Restaurant supplies store from the early 1940s to the late 1970s and not listed from the early 1980s to the present.

131 West Main Street (i.e., currently addressed as 129 West Main Street) was identified as a stove store from the late 1920s to the early 1930s.

133 West Main Street (i.e., currently addressed as 133 West Main Street) was identified as a tailor from the late 1920s to the late 1930s; Highland Merchants, curtains from the early 1940s to the late 1940s; Cohen Chas Tailer in the early 1950s; Leo's barber shop from the late 1950s to the early 1960s; Shorts barber shop in the late 1960s; Cedrics Tavern in the early 1970s; My Place Tavern in the late 1970s; the Gavel Restaurant from the early 1980s to the early 1990s, and the Rabbit Hole in the mid 1990s.

135 West Main Street (i.e., currently addressed as 133 West Main Street) was identified as apartments from the late 1920s to the early to mid 1990s.

139 West Main Street (i.e., currently addressed as 139 West Main Street) was listed as vacant in the late 1920s; identified as a cigar shop in the early 1930s; Direct Sales Service Inc. in the late 1930s; Nobel Sales Notions from the early 1940s to the early 1950s; John Ferreira grocers in the late 1950s; Henry Herrick grocers in the early 1960s; vacant in the late 1960s and Temp Service in the early 1970s.

141-145 West Main Street (i.e., currently addressed as 141 West Main Street) was identified as a tailor in the late 1920s; and the Washington Restaurant from the late 1920s to the late 1950s; and Past Time Tavern from the early 1960s to the early 1990s.

5 South Washington Street (i.e., currently addressed as 141 West Main Street) was identified as the Wellington Hotel in the early 1950s.

6 South Washington Street (i.e., currently addressed as 141 West Main Street) was identified as the Wellington Hotel from the late 1920s to the early 1970s and apartments from the late 1970s to the early 1980s and not listed from the late 1980s to the present.

8 South Washington Street (i.e., currently addressed as 141 West Main Street) was not listed from the late 1920s to the early 1930s; identified as vacant from the late 1930s to the early 1940s; a cigar manufacture in the late 1940s; Monroe Music Company and a chip manufacture in the early 1950s; Deluxe Cleaners from the late 1950s to the early 1960s; vacant in the late 1960s; Light Impressions photo book publisher in the early 1970s; Mattrex Data Entry Service in the late 1970s and vacant in the early 1980s. According to information obtained from subsurface investigations conducted in 1999, it appears that soil borings were conducted around the outer perimeter of the building structure that formerly occupied this portion of the Site. Due to the dense nature of dry cleaning solvents, a concern remains based on the assumption that no soil borings or monitoring wells were advanced within the footprint of the former building (refer to Section 5.2).

10 South Washington Street (i.e., currently addressed as 10 South Washington Street) was identified as a an auction house in the late 1920s; a furniture store in the early 1930s; the National Paper Company in the late 1930s; Rochester Maid Potato chips from the early 1940s to the late 1940s; not listed in the early 1950s; identified as Rochester Maid Inc. potato chip in the late 1950s; vacant in the from the early to the late 1960s; a Mosley-Perinton Corporation, Xentith Land Corporation and Landcare Facility in the early 1970s; and a lawyer's office from the late 1970s to the early 1980s.

12 South Washington Street (i.e., currently addressed as 10 South Washington Street) was not listed from the late 1920s to the late 1940s; listed as vacant in the early to late 1950s; not listed in the early 1960s; and identified as vacant in the late 1960s.

16 South Washington Street (i.e., currently addressed as 16 South Washington Street) was identified as a gasoline station from the late 1920s to the early 1930s; Culian Anthony gasoline station in the late 1930s; Floria Alpohose gasoline station from the early 1940s to the late 1940s; and listed as vacant in the early 1950s. According to the City of Rochester BIS records, 16 South Washington Street was also known as 150 West Broad Street. 150 West Broad Street was not listed in the late 1920s; listed as vacant in the early 1930s; identified as Tire Super Tread Company in the late 1930s; Beers LF Company plumbing supply from the early to late 1940s; not listed in the early 1970s; identified as attorney's office from the late 1970s to the late 1990s; a CPA's office in the early 2000s and not listed in the mid 2000s.

19 South Plymouth Avenue (i.e., currently addressed as 19 South Plymouth Avenue) was listed as vacant in the late 1940s and not listed from the early 1950s to the present.

21 South Plymouth Avenue (i.e., currently addressed as 19 South Plymouth Avenue) was identified as a Hills Garage from the late 1920s to the early 1930s; Marker Parking and service station from the late 1930s to the early 1940s and not listed from the late 1940s to the present.

No listings for 141, 139, 133, 129-131, 119-125, 103, and 99 West Main Street; 10 and 16 South Washington Street; and 19-29 South Plymouth Avenue in the 2006 or 2001 Street directories.

5.3.5 Additional Historical Resources

Historical information of the Site was also reviewed from records obtained from the City of Rochester Building Information System (BIS) (refer to Section 7.2).

10 South Washington Street was utilized as a bar from at least 1991 to 2003 when the three story building was demolished.

141 West Main Street was constructed in the early 1900s; utilized as the Lodging House in the mid 1900s; in the mid 1960s was utilized as a brick two story building with four apartments and was demolished in 2003.

139 West Main Street was a two story building, utilized as a retail store that was demolished in 2003.

133 West Main Street was utilized as a tailor shop in the 1920s; utilized for two stores on the first floor and apartments on the second floor in the 1960s; changed use to a restaurant in the mid 1970s and in the 1980s maintained use as a restaurant and apartments until 2003 when the two story building was demolished.

129-131 West Main Street was utilized as a store in the mid 1930s; a partial demolition occurred in the mid 1930s; a one story building was demolished in 1987 and permit for use as a parking lot was issued in 1995.

119-125 West Main Street was utilized as a brick store in the early 1900s and as a store and warehouse until 1955 when it was demolished and a permit was issued in 1993 for use as a parking lot.

16 South Washington Street was utilized as a gasoline station until it was demolished in 1936; and office building was constructed at sometime after and was demolished in 2003.

19-29 South Plymouth Avenue was utilized as a public garage from prior to the 1930s to 1955 when a portion of the parking station was demolished and in 1969 a masonry gasoline station was demolished.

103 West Main Street was constructed as a store in 1911; utilized as the Newell Building in 1915; as a gasoline station from at least the 1950s to the 1980s when the tanks were removed.

99 West Main Street was a brick business building in the early 1900s and utilized as stores in the 1920s until it was demolished in 1994 and permitted to be utilized as a parking lot.

5.3.6 Summary of Historical Information

This review of readily available historical information has revealed issues of concern due to past ownership.

101-107 West Main Street (i.e., currently addressed as 103 West Main Street), located on the northeastern portion of the Site, was utilized as a gasoline station from at least the late 1920s to the 1980s.

A filling station was located on the southeastern portion of the Site (i.e., currently addressed as 19 South Plymouth Avenue) from at least the late 1930s to the early 1950s. This portion of the Site was also identified as a coal yard and Del Lack and West Railroad Company on the 1875 City of Rochester Plat Map and utilized by AM Zim Brich US Automobile on the 1910 City of Rochester Plat Map.

16 South Washington Street (i.e., currently addressed as 16 South Washington Street), located on the southwestern portion of the Site, was utilized as a filling station from at least the late 1920s to the early 1950s. This portion of the Site was also identified as an oils room, associated with a former storage building located on the southwestern portion of the Site, addressed as 14 South Washington Street in the early 1900s.

129-131 West Main Street (i.e.., currently addressed as 129 West Main Street), located on the north central portion of the Site was utilized as Harley Davidson Motorcycle sales and service from at least the late 1920s to the early 1950s.

In addition, it appears that Broad Street was a portion of the former Erie Canal until the mid 1920s. It is likely that unknown miscellaneous materials were utilized to fill the canal and may have a negative impact on the soil and groundwater present at the Site.

It should also be noted that building structures at 10 South Washington Street , 141 West Main Street, 139 West Main Street, and 133 West Main Street were demolished in 2003; a building structure at 129-131 West Main Street was demolished in 1987; a building structure at 119-125 West Main Street was demolished in 1993; 16 South Washington Street, was utilized as a gasoline station until the structure was demolished in 1936; and 19-29 South Plymouth Avenue was utilized as a public garage and a portion of the parking station was demolished and in 1969; the building structure at 103 West Main Street was demolished in the 1980s; and a building structure at 99 West Main Street was demolished in 1994. It was not reported if the demolition debris from these former buildings have been removed from the Site. As such, it is possible that demolition debris may be present at the Site.

Copies of the Historical Information review is included in Appendix 2.

See Conclusion (Section 8.0).

6.0 Site Reconnaissance

6.1 Methodology and Limiting Conditions

The Phase I ESA Site Visit was conducted by Ms. Janet M. Bissi, CHMM on February 28, 2007. Representative photographs from the Site visit are included in the Figures and Photographs section of this report.

The site visit was limited to visual observations of the perimeter of the property and other accessible areas only. Visual observations were limited at the time of the site visit due to size, snow cover, and presence of cars in the parking lot area. The interior of the parking lot attendant booth was not visually inspected at the time of the site visit. Areas of the Site that were inaccessible were left to the judgment and discretion of the Environmental Professional conducting the site visit.

No RECs were observed at the time of the site visit.

6.2 Stains, Corrosion, Strained Vegetation

At the time of the site visit, no visible stains, areas of unusual corrosion, or visibly strained vegetation was observed.

As such, there are no apparent RECs regarding stains, corrosion, or strained vegetation at the Site at this time.

6.3 Solid Waste Disposal/Fill

Based on visual observations, the known history of the Site, and readily available information from the NYSDEC, and the City of Rochester, it is not suspected that solid waste disposal has taken place at the Site or in the immediate vicinity.

The Site is undeveloped and, as such, does not produce solid waste.

As such, there are no apparent RECs relating to solid waste disposal at the Site at this time.

6.4 Wastewater & Pits, Ponds, Lagoons

Based on visual observations, the known history of the Site, and readily available information from the City of Rochester Assessor's records, and assessment records obtained from the PropertyInfo website, wastewater is not currently generated at the Site. The Site has access to the public sewer system if it is to be developed in the future. In addition, former structures located at the Site since the early 1900s were serviced with the public sewer system.

Storm drains were noted in the parking lot. No floor drains, trench drains, sumps, dry wells, pits, ponds, or lagoons were noted at the Site.

As such, there are no apparent RECs relating to wastewater at the Site at this time.

6.5 Wells

Based on visual observations, the known history of the Site, and readily available information from the NYSDEC, and the City of Rochester, there do not appear to be any drinking water, production, or groundwater monitoring wells at the Site.

As such, there are no apparent RECs relating to wells at the Site at this time.

6.6 Hazardous Substance, Chemical, and Controlled Substance Usage/Storage/Disposal

Based on visual observations, the known history of the Site, and readily available information from the NYSDEC, and the City of Rochester, it appears that no indications of hazardous substances, chemicals or controlled substances storage, usage, or disposal were observed at the Site.

It does not appear that waste management and disposal activities could have caused releases or threatened releases of hazardous substances. In addition, there are no apparent current or past corrective actions and response activities undertaken to address past and/or on-going releases of hazardous substances including

Engineering Controls and Institutional Controls. Also, no properties adjoining or located in the immediate vicinity of the Site were identified that have environmental conditions that could have resulted in conditions indicative of releases or threatened releases of hazardous substances to the Site.

As such, there are no apparent RECs relating to hazardous substance, chemical or controlled substance usage, storage, and disposal at the Site at this time.

6.7 Petroleum Usage/Storage/Disposal

Based on visual observations, the known history of the Site, and readily available information from the NYSDEC, and the City of Rochester, it appears that no indications of petroleum usage, storage, or disposal were observed at the Site.

It was reported that petroleum usage, storage, or disposal associated with former Site operations included the former presence of at least three gasoline stations located on the northeast, southeast, and southwest portions of the Site (refer to Sections 5.1.15, 5.3.6 and 7.2).

As such, there are apparent RECs at the Site at this time relating to petroleum usage, storage, or disposal at the Site at this time.

See Conclusion (Section 8.0).

6.8 Unidentified Substance Containers

Based on visual observations, the known history of the Site, and readily available information from the NYSDEC, and the City of Rochester, it appears that no unidentified substance containers were observed at the Site.

As such, there are no apparent RECs at the Site at this time relating to unidentified substance containers at the Site at this time.

6.9 PCBs

PCBs are most commonly associated with electrical equipment, such as transformers and capacitors. Based on visual observations, the known history of the Site, these items were not identified at the Site.

As such, there are no apparent RECs relating to PCBs at the Site at this time.

6.10 Other Recognized Environmental Conditions

No other Recognized Environmental Conditions were observed at the Site at this time.

The Site Condition checklist is included as Appendix 4.

7.0 Interviews

7.1 Owner, Manager, Occupant, Representative

An interview with the Owner, Manager, Occupant, or Representative of the Site was not conducted as part of the Scope of Work for this assessment.

As such, the lack of an owner, manager, occupant, or representative interview represents a Data Gap in the report at this time.

See Conclusion (Section 8.0).

7.2 Local Government Officials

The City of Rochester Assessors records assessment records obtained from the PropertyInfo Website were reviewed as part of this assessment.

141 West Main Street is a 0.055-acre vacant commercial parcel. 139 West Main Street is a 0.031-acre vacant commercial parcel. 133 West Main Street is a 0.031-acre vacant commercial parcel. 129 West Main Street is a 0.11-acre parking lot. 10 South Washington Street is a 0.061-acre vacant commercial parcel. 16 South Washington Street is a 2.05-acre vacant commercial parcel. These parcels have been owned by Broad and Plymouth, LLC since 2002 and were previously owned by Rochester Rotary Charitable.

119 West Main Street is a 0.016-acre parking lot. 103 West Main Street is a 0.14-acre parking lot. 99 West Main Street is a 0.06-acre parking lot. 19 South Plymouth Avenue is a 0.23-acre parking lot. These parcels have been owned by Broad and Plymouth LLC since 2002 and were previously owned by Allright Realty Company.

These parcels have access to public water and sewer hookups. It appears that they are currently serviced with natural gas and electric.

City of Rochester BIS Records for 141 West Main Street include:

- 2003-demolition of a three story brick building;
- 1965-fire retard basement ceiling in brick two story building with four apartments;
- 1952-install boiler in brick store building;
- Undated- alter inter of Lodging House;
- 1923- remodel brick store front;
- 1913-erect steel columns in brick.

City of Rochester BIS Records for 139 West Main Street include:

- 2003-demolition of a two story building;
- Undated- alter store front.

City of Rochester BIS Records for 133 West Main Street include:

- 2003-demoltion of a two story building;
- 1998-establish use ob background only music accessory to existing restaurant;
- 1997-amusement center license;
- 1982-maintain use as five apartments, storage area, and restaurant and bar;
- 1975-remodel interior of commercial building and change use to restaurant;
- 1969-enclose basement stairs on brick building containing two stores and two residences;
- 1964-enclose basement stairs on two story brick building containing four residences;
- 1923-alter brick tailor shop.

City of Rochester BIS Records for 129 West Main Street include:

- 1995-permit for use as a parking lot;
- 1987- demolish a one story block building;
- 1935-install elevator;
- 1935-demolish two stories on a brick building;
- 1395-alter brick store building.

City of Rochester BIS Records for 119 West Main Street include:

- 1993-legalize use as a commercial parking lot;
- 1955-demolition of a masonry store/warehouse;
- 1913-remodel a brick building;
- 1912-alter a brick store.

City of Rochester BIS Records for 103 West Main Street include:

- 1988-remove three 6,000-gallon gasoline tanks and one 1,000-gallon underground waste oil tank
- 1988-remove seven pumps;
- 1986-air test one 1,000-gallon fuel oil and one 550-gallon waste oil tank;
- 1986-test gasoline tank with Hunter Machine and Product;
- 1985-install four bumper guards around gasoline pump islands;
- 1984-remove six pumps and install four pumps;
- 1980-replace five single pumps;
- 1979-remove three 4,000-gallon, one 2,000-gallon gasoline tanks and install two 6,000-gallon gasoline tanks;
- 1979-pressure test three 4,000-galloon, one 6,000-gallon, and one 2,000-gallon gasoline tanks;
- 1978-remove single gasoline pump and replace with a dual;
- 1978-replace a single gasoline pump;
- 1977-replace a single gasoline pump;
- 1977-replace damaged single gasoline dispenser;
- 1976-replace a single gasoline pump;
- 1975-replace seven gasoline pumps with reconditioned pumps;

- 1974-remove three gasoline pump islands;
- 1974- maintain three 4,000-gallon gasoline tanks, one 2,000-gallon gasoline tank, one 1,000-gallon fuel oil underground tank, and one 550-gallon waste oil tank;
- 1969-erect masonry four bay gasoline station;
- 1957-install one 2,000-gallon gasoline tank;
- 1956-install three 3,000-gallon gasoline tank and five pumps;
- 1956-rebuild concrete public gasoline station;
- 1915-erect musicians balcony in Newell Building hall;
- 1911-erect a store front.

City of Rochester BIS Records for 99 West Main Street include:

- 1994-permit for use as a parking lot;
- 1994-demolition of existing structure (offices);
- 1994- remove one 2,000-gallon underground fuel oil tank;
- 1993-legalize existing commercial parking lot on property known as 99-107 West Main Street and 19 South Plymouth Avenue;
- 1986-replace one 550-gallon waste oil tank with a 1,000-gallon fiberglass tank;
- 1927-remodel stores;
- 1902-remodel brick business block.

City of Rochester BIS records of environmental concern or historical information for 10 South Washington Street include:

- 2003- demolition of a three story building;
- 1997-entertainment, dance and amusement license of existing dance club;
- 1995-leaglize use of second floor as a bar;
- 1991-interior alterations to establish use as a bar on the first floor only;
- 1941-install machine in frame building

City of Rochester BIS Records for 16 South Washington Street include:

- 2003-demolition of a two story building;
- 1997-install a gas fired furnace at the building also known as 150 West Broad Street;
- Undated- alter exterior of existing building;
- 1976-remodel interior and exterior of existing office building;
- 1936-demoltion of a canopy on a gasoline station;
- 1923-cut two doors in building.

City of Rochester BIS Records for 19 South Plymouth Avenue include:

- 1969-demolition of a masonry gasoline station;
- 1955-installation of four 2,000-gallon gasoline tanks and two pumps;
- 1955-masonry enclosure wall on a brick building;
- 1955-demolition of a portion of a parking station;

- 1937-rebuild a brick wall on line;
- 1934-alter a brick public garage.

Based on the information obtained from the City of Rochester Assessor and BIS records, there are apparent RECs for:

- 103 West Main Street due to the reported use as a gasoline station from approximately the late 1950s to the late 1980s, three 6,000-gallon gasoline tanks and one 1,000-gallon underground waste oil tank removed in 1988, the reported presence of a 1,000-gallon fuel oil and one 550-gallon waste oil tank in 1986, the removal of three 4,000-gallon, one 2,000-gallon gasoline tanks and install two 6,000-gallon gasoline tanks in 1979, the reported presence of three 4,000-gallon gasoline tanks, one 2,000-gallon gasoline tank, one 1,000-gallon fuel oil underground tank, and one 550-gallon waste oil tank in 1974, the installation of one 2,000-gallon gasoline tank in 1957 and the installation of three 3,000-gallon gasoline tanks in 1956;
- 99 West Main Street due to the reported removal of a 2,000-gallon fuel oil tank in 1994 and the replacement of a 550-gallon waste oil tank with a 1,000-gallon tank in 1986.
- 16 South Washington Street due to the reported demolition of a gasoline station in 1936; and
- 19-29 South Plymouth Avenue due to the reported demolition of a gasoline station in 1969 and the installation of four 2,000-gallon gasoline tanks in 1955 with no record of removal.

It also appears that there are inconsistencies with the number and size of tanks formerly located at 103 West Main Street and 99 West Main Street.

As of the date of this report submission, no removal or closure records for these tanks have been provided for review.

See Conclusion (Section 8.0).

Freedom of Information Law (FOIL) Requests were submitted to the City of Rochester (February 16, March 1, and 6, 2007). A response was received from the City of Rochester on March 22, 2007. No additional information was obtained from review of the City of Rochester records.

Copies of the FOIL requests and responses are included in Appendix 6.

7.3 Tribal Records

The Site does not appear to be located in the vicinity of tribal lands, as such, no attempt was made to review Tribal Records under the Scope of Work. There do not appear to be any Native American Sovereign Territories in Monroe County.

7.4 New York State Department of Environmental Conservation

Freedom of Information Law (FOIL) Requests were submitted to the NYSDEC (February 16, March 1, and 6, 2007). Responses were received from the NYSDEC on March 12 and March 20, 2007 indicating that after a diligent search, no records for the Site were found.

Copies of the FOIL requests and responses are included in Appendix 6.

7.5 Monroe County Health Department

Freedom of Information Law (FOIL) Requests were submitted to the MCHD and the MCEMC (February 16, March 1, and 6, 2007). A response was received from the MCHD on April 2, 2007. There are no MCHD records on file for the Site.

Copies of the FOIL requests and responses are included in Appendix 6.

8.0 Findings, Opinions and Conclusions

LaBella Associates has performed a Phase I Environmental Assessment in general conformance with the Scope and Limitations of ASTM Practice E 1527-05 of 141, 139, 133, 129, 119, 103, and 99 West Main Street; 10 and 16 South Washington Street; and 19 South Plymouth Avenue, City of Rochester, Monroe County, New York.

8.1 Findings

Based on the Scope of Work, the information detailed herein, the known history of the Site and the current conditions relative to the Site, this assessment has revealed evidence of Recognized Environmental Conditions (RECs) in connection with the Site including, but not limited to the following Sections:

> **SECTIONS 5.1.15, 5.2, 5.3.6. 6.3.6 and 7.2- Inactive and Closed NYSDEC Spills at the Site associated with the historic use and presence of former presence of gasoline tanks at the following parcels:**

As detailed in Sections 5.1.15, 5.2, 5.3.6, 6.3.6, and 7.2, it appears that portions of the Site were historically utilized as gasoline stations. Closed NYSDEC Spills were identified at the Site associated with these former stations and are detailed below.

- 101-107 West Main Street and 99 West Main Street (i.e., currently 103 and 99 West Main Street)

According to the City of Rochester Street Directories, City of Rochester Plat Maps, and Sanborn Maps, 101-107 West Main Street, located on the northeastern portion of the Site, was utilized as a gasoline station from at least the late 1920s to the 1980s. Also, the City of Rochester Building Information System (BIS) records for 103 West Main Street include the rebuild of a concrete gasoline station in 1956; the construction of a four bay gasoline station in 1969; and the replacement of gasoline pumps and islands from 1974 to 1978, and 1980 to 1984. In addition, at least fifteen tanks were reportedly installed at the facility from at least the late 1950s to the late 1970s, and eight of the tanks were removed from the late 1970s to the late 1980s.

The City of Rochester BIS Records indicate that a 2,000-gallon fuel oil tank was removed in 1994 and a 550-gallon waste oil tank was replaced with a 1,000-gallon tank in 1986.

According to the NYSDEC Spill Report Form #7981029, dated October 29, 1979, gasoline fumes were noted in the Mariner Hotel, which is located adjacent to the east of the Site, on the opposite side of South

Plymouth Avenue. Hydrostatic tests identified product loss of approximately sixty gallons of gasoline originating from the Site. The tank was pumped out the fumes ceased in the hotel basement. In 1979, a new 4,000-gallon tank was reportedly installed at the Site. In addition, it was reported that four tanks were removed and no gas fumes were noted in the soil. The excavation was left open overnight to ventilate prior to the installation of two new tanks.

Based on the nature of the Closed NYSDEC Spill, the fact that this facility was a known filling station from at least the late 1920s to the late 1980s, the known presence of approximately eighteen tanks that have existed at the facility at one time and reported removal of ten of the tanks, and the lack of closure or removal reports for review for these tanks, there are apparent RECs at the 103 and 99 West Main Street portion of the Site at this time.

- 16 South Washington Street:

According to the City of Rochester BIS Records, 16 South Washington Street was also known as 150 West Broad Street and is located on the southwestern portion of the Site. In 1936, a canopy on a gasoline station was demolished. No other records regarding tank permits were recorded with the City of Rochester. According to the City of Rochester Street Directories, City of Rochester Plat Maps, and Sanborn Maps, 16 South Washington Street was utilized as a filling station from at least the late 1920s to the early 1950s. This portion of the Site was also identified as an oils room, associated with a former storage building located on the southwestern portion of the Site, addressed as 14 South Washington Street, which also appears to be a former address associated with 16 South Washington Street, in the early 1900s.

According to the City of Rochester Street Directories, 150 West Broad Street was identified as Tire Super Tread Company in the late 1930s.

According to NYSDEC Spill Report Form #0270428 and review of prior Phase I and Phase II ESA reports for this parcel, three subsurface investigations were conducted at the 16 South Washington Street portion of the Site from 1999 to 2002. Petroleum contaminated soil as well as wood and debris was encountered. It was recommended that the contaminated soil be removed as part of future construction of the Site.

Based on the nature of the Inactive NYSDEC Spill and review of prior Phase I and Phase II ESA reports, the fact that contaminated soil was identified on the southwestern portion of the Site in the vicinity of a known filling station, the lack of closure or removal reports for review, and the known former presence of approximately three tanks at this portion of the Site, there are apparent RECs at the 16 South Washington Street portion of the Site at this time.

- 19 South Plymouth Avenue

According to the City of Rochester Street Directories, 19 South Plymouth Avenue is located on the southeastern portion of the Site and was listed as vacant in the late 1940s and not listed from the early 1950s to the present. However, 21 South Plymouth Avenue, which appears to be a former address associated with 19 South Plymouth Avenue, was identified as a Marker Parking and service station from the late 1930s to the early 1940s. In addition, according to the 1938 and 1950 Sandborn Maps, the

southeastern portion of the Site was addressed as 29 South Plymouth Avenue, which also appears to be a former address of 19 South Plymouth Avenue, and was utilized as an automobile parking garage with a filling station on the southeast corner of the Site. Six gasoline tanks were located along West Broad Street. The City of Rochester BIS records for 19-29 South Plymouth Avenue include the installation of four 2,000-gallon gasoline tanks and two pumps in 1955 and the demolition of a masonry gasoline station in 1969.

In addition, according to the historical information, this portion of the Site was also identified as a coal yard and Del Lack and West Railroad Company on the 1875 City of Rochester Plat Map and utilized by AM Zim Brich US Automobile on the 1910 City of Rochester Plat Map.

According to NYSDEC Spill Report Form #9314846, dated March 17, 1994, contaminated soil encountered while removing a 1,000-gallon tank.

Based on the nature of the Closed NYSDEC Spill, the fact that this facility was a known filling station from at least the 1930s to the 1960s, the lack of closure or removal reports for review, the known presence of approximately five other tanks at this facility, and the historical use of the parcel as a coal yard, there are apparent RECs at the 19 South Plymouth Avenue portion of Site at this time.

SECTIONS 5.2, 5.3.6 and 7.2- Past uses of the Site

As detailed in Sections 5.2, 5.3.6, the past uses of the Site have indicated RECs and are detailed below.

- 129-131 West Main Street (i.e., currently 129 West Main Street)

129-131 West Main Street, located on the north central portion of the Site was utilized as Harley Davidson Motorcycle sales and service from at least the late 1920s to the early 1950s.

- 8 South Washington Street (i.e., currently 10 South Washington Street)

8 South Washington Street was identified as Deluxe Cleaners from the late 1950s to the early 1960s. According to information obtained from subsurface investigations conducted in 1999, it appears that soil borings were conducted around the outer perimeter of the building structure that formerly occupied this portion of the Site. Due to the dense nature of dry cleaning solvents, a concern remains based on the assumption that no soil borings or monitoring wells were advanced within the footprint of the former building.

- West Broad Street

It appears that Broad Street was a portion of the former Erie Canal until the mid 1920s. It is likely that unknown miscellaneous materials were utilized to fill the canal and may have a negative impact on the soil and groundwater present at the Site.

It should also be noted that building structures at 10 South Washington Street , 141 West Main Street, 139 West Main Street, and 133 West Main Street were demolished in 2003; a building structure at 129-131 West Main Street was demolished in 1987; a building structure at 119-125 West Main Street was demolished in 1993; 16 South Washington Street, was utilized as a gasoline station until the structure was demolished in 1936; and 19-29 South Plymouth Avenue was utilized as a public garage and a portion

of the parking station was demolished and in 1969; the building structure at 103 West Main Street was demolished in the 1980s; and a building structure at 99 West Main Street was demolished in 1994. It was not reported if the demolition debris from these former buildings have been removed from the Site. As such, it is possible that demolition debris may be present at the Site.

In addition, the following should be taken into consideration:

SECTIONS 2.5, 6.0 and 7.1- Limited On-Site Access, and Interview with Site Owner, Manager, Occupant or Representative

As detailed in Sections 2.5, 6.0, and 7.1., due to the Scope of Work for this assessment, access to the Site was limited and interviews with the Site Owner, Manager, Occupant, or Representative were not conducted. It is recommended that additional information be obtained regarding the current use of the Site by visually inspected the interior and interviewing the Owner, Manager, Occupant or Representative, if possible.

8.2 Opinions and Data Gaps

Data gaps identified as part of this Phase I ESA report include:

- Lack of completed Owner Questionnaire

The presence of this data gaps does not appear to affect the Findings and Conclusions of this report. It is in the opinion of LaBella Associates, P.C. that no further information or documentation is warranted at this time.

8.3 Conclusions

Based on the findings of this assessment, further investigation appears to be warranted at this time.

No determination can be made under the Scope of Work of this assessment regarding this potential impairment. Should the Owner wish to make a determination regarding the potential impairment of soil and/or groundwater at the Site, further investigation would be recommended. Typical methods of investigation include soil boring and sampling, test pitting, or the installation and sampling of groundwater monitoring wells.

9.0 Deviations

No deviations were made to the report, other than the Limitations and Exceptions as stated in Section 2.5.

10.0 Additional Services

No additional services were provided or agreed upon as part of this assessment.

11.0 References

We declare that, to our knowledge and belief, we meet the definition of Environmental Professional as defined in ASTM E1527-05. We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting at the subject property.

We have developed and performed the Scope of Work for this assessment in conformance with the standards, practices, and limitations set forth in ASTM E1527-05.

A copy of all information collected during this assessment including photographs, maps, notes, and other material will be kept on file at the offices of LaBella Associates, P.C. This information is available at your request.

12.0 Signatures of Environmental Professionals

Respectfully submitted,

LABELLA ASSOCIATES, P.C.

By Gregory R. Senecal, CHMM	Janet M. Bissi, CHMM
Environmental Division Director	Environmental Professional

GRS/JMB/lk

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13.0 Qualifications of Environmental Professionals

Gregory R. Senecal, CHMM

Mr. Senecal is the Environmental Division Director. His responsibilities include personnel coordination, scoping, scheduling, organization, and review of Phase I Environmental Site Assessments, Phase II Environmental Site Assessments, and remedial efforts undertaken by the firm. With sixteen years of experience conducting and supervising environmental investigations, Mr. Senecal has gained in-depth insight with regard to the issues faced by today's property owner.

Mr. Senecal is certified in Hazardous Materials Management and has extensive experience in the field of Environmental Management relating to Phase I and Phase II Environmental Site Assessments, remediation, and environmental compliance evaluations. Mr. Senecal has conducted or supervised over 1,000 Phase I Environmental Site Assessments and over 400 Phase II Environmental Site Assessments during his time with LaBella.

Dennis E. Porter, CHMM

Mr. Porter is a Client Manager in the Environmental Division. His responsibilities include personnel coordination, scheduling, organization, and review of Phase I Environmental Site Assessments, Phase II Environmental Site Assessments, and remedial efforts undertaken by the firm. With fifteen years of experience conducting and supervising environmental investigations, Mr. Porter has gained in-depth insight with regard to the issues faced by today's property owner.

Mr. Porter is certified in Hazardous Materials Management and has extensive experience in the field of Environmental Management relating to Phase I and Phase II Environmental Site Assessments, remediation, and environmental compliance evaluations. Mr. Porter is also a Certified USEPA AHERA Building Inspector.

Janet M. Bissi, CHMM

Ms. Bissi is the Phase I ESA Program Manager and an Environmental Analyst, with over five years experience, who conducts Phase I and Phase II Environmental Site Assessments. Her Phase I duties include conducting historical research and database research about the site and the area. Her Phase II work includes placement of test pits, soil borings and monitoring wells, soil sampling, underground storage tank removal, groundwater monitoring, well sampling, etc.

Current work includes numerous environmental site assessments and audits in New York and Pennsylvania. This includes assessment of environmental liability associated with properties such as warehouses, gas stations/repair facilities, manufacturing facilities, farms, and other commercial properties. While conducting these investigations, Ms. Bissi has obtained a solid understanding of the many environmental issues facing property owners.

Ms. Julie Caswell

Ms. Caswell is an Environmental Analyst, with over a year of experience, who conducts Phase I Environmental Site Assessments under the supervision of Ms. Bissi. Her Phase I duties include conducting historical research and database research about the site and the area.

Current work includes numerous environmental site assessments and audits in New York and Pennsylvania. This includes assessment of environmental liability associated with properties such as warehouses, gas stations/repair facilities, manufacturing facilities, farms, and other commercial properties. While conducting these investigations, Ms. Caswell has obtained a solid understanding of the many environmental issues facing property owners.

Michael F. Pelychaty

Mr. Pelychaty is a staff Environmental Geologist. He has over seven years of experience in the field of Environmental Management relating to Phase I and Phase II Environmental Site Assessments.

Current work includes numerous environmental site assessments and audits in New York and Pennsylvania. The site assessments include assessment of environmental liability associated with properties such as warehouses, gas stations, auto repair facilities, manufacturing facilities, farms, and commercial properties. While conducting these investigations, Mr. Pelychaty has obtained an understanding of the many environmental issues facing property owners.

Craig Stiles

Mr. Stiles is a staff Environmental Geologist. He has over sixteen years of experience in the field of Environmental Management relating to Phase I and Phase II Environmental Site Assessments.

Current work includes numerous environmental site assessments and audits in New York and Pennsylvania. The site assessments include assessment of environmental liability associated with properties such as warehouses, gas stations, auto repair facilities, manufacturing facilities, farms, and commercial properties. While conducting these investigations, Mr. Stiles has obtained an understanding of the many environmental issues facing property owners.

Daniel P. Noll, P.E.

Mr. Noll has over eight years of experience in investigation and remediation of contaminated sites. Mr. Noll has conducted numerous Phase II Environmental Site Assessments including: groundwater monitoring programs, soil vapor investigations, test pit investigations, and geo-probe investigations. He has also conducted numerous underground storage tank removals, and remediation of soil and groundwater contamination at various sites.

LABELLA Associates, P.C.

Engineering
Architecture
Environmental

Phase II Environmental Site Assessment

Location:

Rotary Site and Mariner Site
Rochester, New York

Prepared for:

Monroe County
7100 City Place
5 West Main Street
Rochester, New York

LaBella Project No. 207367

February 2008

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300 State Street
Rochester, New York 14614

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1.0 Introduction and Background

Monroe County retained LaBella Associates, P.C. ("LaBella") to conduct a Phase II Environmental Site Assessment (ESA) at the "Rotary Site" and the "Mariner Site". The Rotary Site consists of ten (10) contiguous parcels addressed as 141, 139, 133, 129, 119, 103, and 99 West Main Street; 10 and 16 South Washington Street; and 19 South Plymouth Avenue, City of Rochester, Monroe County, New York. The Mariner Site consists of four (4) contiguous parcels addressed as 97 and 81 West Main Street, 5 School Alley, and 30 South Plymouth Street, City of Rochester, Monroe County, New York. The Rotary Site and Mariner Site are located on the western side and eastern side of South Plymouth Avenue, respectively. Both sites are bordered by West Main Street to the north and by West Broad Street to the south. South Washington Street borders the western side of the Rotary Site. The Mariner Site is bordered by Montgomery Alley to the east. A Site Location Map is provided as Figure 1. In addition, Figure 2 identifies the various parcels for each site.

LaBella conducted a Phase I ESA at both of these sites. The following potential sources of subsurface contamination were identified as Recognized Environmental Concerns (RECs) associated with the sites. The Rotary Site and Mariner Site are presented separately below.

Rotary Site

Numerous closed NYSDEC Spills were identified for the Rotary Site. These Spills were related the presence of Underground Storage Tanks (USTs) associated with gasoline stations. Specifically, city directories and Sanborn Maps identified gasoline stations in the southwest corner, northeast corner and southeast corners of the Rotary Site. In addition, it appears that sometime prior to 1971, the two gasoline stations in the northeast and southeast corners were razed and another gasoline station was constructed in the eastern portion of the Rotary Site.

In addition to the gasoline stations discussed above, the following operations were also identified at the Rotary Site:

- A motorcycle sales and service facility was identified on Sanborn Maps as being located in the northwestern portion of the Rotary Site.
- Deluxe Cleaners was identified in City of Rochester Directories from the late 1950s to the early 1960s. It should be noted that a subsurface investigation was conducted in 1999 by the Sear-Brown Group, Inc.; however, this investigation was limited in scope and only consisted of overburden soil borings around the outer perimeter of the building that formerly occupied this portion of the Site.
- It appears that Broad Street was a portion of the former Erie Canal until the mid 1920s. It is likely that unknown miscellaneous materials were utilized to fill the canal and may have a negative impact on the soil and groundwater present at the Site.

These historic features are generally identified on Sanborn Maps obtained as part of the Phase I ESA. Figures 3 through 5 include the current property line boundaries overlain on the 1938 Sanborn Map (Figure 3), 1950 Sanborn Map (Figure 4), and 1971 Sanborn Map (Figure 5). In addition, the other areas of potential subsurface liabilities that were identified in the Phase I ESA (e.g., dry cleaner indicated in the City of Rochester Directories) are also illustrated on Figure 9.

Mariner Site

The following issues were identified as potential sources of subsurface impairment:

- Based on the information obtained from the City of Rochester Assessor and BIS records, a #6 fuel oil tank was removed in 2000 from 97 West Main Street. No information regarding the size or location of the tank, or if the tank was an aboveground or underground storage tank was provided. However, it was noted that a generator was installed in 1979 and this fuel oil tank may be associated with the generator and may be the 10,000-gallon fuel oil UST identified on the NYSDEC Petroleum Bulk Storage (PBS) registration.
- A gasoline station was reportedly demolished in 1956 at 97 West Main Street. No information regarding the location, number or size of tanks associated with the former gasoline station was provided, as well as information regarding the dates of use were not identified. [*Note: Based on Sanborn Maps, this gas station appears to be at 30 South Plymouth Avenue directly south of West Main Street.*]
- At 30 South Plymouth Avenue, two 500-gallon storage tanks were permitted in 1938 and two 550-gallon storage tanks and one 1,000-gallon storage tank were permitted in 1950. No further information was provided regarding the product stored in the tanks, removals of the tanks, or information indicating that the tank was an aboveground or underground storage tank was provided.
- 24, 26 and 30 South Plymouth (i.e., currently 30 South Plymouth Avenue) the southwestern portion of the Site was utilized as the Hotel Garage where three (3) USTs were installed. No further information regarding these tanks was provided.
- 83 West Main Street (i.e., currently 81 West Main Street) the northeastern portion of the Site was identified as All Pro Printers from the early 1980s to the late 1980s.
- The north central portion of the Site was addressed as 91 West Main Street and identified as a Rappaport Jacob photos from the late 1920s to the early 1930s; 3-hour laundry from the early 1950s to the late 1950s; and Plymouth Photo studio from the late 1960s to the late 1990s.
- The northwestern portion of the Site was addressed as 95 West Main Street and identified as Valet Dry Cleaners in the late 1960s.
- It appears that Broad Street was a portion of the former Erie Canal until the mid 1920s. It is likely that unknown miscellaneous materials were utilized to fill the canal and may have a negative impact on the soil and groundwater present at the Site.

These historic features are generally identified on Sanborn Maps obtained as part of the Phase I ESA. Figures 8 through 10 include the current property line boundaries overlain on the 1938 Sanborn Map (Figure 8), 1950 Sanborn Map (Figure 9), and 1971 Sanborn Map (Figures 10). In addition, the other areas of potential subsurface liabilities that were identified in the Phase I ESA (e.g., dry cleaner indicated in the City of Rochester Directories) are also illustrated on Figure 11.

2.0 Objective and Scope of Work

The objective of this Phase II ESA was to evaluate potential subsurface impacts that could be a liability for Monroe County if they were to purchase and redevelop the Mariner Site and/or the Rotary Site. Specifically, LaBella was retained to evaluate the RECs identified in the Phase I ESAs presented above, in order to minimize risk associated with subsurface unknowns. To obtain this objective, LaBella conducted the following:

1) a geophysical evaluation of the Site (refer to Section 3.0)
2) a subsurface condition evaluation of the Site (refer to Sections 4.0 & 5.0)
3) a report summarizing the findings, conclusions, and recommendations (refer to Section 6.0)

Due to the long history of USTs at the Rotary Site and Mariner Site, LaBella retained the services of a specialized subcontractor to conduct a geophysical survey of the Rotary Site and the Mariner Site. The geophysical survey was intended to identify subsurface magnetic anomalies that could be indicative of USTs. Subsequent to obtaining the results of the geophysical survey, LaBella conducted a two-phased subsurface evaluation of the Site: 1) a test pitting program (to evaluate magnetic anomalies that were identified as part of the geophysical survey) and 2) a soil boring program (to evaluate identified areas of potential concern and to evaluate the general subsurface conditions at the Site). The soil boring study included the installation and sampling of groundwater monitoring wells at the Sites.

3.0 Geophysical Evaluation

During the weekend of November 3, 2007, LaBella retained the services of Geomatrix Consultants, Inc. (Geomatrix) of Amherst, New York to conduct the geophysical evaluation of the Rotary Site and the Mariner Site. Geomatrix conducted the electromagnetic survey using a Geonics EM61 unit, a high-sensitivity, high-resolution, time domain electromagnetic (TDEM) metal detector that can detect both ferrous and nonferrous metallic objects to an approximate depth of 10 feet below ground surface (BGS).

Data collected by the EM61 unit was processed and a contour map was produced based upon the measured electromagnetic response to identified potential magnetic anomalies. The contour map is displayed in colors that indicate the response of the equipment. Areas of blue indicate 'background', while areas of yellow indicate magnetic anomalies. A copy of the Geophysical Survey Report is included in Appendix 1.

The geophysical survey results provided by Geomatrix were overlain on the 1938 Sanborn Maps to evaluate the magnetic anomalies in comparison to documented UST locations. The 1938 Sanborn map is used for the purpose of presentation since it contains a majority of the pertinent information from the other maps. However, the other Sanborn Maps were overlain with the geophysical results as part of the evaluation. The geophysical results were also overlain on aerial photographs of the site and these are included as Figures 6, 7, 11 and 12. As shown on these figures, the geophysical evaluation identified numerous magnetic anomalies. The magnetic anomalies for each site are discussed below.

Rotary Site

As shown on Figure 6, numerous magnetic anomalies were identified within the Rotary Site survey areas. However, many of these anomalies correspond with surface features (e.g., concrete sidewalks, metal railing, catch basins, etc.). These surface features were most prevalent along the periphery of the Rotary Site survey areas. Subsequent to taking into account the surface features, approximately six of these magnetic anomalies corresponded with historical locations of USTs or in the area of gasoline stations. Specifically, two magnetic anomalies identified in the southwest corner of the Rotary Site were located in areas of a former gasoline station and/or "gas tanks" (identified by "GTS' on Sanborn Map). The other magnetic anomalies were located in the northeast portion of the Rotary Site. However, the size of several of these anomalies indicated the probable presence of former building slabs.

Mariner Site

As shown on Figure 11, approximately six (6) magnetic anomalies of sufficient size to be an UST were identified within the Mariner Site survey area. Of these six magnetic anomalies, two of the magnetic anomalies in the eastern portion of the Mariner Site survey area correspond with surface features (attendant 'hut' and electric equipment). One magnetic anomaly was identified in the southwest corner of the Mariner Site where the Sanborn Maps also identified two "gas tanks" (identified by "GTS" on the Sanborn Map). [*Note: No other gas tanks were identified on the Sanborn Maps for the Mariner Site.*]. Another magnetic anomaly, the central portion of the Mariner Site, is in an area where a vent pipe was identified in a Day Engineering, P.C. report (when the former building was still located at the Site). The remaining two sizeable magnetic anomalies (central portion of the Mariner Site and in the southwest corner of the Mariner Site) were not located in areas of known USTs; however, the magnetic anomaly in the southwest corner is located in the area of the former gasoline station previously located at the Site.

4.0 Subsurface Condition Evaluation

4.1 Test Pit Investigation

In order to investigate the more significant magnetic anomalies discussed above, a test pit investigation was performed at the Rotary Site and the Mariner Site on November 7 and 8, 2007. Although test pits were excavated in locations of magnetic anomalies of select size and shape (i.e., potential USTs) that corresponded with areas of known suspect historical operations, it should be noted that not all the anomalies the size and shape of tanks were evaluated. Furthermore, underground utilities and surface features limited evaluating some areas. However, test borings were advanced and monitoring wells were installed to further evaluate the Site and minimize potential subsurface unknowns (refer to Sections 4.2 and 4.3).

The excavation of test pits allows for visual observation of subsurface conditions and for the collection of subsurface soil samples.

Initially, an Underground Facilities Protection Organization (UFPO) stakeout was conducted at the Site to locate subsurface utilities in the areas where the subsurface assessment was to take place. LaBella retained the services TREC Environmental, Inc. of Spencerport, New York (TREC) to perform the test pit program at the Site. TREC mobilized a "Kubota KX121-3 Super Series" excavator and operator to the Site and twenty three test pits (TP-1 through TP-23) were excavated to equipment "refusal", which ranged from 0.6 feet to 8.0 feet below the ground surface (BGS). The test pits were backfilled with excavated materials and compacted with the bucket of the excavator. The test pit locations are illustrated on Figures 7 and 12.

Soils from the test pits were continuously assessed for visible impairment, olfactory indications of impairment, and/or indication of detectable volatile organic compounds (VOCs) on a photo-ionization detector (PID) total VOC meter. Positive indications from any of these screening methods are collectively referred to as "evidence of impairment."

4.2 Rotary Site Test Pits

The two (2) suspect anomalies identified in the southwestern corner of the Rotary Site in the area of the former gas station (that did not correspond with the surface features) were evaluated by excavating test pits TP-6 and TP-7. USTs were not encountered in these test pits; however, scrap metal was encountered, which would appear to be the cause of the magnetic anomalies. Test pit TP-9 was also excavated in this area and was observed to contain an interval of suspect fill materials (consisting predominantly of ash) from approximately 2.8'-3.5' below the ground surface (BGS).

Test pits TP-1 through TP-5 and TP-8 were excavated in the area of suspect anomalies along the eastern portion of the Rotary Site. Test pit, TP-1 revealed an orphaned UST at an approximate depth of 5.0 feet below the ground surface. Due to sloughing of the test pit walls and underground utilities in the area, the size of this UST was not determined; however, this UST appeared to be approximately 1,000 gallons in size. The soils surrounding this UST were observed in the field to be stained with strong weathered gasoline odors. PID field screening yielded readings of over 2,000 ppm. The other test pits evaluated in this area of the Rotary Site did not encounter USTs.

Construction and demolition debris (C&D) was encountered in the other test pits including concrete foundation/footers, wire mesh, rebar, and brick fragments. Additionally, two (2) pipes were encountered in TP-1 at approximately 1.2' BGS leading toward TP-2; however, these pipes were not observed within TP-2. [*Note: Early refusal was encountered in test pits TP-2, TP-4, and TP-8, and as such, subsurface conditions in these areas could not be evaluated.*]. Visually stained soil was observed immediately surrounding these pipes.

In addition to the above test pits excavated to evaluate magnetic anomalies, four test pits (TP-10 through TP-13) were excavated in the northwestern portion of the Rotary Site. These test pits were excavated in order to evaluate the former dry cleaner in this area (TP-10 and TP-11) and to obtain general Site coverage (TP-12 and TP-13). Although, C&D (consisting of bricks and brick fragments) was observed in these test pits, there was no other evidence of impairment in these areas.

Soil samples from the test pits were placed in a cooler with ice and delivered under chain of custody procedures to Paradigm Environmental Services, Inc. (Paradigm), a New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP) certified laboratory. Table 1 below presents PID readings collected from the test pits and summarizes the test pit soil samples submitted for laboratory testing from the Rotary Site and the parameters analyzed.

Table 1
Rotary Site
Summary of Test Pit PID Readings
Concentrations Shown are in Part Per Million (ppm)

Test Pit I.D.	Depth Interval								Depth of Sample Analyzed	Analytical Parameters
	0'-2'	2'-4'	4'-6'	6'-8'	8'-10'	10'-12'	12'-14'	14' - 16'		
Test Pits — November 7, 2007										
TP-1	1,320	134	2,000+	690	-----	-----	-----	-----	4.0' - 4.5'	VOCs, SVOCs, Flash & Lead
TP-2	Not Available - Could not penetrate concrete pad beneath asphalt.								Not Analyzed	
TP-3	0.0	0.0	0.0	-----	-----	-----	-----	-----	Not Analyzed	
TP-4	Not Available - Could not penetrate concrete pad beneath asphalt.								Not Analyzed	
TP-5	0.0	0.0	0.0	0.0	-----	-----	-----	-----	Not Analyzed	
TP-6	0.0	0.0	0.0	0.0	-----	-----	-----	-----	Not Analyzed	
TP-7	0.0	0.0	Not Available - Could not penetrate concrete pad encountered @ 1.6-ft. BGS.						Not Analyzed	
TP-8	0.0	0.0	Not Available - Could not penetrate concrete pad encountered @ 3.0-ft. BGS.						Not Analyzed	
TP-9	0.0	0.0	0.0	0.0	-----	-----	-----	-----	4.8'	SVOCS & RCRA
TP-10	0.0	0.0	0.0	0.0	-----	-----	-----	-----	Not Analyzed	
TP-11	0.0	0.0	0.0	0.0	-----	-----	-----	-----	Not Analyzed	
TP-12	0.0	0.0	0.0	0.0	-----	-----	-----	-----	Not Analyzed	
TP-13	0.0	0.0	0.0	0.0	-----	-----	-----	-----	Not Analyzed	

Note: All PID readings were collected utilizing a MiniRae 2000 PID and are representative of total VOCs in parts per million (ppm).
VOCs denotes sample analyzed for NYSDEC STARS VOCS by USEPA Method 8260B.
SVOCs denotes sample analyzed for NYSDEC STARS SVOCS by USEPA Method 8270C.
RCRA denotes sample analyzed for Resource Conservation and Recovery Act metals by USEPA Methods 6010 and 7471.
----- denotes soil sample not collected since the test pit did not extend to this depth.
Lead denotes Analysis for lead using USEPA Method 6010 subsequent to a Toxicity Characteristic Leachate Procedure (TCLP) extraction using USEPA Method 1311.
Flashpoint denotes analysis for ignitability using USEPA Method 1010.

4.3 Mariner Site Test Pits

The four (4) suspect anomalies identified at the Mariner Site were evaluated by excavating test pits TP-14 through TP-21. Test pits TP-14 through TP-17 did not encounter USTs or any evidence of impairment. However, metallic objects and/or concrete were encountered within those test pits (e.g., abandoned telephone and electrical conduits, crushed steel panel, ceramic tiles, and wood scraps) at depths ranging from approximately 0.0'-2.0' BGS. This C&D appears to be the cause of the magnetic anomalies in these areas. Suspect fill in the form of ash was also intermixed within the C&D at the same intervals for test pits TP-14 through TP-16.

Test pits TP-18 through TP-21 were excavated in the large magnetic anomaly identified in the area of the gas tanks on the Sanborn Maps. One (1) 550-gallon UST and one (1) 1,000-gallon UST were encountered in test pits TP-18 through TP-21. Slight to very strong weathered petroleum odors were observed in these test pits. PID screenings of soils from these test pits yielded results greater than 2,000 ppm. In addition, abandoned product delivery lines were also observed leading to these two (2) USTs. One (1) additional product delivery line was observed to end along the northern end of test pit TP-21 which is the former property line.

In addition to the above test pits excavated to evaluate magnetic anomalies, two other test pits TP-22 and TP-23 were excavated at the Mariner Site. Specifically, TP-22 was excavated in the central portion of the Site for general Site coverage and test pit TP-23 was excavated in the area of a potential former dry cleaner. With the exception of suspect fill material (e.g., ash) and C&D, evidence of impairment was not observed.

Apparently native soil was observed in only one (1) test pit, TP-17 (3.0 ft. BGS). The apparent native soils consist of sandy silts.

Table 2 below presents PID readings collected from the test pits and summarizes the test pit soil samples submitted for laboratory testing from the Mariner Site and the parameters analyzed.

Table 2
Mariner Site
Summary of Soil PID Field Readings
Concentrations Shown are in Part Per Million (ppm)

Test Pit I.D.	Depth Interval								Depth of Sample Analyzed	Analytical Parameters
	0'-2'	2'-4'	4'-6'	6'-8'	8'-10'	10'-12'	12'-14'	14' - 16'		
Test Pits — November 8, 2007										
TP-14	0.0	0.0	0.0	0.0	-----	-----	-----	-----	Not Analyzed	
TP-15	0.0	0.0	0.0	0.0	-----	-----	-----	-----	Not Analyzed	
TP-16	0.0	0.0	0.0	0.0	-----	-----	-----	-----	Not Analyzed	
TP-17	0.0	0.0	0.0	0.0	-----	-----	-----	-----	Not Analyzed	
TP-18	125	2,000+	-----	-----	-----	-----	-----	-----	2.8' - 4.0'	VOCs, SVOCs, Flash & Lead
TP-19/20/21	379	2,000+	-----	-----	-----	-----	-----	-----	2.6' - 3.5'	TCL VOCs, RCRA & PCBs
TP-22	1.0	1.1	1.0	-----	-----	-----	-----	-----	Not Analyzed	
TP-23	0.0	0.0	0.0	0.0	-----	-----	-----	-----	Not Analyzed	

Note: All PID readings were collected utilizing a MiniRae 2000 PID and are representative of ppm VOC.
VOCs denotes sample analyzed for NYSDEC STARS VOCS by USEPA Method 8260B.
TCL VOCs denotes sample analyzed for USEPA Target Compound List plus NYSDEC STARS VOCS by USEPA Method 8260B.
SVOCs denotes sample analyzed for NYSDEC STARS SVOCS by USEPA Method 8270C.
PCBs denotes sample analyzed for PCBs by USEPA Method 8082A.
RCRA denotes sample analyzed for Resource Conservation and Recovery Act metals by USEPA Methods 6010 and 7471
----- denotes soil sample not collected as the test boring was not extended to this depth.
Lead denotes Analysis for lead using USEPA Method 6010 subsequent to a Toxicity Characteristic Leachate Procedure (TCLP) extraction using USEPA Method 1311.
Flashpoint denotes analysis for ignitability using USEPA Method 1010.

Test Pit Logs are included in Appendix 2 and the test pit locations are depicted on Figure 12 which also includes an overlay of the Geophysical Survey results.

4.4 Direct-Push Soil Borings

On November 12 and November 13, 2007, TREC was retained to perform a direct-push Geoprobe® soil boring and sampling program at the Site. Borings were advanced with a Geoprobe® Systems Model 5400HD truck-mounted, direct-push sampling system. The use of direct push technology allows for rapid sampling, observation, and characterization of relatively shallow overburden soils. The Geoprobe® utilizes a 4-foot macro-core sampler with disposable polyethylene sleeves. Soil cores are retrieved in 4-foot sections and can be easily cut from the polyethylene sleeves for observation and sampling.

The soil collected from the borings was continuously assessed by a LaBella Environmental Geologist for soil type, changes in the overburden formation, and evidence of impairment. Thirty-three soil borings (TB-1 through TB-33) were advanced at both the Rotary Site and the Mariner Site until reaching direct-push equipment "refusal", which ranged from 1.7 feet to 16 feet BGS. The shallower direct-push equipment refusals appear to be caused by former building foundations. The test boring locations are illustrated on Figures 7 and 12.

Except for TB-33, all of the soil borings encountered fill materials, similar in composition to the fill observed in the test pits.

Beneath the fill materials, native soils at the Site generally consisted of a more coarse-grained alluvial deposit (primarily brown sand and gravel). On November 12 through 13, 2007, the apparent groundwater table was not observed during soil boring activities.

4.5 Rotary Site Test Borings

Test borings TB-1 through TB-10, TB-19 through TB-23, and TB-30 through TB-33 were advanced at the Mariner Site. The specific areas of evaluation for each test boring and the information obtained are summarized below:

- Test borings TB-1, TB-31, TB-32 and TB-33 were advanced in proximity to the UST identified in TP-1. Test borings TB-1 and TB-31 did not encounter evidence of impairment related to petroleum products; however, these test borings encountered refusal at 10.6' BGS and 8.6' BGS. Test borings TB-32 and TB-33 encountered evidence of petroleum impairment.
- Test borings TB-2 through TB-5 were advanced in proximity to the former gasoline station in the southwest portion of the Site. Test borings TB-2 and TB-3 did not encounter evidence of impairment. Test borings TB-4 and TB-5 encountered slight petroleum odors directly above equipment refusal. Suspect fill materials (e.g., ash) were noted in some of these borings.
- Test boring TB-6 was advanced in the approximate area of the former dry cleaner identified at the Site in the City of Rochester Directories. This test boring did not encounter evidence of impairment. Evidence of construction and demolition debris were observed continuously from approximately 0.3' BGS to 5.7' BGS. No other fill materials were observed in TB-6.
- Test borings TB-7 and TB-8 were advanced in the area of the former Motorcycle Sales and Service operation that was identified on Sanborn Maps. Evidence of impairment was not encountered in these test borings, with the exception of a "very slight" petroleum odor at 8.5' BGS in test boring TB-8. Bricks were observed in TB-8 beginning at approximately 0.7' BGS through 8.0' BGS. No other fill materials were observed in TB-7 or TB-8.
- Test borings TB-9, TB-19 through TB-21 and TB-23 were advanced in the area of the former gasoline station identified on Sanborn Maps in the southeast corner of the Site. Evidence of impairment was not encountered in these borings with the exception of slight petroleum odors in TB-21 and TB-23 above equipment refusal. Suspect fill material in the form of ash was observed in TB-9 from approximately 4.0' BGS to 8.0' BGS and in TB-21 from approximately 5.0' BGS to 8.0' BGS. Trace amounts of ash were also observed in TB-23.
- Test borings TB-10, TB-22 and TB-30 were advanced in the eastern portion of the Site to further evaluate the historical use of this area as gasoline stations. Evidence of construction and demolition debris in the form of concrete was observed in TB-22 from approximately 5.7' BGS to 8.0' BGS. In addition, trace amounts of ash were also observed in TB-22.

Table 3
Rotary Site
Summary of Soil PID Field Readings
Concentrations Shown are in Part Per Million (ppm)

Test Boring I.D.	Depth Interval								Depth of Sample Analyzed	Analytical Parameters
	0'-2'	2'-4'	4'-6'	6'-8'	8'-10'	10'-12'	12'-14'	14' - 16'		
Test Borings — November 12 & 13, 2007										
TB-1	1.3	I.R.	2.3	I.R.	4.0	I.R.	-----	-----	Not Analyzed	
TB-2	6.9	0.4	0.7	0.4	0.3	I.R.	-----	-----	Not Analyzed	
TB-3	0.2	I.R.	0.3	I.R.	0.2	I.R.	-----	-----	Not Analyzed	
TB-4	0.2	I.R.	0.4	I.R.	0.4	-----	-----	-----	Not Analyzed	
TB-5	0.2	I.R.	0.3	I.R.	7.9	-----	-----	-----	8.0' - 8.2'	VOCs & SVOCs
TB-6	1.2	I.R.	0.1	I.R.	0.0	-----	-----	-----	Not Analyzed	
TB-7	1.3	I.R.	0.0	I.R.	I.R.	I.R.	0.0	I.R.	Not Analyzed	
TB-8	0.0	I.R.	0.2	I.R.	1.2	I.R.	0.0	I.R.	Not Analyzed	
TB-9	2.3	0.2	0.0	I.R.	1.0	-----	-----	-----	Not Analyzed	
TB-10	0.9	-----	-----	-----	-----	-----	-----	-----	Not Analyzed	
TB-19	0.6	I.R.	0.6	I.R.	6.0	I.R.	-----	-----	Not Analyzed	
TB-20	0.0	I.R.	0.0	I.R.	0.0	-----		-----	Not Analyzed	
TB-21	0.0	I.R.	0	I.R.	0.0	I.R.	-----	-----	5.0' - 5.4'	SVOCs & RCRA
								-----	8.0' - 8.3'	TCL VOCs, RCRA & PCBs
TB-22	3.1	2.2	1.3	0.9	0.3	I.R.	-----	-----	Not Analyzed	
TB-23	0.3	I.R.	0.2	I.R.	3.6	I.R.	-----	-----	Not Analyzed	
TB-30	0.7	I.R.	0.2	I.R.	0.4	I.R.	-----	-----	Not Analyzed	
TB-31	0.2	I.R.	0.0	I.R.	0.3	-----	-----	-----	Not Analyzed	
TB-32	0.9	I.R.	0.6	I.R.	183	I.R.	-----	-----	Not Analyzed	
TB-33	37.9	1849	174	I.R.	509	I.R.	1296	I.R.	4.0' - 4.7'	TCL VOCs & SVOCs
									12.0' - 12.5'	TCL VOCs

Note: All PID readings were collected utilizing a MiniRae 2000 PID and are representative of ppm VOC.
VOCs denotes sample analyzed for NYSDEC STARS VOCS by USEPA Method 8260B.
TCL VOCs denotes sample analyzed for USEPA Target Compound List plus NYSDEC STARS VOCS by USEPA Method 8260B.
SVOCs denotes sample analyzed for NYSDEC STARS SVOCS by USEPA Method 8270C.
PCBs denotes sample analyzed for PCBs by USEPA Method 8082A.
RCRA denotes sample analyzed for Resource Conservation and Recovery Act metals by USEPA Methods 6010 and 7471
I.R. denotes Insufficient sample recovery for that interval.
----- denotes soil sample not collected as the test boring was not extended to this depth.

4.6 Mariner Site Test Borings

Test borings TB-11 through TB-18 and TB-24 through TB-29 were advanced at the Mariner Site. The specific areas of evaluation for each test boring and the information obtained are summarized below:

- Test borings TB-11 through TB-14 were advanced to evaluate the two potential former dry cleaners located along the northern portion of the Mariner Site. These test borings did not encounter evidence of impairment. However, suspect fill in the form of ash was observed in each of these test borings In addition, evidence of construction and demolition debris were observed in all four (4) test borings. Bricks were observed in TB-11 from approximately 0.6' BGS to 12.0' BGS. Concrete and bricks were observed in TB-12 from approximately 0.5' BGS to 12.0' BGS. TB-13 and TB-14 were observed to contain concrete and brick from approximately 0.2' BGS to 4.0' BGS.
- Test borings TB-15 through TB-17 and TB-29 were advanced throughout the central portion of the Site to obtain information on the general Site condition. These test borings did not encounter evidence of impairment, with the exception of a slight petroleum odor in test boring TB-29 in the top two (2) feet. Test borings TB-15 and TB-17 were observed to contain suspect fill materials including ash, cinders, and coal. However, these fill materials were limited to approximately 4.0' BGS and 2.0' BGS, respectively. TB-29 was observed to contain a fill material in the form of bricks from approximately 8.0' BGS to 13.5' BGS.
- Test borings TB-18 and TB-24 through TB-28 were advanced in proximity to the USTs identified in the southwest corner of the Site to evaluate the extent of impacts in this area. Evidence of impairment was encountered in test borings TB-24 and TB-27 and consisted of petroleum odors and elevated PID readings. Test borings TB-18, TB-25, TB-26, and TB-28 did not encounter evidence of impairment; however, it should be noted that test borings TB-18, TB-25, and TB-26 encountered early refusal. Suspect fill that consisted of cinders was observed in TB-18 from approximately 0.65' BGS to 0.70' BGS. Brick and concrete fragments were observed in TB-25 between 0.3' BGS and 0.8' BGS. Brick fragments were observed in TB-27 from approximately 4.3' BGS to 4.6' BGS. TB-28 was observed to contain brick fragments from approximately 0.0' BGS to 8.0' BGS.

Table 4
Mariner Site
Summary of Soil PID Field Readings
Concentrations Shown are in Part Per Million (ppm)

Test Boring I.D.	Depth Interval								Depth of Sample Analyzed	Analytical Parameters
	0'-2'	2'-4'	4'-6'	6'-8'	8'-10'	10'-12'	12'-14'	14' - 16'		
Test Borings — November 12 & 13, 2007										
TB-11	0.2	I.R.	0.1	I.R.	0.4	I.R.	0.3	-----	Not Analyzed	
TB-12	0.4	I.R.	0.2	I.R.	0.2	I.R.	0.1	-----	Not Analyzed	
TB-13	0.1	I.R.	0.0	-----	-----	-----	-----	-----	Not Analyzed	
TB-14	0.2	I.R.	0.3	I.R.	0.2	I.R.	-----	-----	Not Analyzed	
TB-15	0.1	I.R.	0.4	I.R.	0.1	I.R.	-----	-----	0.0' - 1.4'	SVOCs & RCRA
TB-16	0.3	-----	-----	-----	-----	-----	-----	-----	Not Analyzed	
TB-17	0.5	I.R.	0.0	-----	-----	-----	-----	-----	Not Analyzed	
TB-18	1.0	I.R.	0.1	-----	-----	-----	-----	-----	Not Analyzed	
TB-24	17.9	I.R.	504	I.R.	-----	-----	-----	-----	Not Analyzed	
TB-25	0.5	I.R.	0.7	-----	-----	-----	-----	-----	Not Analyzed	
TB-26	0.3	I.R.	0.3	-----	-----	-----	-----	-----	Not Analyzed	
TB-27	1.3	I.R.	27.9	I.R.	-----	-----	-----	-----	4.6' - 5.0'	VOCs & SVOCs
TB-28	0.8	I.R.	0.4	I.R.	0.1	I.R.	0.3	I.R.	Not Analyzed	
TB-29	2.8	I.R.	0.6	I.R.	0.2	I.R.	0.1	-----	Not Analyzed	

Note: All PID readings were collected utilizing a MiniRae 2000 PID and are representative of ppm VOC.
VOCs denotes sample analyzed for NYSDEC STARS VOCS by USEPA Method 8260B.
SVOCs denotes sample analyzed for NYSDEC STARS SVOCS by USEPA Method 8270C.
RCRA denotes sample analyzed for Resource Conservation and Recovery Act metals by USEPA Methods 6010 and 7471
I.R. denotes Insufficient sample recovery for that interval.
----- denotes soil sample not collected as the test boring was not extended to this depth.

Soil samples were collected during this work and select samples were placed in a cooler with ice and delivered under chain of custody procedures to Paradigm. The analytical testing of soil samples is discussed in Section 6.0.

The locations of the test pits, soil borings, and monitoring wells were recorded using a Trimble Geo-XT global position system and are presented on Figure 12. Soil Boring Logs and Well Completion Diagrams are included in Appendix 2.

4.7 Bedrock Monitoring Well Installation

To further evaluate the subsurface conditions at the Site, rotary drill rig advanced test borings were also conducted and subsequently converted in to 2-inch groundwater monitoring wells. LaBella retained Nothnagle Drilling Company (Nothnagle) to conduct this work. From November 26 through December 1, 2007, nine rotary advanced test borings were advanced and eight (8) monitoring wells were installed. [Note: A monitoring well was not installed at location MW-8.] The monitoring wells were advanced approximately ten (10) feet into bedrock.

As part of this work, initially, the overburden was sampled using 2-ft. split-spoon samplers. Subsequent to encountering auger refusal, bedrock was cored in two (2) 5-ft. runs.

Shallow overburden encountered during this work consisted of fill materials similar in composition to the fill observed in the test pits and soil borings. Native soils encountered during this activity again resembled alluvial deposits (primarily brown sand and gravel).

Each of the eight (8) monitoring wells installed was constructed of 2" PVC casing combined with ten (10) feet of 0.010-slot screen. The monitoring wells were finished with approximately two (2) feet of filter pack (sand) extending above the screened interval. A three (3) foot seal of bentonite was installed above the filter pack. Each monitoring well was finished to grade with a steel-flush mount road box and cover. Monitoring well boring logs and installation logs are included in Appendix 2.

4.8 Rotary Site Bedrock Monitoring Wells

Test borings MW-1 through MW-5 were advanced at the Rotary Site and are illustrated in Figure 7. The specific areas of evaluation for each of these test borings and the resulting monitoring well and the information obtained are summarized below:

- Test boring/monitoring well MW-1 was advanced in proximity to the USTs identified in the northeast corner of the Rotary Site. Soil samples were not recovered during the advancement of this test boring.
- Test boring/monitoring well MW-2 was advanced to evaluate the potential former dry cleaner in the western portion of the Rotary Site. Directly above bedrock, a slight petroleum odor and PID readings up to 132 ppm were noted in this test boring.
- Test boring/monitoring well MW-3 was advanced in proximity to the former gasoline station in the southwest portion of the Site. This test boring did not encounter evidence of impairment.
- Test boring/monitoring well MW-4 was advanced in the area of the former gasoline station in the southeast corner of the Rotary Site. Evidence of impairment was encountered directly above the bedrock in this test boring, consisting of petroleum odors and a peak PID reading of 469 ppm. In addition, trace amounts of suspect fill materials were noted in this test boring between 2 and 8 feet BGS.
- Test boring/monitoring well MW-5 was advanced in the area of the former Motorcycle Sales and Service operation that was identified on Sanborn Maps. A slight petroleum odor with a peak PID reading of 9.0 ppm was noted in this test boring. In addition, trace amounts of suspect fill materials were noted in this test boring.

Table 5
Rotary Site
Summary of Soil PID Field Readings
Concentrations Shown are in Part Per Million (ppm)

Monitoring Well I.D.	Depth Interval								Depth of Sample Analyzed	Analytical Parameters
	0'-2'	2'-4'	4'-6'	6'-8'	8'-10'	10'-12'	12' - 14'	14' - 16'		
Overburden/Bedrock Interface Wells November 26 to December 3, 2007										
MW-1	0.7	I.R.	4.2	I.R.	-----	3.7	-----	-----	Not Analyzed	
MW-2	0.1	0.1	0.2	1.3	0.1	132	100	-----	Not Analyzed	
MW-3	0.3	0.2	0.1	-----	2.1	-----	-----	-----	Not Analyzed	
MW-4	0.7	0.3	-----	0.1	1.3	426	469	-----	Not Analyzed	
MW-5	7.3	9.0	3.2	5.0	1.1	-----	-----	-----	Not Analyzed	

Note: All PID readings were collected utilizing a MiniRae 2000 PID and are representative of ppm VOC.
----- denotes soil sample not collected as the test boring was not extended to this depth.

Apparent bedrock (based on auger refusal) was encountered between approximately 9.5 and 12.8 feet BGS in the five rotary drill rig test borings advanced at the Rotary Site. The bedrock encountered consisted of Penfield Dolostone of the Lockport Group from the Middle Silurian age. The samples of this type of bedrock feature fluctuations in weathering from slight to heavy weathering at varying depths. As a result, some vertical fractures were observed on some of the bedrock core samples. In MW-1, a vertical fracture was observed from approximately 14.7 to 14.9 feet BGS. Additionally, various high angle fractures were observed on bedrock core samples from monitoring well MW-1.

4.9 Mariner Site Bedrock Monitoring Wells

Test borings MW-6 through MW-9 were advanced at the Mariner Site. The specific areas of evaluation for each of these test borings and the resulting monitoring well and the information obtained are summarized below:

- Test boring/monitoring wells MW-6 and MW-7 were advanced in the area of the two potential former dry cleaners located along the northern portion of the Mariner Site. Evidence of impairment was not encountered in these two test borings. However, significant amounts of C&D and some suspect fill material (ash) were encountered in these test borings.
- Test boring MW-8 was advanced as part of the Geotechnical Evaluation being completed in conjunction with the environmental work. However, this test boring was also observed by LaBella to further evaluate the general subsurface conditions at the Site. Evidence of impairment was not encountered in this test boring.
- Test boring/monitoring well MW-9 was advanced slightly to the north and east (in an assumed downgradient direction) of the former gasoline station and USTs identified in the southwest corner of the Mariner Site. Evidence of impairment was not encountered in this test boring; however, some C&D and suspect fill materials were noted.

Table 6
Mariner Site
Summary of Soil PID Field Readings
Concentrations Shown are in Part Per Million (ppm)

Monitoring Well I.D.	Depth Interval								Depth of Sample Analyzed	Analytical Parameters
	0'-2'	2'-4'	4'-6'	6'-8'	8'-10'	10'-12'	12' - 14'	14' - 16'		
Overburden/Bedrock Interface Wells November 26 to December 3, 2007										
MW-6	0.0	0.0	0.0	0.1	0.0	-----	-----	-----	Not Analyzed	
MW-7	0.0	0.0	0.0	0.0	-----	0.0	0.0	0.0	Not Analyzed	
MW-8	0.2	0.6	-----	-----	-----	-----	-----	-----	Not Analyzed	
MW-9	0.0	0.0	0.1	0.1	0.3	0.2	0.4	0.3	Not Analyzed	

Note: All PID readings were collected utilizing a MiniRae 2000 PID and are representative of ppm VOC.
----- denotes soil sample not collected as the test boring was not extended to this depth.

Bedrock was encountered between 5.5 and 17.5 feet BGS in the five rotary drill rig test borings advanced at the Mariner Site. The bedrock encountered consisted of Penfield Dolostone of the Lockport Group from the Middle Silurian age. The samples of this type of bedrock feature fluctuations in weathering from slight to heavy weathering at varying depths. Vertical fractures were observed on the bedrock core from MW-6 from 13.6 to 13.7 feet BGS and from 16.1 to 16.4 feet BGS. Some vertical fractures were observed on the bedrock core from MW-9 from 19.5 to 19.9 feet BGS, as well as from 20.7 to 21.0 feet BGS. Additionally, various high angle fractures were observed on bedrock core samples from monitoring wells MW-7 and MW-9.

4.10 Groundwater Development and Sampling

Subsequent to installation, LaBella attempted to recover the groundwater lost during coring of the bedrock. Between December 5 through December 11, 2007, LaBella purged the wells periodically. Based on the amounts of water lost during coring compared to the amounts of water recovered it was not feasible to recover the total amount of water lost. Groundwater samples were collected on December 12, 2007.

Prior to sampling, static water levels and depth to bottoms were collected from each of the wells. Subsequently, at least three well volumes were purged from each monitoring well in order to obtain a representative sample of the groundwater. The wells were purged using disposable bailers. During well purging, indicator parameters were collected in the field (e.g., pH, conductivity, temperature, etc.). The wells were generally purged until indicator parameters stabilized.

Due to the significant amount of water introduced into the wells during coring, a second groundwater sampling event was conducted on January 9, 2008 (approximately six (6) weeks after installation) in order to confirm the initial results were representative samples of the groundwater at both sites. Prior to sampling, static water levels were collected from the eight (8) monitoring wells. As a result, at least three (3) well volumes were purged from each well before a samples was obtained. Purging and sampling was completed by utilizing dedicated bailers at each well.

During both sampling events, the groundwater samples were placed in a cooler with ice and delivered under chain of custody procedures to Paradigm for analysis. The groundwater sampling parameters and results are discussed in Section 5.0.

Groundwater Sample Summary Table

Monitoring Well ID	Analytical Parameters	
	December 12, 2007	**January 9, 2008**
MW-1	TCL-STARS-List VOCs, STARS-List SVOCs, RCRA Metals, and PCBs	TCL-STARS-List VOCs and STARS-List SVOCs
MW-2	TCL-STARS-List VOCs and STARS-List SVOCs	TCL STARS-List VOCs
MW-3	TCL-STARS-List VOCs and STARS-List SVOCs	TCL STARS-List VOCs
MW-4	TCL-STARS-List VOCs, STARS-List SVOCs, RCRA Metals, and PCBs	TCL STARS-List VOCs
MW-5	TCL-STARS-List VOCs, STARS-List SVOCs, RCRA Metals, and PCBs	TCL STARS-List VOCs
MW-6	TCL-STARS-List VOCs and STARS-List SVOCs	TCL-STARS-List VOCs and STARS-List SVOCs
MW-7	TCL-STARS-List VOCs and STARS-List SVOCs	TCL-STARS-List VOCs and STARS-List SVOCs
MW-9	TCL-STARS-List VOCs, STARS-List SVOCs, RCRA Metals, and PCBs	TCL-STARS-List VOCs and STARS-List SVOCs

Notes:

- TCL & STARS-List VOCs = United States Environmental Protection Agency (USEPA) Target Compound List (TCL) and NYSDEC Spill Technology and Remediation Series (STARS) List VOCs using USEPA Method 8260.
- STARS-List SVOCs = NYSDEC STARS-List Semi-VOCs (SVOCs) using USEPA 8270.
- RCRA Metals = USEPA Resource Conservation and Recovery Act (RCRA) Metals using USEPA Methods 6010 and 7471.

4.11 Groundwater Flow

Static Water Level (SWL) measurements collected on January 9, 2008 indicate that the surface of the uppermost water-bearing zone ranged between about 9 and 15 feet below the ground surface. [*Note: Two SWL measurements were deeper than this range (MW-5 and MW-9) and appear anomalous or could potentially represent a separate flow zone. As such, for the purpose of this evaluation, these wells were not used in determining groundwater flow direction.*] The Table below indicates the groundwater elevations based on an assumed vertical datum.

Groundwater Elevations

January 9, 2008

Well Location	Top of Casing Elevation	January 8, 2008	
		SWL	Groundwater Elevation
MW-1	95.34	15.23	79.59
MW-2	98.57	13.05	84.86
MW-3	101.33	8.90	91.87
MW-4	103.24	9.25	93.70
MW-5	95.85	19.26	76.06
MW-6	96.44	14.43	81.57
MW-7	Not Surveyed	14.63	N.A.
MW-9	99.53	21.80	77.16

Groundwater contours developed from SWL measurements collected on January 8, 2008 are illustrated on Figure 13. As shown, the general groundwater flow at the Site is from the south to the north with a slight trend to the northwest.

5.0 Laboratory Analysis and Results

5.1 The Rotary Site

Soil Samples

Soil samples taken from the test pit areas and from the various test borings were submitted to Paradigm for the selected analyses as presented in the following table:

Soil Sample Summary Table

Soil Sample ID	Analytical Parameters
TP-1 (4'-4.5')	STARS-List VOCs, STARS-List SVOCs, TCLP Lead, and Flashpoint
TP-9 (4.8')	STARS-List SVOCs and RCRA Metals
TB-5 (8.0'-8.2')	STARS-List VOCs and STARS-List SVOCs

Soil Sample ID	Analytical Parameters
TB-21 (5.0-5.4')	STARS-List SVOCs and RCRA Metals
TB-21 (8.0'-8.3')	TCL-STARS-List VOCs, STARS-List SVOCs, RCRA Metals, and PCBs
TB-33 (4.0'-4.7')	TCL-STARS-List VOCs and STARS-List SVOCs
TB-33 (12.0'-12.5')	TCL-STARS-List VOCs

Notes:
- TCL & STARS-List VOCs = United States Environmental Protection Agency (USEPA) Target Compound List (TCL) and NYSDEC Spill Technology and Remediation Series (STARS) List VOCs using USEPA Method 8260
- STARS-List SVOCs = NYSDEC STARS-List Semi-VOCs (SVOCs) using USEPA Method 8270
- RCRA Metals = USEPA Resource Conservation and Recovery Act (RCRA) Metals using USEPA Methods 6010 and 7471
- PCBs = Polychlorinated Biphenyls (PCBs) using USEPA Method 8082.
- TCLP Lead = Analysis for lead using USEPA Method 6010 subsequent to a Toxicity Characteristic Leachate Procedure (TCLP) extraction using USEPA Method 6010B/7470A.
- Flashpoint = Analysis for ignitability using USEPA Method 1010.

The laboratory analytical results for the Rotary Site are summarized in Tables 2 through 4 and are compared to the Recommended Soil Cleanup Objectives (RSCOs) referenced in NYSDEC Technical and Administrative Guidance Memorandum (TAGM) 4046, as amended by Supplemental Tables dated August 22, 2001 (for petroleum related compounds). The comparison includes the RSCO and the soil cleanup objective to protect groundwater quality using a correction factor of 40 (Cf_{40}) as indicated in TAGM 4046. In addition, metals results were also compared to the Eastern USA Background Ranges referenced in TAGM 4046.

VOCs in Soil

Each of the five (5) soil samples collected from the test pits and test borings at the Rotary Site and analyzed for VOCs (2 for STARS-List and 3 for TCL & STARS-List) detected one or more VOCs above the reported laboratory detection limits. However, the reported concentrations are below their respective NYSDEC TAGM #4046 RSCOs for two of these samples. Two of the three soil samples with exceedances of RSCOs only detected one VOC (acetone) above the RSCOs; however, acetone is a common laboratory contaminant and these detections of acetone are not anticipated to be representative of actual subsurface conditions. One soil sample detected multiple petroleum related VOCs at concentrations that exceed the RSCOs and this sample was collected from TB-33 (12.0'-12.5'), which was collected from a boring advanced west of the UST identified in TP-1.

Table 7

Rotary Site
Summary of Detected Volatile Organic Compounds (VOCs) in Soil
Test Results in Micrograms per Kilogram (µg/Kg) or about Parts Per Billion (ppb)

Constituent	Test Pit Sample and Depth	Test Boring Samples and Depths				NYSDEC TAGM #4046: Soil Cleanup Objectives to Protect Groundwater Quality Cf_{40}	NYSDEC TAGM #4046: Recommended Soil Cleanup Objectives
	TP-1 (4.0 - 4.5-ft.)	TB-5 (8.0 to 8.2-ft.)	TB-21 (8.0 to 8.3-ft.)	TB-33 (4.0 to 4.7-ft.)	TB-33 (12.0 to 12.5-ft.)		
	November 7, 2007	November 12 & 13, 2007					
Petroleum-related Volatile Organic Compounds							
sec-Butylbenzene	ND <11.8	ND <8.13	68.4	ND <9.77	1,930	4,400	10,000*
Ethylbenzene	ND <11.8	ND <8.13	ND <12.6	13.4	**3,450**	2,200	5,500
n-Propylbenzene	ND <11.8	ND <8.13	17.6	10.5	**5,800**	1,480	3,700
Isopropylbenzene	ND <58.9	ND <40.7	ND <62.9	ND <48.8	**2,760**	920	2,300
p-Isopropyltoluene	ND <58.9	ND <40.7	ND <62.9	ND <48.8	1,910	4,400	10,000*
Naphthalene	ND <29.4	ND <20.3	ND <31.4	ND <24.4	**11,300**	5,200	10,000*
Toluene	12.8	11.2	19.3	21.4	584	600	1,500
1,2,4-Trimethylbenzene	ND <11.8	ND <8.13	25.4	93.3	**33,100**	5,200	10,000*
1,3,5-Trimethylbenzene	ND <11.8	ND <8.13	14.9	35.4	**19,500**	1,320	3,300
m,p-Xylene	16.1	18.4	32.8	111	**30,200**	480 †	1,200†
o-Xylene	ND <11.8	ND <8.13	ND <12.6	40.3	**14,800**	480 †	1,200†
Solvent-relateed Volatile Organic Compounds							
Acetone	Not Tested	Not Tested	**226**	**79.2**	**738**	44	200
Total VOCs	28.9	29.6	404	404.5	126,072	Not Applicable	10,000*

Notes:
VOC analysis by Unites States Environmental Protection Agency (USEPA) Method 8260B NYSDEC Spill Technology and Remediation Series (STARS) Compounds Only.
ND denotes compound not detected above the reported laboratory method detection limit.
* denotes that the maximum Recommended Soil Cleanup Objective for individual and total VOCs is 10,000-µg/kg.
† denotes that the Recommended Soil Cleanup Objective is for total Xylenes (i.e. m,p-Xylene plus o-Xylene).
† denotes that the Restricted Use Soil Cleanup Objective is for total Xylenes (i.e. m,p-Xylene plus o-Xylene).
Bold type denotes concentration that exceeds NYSDEC TAGM #4046 Soil Cleanup Objective to Protect Groundwater Quality CF_{40}.
Underlined and Bold type denotes concentration that exceeds NYSDEC TAGM #4046 Recommended Soil Cleanup Objective.

SVOCs in Soil Analytical Results

Each of the three (3) soil samples submitted for SVOC analysis detected concentrations above the reported laboratory detection limits. However, none of these samples detected concentrations of SVOCs above the RSCOs. [*Note: Two of the samples detected one SVOC each above the Cf40 RSCOs; however, based on the depth of groundwater, it does not appear that this criteria would be relavent.*] Table 8 summarizes analytical results for SVOCs in soils at the Rotary Site.

Table 8
Rotary Site
Summary of Detected Semi-Volatile Organic Compounds (SVOCs) in Soil
Test Results in Micrograms per Kilogram (µg/Kg) or about Parts Per Billion (ppb)

Constituent	Test Pit Samples and Depth		Test Boring Sample and Depth	NYSDEC TAGM #4046: Soil Cleanup Objectives to Protect Groundwater Quality Cf40	NYSDEC TAGM #4046: Recommended Soil Cleanup Objectives
	TP-1 (4.0 - 4.5-ft.)	TP-9 (4.8-ft.)	TB-21 (8.0 to 8.3-ft.)		
	November 7, 2007		November 12, 2007		
Anthracene	ND<366	ND<326	ND <331	50,000†	50,000†
Benzo (a) anthracene	428	ND<326	ND <331	1,120	224 or MDL
Benzo (a) pyrene	ND<366	ND<326	ND <331	4,400	61 or MDL
Benzo (b) fluoranthene	ND<366	ND<326	ND <331	440	220 or MDL
Benzo (g,h,i) perylene	ND<366	ND<326	ND <331	50,000†	50,000†
Benzo (k) fluoranthene	ND<366	ND<326	ND <331	440	220 or MDL
Chrysene	**383**	ND<326	ND <331	160	400
Fluoranthene	775	ND<326	597	50,000†	50,000†
Indeno (1,2,3-cd) pyrene	ND<366	ND<326	ND <331	1,280	3,200
Naphthalene	ND<366	**5,930**	ND <331	5,200	13,000
Phenanthrene	465	ND<326	ND <331	50,000†	50,000†
Pyrene	708	ND<326	563	50,000†	50,000†
Total SVOCs	2,759	5,930	1,160	Not Applicable	500,000*

Notes:
SVOC analysis by Unites States Environmental Protection Agency (USEPA) Method 8270C NYSDEC Spill Technology and Remediation Series (STARS) Compounds Only.
ND denotes compound not detected above the reported laboratory method detection limit.
* denotes that the maximum Recommended Soil Cleanup Objective for individual and total SVOCs is 500,000-µg/kg.
† denotes that the Recommended or Restricted Use Soil Cleanup Objective is a maximum of 50,000-µg/kg.
Bold type denotes concentration that exceeds NYSDEC TAGM #4046 Soil Cleanup Objective to Protect Groundwater Quality CF_{40}.
Underlined and Bold type denotes concentration that exceeds NYSDEC TAGM #4046 Recommended Soil Cleanup Objective.

Metal in Soil Analytical Results

Three (3) soil samples were submitted for analysis of USEPA RCRA metals and as summarized in Table 4 on the following page, RCRA metals were detected above the reported laboratory detection limits in each of these samples. However, only one sample detected one metal (mercury) at a concentration above the NYSDEC TAGM 4046 RSCO and the Eastern USA Background Range. This sample was collected from the ash layer that was observed in test pit TP-9.

Table 9
Rotary Site
Summary of Detected Metals in Soil
Test Results in Milligrams per Kilogram (mg/Kg) or about Parts Per Million (ppm)

TAL Metals	Test Pit Sample and Depth	Test Boring Samples and Depths		NYSDEC TAGM #4046: Recommended Soil Cleanup Objectives	NYSDEC TAGM #4046: Eastern USA Background Levels
	TP-9 (4.8-ft.)	TB-21 (5.0 to 5.4-ft.)	TB-21 (8.0 to 8.3-ft.)		
	November 7, 2007	November 13, 2007			
Arsenic	4.19	ND <0.614	5.78	7.5 or SB	3 to 12
Barium	39.5	30.8	52.2	300 or SB	15 to 600
Cadmium	ND <0.436	ND <0.614	0.598	1 or SB	0.1 to 1
Chromium	8.3	**12.6**	8.89	10 or SB	1.5 to 40
Lead	77.46	131	109	200 to 500	200 to 500
Mercury	**0.8255**	0.0872	0.0469	0.1	0.001 to 0.2
Selenium	ND <0.436	ND <0.614	ND <0.485	2 or SB	0.1 to 3.9
Silver	ND <0.872	ND <1.23	ND <0.966	SB	Not Available

Notes:
Metals analysis by Unites States Environmental Protection Agency (USEPA) Methods 6010, 7470, and/or 7471.
ND denotes compound not detected above the reported laboratory method detection limit.
SB denotes that a NYSDEC TAGM 4046 RSCO has not been established for the given compound. Deference to the NYSDEC TAGM 4046 Eastern USA Background Levels is required.
Bold type denotes concentration that exceeds NYSDEC TAGM #4046 Soil Cleanup Objective to Protect Groundwater Quality CF_{40}.
Underlined and Bold type denotes concentration that exceeds NYSDEC TAGM #4046 Recommended Soil Cleanup Objective.

PCBs in Soil Analytical Results

The one soil sample analyzed for PCBs from the Rotary Site, TP-21 (8.0'-8.3') did not detect PCBs above the reported laboratory detection limits.

TCLP Lead Analysis and Flashpoint Results

A soil sample from test pit TP-1 (4'-4.5'), in proximity to the UST, was submitted for TCLP Lead Analysis via USEPA Method 6010. Lead was not detected in this sample above the laboratory method detection limit. Additionally, this sample was analyzed for flashpoint via Method SW846 1010. The flashpoint for this sample was determined to be greater than seventy degree Celsius. This testing indicates that the impacted soils in this area would not be considered characteristic hazardous waste.

5.2 The Mariner Site

Soil samples taken from the test pit areas and from the various test borings were submitted to Paradigm for the selected analyses as presented in the following table:

Soil Sample Summary Table

Soil Sample ID	Analytical Parameters
TP-18 (2.8'-4')	STARS-List VOCs, STARS-List SVOCs, TCLP Lead, and Flashpoint
TP-19 (2.6'-3.5')	TCL-STARS-List VOCs, STARS-List SVOCs, RCRA Metals, and PCBs
TB-15 (0.0'-1.4')	STARS-List SVOCs and RCRA Metals
TB-27 (4.6'-5.0')	STARS-List VOCs and STARS-List SVOCs

Notes:

- TCL & STARS-List VOCs = United States Environmental Protection Agency (USEPA) Target Compound List (TCL) and NYSDEC Spill Technology and Remediation Series (STARS) List VOCs using USEPA Method 8260
- STARS-List SVOCs = NYSDEC STARS-List Semi-VOCs (SVOCs) using USEPA 8270
- RCRA Metals = USEPA Resource Conservation and Recovery Act (RCRA) Metals using USEPA Methods 6010 and 7471
- PCBs = Polychlorinated Biphenyls (PCBs) using USEPA Method 8082.TCLP
- Lead = Analysis for lead using USEPA Method 6010 subsequent to a Toxicity Characteristic Leachate Procedure (TCLP) extraction using USEPA Method 1311.
- Flashpoint = Analysis for ignitability using USEPA Method 1010.

The laboratory analytical results for the Mariner Site are summarized in Tables 10 through 12 and are compared to the RSCOs referenced in NYSDEC TAGM 4046, as amended by Supplemental Tables dated August 22, 2001 (for petroleum related compounds). The comparison includes the RSCO and the soil cleanup objective to protect groundwater quality using a correction factor of 40 (Cf_{40}) as indicated in TAGM 4046. In addition, metals results were also compared to the Eastern USA Background Ranges referenced in TAGM #4046.

VOCs in Soil Analytical Results

Each of the three (3) soil samples collected from the test pits and test borings at the Mariner Site were analyzed for VOCs (2 for STARS-List and 1 for TCL & STARS-List). Three (3) soil samples contained detections of VOCs above the reported laboratory detection limits. Soil sample TB-27 (4.6'-5.0') detected two (2) VOCs slightly above the detection limits; however, these detections are below the NYSDEC TAGM #4046 Soil Cleanup Objectives to Protect Groundwater Quality Cf_{40}. Only the soil sample from test pit TP-18 (2.8'-4.0') was found to contain concentrations of VOCs that exceeded the NYSDEC TAGM #4046 RSCOs and Soil Cleanup Objectives to Protect Groundwater Quality Cf_{40}. On the following page, Table 10 summarizes analytical results for VOCs in soils at the Mariner Site.

Table 10
Mariner Site
Summary of Detected Semi-Volatile Organic Compounds (VOCs) in Soil
Test Results in Micrograms per Kilogram (µg/Kg) or about Parts Per Billion (ppb)

Constituent	Test Pit Samples and Depths		Test Boring Sample and Depth	NYSDEC TAGM #4046: Soil Cleanup Objectives to Protect Groundwater Quality Cf_{40}	NYSDEC TAGM #4046: Recommended Soil Cleanup Objectives
	TP-18 (2.8 - 4.0-ft.)	TP-19 (2.6 - 3.5-ft.)	TB-27 (4.6 to 5.0-ft.)		
	November 8, 2007		November 13, 2007		
Petroleum-related VOCs					
sec-Butylbenzene	ND <1,970	ND <7.07	ND <9.47	4,400	10,000*
Ethylbenzene	**2,400**	ND <7.07	ND <9.47	2,200	5,500
n-Propylbenzene	**3,460**	ND <7.07	ND <9.47	1,480	3,700
Isopropylbenzene	ND <9,870	ND <35.4	ND <47.4	920	2,300
p-Isopropyltoluene	ND <9,870	ND <35.4	ND <47.4	4,400	10,000*
Naphthalene	**8,820**	ND <17.7	ND <23.7	5,200	10,000*
Toluene	ND <1,970	ND <7.07	10.7	600	1,500
1,2,4-Trimethylbenzene	**57,200**	ND <7.07	ND <9.47	5,200	10,000*
1,3,5-Trimethylbenzene	**20,600**	ND <7.07	ND <9.47	1,320	3,300
m,p-Xylene	**16,600**	ND <7.07	12.2	480 †	1,200†
o-Xylene	**5,360**	ND <7.07	ND <9.47	480 †	1,200†

Table 10 (continued)
Mariner Site
Summary of Detected Semi-Volatile Organic Compounds (VOCs) in Soil
Test Results in Micrograms per Kilogram (µg/Kg) or about Parts Per Billion (ppb)

Constituent	Test Pit Samples and Depths		Test Boring Sample and Depth	NYSDEC TAGM #4046: Soil Cleanup Objectives to Protect Groundwater Quality Cf_{40}	NYSDEC TAGM #4046: Recommended Soil Cleanup Objectives
	TP-18 (2.8 - 4.0-ft.)	TP-19 (2.6 - 3.5-ft.)	TB-27 (4.6 to 5.0-ft.)		
	November 8, 2007		November 13, 2007		
Solvent-related VOCs					
Acetone	Not Tested	**96.6**	Not Tested	44	200
Total VOCs	114,440	96.6	22.9	Not Applicable	10,000*

Notes:
VOC analysis by Unites States Environmental Protection Agency (USEPA) Method 8260B NYSDEC Spill Technology and Remediation Series (STARS) Compounds Only.
ND denotes compound not detected above the reported laboratory method detection limit.
* denotes that the maximum Recommended Soil Cleanup Objective for individual and total VOCs is 10,000-µg/kg.
† denotes that the Recommended Soil Cleanup Objective is for total Xylenes (i.e. m,p-Xylene plus o-Xylene).
‡ denotes that the Restricted Use Soil Cleanup Objective is for total Xylenes (i.e. m,p-Xylene plus o-Xylene).
Bold type denotes concentration that exceeds NYSDEC TAGM #4046 Soil Cleanup Objective to Protect Groundwater Quality CF_{40}.
Underlined and Bold type denotes concentration that exceeds NYSDEC TAGM #4046 Recommended Soil Cleanup Objective.

SVOCs in Soil Analytical Results

Three (3) of the four (4) soil samples submitted for SVOC analysis detected concentrations above the reported laboratory detection limits. Soil sample TB-5 (8.0'-8.2') did not record detections of SVOCs above the laboratory detection limits. As summarized in Table 6, samples TP-18 (2.80' – 4.0'), TP-19 (2.6'-3.5'), and TB-15 (0.0'-1.4') reported concentrations of one or more SVOCs above the NYSDEC TAGM #4046 RSCO to Protect Groundwater Quality Cf_{40}. Table 11 summarizes analytical results for SVOCs in soils at the Mariner Site.

Table 11
Mariner Site
Summary of Detected Semi-Volatile Organic Compounds (VOCs) in Soil
Test Results in Micrograms per Kilogram (µg/Kg) or about Parts Per Billion (ppb)

Constituent	Test Pit Sample and Depths		Test Boring Sample and Depth	NYSDEC TAGM #4046: Soil Cleanup Objectives to Protect Groundwater Quality Cf40	NYSDEC TAGM #4046: Recommended Soil Cleanup Objectives
	TP-18 (2.8 - 4.0-ft.)	TP-19 (2.6 - 3.5-ft.)	TB-15 (0.0 to 1.4-ft.)		
	November 8, 2007		November 12, 2007		
Anthracene	ND <332	ND <333	5,970	50,000†	50,000†
Benzo (a) anthracene	ND <332	**1,240**	**11,800**	1,120	224 or MDL
Benzo (a) pyrene	ND <332	1,320	**9,280**	4,400	61 or MDL
Benzo (b) fluoranthene	ND <332	**1,110**	**8,640**	440	220 or MDL

Table 11 (continued)
Mariner Site
Summary of Detected Semi-Volatile Organic Compounds (VOCs) in Soil
Test Results in Micrograms per Kilogram (µg/Kg) or about Parts Per Billion (ppb)

Constituent	Test Pit Sample and Depths		Test Boring Sample and Depth	NYSDEC TAGM #4046: Soil Cleanup Objectives to Protect Groundwater Quality Cf40	NYSDEC TAGM #4046: Recommended Soil Cleanup Objectives
	TP-18 (2.8 - 4.0-ft.)	TP-19 (2.6 - 3.5-ft.)	TB-15 (0.0 to 1.4-ft.)		
	November 8, 2007		November 12, 2007		
Benzo (g,h,i) perylene	ND <332	898	5,470	50,000†	50,000†
Benzo (k) fluoranthene	ND <332	**1,270**	**6,850**	440	220 or MDL
Chrysene	ND <332	**1,450**	**10,600**	160	400
Fluoranthene	ND <332	3,270	26,100	50,000†	50,000†
Indeno (1,2,3-cd) pyrene	ND <332	892	**4,870**	1,280	3,200
Naphthalene	**7,050**	ND <333	ND <3,130	5,200	13,000
Phenanthrene	ND <332	1,900	20,900	50,000†	50,000†
Pyrene	ND <332	2,950	22,500	50,000†	50,000†
Total SVOCs	7,050·	16,300	132,980	Not Applicable	500,000‡

Notes:
SVOC analysis by Unites States Environmental Protection Agency (USEPA) Method 8270C NYSDEC Spill Technology and Remediation Series (STARS) Compounds Only.
ND denotes compound not detected above the reported laboratory method detection limit.
* denotes that the maximum Recommended Soil Cleanup Objective for individual and total SVOCs is 500,000-µg/kg.
† denotes that the Recommended or Restricted Use Soil Cleanup Objective is a maximum of 50,000-µg/kg.
Bold type denotes concentration that exceeds NYSDEC TAGM #4046 Soil Cleanup Objective to Protect Groundwater Quality CF_{40}.
Underlined and Bold type denotes concentration that exceeds NYSDEC TAGM #4046 Recommended Soil Cleanup Objective.

Metals in Soil Analytical Results

Two (2) soil samples were submitted for analysis of USEPA RCRA metals and as summarized in Table 7, RCRA metals were detected above the reported laboratory detection limits in each of these samples. One of these samples, TP-19 (2.6'-3.5'), detected Mercury at concentrations above its respective NYSDEC TAGM 4046 RSCO and Eastern USA Background Range referenced in NYSDEC TAGM 4046. The soil sample from TB-15 (0.0'-1.4') detected both Chromium and Mercury at concentrations that exceeded the NYSDEC TAGM #4046 RSCO for both compounds; however, the concentrations of these metals were within the background ranges referenced in TAGM 4046. Table 12 summarizes detections of metals in soil at the Mariner Site.

Table 12
Mariner Site
Summary of Detected Metals in Soil
Test Results in Milligrams per Kilogram (mg/Kg) or about Parts Per Million (ppm)

TAL Metals	Test Pit Sample and Depth	Test Boring Sample and Depths	NYSDEC TAGM #4046: Recommended Soil Cleanup Objectives	NYSDEC TAGM #4046: Eastern USA Background Levels
	TP-19 (2.6 to 3.5-ft.)	TB-15 (0.0 to 1.4-ft.)		
	November 8, 2007	November 12, 2007		
Arsenic	4.72	3.31	7.5 or SB	3 to 12
Barium	35.9	105	300 or SB	15 to 600
Cadmium	0.95	0.529	1 or SB	0.1 to 1
Chromium	7.14	**26.2**	10 or SB	1.5 to 40
Lead	143	161	200 to 500	200 to 500
Mercury	**0.777**	**0.1157**	0.1	0.001 to 0.2
Selenium	ND <0.411	ND <0.332	2 or SB	0.1 to 3.9
Silver	ND <0.820	ND <0.665	SB	Not Available

Notes:
Metals analysis by Unites States Environmental Protection Agency (USEPA) Methods 6010, 7470, and/or 7471.
ND denotes compound not detected above the reported laboratory method detection limit.
SB denotes that a NYSDEC TAGM 4046 RSCO has not been established for the given compound. Deference to the NYSDEC TAGM 4046 Eastern USA Background Levels is required.
Bold type denotes concentration that exceeds NYSDEC TAGM #4046 Soil Cleanup Objective to Protect Groundwater Quality CF_{40}.
Underlined and Bold type denotes concentration that exceeds NYSDEC TAGM #4046 Recommended Soil Cleanup Objective.

PCBs in Soil Analytical Results

The one soil sample analyzed for PCBs from the Mariner Site, TP-19 (2.6'-3.5') did not detect PCBs above the reported laboratory detection limits.

TCLP Lead Analysis and Flashpoint Results

A soil sample from test pit TP-18 (2.8'-4.0') was submitted for TCLP Lead Analysis via USEPA Method 6010. Lead was detected in this sample. However, the concentration of lead was not above the NYSDEC TAGM #4046 RSCO. Additionally, this sample was analyzed for flashpoint via Method SW846 1010. The flashpoint for this sample was determined to be greater than seventy degree Celsius. As such, the petroleum impacted soil in this area would not be considered a characteristic hazardous waste.

5.3 Groundwater Analytical Results

As stated in section 5.4, eight (8) monitoring wells were sampled on December 12, 2007 and on January 9, 2008. See Figures 7 and 12 for monitoring well locations.

December 12, 2007

Volatile Organic Compounds

The following table presents a summary of detected VOCs in groundwater samples from the December 12, 2007 sampling event.

Table 13
Summary of Detected VOCs in Groundwater Samples - December 12, 2007
Results in micrograms per Liter (µg/L) or about Parts per Billion (ppb)

Parameter	Well Location			6 NYCRR Part 703 Groundwater Standards
	MW-1	MW-3	MW-4	
VOCs				
1,2,4-Trimethylbenzene	**721**	ND<5.00	ND<5.00	5
Benzene	**21.1**	**1.44**	ND<0.700	0.7
Ethylbenzene	**155**	ND<2.00	ND<2.00	5
n-Propylbenzene	**33.8**	4.92	4.68	5
Isopropylbenzene	ND<50.0	**5.37**	ND<5.00	5
m,p-Xylene	**185**	ND<2.00	ND<2.00	5
o-Xylene	**87.2**	ND<2.00	ND<2.00	5
Total VOCs	1,414	11.73	4.68	N/A

Notes:
Bold denotes a concentration that exceeds the NYSDEC Part 703 Groundwater Standards.
ND – <10.0 denotes that the compound was not detected above the reported laboratory detection limit.
NA – Not Available.

As shown in Table 13 above, VOCs were detected in three (3) of the eight (8) groundwater samples analyzed. Specifically, the groundwater sample from monitoring well MW-1 detected six (6) VOCs, and each of these detections are above the NYSDEC Part 703 Groundwater Standards. Monitoring well MW-3 detected concentrations of Benzene and Isopropylbenzene above the NYSDEC Part 703 Groundwater Standards. However, the groundwater sample from MW-4 did not detect any VOCs above the NYSDEC Part 703 Groundwater Standards. Additionally, the remaining five (5) samples did not contain detections of VOCs above the laboratory method detection limits.

Semi-Volatile Organic Compounds

Each of the eight (8) groundwater samples were analyzed for SVOCs. However, none of these samples returned detections of SVOCs above the laboratory method detection limits.

Metal in Groundwater Analytical Results

Four (4) of the eight (8) monitoring wells were sampled for 8 RCRA Metals. Of these RCRA Metals, only Barium was detected above the laboratory method detection limits in all four (4) samples. However, these detections were below the 6 NYCRR Part 703 Groundwater Standards.

January 9, 2008

Volatile Organic Compounds

The following table presents a summary of detected VOCs in groundwater samples from the January 9, 2008 sampling event.

Table 14
Summary of Detected VOCs in Groundwater Samples – January 9, 2008
Results in micrograms per Liter (µg/L) or about Parts per Billion (ppb)

Parameter	Well Location MW-1	6 NYCRR Part 703 Groundwater Standards
VOCs		
1,2,4-Trimethylbenzene	**1,090**	5
Benzene	**22.8**	0.7
Ethylbenzene	**307**	5
n-Propylbenzene	**84.3**	5
m,p-Xylene	**630**	5
o-Xylene	**207**	5
Total VOCs	2,341	N/A

Notes:
Bold denotes a concentration that exceeds the NYSDEC Part 703 Groundwater Standards.
N/A – Not Available.

As shown in Table 14 above, VOCs were detected in the groundwater sample from MW-1. Specifically, six (6) VOCs were detected and each of these detections are above the NYSDEC Part 703 Groundwater Standards. Additionally, the remaining seven (7) samples did not contain detections of VOCs above the laboratory method detection limits.

Semi-Volatile Organic Compounds

Four (4) of the eight (8) groundwater samples were analyzed for SVOCs. The groundwater sample from monitoring well MW-1 detected one (1) SVOC above the NYSDEC Part 703 Groundwater Standards. Specifically, Naphthalene was detected at a concentration that exceeds the NYSDEC Part 703 Groundwater Standards. However, none of the other four (4) groundwater samples detected SVOCs above the laboratory detection limits.

6.0 Summary of Findings, Conclusions and Recommendations

LaBella conducted a Phase II ESA at the Rotary Site and the Mariner Site. This Phase II ESA consisted of a geophysical survey, the excavation of twenty-three test pits, advancement of thirty-three soil borings, installation of eight (8) groundwater monitoring wells, and collecting/analyzing soil and groundwater samples. Based upon the work completed, the following findings are presented:

Summary of Findings

Rotary Site

- One UST was encountered in the northeast portion of the Site in the area of a former gasoline station. Petroleum impacted soil and groundwater was encountered in this location and NYSDEC Spill #0708686 was opened. Analytical testing of soil and groundwater samples from this area detected exceedences of NYSDEC criteria. Due to the constraints of the Site (e.g., underground utilities, ROW, etc.), it is possible that additional USTs could be located in this area.
- Low-level petroleum impacts were encountered just above apparent bedrock (equipment refusal) in several test borings across the Site. Soil and groundwater samples collected from some of these areas did not detect VOCs or SVOCs at concentrations above NYSDEC criteria.
- Fill materials were encountered in a majority of the test pit and test boring locations consisting of significant quantities of C&D (e.g., brick and concrete) with lesser amounts of suspect fill materials (e.g,. ash and cinders). SVOCs and the metal mercury were detected at concentrations slightly above the NYSDEC criteria in the fill materials.
- Bedrock groundwater samples including the area of two former gas stations (southwest and southeast corners), the former dry cleaner and the former motorcycle repair shop did not detect contaminants of concern.
- The extent of the evaluation was limited in some areas due to early equipment refusal, presumably due to former building foundations.
- Groundwater was determined to be generally flowing to the north on January 9, 2008.

Mariner Site

- Two USTs were encountered in the southwest portion of the Site in the area of a former gasoline station. Petroleum impacted soil was encountered in this location and NYSDEC Spill #0708687 was opened. Analytical testing of soil samples from this area detected exceedences of NYSDEC criteria. Due to the constraints of the Site (fencing, ROW, etc.), it is possible that additional USTs could be located in this area.
- Fill materials were encountered in a majority of the test pit and test boring locations consisting of significant quantities of C&D (e.g., brick) with lesser amounts of suspect fill materials (e.g., ash and cinders). SVOCs and the metal mercury were detected at concentrations above the NYSDEC criteria in the fill materials.
- Bedrock groundwater samples collected from the area of two former potential dry cleaners did not detect contaminants of concern.
- The extent of the evaluation was limited in some areas due to early equipment refusal, presumably due to former building foundations.
- Groundwater was determined to be generally flowing to the north on January 9, 2008.

Conclusions

Rotary Site

- A remedial action appears warranted in order to address NYSDEC Spill # 0708687, which is listed for the Site in relation to the UST and associated petroleum impacted soil and groundwater.
- Although SVOCs and the metal mercury were detected at concentrations that slightly exceed NYSDEC criteria in fill materials, it does not appear that active remediation would be required. Since these contaminants are common in fill materials throughout urban environments, it is possible to manage these fill materials on-site (under certain conditions). However, if necessary to remove fill materials (e.g., during utility work or redevelopment), these materials would likely require off-site disposal as regulated solid waste.
- Based on the history of the individual parcels and the numerous foundations encountered during the Phase II ESA fieldwork, it is possible that pockets of unknown residual impacts or orphan USTs may be present at the Site.
- The known low-level petroleum impacts directly above apparent bedrock that were identified in various locations throughout the Site do not appear to require active remediation; however, future developments should include sub-slab depressurization systems to minimize the potential for vapor intrusion issues.

Mariner Site

- A remedial action appears warranted in order to address NYSDEC Spill # 0708686, which is listed for the Site in relation to the UST and associated petroleum impacted soil.

- Although SVOCs and the metal mercury were detected at concentrations that exceed NYSDEC criteria in fill materials, it does not appear that active remediation would be required. Since these contaminants are common in fill materials throughout urban environments, it is possible to manage these fill materials on-site (under certain conditions). However, if necessary to remove fill materials (e.g., during utility work or redevelopment), these materials would likely require off-site disposal as regulated solid waste.
- Based on the history of the individual parcels and the numerous foundations encountered during the Phase II ESA fieldwork, it is possible that pockets of unknown residual impacts may be present at the Site.
- Based on the historical use of portions of the Site, there is a potential for low-level residual impacts in the subsurface and as such, future developments should include sub-slab depressurization systems to minimize the potential for vapor intrusion issues.

Recommendations

Rotary Site

- This report should be submitted to the NYSDEC and a Corrective Action Plan (CAP) should be developed and implemented in order to close NYSDEC Spill #0708687.
- A Site Management Plan (SMP) should be developed and implemented in order to properly manage fill materials and other potential soil and groundwater impacts that could be encountered during any future ground intrusive work at the Site. The SMP would provide procedures for proper reuse of suspect fill materials on-site (adequate cover) or proper off-site disposal, including potential sampling requirements. The SMP would also include air monitoring procedures to be implemented during such work and include procedures for addressing orphan tanks should any be encountered.
- Future buildings constructed at the Site should include sub-slab depressurization systems in order to address any low-level residual impacts in the subsurface.

Mariner Site

- This report should be submitted to the NYSDEC and a Corrective Action Plan (CAP) should be developed and implemented in order to close NYSDEC Spill #0708686.
- A Site Management Plan (SMP) should be developed and implemented in order to properly manage fill materials and other potential soil and groundwater impacts that could be encountered during any future ground intrusive work at the Site. The SMP would provide procedures for proper reuse of suspect fill materials on-site (adequate cover) or proper off-site disposal, including potential sampling requirements. The SMP would also include air monitoring procedures to be implemented during such work and include procedures for addressing orphan tanks should any be encountered.
- Future buildings constructed at the Site should include sub-slab depressurization systems in order to minimize the potential for low-level residual impacts in the subsurface to impact indoor air.

LABELLA Associates, P.C.

Engineering
Architecture
Environmental

Remedial Action Report
NYSDEC Spill #0708687

Location:

Rotary Site
141, 139, 133, 129, 119, 103, and 99 West Main Street;
10 and 16 South Washington Street; and
19 South Plymouth Avenue
Rochester, New York

Prepared for:

Broad & Plymouth, LLC
c/o Phillips Lytle, LLC
1400 First Federal Plaza
Rochester, New York 14614

LaBella Project No. 209645

April, 2010

Remedial Action Report
NYSDEC Spill #0708687

Location:

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1.0 INTRODUCTION

LaBella Associates, P.C. (LaBella) was retained by Broad & Plymouth, LLC to implement Remedial Action measures for the property known as the Rotary Site that consists of ten (10) contiguous parcels located at 141, 139, 133, 129, 119, 103, and 99 West Main Street; 10 and 16 South Washington Street; and 19 South Plymouth Avenue, City of Rochester, Monroe County, New York, hereinafter referred to as the "Site" (see Figure 1).

The remedial activities completed at the Site were conducted in accordance with the New York State Department of Environmental Conservation (NYSDEC) approved Remedial Action Work Plan (RAWP) entitled *Remedial Action Work Plan, NYSDEC Spill No. 0708687, Rotary Site, 141, 139, 133, 129, 119, 103, and 99 West Main Street; 10 and 16 South Washington Street; and 19 South Plymouth Avenue, Rochester, New York* prepared by LaBella dated September 2009.

The remedial actions at the Site were implemented to remove to the extent feasible petroleum-impacted soil and all known orphan underground storage tanks (USTs) located within the footprint of the remedial area.

2.0 SITE DESCRIPTION AND BACKGROUND

2.1 Site Description

The Site consists of approximately 1.3 acres of land that presently is used as a parking lot. The only improvement at the Site is a slab on grade booth for the parking lot attendants. The Site is intersected by Melvin and Scott Alley, and bordered by West Main Street to the north; West Broad Street to the south; South Plymouth Avenue to the east; and South Washington Street to the west.

The Site is located in a highly developed urban setting and bordered by the following adjacent properties:

North:	Parking lot, offices, and commercial businesses
South:	Parking lot, Rochester Board of Education building, and commercial businesses
East:	Parking lot (Mariner Site)
West:	Parking lot, offices, and commercial businesses

A site plan is shown on Figure 2 which shows property boundaries and the adjacent properties.

2.2 Previous Environmental Reports

LaBella completed a Phase II Environmental Site Assessment (ESA) in February 2008. Based on the work completed one UST was encountered in the northeast portion of the Site in the area of a former gasoline station. Soil impacts were observed in test pits TP-1 and borings TB-1, TB-32, and TB-33 which were completed in the area of the orphan UST and are shown on Figure 3. Petroleum related volatile organic compounds in soil were detected above the NYSDEC Technical Administrative Guidance Memorandum (TAGM) 4046 Recommended Soil Cleanup Objective (RSCO) in soil samples submitted from boring TB-33. As a result NYSDEC Spill #0708687 was opened. In addition, a bedrock groundwater monitoring well (MW-1) was installed in the northeast portion of the Site. The location of bedrock well MW-1 is shown on Figure 3. A groundwater sample from MW-1 was reported to contain petroleum related VOCs above the NYSDEC Part 703 Groundwater Standards (see Table 2).

The Phase II ESA concluded that an estimated 2,000 cubic yards of petroleum impacted soil will require remediation. It was recommended that a RAWP be developed to detail plans and operations to remove the UST, excavate and dispose of non hazardous contaminated soil, and monitor the effectiveness of the remedial actions.

[*Note: Fill materials were encountered in a majority of the test pit and test boring locations consisting of significant quantities of C&D (e.g., brick and concrete) with lesser amounts of suspect fill materials (e.g.,. ash and cinders). SVOCs and some metals were detected at concentrations slightly above the NYSDEC criteria in the fill materials. Although SVOCs and metals were detected at concentrations that slightly exceed NYSDEC criteria in fill materials, it does not appear that active remediation would be required. Since these contaminants are common in fill materials throughout urban environments, it is possible to manage these fill materials on-site (under certain conditions).*]

A RAWP was developed to detail plans and operations to remove the USTs, excavate and dispose of non-hazardous contaminated soil, and the collection of confirmation soil samples.

A copy of the LaBella RAWP and Phase II ESA Report were previously submitted to the NYSDEC.

3.0 OBJECTIVE

The Objectives of the Remedial Action measures for the Site included:

- Removal of one UST in accordance with 6 NYCRR Part 613.9(b)
- Removal and disposal of petroleum-impacted soil at a NYSDEC Part 360 permitted landfill in accordance with the RAWP

The remedial actions were designed to reduce the toxicity and mobility of contamination, be protective of human health and the environment, and reduce potential exposure to future users of the Site.

4.0 REMEDIAL ACTION

Remedial Action measures at the Site primarily entailed the removal of the source of the contamination identified at the Site during prior investigations. These included:

- Development of a RAWP for the Site and submission to the NYSDEC for approval;
- Decommission of the USTs at the Site in accordance with 6 NYCRR Part 613.9(b);
- Excavation of approximately 1,290.82 tons of impacted soil and 300 cubic yards (cy) of 'clean soil' from the northeastern portion of the Site in the area of four orphan USTs;
- Disposal of contaminated soil at a NYSDEC Part 360 permitted landfill; and
- Collection of confirmation soil samples to document the effectiveness of the remedial excavation.

Specifically, the following detailed actions were completed as part of the RAWP.

4.1 Decommissioning of Underground Storage Tanks (USTs)

Four orphan USTs were decommissioned on March 10, 2010. Three of the tanks were 3,000 gallons and one tank was 2,000 gallons in size based on measurements collected at the time of the tank removal work and their locations are shown on Figure 4. TREC Environmental, Inc. (TREC), a City of Rochester licensed tank removal contractor, was retained to decommission the tanks. The tanks were found to be previously filled with concrete and were removed by TREC to a location outside the City of Rochester limits, in accordance with a City of Rochester permit (see copy, Appendix 3). The tanks were then dismantled to the extent practicable and disposed of as scrap metal at Metalico scrap yard. Tank disposal documentation is summarized in Section 6.0.

4.2 Remedial Excavation

Remedial Action measures to address soil impacts identified in the previous environmental report were conducted on March 8, 9, 11, and 12, 2010. The excavator, operators, and equipment to conduct the remedial actions where provided by Spoleta Construction. Impacted soil was excavated in accordance with the NYSDEC-approved RAWP. A PID headspace reading of 25 parts per million (ppm) was used as a cut off level to segregate unimpacted on-site soils from petroleum-impacted soil. Approximately 717 cy of petroleum-impacted soil was excavated with a metal tracked Komatsu PLC220 excavator and directly loaded into Riccelli Enterprises NYSDEC Part 364 vehicles and transported to a NYSDEC Part 360 landfill for disposal. The approximate limit of the remedial excavation is shown on Figure 4.

The excavation was advanced to the extent feasible in all directions. Bedrock was encountered at approximately 14 ft bgs in the eastern portion of the excavation and 16 ft bgs in the western portion of the excavation and groundwater was not observed within the remedial excavation. The excavation of impacted soil was limited in the westerly direction due to underground utilities in the Scott Alley right-of-way (ROW) and the northerly direction due to the location of the Main Street ROW. Three (3) geoprobe soil borings were advanced on the west side of Scott Alley to determine if impacted soil is present. Geoprobe locations are shown on Figures 3 and 4. Soils encountered in the geoprobe borings did not contain evidence of impairment and soil samples collected from GP-2 and GP-3 were reported to contain no petroleum-related VOCs at concentrations above NYSDEC TAGM 4046 RSCOs. Soil boring logs for these borings are included in Appendix 4.

In addition, approximately 300 cy of unimpacted soil overlying the impacted material was removed from the excavation and staged on site pending sampling and analysis to confirm that residual levels of petroleum related VOCs do not remain in the soil that would prevent reuse of this material as backfill in the excavation. The clean soil was placed back into the excavation after sampling and laboratory analysis was conducted to confirm that chemicals of concern were not preset at concentration above the NYSDEC Technical Administrative Guidance Manual (TAGM) 4046 Recommended Soil Cleanup Objective (RSCO).

4.3 Confirmation Soil Sampling

Excavation closure sampling was conducted in general accordance with NYSDEC Department of Environmental Remediation (DER) 10 guidance document. Samples from the excavation sidewalls were collected from approximately 1 ft above the base every 30 ft along the perimeter of the excavation. No bottom samples were collected from the bottom of the excavation, as it was advanced to the top of bedrock. Final dimensions of the remedial excavation were approximately 55 ft wide, by 60 ft long, and

14-16 ft deep. The perimeter of the excavation is approximately 220 ft and its area is approximately 2,450 square ft. Accordingly, seven sidewall confirmation soil samples were collected for laboratory analysis. Two soil samples were collected from the geoprobe soil borings west of Scott Alley and submitted for laboratory analysis. The location of the confirmation and geoprobe soil samples are shown on Figure 4.

One 4:1 composite soil sample was collected and tested from the unimpacted soil pile to document soil conditions prior for reuse as backfill.

Soil samples were placed in laboratory supplied sample jars and placed in coolers with ice and submitted under chain of custody procedures to a New York State Department of Health (NYSDOH) Environmental Laboratory Approved Program (ELAP) certified laboratory for testing.

4.4 Laboratory Analytical Results of Confirmation Soil Samples

The seven confirmation soil samples collected from the remedial excavation and the one confirmation soil sample collected from the segregated clean soil pile (staged on-site prior to reuse as backfill) were analyzed for NYSDEC Spill Technology and Remedial Series (STARS) list VOCs using United States Environmental Protection Agency (USEPA) Method 8260B. The confirmation soil sample results were compared to the NYSDEC TAGM RSCO 4046 guidance document dated January 24, 1994 as amended by supplemental tables dated August 22, 2001. The laboratory results of the confirmation soil samples are summarized in Table 1. A copy of the laboratory analytical reports are included in Appendix 1.

The analytical results of the confirmation soil samples indicate that petroleum related VOCs were not detected above the laboratory method detection limit (MDL) in 4 of the 7 samples. Two confirmation soil samples were reported to contain VOCs above the laboratory MDL and below NYSDEC TAGM 4046 RSCOs. Only the sample collected from the north sidewall (CS2-N-8) detected concentrations of VOCs above the laboratory MDL and the NYSDEC TAGM 4046 RSCOs. As previously indicated, the excavation was limited in the northerly direction due to the Main Street ROW and in the westerly direction due to the Scott Alley ROW. The analytical results of the soil boring samples indicate that both samples contained VOCs above laboratory MDLs, but below NYSDEC TAGM 4046 RSCOs. NYSDEC was informed that the removal of impacted soil was limited in the northerly and westerly direction.

The results of the confirmation soil sample collected from the unimpacted soil pile did not indicate the presence of petroleum related VOCs above the laboratory MDLs.

5.0 TANK REGISTRATION

In accordance with the 6 NYCRR Parts 612-614, the tanks were registered and subsequently closed with the NYSDEC. A copy of the Petroleum Bulk Storage (PBS) Application that was submitted to the NYSDEC and a copy of the PBS Registration Certificate are included in Appendix 2.

6.0 WASTE DISPOSAL DOCUMENTATION

The following items were disposed of as part of the remedial actions conducted:

- 1,290.82 tons of petroleum impacted soil were transported by Riccelli Enterprises, a NYSDEC Part 364 permitted waste hauler, and disposed of at Mill Seat Landfill, a NYSDEC Part 360 permitted landfill located at 303 Brew Road, Bergen, New York.
- The USTs and all associated piping removed from the Site were disposed of as scrap metal at Metalico located at 1515 Scottsville Road, Rochester, New York.

A copy of the waste manifests and associated waste characterization laboratory analytical reports (as applicable) for the above listed wastes are included as Appendix 3.

7.0 FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS

Findings:

- Four orphan USTs were decommissioned in accordance with 6 NYCRR 613.9(b).
- Approximately 1,290.82 tons of source area petroleum-impacted soil has been removed from the northeastern portion of the site at the location of four orphan USTs, three of which were 3,000 gallon and the other was 2,000 gallons in size.
- Confirmation soil sampling and laboratory analysis indicate that petroleum related VOCs have been removed to concentrations primarily below the NYSDEC TAGM 4046 RSCO, except for soil along the northern sidewall of the excavation. Soil was removed to the extent feasible in the northerly direction up to the Main Street ROW.
- Soil boring sampling and laboratory analysis indicate that petroleum related VOCs are not present above their respective NYSDEC TAGM 4046 RSCOs to the west of Scott Alley.
- Approximately 300 cy of 'clean' soil that was excavated as part of the remedial excavation was sampled and laboratory tested to confirm that petroleum related VOCs do not exist at concentrations above the NYSDEC TAGM 4046 RSCO that would limit its reuse as backfill within the remedial excavation.

Conclusions:

- Based on the removal and disposal of petroleum-impacted soil, the results of the confirmation soil samples and the physical constraints in the northerly direction, no further remediation is recommended at this time.

- A bedrock groundwater monitoring well (MW-1) was installed adjacent to the east of the USTs during the Phase II ESA completed by LaBella. The location of bedrock well MW-1 is shown on Figure 3. The groundwater in well MW-1 was sampled and tested during the Phase II ESA for petroleum related VOCs and the results indicate that petroleum related VOCs were detected above the NYSDEC Part 703 Groundwater Standards. However, the source of the impacts (i.e. the four USTs and 1,290.82 tons of petroleum impacted soils) have been removed. Furthermore, groundwater was not observed within the remedial excavation and since the source of impacts has

been removed and the use of groundwater is prohibited in the City of Rochester, there does not appear to be a remedial concern regarding petroleum related impacts to groundwater at the Site.

- Since concentrations of petroleum-related VOCs that exceed the NYSDEC TAGM 4046 RSCO are present along the northern sidewall of the remedial excavation that abuts with the Main Street ROW, a Soil Management Plan (SMP) should be developed to manage these residual concentrations if encountered during future intrusive work in this area of the Site or ROW.

Recommendations:

LaBella recommends that a copy of this report and a SMP be submitted to the NYSDEC with a request that the Department issue a "No Further Action Letter" for NYSDEC Spill #0708687.

A copy of all information collected during this assessment, including maps, notes, analytical data and other material will be kept on file at the offices of LaBella. This information is available upon request and approval of LaBella and Broad & Plymouth, LLC.

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LABELLA Associates, P.C.

Engineering
Architecture
Environmental

Soil and Groundwater Management Plan NYSDEC Spill #0708687

Location:

Rotary Site
141, 139, 133, 129, 119, 103 and 99 West Main Street;
10 and 16 South Washington Street; and 19 Plymouth Avenue
Rochester, New York

Prepared for:

Broad & Plymouth, LLC
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LaBella Project No. 209645
April 13, 2010

Soil and Groundwater Management Plan
NYSDEC Spill #0708687

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Figure 1 – Site Location Map
Figure 2 – Phase II ESA Exploration Locations
Figure 3 – Approximate Location of Residual Impacted Soil

1.0 Introduction

LaBella Associates, P.C. ("LaBella") has been retained by Broad & Plymouth, LLC to develop a Soil and Groundwater Management Plan (SGMP) to be implemented in the event that future ground intrusive work encounters petroleum impacted soil at the property known as the Rotary Site that consists of 10 contiguous parcels located at 141, 139, 133, 129, 119, 103 and 99 West Main Street; 10 and 16 South Washington Street; and 19 Plymouth Avenue, City of Rochester, Monroe County, New York, hereinafter referred to as the "Site" (see Figure 1).

The results of a Phase II Environmental Site Assessment (ESA) conducted by LaBella in February 2008 identified petroleum impacted soil in the area of former underground storage tanks (USTs). As a result, remedial activities were conducted in March 2010 to decommission the four orphan USTs and remove contaminated soil to the extent feasible. Petroleum impacted soil was able to be removed in all directions until New York State Department of Environmental Conservation (NYSDEC) cleanup objectives were met, except along the northern sidewall of the excavation that abutted up to the West Main Street (ROW).

As a result, the NYSDEC requested that a SGMP be developed to formulate tasks and procedures to manage residual petroleum impacted soil that remain as a result of the release associated with NYSDEC Spill #0708687.

2.0 Background

LaBella completed a Phase II ESA in February 2008. Based on the work completed and orphan UST was encountered in the northeast portion of the Site in the area of a former gasoline station. Soil impacts were observed in test pit TP-1 and test boring TB-33 which were completed in the area of the orphan UST and are shown on Figure 2. Petroleum related volatile organic compounds in soil were detected above the NYSDEC Technical Administrative Guidance Memorandum (TAGM) 4046 Recommended Soil Cleanup Objective (RSCO) in a soil sample submitted from test boring TB-33. In addition, a bedrock groundwater monitoring well (MW-1) was installed in the northeast portion of the Site. The location of bedrock well MW-1 is shown on Figure 2. A groundwater sample from MW-1 was reported to contain petroleum related VOCs above the NYSDEC Groundwater Standards. [*Note: Groundwater was not observed within the overburden soils during the Phase II ESA.*] As a result NYSDEC Spill #0708687 was opened.

Based on the findings and conclusions of the Phase II ESA, a Remedial Action Work Plan (RAWP) was developed that detailed plans and operations to remove the orphan USTs excavate and dispose of non hazardous contaminated soil, and the collection of confirmation soil samples.

A copy of the LaBella RAWP and Phase II ESA were previously submitted to the NYSDEC.

Remedial Activities were conducted at the Site from March 8 to 12, 2010 included:

- Decommissioning four orphan USTs in accordance with 6 NYCRR Part 613.9(b)
- Excavation of all petroleum impacted above NYSDEC TAGM 4046 RSCO to the extent feasible that included 1,290.82 tons of impacted soil from the northeastern portion of the Site in the area of four orphan USTs

- Disposal of contaminated soil at a NYSDEC Part 360 permitted landfill
- Collection of confirmation soil samples to document the effectiveness of the remedial excavation

The location of the remedial excavation is shown on Figures 2 and 3. Confirmation soil sampling and laboratory analysis from soil samples collected along the sidewalls of the remedial excavation indicate that petroleum related VOCs have been removed to concentrations primarily below the NYSDEC TAGM 4046 RSCO, except for soil along the northern sidewall of the excavation. Soil was removed to the extent feasible in the northerly direction to the West Main Street ROW as shown on Figures 2 and 3. Also, the excavation was limited in the westerly direction due to the presence of underground utilities (i.e. water, gas, and electric) located within the Scott Alley. As a result, Geoprobe soil borings were completed on the western side of Scott Alley to assess soil conditions and the potential for soil contamination to exist above the NYSDEC TAGM 4046 RSCO. The locations of the Geoprobe borings are shown on Figure 3.

Soil Results

Soil results from the confirmation soil samples collected from the north excavation are summarized in Table 1. The analytical results for the confirmation soil samples were compared to the NYSDEC TAGM 4046 RSCO. The soil samples were analyzed for the NYSDEC Spill Technology and Remediation Series (STARS) list VOCs using United Stated Environmental Protection Agency (USEPA) Method 8260B.

As indicated in Table 1, only the soil sample collected from the west sidewall (CS2-N-8) detected concentrations of VOCs above the NYSDEC TAGM 4046 RSCO. Also, residual concentration of petroleum related VOCs were above the laboratory MDL but below the NYSDEC TAGM 4046 RSCO along the western sidewall of the remedial excavation.

Groundwater Results

The following table presents a summary of detected VOCs in the groundwater sample collected from MW-1 during the Phase II ESA:

Summary of Detected VOCs in Bedrock Groundwater Monitoring Well MW-1
January 9, 2008
Results in micrograms per Liter (µg/L) or about Parts per Billion (ppb)

Parameter	MW-1	NYSDEC Groundwater Standards
1,2,4-Trimethylbenzene	**1,090**	5
Benzene	**22.8**	0.7
Ethylbenzene	**307**	5
n-Propylbenzene	**84.3**	5
m,p-Xylene	**630**	5
o-Xylene	**207**	5

Notes:
Bold denotes a concentration that exceeds the NYSDEC Groundwater Standards.

As shown in table above, six VOCs were detected in the groundwater sample from MW-1 above the NYSDEC Groundwater Standards.

Remedial Action Report Conclusions

Based upon the remedial work completed and discussed above the following Conclusions are presented:

- Based on that impacted soil was removed to the extent feasible and results of the confirmation soil samples collected from the remedial excavation, no further remediation is warranted.
- Based on the lack of observations of groundwater observed within the remedial excavation, there does not appear to be a remedial concern regarding overburden groundwater impacts at the Site.
- Based on that residual concentrations of petroleum related VOCs that exceed the NYSDEC TAGM 4046 RSCO are present along the northern sidewall of the remedial excavation that abuts with the West Main Street ROW, a SGMP can be developed to manage these residual concentrations if encountered during future intrusive work in this area of the Site or West Main Street ROW.

3.0 Objective

This SGMP is intended to provide guidance in the identification and management of petroleum impacted soil that may be encountered during potential future construction related excavations at the Site (e.g., utility work, etc.) along the northern sidewall of the remedial excavation as shown on Figure 3.

This SGMP has been prepared in general accordance with current United States Environmental Protection Agency (USEPA) and NYSDEC non-hazardous waste disposal regulations and guidelines. In addition, this SGMP has been designed to satisfy the requirements of the "Soil and Groundwater Management Plan Criteria" of the NYSDEC Region 8 Spills Unit and to satisfy the requirements established by the NYSDEC regarding the handling of petroleum impacted media generated during construction.

This SGMP should be provided to contractors, future owners, etc. that may disturb the subsurface at the Site shown on Figure 3.

4.0 Approach

This section of the SGMP details the classification system that will be used to field screen and segregate excavated soil during potential future subsurface work at the Site. The method to screen and segregate soil will rely on visual evidence of impairment, olfactory evidence of impairment, photo-ionization detector (PID) readings, and previous analytical data generated at the Site.

4.1 Development of Screening Procedures for Excavated Soil

Impacted soil in the area of the West Main Street ROW was confirmed during the remedial activities and excavation confirmation soil sampling.

Upon discovery of this impacted media, on-site contractors should follow their own company's Health and Safety Plan (HASP) to provide for worker health and safety measures.

Two classes of soil have been defined for the Site and will be managed and handled in a manner dictated by evidence of environmental impairment. The two classes of material are described in table below.

Material Classifications

Class of Material	Physical Description	Screening Parameter	Management/ Re-use of Material
Class 1 Material	Soil and fill materials suitable for re-use on-site as backfill.	No Petroleum Odors; PID Readings less than 5.0 ppm; No Obvious Staining	Re-use on-site for backfill of excavations. Prior to re-use, soil will be sampled and analyzed for constituents of concern. If potential constituents of concern are detected below NYSDEC STARS list criteria, the soil may be used off-site as clean fill. If constituents of concern are detected above NYSDEC STARS list criteria, the soil may be used on-site as fill material. However, if constituents of concern are detected above NYSDEC TAGM 4046, then this material will be treated as Class 2.
Class 2 Material	Soil and fill materials with impacts.	Petroleum Odors; Obvious Staining; PID Readings Greater Than 5.0 ppm	Prior to off-site disposal, soil will be sampled and analyzed for constituents of concern. If constituents of concern are detected above NYSDEC TAGM 4046, then this material will be transported off-site for disposal at a NYSDEC Part 360 Permitted Landfill. If constituents of concern are detected below NYSDEC TAGM 4046 RSCOs, but above NYSDEC STARS list compounds, then this material will be treated as Class 1 material.

The on site management and use of Class 1 and 2 Materials are supported by the site specific screening of materials with a PID and the corresponding analytical data gathered at the Site.

4.2 On Site Management of Petroleum Impacted Soil

A confirmation soil sample collected as part of the remedial activities conducted at the Site in March 2010 indicated that a portion of the soil at the Site qualified as Class 2 Materials. Figure 3 indicates the anticipated limits of the Class 2 materials. Responsibility for the ROW impacts should stay with Broad & Plymouth, LLC. As such, analytical testing would be required at the time of future ground intrusive work that encounters petroleum-impacted materials, in order to determine which soil class the impacted soil would be managed under.

Class 1 Materials: Will be excavated and staged on and covered with polyethylene sheeting adjacent to areas of the site that require filling (if any). The material staged as apparent Class 1 Material should be sampled for NYSDEC STARS-list VOCs in order to determine if on-site reuse or off-site disposal is appropriate. NYSDEC STARS Memo #1 should be consulted to determine the number of soil samples required, based upon the quantity of the material in question. The laboratory analytical results should be compared to NYSDEC TAGM 4046 Recommended Soil Cleanup Objectives. If potential constituents of concern are detected above NYSDEC TAGM 4046 RSCOs, then this material will be treated as Class 2.

Class 2 Materials: Any stockpiled Class 2 Material will be staged on a minimum two layers of 6-mil polyethylene sheeting and covered with one layer of polyethylene sheeting in the "off-site disposal staging area" at the Site. The location of the "off-site disposal staging area" will be selected at the time of the excavation work based on site restrictions at the time. In accordance with NYSDEC solid waste regulations, Class 2 Materials will be transported from the site via NYSDEC Part 364 Permitted vehicles for final disposal at a NYSDEC Part 360 Landfill within 60 days of stockpiling. *[Note: Class 2 Material may require waste characterization sampling and analysis prior to off-site transportation & disposal.]*

All waste streams will be staged separately. The Contractor will be required to cover the Class 1 and Class 2 Materials during non-working hours. The covers will be anchored or weighted at the edges to prevent storm water and wind borne erosion.

4.3 Cover Thickness and Procedures for Class 1 Materials

All Class 1 Materials acceptable for re-use will be covered upon completion of the earthwork portion of the site development. The table below details the final requirements for covering Class 1 Materials:

Excavated Material Cover Requirements

Action	Class 1 Material
Final Cover Requirement and Details	Covered with a minimum of 1-foot of topsoil or clean material if area is not to be paved; No cover requirement if area is to be paved or covered with other impervious building materials

4.4 Excavation and Bedrock Derived Groundwater Management Plan

Petroleum-impacted groundwater at the Site may exhibit a petroleum odor and may be discolored (gray or black) and exhibit a petroleum sheen and odor.

There does not appear to be an overburden groundwater table present at the Site, as such, the management of impacted groundwater appears to be limited to groundwater located within the bedrock at the Site or any groundwater that may enter excavations and come into contact with residual impacted soil.

Upon discovery of impacted groundwater in an on-site excavation, contractors should follow their company's HASP to provide for worker health and safety measures. Pockets of water in utility corridors may also exhibit similar petroleum like odors and petroleum sheen.

Based upon information gathered during prior investigations and remedial activities, it is possible that groundwater encountered within the bedrock and excavations may be impacted with contaminants. As such, groundwater and/or rainwater entering excavations may require proper handling, treatment and discharge. This section provides procedures for identification and proper handling, containerizing, sampling, treating and discharging of the groundwater and storm water that collects in excavations. The impacted water management plan is as follows:

- Impacted water required shall be removed or pumped from an excavation into an appropriate sized container (e.g. Frac tank) and managed in accordance with all Federal, State, County and local regulations. Impacted water may be disposed of under a temporary discharge permit that can be obtained from Monroe County Pure Waters (MCPW). This will include preparing paperwork, coordination with MCPW, and collection and analysis of samples as required by MCPW. A copy of the MCPW Short Term Sewer Use Permit Application is included in Appendix 1.

- In the event that off-site transportation of impacted water is necessary, a valid 6 NYCRR Part 364 Waste Transporter Permit shall be required. The owner will also be required to provide all disposal documentation at an approved treatment storage and disposal facility to the NYSDEC, if required.

Geology and Hydrogeology

Site geology has been assessed through observations of made during the remedial excavation and soil borings and test pits conducted during the Phase II ESA and remedial work. Soil at the Site primarily consists of Brown SAND and little Gravel fill materials that is intermixed with bricks, concrete, and asphalt from approximately 0 to 5 ft bgs and generally underlain by Lacustrine soils that consist generally of Gray SILT and little fine Sand from approximately 5 to 8 ft bgs. Bedrock was encountered at approximately 8 to 17 ft bgs in the area of the remedial excavation. The depth of bedrock was observed to be greater along the western side of the remedial excavation.

The overburden groundwater table was not observed in the excavation during the remedial activities conducted at the Site.

5.0 Responsibility and Notification of Appropriate Parties

5.1 Responsible Party

The following entity is responsible for costs relating to the disposal and on-site management of impacted soil and groundwater outlined in this SGMP:

Mr. Michael Spoleta
Broad & Plymouth, LLC
7 Van Auker Street
Rochester, New York 14608
Office: (585) 436-2701

5.2 Notification of Appropriate Parties

Upon discovery of petroleum impacted media, as described in Section 3.0 above, the following parties should be notified immediately so that appropriate management of impacted soils can be implemented. Contact should be made in the following order:

Mr. Joseph Biondolillo
Sr. Environmental Specialist
City of Rochester
Division of Environmental Quality
Room 300-B
30 Church Street
Rochester, New York 14614
(585) 428-6649

Mr. Michael Spoleta
Broad & Plymouth, LLC
7 Van Auker Street
Rochester, New York 14608
Office: (585) 436-2701

Dennis Porter or Michael Pelychaty
LaBella Associates, P.C.
300 State Street
Rochester, New York 14614
(585) 454-6110

Notification to the NYSDEC will be made directly by the property owner, the property owners' legal counsel or LaBella Associates, P.C. The NYSDEC representative is:

Mr. Michael Zamiarski
Division of Environmental Remediation
NYSDEC - Region 8
6274 East Avon-Lima Road
Avon, New York 14414-9519
(585) 226-5438

6.0 Decontamination of Equipment

It is recommended that all equipment used on the work site and that comes in contact with impacted soil be decontaminated using manual methods to scrape off residual soil from construction activities.

7.0 Health and Safety Plan (HASP)

Contractors disturbing subsurface soil and/or groundwater should develop a HASP to manage health and safety issues associated with potential exposure to site chemicals of concern.

Y:\BROAD & PLYMOUTH, LLC\209645\REPORTS\RPT.2010.04.01.SMP.DOCX

LABELLA
LaBella Associates, P.C.
300 State Street
Rochester, New York 14614

Table

TABLE 1
Confirmation Soil Sample Results
Soil Management Plan - NYSDEC Spill #0708687
Rotary Site, 141, 139, 133, 129, 119, 103 and 99 West Main Street; 10 and 16 South Washington Street; and 19 Plymouth Avenue, Rochester, New York
All Results Expressed in micrograms per kilogram (µg/kg)

Sample ID	NYSDEC TAGM 4046 Recommended Soil Cleanup Objective	CS1-W-16	CS2-N-8	CS3-E-8	CS4-E-8	CS5-W-15	CS6-S-15	CS7-S-15	GP-2	GP-3	Clean Soil Pile / S-1
Sample Depth (ft)		16	8	8	8	15	15	15	16-20	16-20	Not Applicable
Methyl tert-butyl ether	120	7.2 U	6,400 U	5.3 U	6.5 U	5.5 U	6.2 U	5.8 U	8 U	8.8 U	5.2 U
Benzene	60	7.2 U	6,400 U	5.3 U	6.5 U	5.5 U	6.2 U	5.8 U	1.9 J	8.8 U	5.2 U
Toluene	1,500	5.1 J	1,400 J	5.3 U	6.5 U	5.5 U	6.2 U	5.8 U	3.3 J	8.8 U	5.2 U
Ethylbenzene	5,500	14	**9,300**	5.3 U	6.5 U	37	6.2 U	5.8 U	3.9 J	8.8 U	5.2 U
m,p-Xylene	1,200	24	**100,000**	5.3 U	6.5 U	69	6.2 U	3.3 J	18	3.1 J	5.2 U
o-Xylene	1,200	5.1 J	**33,000**	5.3 U	6.5 U	16	6.2 U	5.8 U	12	8.8 U	1.8 J
Xylene (total)	1,200	29	**140,000**	5.3 U	6.5 U	85	6.2 U	3.3 J	30	3.1 J	2.9 J
Isopropylbenzene	2,300	13	**2,700** J	5.3 U	6.5 U	51	6.2 U	5.8 U	8 U	8.8 U	5.2 U
n-Propylbenzene	3,700	29	**9,300**	5.3 U	6.5 U	170	6.2 U	5.8 U	8 U	7.2 J	5.2 U
1,3,5-Trimethylbenzene	3,300	4.2 J	**60,000**	5.3 U	6.5 U	88	6.2 U	5.8 U	8 U	8.8 U	2.3 J
tert-Butylbenzene	10,000	7.2 U	6,400 U	5.3 U	6.5 U	5.5 U	6.2 U	5.8 U	8 U	8.8 U	5.2 U
1,2,4-Trimethylbenzene	10,000	28	**160,000**	5.3 U	6.5 U	490 E	6.2 U	3.1 J	3.7 J	6.6 J	1.3 J
sec-Butylbenzene	10,000	7.2 J	2,500 J	5.3 U	6.5 U	50	6.2 U	5.8 U	8 U	12	5.2 U
4-Isopropyltoluene	10,000	3.4 J	6,400 U	5.3 U	6.5 U	31	6.2 U	5.8 U	8 U	21	5.2 U
n-Butylbenzene	10,000	8.3	**16,000**	5.3 U	6.5 U	160	6.2 U	5.8 U	8 U	16	5.2 U
Naphthalene	13,000	3.1 BJ	**22,000**	5.3 U	6.5 U	49 B	6.2 U	3.3 BJ	3.9 BJ	22 B	3.2 BJ

Notes:

U denotes compound was not detected above the laboratory method detection limit

J denotes estimated value, compound detected at concentration below laboratory method detection limit

Bold results indicates compound was detected above the NYSDEC TAGM 4046 Recommended Soil Cleanup Objective (RSCO)

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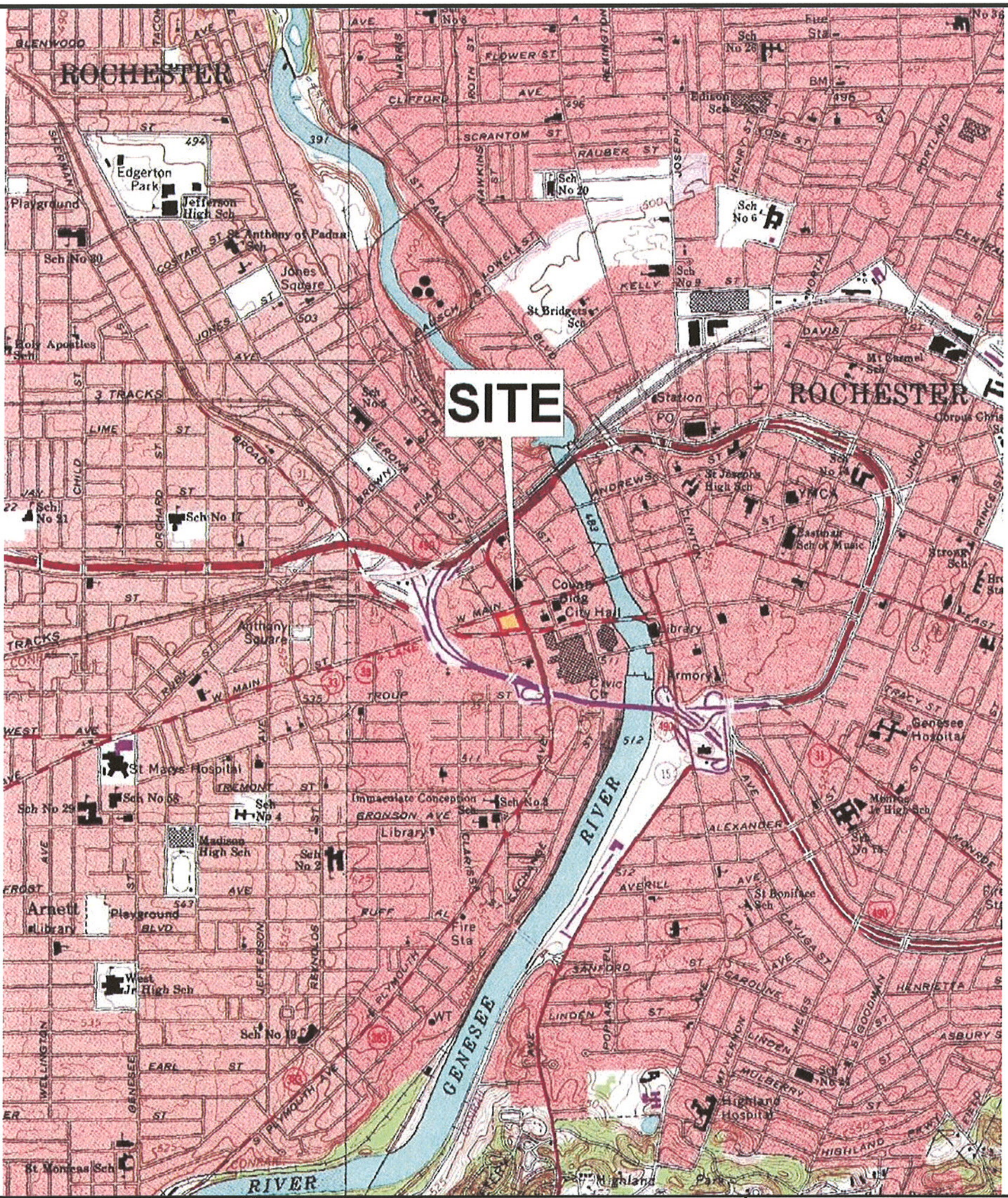
300 State Street
Rochester, New York 14614

Figures



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SCALE: 1:24,000

FIGURE 1
SITE LOCATION MAP

Rotary Site
141, 139, 133, 129-131, 119-125, 103, and 99 West Main Street; 10 and 16 South Washington Street and 19-29 South Plymouth Avenue
Rochester, New York

LABELLA

PROJECT NO. 209645

Y:\Broad & Plymouth, LLC\209645\Drawings\SMP\SMP Figure 2.mxd

LABELLA Associates, P.C.
ROCHESTER, NY 14614
P: (585) 454-6110
F: (585) 454-3066
www.labellapc.com

Soil Management Plan
NYSDEC Spill #078687

Rotary Site
141, 139, 133, 129, 119, 103 and 99 West Main Street; 10 and 16 South Washington Street; and 19 Plymouth Avenue
Rochester, New York

Client:
Broad & Plymouth, LLC

Phase II ESA Exploration Locations

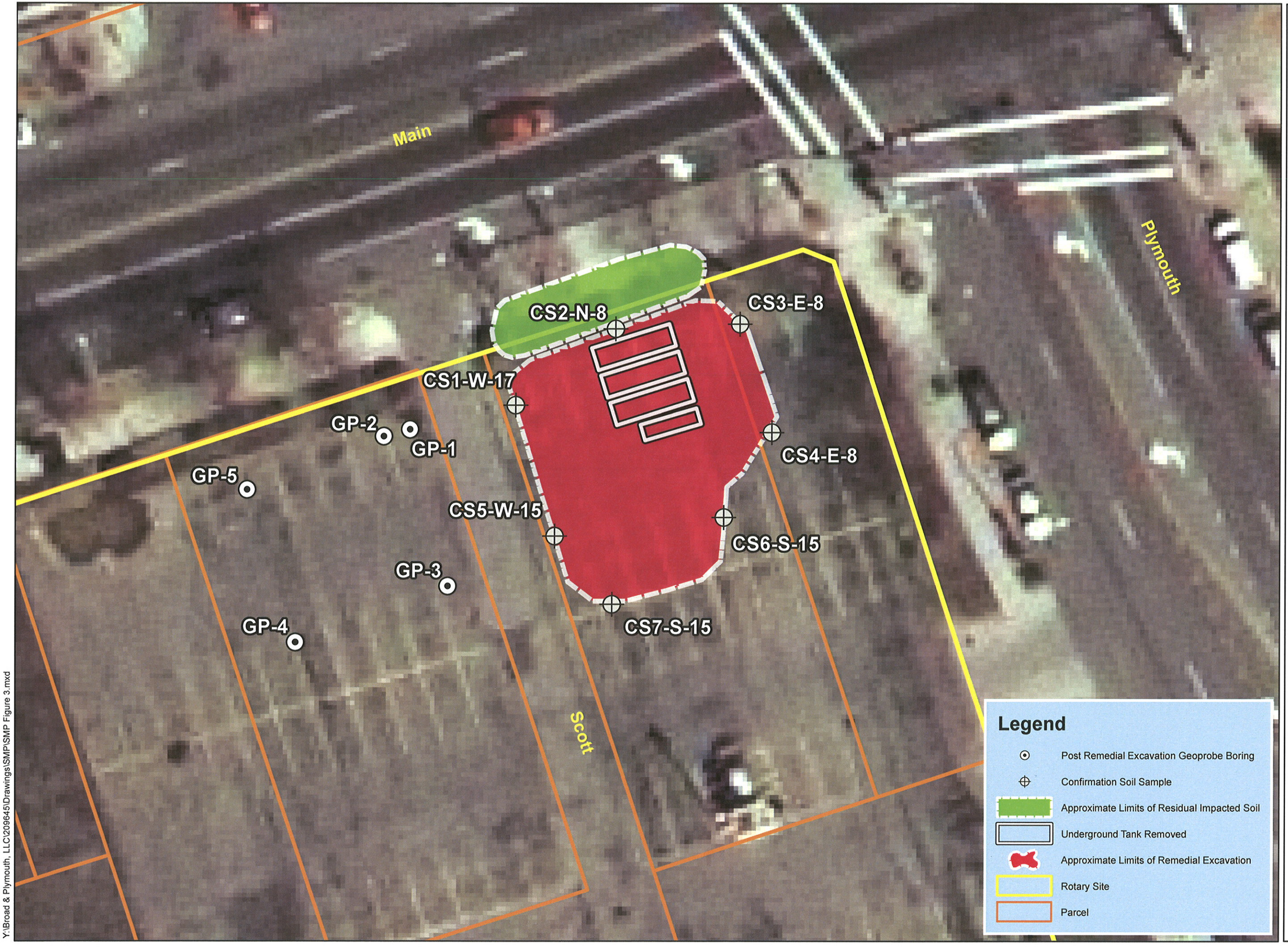
N
W
E
S

0 20

1 inch = 20 feet

209645

FIGURE 2



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Soil Management Plan
NYSDEC Spill #078687

Rotary Site
141, 139, 133, 129, 119, 103 and 99 West Main Street; 10 and 16 South Washington Street; and 19 Plymouth Avenue
Rochester, New York

Client:
Broad & Plymouth, LLC

Approximate Location of Residual Impacted Soil

N
W E
S

0 20
1 inch = 20 feet

209645

FIGURE 3

Y:\Broad & Plymouth, LLC\209645\Drawings\SMP\SMP Figure 3.mxd

Phase I
Environmental Site Assessment

Location:

Properties on South Plymouth Avenue, West Main Street, and South Washington Street
Rochester, New York 14614

Prepared for:

Whitney McClary
CSD Housing LLC
642 Kreag Road, Suite 301
Pittsford, New York 14534

LaBella Project No. 2212099

September 10, 2021

LaBella
Powered by partnership.

300 State Street | Rochester, New York 14614 | p 585-454-6110 | f 585-454-3066

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Appendix 5 Site Representative Interview

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Appendix 8 Previous Reports

Appendix 9 Additional Services

Appendix 10 Qualifications

LaBella Associates, D.P.C. (LaBella) has been contracted by CSD Housing LLC to perform an All Appropriate Inquiry (AAI) Phase I Environmental Site Assessment (ESA) report for 81-97, 99, 103, 119-125, 129-131, 133, 139, and 141 West Main Street, 19-29 South Plymouth Avenue, 10 and 16 South Washington Street, City of Rochester, Monroe County, New York, 14614, (Tax IDs: 121.30-1-20.001, 121.30-1-19, 121.30-1-18, 121.30-1-15, 121.30-1-14, 121.30-1-13, 121.30-1-12, 121.30-1-11, 121.30-1-17, 121.30-1-10, and 121.30-1-16) hereinafter referred to as the "Site".

The findings of this report are based upon a preliminary assessment of the condition of the Site within the Scope of Work and objective described below as of the date of our Site observations and documentation review. This assessment was prepared according to the American Society for Testing and Materials (ASTM) Standard Practice E1527-13 to satisfy the due diligence requirements set for CSD Housing LLC. The information contained in this report is considered privileged and confidential and is intended solely for the use of CSD Housing LLC,as it applies to the Site.

1.0 EXECUTIVE SUMMARY

1.1 Report Findings

Based on the results of this assessment, no apparent Recognized Environmental Conditions (RECs) have been identified in association with the Site at this time.

1.2 Additional Findings

Based on the results of this assessment, no apparent Historic Recognized Environmental Conditions (HREC) or de minimis conditions have been identified associated with the Site at this time; however, the following Controlled Recognized Environmental Conditions (CREC) has been identified in association with the Site.

Known Contamination with Soil and Groundwater Management Plan (SGMP): 99 and 103 West Main Street (NYSDEC Spill #0708687)

During a Phase II ESA in February 2008, petroleum-impacted soils were encountered in the area of former Underground Storage Tanks (USTs). The former USTs were located in the north portion of the parcels addressed as 99 and 103 West Main Street (Tax ID #s 121.30-1-19 and 121.30-1-18), proximate the location of a former gasoline station. The spill was assigned New York State Department of Environmental Conservation (NYSDEC) Spill #0708687. Remedial action included the decommissioning and removal of four orphan USTs and the removal of impacted soils. Approximately 1,290 tons of impacted soils were removed until cleanup objectives were met, except along the northern sidewall of the excavation. As a result, the NYSDEC requested that a Soil and Groundwater Management Plan (SGMP) be developed to formulate tasks and procedures to manage the residual petroleum impacted soil for the NYSDEC Spill #0708687.

A SGMP, dated April 13, 2010, was prepared to address the residual soil impacts present at the Site. The SGMP is intended to be implemented in the event that future ground-intrusive work encounters petroleum-impacted soil or groundwater.

Known Contamination with SGMP: 81-97 West Main Street (NYSDEC Spill #0708686)

During a Phase II ESA in February 2008, impacted soils were encountered during the removal of two gasoline USTs including, one 1,000-gallon UST and one 500-gallon UST. The former USTs were located in the southwest portion of 81-97 West Main Street (Tax ID #121.30-1-20.001), proximate the location of a former gasoline station. The spill was assigned NYSDEC Spill #0708686. Remedial actions included the decommissioning and removal of the USTs and the removal of impacted soils. Approximately 437 tons of impacted soils were removed until NYSDEC cleanup objectives were met, except for the western sidewall of the excavation area along the South Plymouth Avenue Right-of-Way. As a result, the NYSDEC requested that a SGMP be developed to formulate tasks and procedures to manage residual petroleum impacted soil that remain as a result of the release associated with NYSDEC Spill #0708686.

A SGMP, dated March 25, 2010, was prepared address the residual soil impacts present at the Site. The SGMP is intended to be implemented in the event that future ground-intrusive work encounters petroleum-impacted soil or groundwater.

Known Contamination to be Addressed: 16 South Washington Street (NYSDEC Spill #0270428)

Based on previous subsurface investigations completed at the Site, low-level petroleum impacted soils were encountered at the Site. Between at least 1938 and 1950, three USTs were located on the west portion of 16 South Washington Street (Tax ID #121.30-1-16), proximate the location of a former gasoline filling station (noted from the early 1920's through 1952). Records indicated one 1,000-gallon UST and two 550-gallon USTs were previously registered at the Site. The spill was assigned NYSDEC Spill #0270428. Records reviewed by the NYSDEC did not indicate that the tanks had been removed and subsurface investigations did not identify the presence of these tanks, only the presence of low-level petroleum contamination. The NYSDEC approved for contaminated soils to be addressed at the time of future development. The spill was inactivated on February 5, 2004.

1.3 Conclusions

Based on the findings of this assessment, no further investigation appears warranted at this time. However, LaBella notes the following:

- Known residual petroleum impacts are located throughout the Site. SGMPs have been prepared for 81-97, 99, and 103, West Main Street to manage petroleum impacts during future ground-intrusive work. In addition, the NYSDEC approved for residual petroleum impacts at 16 South Washington Street to be addressed during future development. All

future ground-intrusive work conducted at the Site should be conducted in accordance with SGMPs prepared for the Site.

1.4 Data Failures and Data Gaps

1.4.1 Data Failures

ASTM E1527-13 defines a data failure as a failure to achieve the historical research objectives of AAI even after reviewing the standard historical sources that are reasonably ascertainable and likely to be useful. Specifically, the historical research objectives include identifying all obvious uses of the Site from the present, back to the Site's first developed use, or back to 1940, whichever is earlier.

A data failure was encountered within the scope of this assessment. Specifically, historical uses of the Site were identified back to 1892. Historical sources prior to 1892 were not available. The lack of identification of the Site prior to its first developed use does not appear to represent a significant data failure based on the subsurface investigations conducted on the Site.

1.4.2 Data Gaps

ASTM E1527-13 defines a data gap as a lack of or an inability to obtain information required by this practice despite *good faith* efforts by the *Environmental Professional* to gather such information. Data gaps may result from incompleteness in any of the activities required by this practice, including, but not limited to site reconnaissance, interviews, data failure, or lack of a User Questionnaire.

A data gap was encountered within the Scope of Work of this assessment. This data gap includes the historical data failure discussed above. This data gap does not appear significant based on the local, state, and federal records reviewed during this assessment.

2.0 INTRODUCTION

2.1 Purpose

This investigation was requested to identify, to the extent feasible, Recognized Environmental Conditions in connection with the Site, including the identification of conditions indicative of releases and threatened releases of hazardous substances on, or in the vicinity of, the Site. This AAI Phase I ESA report was conducted in general conformance with the Scope and Limitations of ASTM Standard Practice E1527-13.

The performance of ASTM Standard Practice E1527-13 is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs (defined below) and the potential liability for contamination to be present in connection with the Site recognizing reasonable limits of time and cost. It is also intended to add protection from Comprehensive Environmental Response Compensation and Liability Act (CERCLA) liability for innocent landowner defense, bona fide

prospective purchaser, contiguous property owners and grantors who meet certain statutory requirements.

The objective of this AAI Phase I ESA was to determine the following, using our professional judgment, by means of the Scope of Work hereafter described.

1. A general description of the Site.
2. The current and historical use of the Site and adjacent properties.
3. Whether RECs exist or have the potential to exist at the Site.
4. Whether Site conditions suggest further evaluation based on the presence or probable presence of such RECs.
5. Provide information which may assist CSD Housing LLC in evaluating the fair market value of the Site.

The term "Recognized Environmental Condition" is defined by ASTM as the presence or likely presence of any hazardous substances (as currently defined by the CERCLA including pollutants and contaminants) or petroleum products (excluded from the definition of hazardous substance and controlled substances; or the presence of petroleum products as defined by the Resource Conservation and Recovery Act, the Oil Pollution Act of 1990, and the Clean Water Act) in, on, or at a property due to release to the environment, under conditions indicative of a release to the environment, or under conditions that pose a material threat of a future release to the environment.

The term "Historical Recognized Environmental Condition" is defined by ASTM as a past release of any hazardous substance or petroleum product that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.

The term "Controlled Recognized Environmental Condition" is defined by ASTM as resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

The term "REC" is not intended to include "de minimis" conditions, which generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis conditions are not RECs or CRECs.

The term "data gap" means lack or inability to obtain information required by the standards and practices as defined in ASTM Standard Practice E1527-13 despite good faith efforts by the Environmental Professional and Environmental Analyst.

The term "Environmental Professional" is defined by ASTM as a person who possesses sufficient specific education, training, and experience necessary to exercise professional judgement to develop

opinions and conclusions regarding conditions indicative of releases or threatened releases on, at, in, or to a property, sufficient to meet the objectives and performance factors defined in the ASTM Standard Practice E1527-13 and §312.20 of 40 CFR §312.

2.2 Scope of Work

The major components of an AAI Phase I ESA report in conformance with ASTM Standard Practice E1527-13 include a visual inspection of the Site and adjacent properties; interviews and review of documents from past and present owners, occupants, managers, representatives and neighbors to the extent necessary; interviews with tribal and local government agency representatives; review of tribal, local, and state records relative to the Site; and a review of tribal, local, state, and federal standard environmental record sources relative to the Site. The findings and conclusions presented in this report are based on information gathered and limitations set forth in this report.

The Scope of Work performed in this assessment is limited to the areas described as follows:

1. Interview with Mike Spoleta, to evaluate for potential environmental contamination to be present at the Site. Mike Spoleta has reportedly been associated with the Site for approximately 19 years (West Broad Street and South Plymouth Avenue) and 21 Years (West Main Street and South Plymouth Avenue).
2. Interviews with and/or record reviews of each of the following to obtain information directly regarding environmental concerns at, or in the immediate vicinity of, the Site, which is available directly by file or through general knowledge of the individual being interviewed. Information sources include:
    a. United States Environmental Protection Agency (USEPA)
    b. NYSDEC, Region 8
    c. Monroe County Health Department (MCHD)
    d. Monroe County online resources
    e. City of Rochester municipal office
3. Review of the following federal, state, and local environmental records and databases to aid in the identification of conditions at or related to the Site and properties adjacent to, or in the immediate vicinity of, the Site, including:
    a. USEPA National Priority List (NPL) – 1.0 mile
    b. USEPA Delisted NPL – 0.5 mile
    c. USEPA Superfund Enterprise Management System (SEMS) and SEMS Archived Sites – 0.5 mile
    d. USEPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) – 0.5 mile
    e. USEPA CERCLIS No Further Remedial Action Planned (NFRAP) – 0.5 mile
    f. USEPA Resource Conservation and Recovery Act (RCRA) Corrective Action Sites (CORRACTS) – 1.0 mile

g. USEPA RCRA non-CORRACTS Treatment, Storage, and Disposal Facility List (TSD) Facilities – 0.5 mile
h. USEPA RCRA Large Quantity Generator (LQG), Small Quantity Generator (SQG), and Very Small Quantity Generator (VSQG) Listings – Site and adjacent properties
i. National Response Center (NRC) Emergency Response and Notification System Listing (ERNS) – Site only
j. Federal, state, and local Institutional Controls/Engineering Controls and Land Use Restrictions – Site only
k. NYSDEC Registry of Inactive Hazardous Waste Disposal Sites (SHWS) (state equivalent of NPL Sites) – 1.0 mile
l. NYSDEC Registry of Brownfield Cleanup Program (BROWNFIELDS), Voluntary Cleanup Program (VCP), Environmental Restoration Program (ERP) Sites – 0.5 miles
m. NYSDEC Hazardous Substance Waste Disposal Sites (HSWDS) (state equivalent of SEMS Sites) – 0.5 mile
n. NYSDEC Solid Waste Facilities and Landfills (SWF/LF) – 0.5 mile
o. NYSDEC Inventory of Hazardous Substance Waste Disposal Sites – 0.5 mile
p. NYSDEC Listing of Spills and Leaking Storage Tanks (LST) – 0.5 miles
q. NYSDEC Listing of Registered Petroleum Bulk Storage Facilities (PBS), Chemical Bulk Storage Facilities (CBS), and Major Oil Storage Facilities (MOSF) – Site and adjacent properties
r. United States Geological Survey (USGS) Topographic Quadrangle Map Rochester East, New York
s. Generalized Groundwater Contour Map of Monroe County
t. United States Department of Agriculture (USDA) Monroe County Soil Survey obtained from the Natural Resource Conservation Service (NRCS) website
u. Previous Subsurface Investigations
v. Vapor Intrusion Assessment (VIA)
w. Sanborn Fire Insurance maps
x. Aerial photographs of the area
y. Historical topographic maps
z. Local street directories

4. Site visit on September 3, 2021 by Alexandra Shipman Messner of LaBella to photograph the Site and to visually identify areas of concern as defined in the agreement.
5. Completion of LaBella's AAI Phase I ESA Site Reconnaissance Report.
6. Completion of a User Questionnaire by Whitney McClary, of CSD Housing LLC.

3.0 SITE DESCRIPTION

The Site consists of 11 tax parcels (Tax IDs: 121.30-1-20.001, 121.30-1-19, 121.30-1-18, 121.30-1-15, 121.30-1-14, 121.30-1-13, 121.30-1-12, 121.30-1-11, 121.30-1-17, 121.30-1-10, and 121.30-1-16), totaling approximately 2.25 acres, located north of West Broad Street, east of South Washington Street, south of West Main Street, and west of School Alley in the City of Rochester, New York. The

Site consists of asphalt-paved parking lots and concrete sidewalks. The Site is located in an urban area; surrounding properties include commercial buildings and parking lots.

3.1 Site Location and Description

The parcels that comprise the Site are outlined in the table below. Property boundaries for the purpose of this assessment were obtained from the Monroe County GIS website. A map depicting the individual tax parcels that comprise the Site is located in the Figures Appendix of this report.

Property Summary

Legal Address	Tax ID	Property Use Code	Acreage	Also Referred To As
81-97 West Main Street	121.30-1-20.001	438 - Parking lot	1.08	East Parcel
99 West Main Street	121.30-1-19	438 - Parking lot	0.07	Central Parcels
103 West Main Street	121.30-1-18	438 - Parking lot	0.14	
19-29 South Plymouth Avenue	121.30-1-17	438 - Parking lot	0.24	
119-125 West Main Street	121.30-1-15	438 - Parking lot	0.17	Northwest Parcels
129-131 West Main Street	121.30-1-14	438 - Parking lot	0.11	
133 West Main Street	121.30-1-13	438 - Parking lot	0.03	
139 West Main Street	121.30-1-12	438 - Parking lot	0.03	
141 West Main Street	121.30-1-11	438 - Parking lot	0.06	
19-29 South Plymouth Avenue	121.30-1-17	438 - Parking lot	0.24	
10 South Washington Street	121.30-1-10	438 - Parking lot	0.06	
16 South Washington Street	121.30-1-16	438 - Parking lot	0.26	Southwest Parcel

Present Ownership and Use

Based on information obtained from the Monroe County GIS website, all of the Site parcels are currently owned by Broad and Plymouth LLC, except for 81-97 West Main Street, which is owned by Main and Plymouth LLC. The Site parcels all consist of asphalt-paved parking lots and concrete sidewalks.

Site Vicinity Characteristics

Surrounding Areas	Urban
Topography	Slightly sloping to the north
Nearest Water Body	Genesee River approximately 1,120-feet to the east
Apparent Groundwater Flow	Towards the east
Soil Characteristics	The Site consists of urban land. Urban land consists of areas that have been so altered or obscured by urban works and structures that identification of the soils is not feasible. Areas are mainly in the closely built-up parts of the city.

3.2 Current Use of the Adjacent Properties

Direction	Occupant (address)
North	Commercial offices (134-146 West Main Street) Vacant (132 West Main Street) Commercial or vacant (128 West Main Street) Busy Bee, restaurant (124 West Main Street) United States Postal Service (116 West Main Street) Vacant (110 West Main Street) Parking lot (90, 92-94, and 96 West Main Street) Vacant (82-84 West Main Street Monroe County Defender (76-80 West Main Street)
East	Stewart Title Insurance Company (47 West Main Street) Founders Café (13 South Fitzugh Street) St. Luke & St. Simon Cyrene (17 South Fitzugh Street) Parking Lot (25 South Fitzugh Street)
South	Commercial (37 South Fitzhugh Street) Rochester City School District (131 West Broad Street) Monroe County Crime Laboratory (100-150 South Plymouth Street) Commercial (31-33 South Washington Street)
West	The Washington Building, business center (155-165 West Main Street) Commercial (150-154 West Main Street)

Refer to Section 5.1.3 for additional information regarding the adjacent properties.

4.0 USER PROVIDED INFORMATION

In accordance with the ASTM E1527-13, a "User" is defined as the party seeking to complete an environmental site assessment of the property. If the user is aware of any specialized knowledge or experience that is material to RECs in connection with the Site, it is the user's responsibility to communicate any information based on such specialized knowledge or experience to the Environmental Professional. The User Questionnaire was completed by Whitney McClary, of CSD Housing LLC. A copy of the User Questionnaire is included in Appendix 7.

ASTM Standard Practice E1527-13 User Questionnaire Questions	Reported by User
Land Title Records	
Are land title records available for review?	The User is unaware if land title records are available for review.
Environmental Liens or Activity Use Limitations	
Did a search of *recorded land title records* identify any environmental liens filed or recorded against the *property* under federal, tribal, state or local law?	The User did not report environmental liens currently recorded against or relating to the property. In addition, the User did not report any activity or use limitations currently recorded against or relating to the property.
Did a search of *recorded land title records* identify any AULs, such as *engineering controls*, land use restrictions or *institutional controls* that are in place at the *property* and/or have been filed or recorded against the *property* under federal, tribal, state or local law?	The User is not aware of any AULs, such as engineering controls, land use restriction, or institutional controls that are in place at the Site and/or have been filed or recorded in a registry under federal, tribal, state, or local law.
Specialized Knowledge	
Does the *User* of this *ESA* have any specialized knowledge or experience related to the *property* or nearby properties? For example, is the *User* involved in the same line of business as the current or former *occupants* of the *property* or an *adjacent property* so that the *User* would have specialized knowledge of the chemicals and processes used by this type of business?	The User does not have any specialized knowledge or experiences related to the property or nearby properties.
Commonly Known or Reasonably Ascertainable Information	
Is the *User* aware of commonly known or *reasonably ascertainable* information about the *property* that would help identify conditions indicative of releases or threatened releases?	The User is aware that the Site was formerly developed with a gas station.
Based on the *User's* knowledge and experience related to the *property* are there any *obvious* indicators that point to the presence or likely presence of releases at the *property*?	Based on the User's knowledge and experiences related to the Site, the User of this ESA is not aware of obvious indicators that point to the presence or likely presence of contamination at the Site.

ASTM Standard Practice E1527-13 User Questionnaire Questions	Reported by User
Valuation Reduction for Environmental Issues	
Does the purchase price being paid for the *property* reasonably reflect the fair market value of the *property*?	The User did not report a below fair market value.
If the *User* concluded that there is a difference, has the *User* considered whether the lower purchase price is because contamination is known or believed to be present at the *property*?	The User did not report a below fair market value.

4.1 Reason for Performing Phase I ESA

According to ASTM E1527-13, either the User shall make known to the Environmental Professional the reason why the User wants to have the Phase I ESA performed or, if the User does not identify the purpose of the Phase I ESA, the Environmental Professional shall assume the purpose is to qualify for the Landowner Liability Protections under the Brownfields Amendments. The User indicated that the Phase I ESA is being conducted as part of a potential purchase.

5.0 RECORDS REVIEW

5.1 Regulatory Report Summary

ERIS, an independent research firm, was contracted to perform an ASTM compliant regulatory records search. The ERIS report is included in Appendix 1. Below is summary of the positive responses to the regulatory database search.

Regulatory Report Summary

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
BROWNFIELDS	0.5	0	0	0	9	-	9
BULK TERMINAL	0.25	0	0	0	-	-	3
CERCLIS	0.5	0	0	0	2	-	2
CERCLIS NFRAP	0.5	0	0	0	1	-	1
FED BROWNFIELDS	0.5	0	3	0	11	-	14

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
FINDS/FRS	0.02	0	3	-	-	-	3
FUDS	1.0	0	0	0	1	0	1
GEN MANIFEST	0.125	0	1	-	-	-	1
HMIRS	0.125	0	2	-	-	-	2
HSWDS	1.0	0	0	0	0	6	6
LST	0.5	0	3	1	12	-	16
MGP	1.0	0	0	0	2	2	4
MOSF	0.5	0	0	0	1	-	1
MRDS	1.0	0	2	0	0	0	2
NY SPILLS	0.25	4	37	45	-	-	86
PFAS	0.5	0	0	0	2	-	2
RCRA CORRACTS	1.0	0	0	0	0	1	1
RCRA NON GEN	0.25	0	3	0	-	-	3
RCRA TSD	0.5	0	0	0	1	-	1
RCRA VSQG	0.25	0	1	1	-	-	2
SEMS	0.5	0	0	0	1	-	1
SEMS ARCHIVE	0.5	0	0	0	1	-	1
SHWS	1.0	0	0	0	5	6	11
SWF/LF	0.5	0	1	1	0	-	2
TIER 2	0.125	0	2	-	-	-	2
UST	0.25	3	2	1	-	-	6
VAPOR	1.0	0	0	0	1	2	3
VCP	0.5	0	0	0	5	-	5

Refer to Section 5.1.2 and Section 5.1.3 for additional details pertaining to Site and adjacent listings, respectively.

5.1.1 ASTM Standard Regulatory Database Listings

Target Property Summary

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
NY SPILLS (0708686 - Inactive)	BROAD & PLYMOUTH LLC	99 WEST MAIN STREET, ROCHESTER, NY, 14614	0.00/NW	-2	Site - See Section 5.1.2
UST (8-601456)	ROTARY SITE	103 WEST MAIN STREET, ROCHESTER, NY, 14614	0.00/WNW	-3	Site - See Section 5.1.2
UST (8-600710)	OLD ROCHESTER HOTEL	AKA VOA 87-89 WEST MAIN STREET, ROCHESTER, NY, 14608	0.00/ENE	-3	Site - See Section 5.1.2
NY SPILLS (9314846 - Closed)	FORMER CUMBERLAND FARMS	19 SOUTH PLYMOUTH AVENUE/WEST MAIN, ROCHESTER, NY, 14614	0.00/NW	-2	Site - See Section 5.1.2
UST (8-601455)	MARINER SITE	30 SOUTH PLYMOUTH AVENUE, ROCHESTER, NY, 14614	0.00/E	1	Site - See Section 5.1.2
NY SPILLS (0708687 - Inactive)	MAIN & PLYMOUTH LLC	30 SOUTH PLYMOUTH AVENUE, ROCHESTER, NY, 14614	0.00/E	1	Site - See Section 5.1.2
NY SPILLS (0270428 - Inactive)	140,146,150 WEST BROAD ST	140,146,150 WEST BROAD ST, ROCHESTER, NY, 14514	0.00/WSW	4	Site - See Section 5.1.2

Surrounding Properties Summary

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
NY SPILLS (8901885 - Closed)	BERGMAN ASSOCIATES	1 SOUTH WASHINGTON STREET, ROCHESTER, NY, 14614	0.01/W	-1.0	Adjacent West - See Section 5.1.3
FINDS/FRS (110019641253)	BERGMANN ASSOCIATESNA P.C.	1 SOUTH WASHINGTON ST, ROCHESTER, NY, 14614	0.01/W	-1.0	Adjacent West - See Section 5.1.3
NY SPILLS (1215841 - Closed)	MARTINI CONSTRUCTION	116 WEST MAIN STREET, ROCHESTER, NY,	0.01/NW	-3.0	Adjacent North - See Section 5.1.3
UST (8-381411)	ROCHESTER CITY SCHOOL DISTRICT	CENTRAL OFFICE 131 WEST BROAD STREET, ROCHESTER, NY, 14614	0.01/S	4.0	Adjacent South - See Section 5.1.3
NY SPILLS (9213309 - Closed)	ROCHESTER SCHOOL DISTRICT	131 WEST BROAD STREET, ROCHESTER, NY,	0.01/S	4.0	Adjacent South - See Section 5.1.3
FINDS/FRS (110011778610)	ROCHESTER CITY SCHOOLS DISTRICT	131 WEST BROAD STREET, ROCHESTER, NY, 14614-1187	0.01/S	4.0	Adjacent South - See Section 5.1.3
RCRA VSQG (NYR000226290)	MONROE COUNTY CRIME LABORATORY	85 W BROAD ST, ROCHESTER, NY, 14614	0.01/ESE	3.0	Adjacent South - See Section 5.1.3
FINDS/FRS (110067548684)	MONROE COUNTY CRIME LABORATORY	85 W BROAD ST, ROCHESTER, NY, 14614	0.01/ESE	3.0	Adjacent South - See Section 5.1.3
GEN MANIFEST (NYR000226290)	MONROE COUNTY CRIME LABORATORY	85 W BROAD ST, ROCHESTER, NY, 14614	0.01/ESE	3.0	Adjacent South - See Section 5.1.3
NY SPILLS (1800097 - Inactive)	SILVEROLE VEHICLE	MAIN STREET/ PLYMOUTH AVENUE PAVED ROADWAY, , NY, 14614	0.02/NNW	-3.0	Adjacent North - See Section 5.1.3

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
NY SPILLS (7981925 - Closed)	PLYMOUTH ROAD	PLYMOUTH & BROAD, ROCHESTER, NY, 14608	0.02/SE	4.0	Adjacent South - See Section 5.1.3
RCRA NON GEN (NYD067910349)	DATCO INDUSTRIES INC	140 W MAIN ST, ROCHESTER, NY, 14614-1119	0.02/WNW	-2.0	Adjacent North - See Section 5.1.3
RCRA NON GEN (NYD987020229)	RIT CITY CENTER	50 W MAIN ST, ROCHESTER, NY, 14614-1274	0.04/ENE	-4.0	Adjacent North - See Section 5.1.3
SWF/LF ([28Y08])	Monroe County Yardwaste Composting - Brew Rd.	50 W. Main St.; Suite 7100 Brew Rd - Riga(T) (location), Rochester, NY, 14614	0.04/ENE	-4.0	Adjacent North - See Section 5.1.3
NY SPILLS (9714269 - Inactive)	EDWARDS RESTAURANT	13 SOUTH FITZHUGH ST, ROCHESTER, NY,	0.04/E	0.0	Adjacent East - See Section 5.1.3
RCRA NON GEN (NYR000043067)	ST LUKE - ST SIMON CHURCH	17 S FITZHUGH ST, ROCHESTER, NY, 14614	0.04/E	2.0	Adjacent East - See Section 5.1.3
FED BROWNFIELDS (105121)	179-191 West Main Street	179-191 West Main Street, Rochester, NY, 14614	0.06/W	0.0	Nearby West - See Section 5.1.4
FED BROWNFIELDS (105122)	201-217 West Main Street	201-217 West Main Street, Rochester, NY, 14614	0.07/W	3.0	Nearby West - See Section 5.1.4
NY SPILLS (1401205 - Closed)	COUNTY PARKING LOT	101 SOUTH PLYMOUTH AVENUE, ROCHESTER, NY, 14608	0.09/SSE	4.0	Adjacent South - See Section 5.1.3
UST (8-051292)	MONROE COUNTY SHERIFF'S DEPARTMENT	130 SOUTH PLYMOUTH AVENUE, ROCHESTER, NY, 14614	0.09/SSE	4.0	Adjacent South - See Section 5.1.3

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
NY SPILLS (8900514 - Closed)	ROCHESTER POLICE DEPT	SOUTH PLYMOUTH AVENUE, ROCHESTER, NY, 14614	0.09/SSE	4.0	Adjacent South - See Section 5.1.3
NY SPILLS (9108228 - Closed)	MONROE COUNTY JAIL	130 SOUTH PLYMOUTH AVENUE, ROCHESTER, NY, 14608	0.09/SSE	4.0	Adjacent South - See Section 5.1.3
NY SPILLS (9206456 - Closed)	MONROE COUNTY JAIL	130 SOUTH PLYMOUTH AVENUE, ROCHESTER, NY, 14614	0.09/SSE	4.0	Adjacent South - See Section 5.1.3
NY SPILLS (9201435 - Closed)	MONROE COUNTY JAIL	130 SOUTH PLYMOUTH AVENUE, ROCHESTER, NY, 14608	0.09/SSE	4.0	Adjacent South - See Section 5.1.3
NY SPILLS (9814809 - Inactive)	MONROE COUNTY JAIL	130 SOUTH PLYMOUTH AVENUE, ROCHESTER, NY, 14614	0.09/SSE	4.0	Adjacent South - See Section 5.1.3
NY SPILLS (9870479 - Inactive)	MONROE COUNTY JAIL	130 SOUTH PLYMOUTH AVENUE, ROCHESTER, NY, 14614	0.09/SSE	4.0	Adjacent South - See Section 5.1.3
RCRA VSQG (NYD981481013)	PUBLIC SAFETY BUILDING LABORATORY	150 PLYMOUTH AVE S RM 524, ROCHESTER, NY, 14614	0.14/SE	8.0	Adjacent South - See Section 5.1.3
UST (8-393592)	CITY OF ROCHESTER	PUBLIC SAFETY BUILDING 150 SOUTH PLYMOUTH AVENUE, ROCHESTER, NY, 14614	0.14/SE	8.0	Adjacent South - See Section 5.1.3

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
NY SPILLS (9307558 - Closed)	PUBLIC SAFETY BUILDING	150 SOUTH PLYMOUTH AVENUE, ROCHESTER, NY, 14608	0.14/SE	8.0	Adjacent South - See Section 5.1.3
NY SPILLS (8503272 - Closed)	PUBLIC SAFETY BUILDING	150 SOUTH PLYMOUTH AVENUE, ROCHESTER, NY, 14608	0.14/SE	8.0	Adjacent South - See Section 5.1.3
NY SPILLS (8280094 - Inactive)	PUBLIC SAFETY BUILDING	150 SOUTH PLYMOUTH AVENUE, ROCHESTER, NY, 14608	0.14/SE	8.0	Adjacent South - See Section 5.1.3
NY SPILLS (9706970 - Inactive)	PUBLIC SAFETY BUILDING	150 SOUTH PLYMOUTH AVENUE, ROCHESTER, NY, 14614	0.14/SE	8.0	Adjacent South - See Section 5.1.3
NY SPILLS (1111775 - Closed)	WASTE MANAGEMENT	150 SOUTH PLYMOUTH AVENUE PARKING LOT, ROCHESTER, NY, 14614	0.14/SE	8.0	Adjacent South - See Section 5.1.3
NY SPILLS (9211980 - Closed)	ROCHESTER PUBLIC SAFETY	150 SOUTH PLYMOUTH AVENUE, ROCHESTER, NY, 14608	0.14/SE	8.0	Adjacent South - See Section 5.1.3
NY SPILLS (8705097 - Closed)	CROSSETT INC	150 SOUTH PLYMOUTH AVENUE, ROCHESTER, NY, 14608	0.14/SE	8.0	Adjacent South - See Section 5.1.3
MRDS (10175676)	HOWARD & BOWEN CORP/ ROCHESTER, N.Y.	MONROE COUNTY, ROCHESTER, NY, 14614	0.04/E	3.0	This listing does not appear to be a REC based on the distance from the Site.

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
MRDS (10272692)	ROCHESTER SMELT & REF/ ROCHESTER, NY	MONROE COUNTY, ROCHESTER, NY, 14614	0.04/E	3.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (9213751 - Closed)	KERRY & MURRAY	SOUTH FITZHUGH & BROAD ST, ROCHESTER, NY,	0.05/E	3.0	This listing does not appear to be a REC based on the status of the spill.
NY SPILLS (9970696 - Closed)	CITY OF ROCHESTER	62 SOUTH FITZHUGH STREET, ROCHESTER, NY,	0.05/ESE	3.0	This listing does not appear to be a REC based on the status of the spill.
NY SPILLS (9203945 - Closed)	12 NORTH WASHINGTON	12 NORTH WASHINGTON ST, ROCHESTER, NY, 14614	0.05/WNW	-5.0	This listing does not appear to be a REC based on the status of the spill.
NY SPILLS (1301112 - Closed)	SPIDERMAN 2 ROADWAY SPILL	36 W MAIN STREET, ROCHESTER, NY, 14614	0.06/ENE	-3.0	This listing does not appear to be a REC based on the status of the spill.
NY SPILLS (0911013 - Inactive)	PARKING LOT	179-191 WEST MAIN STREET, ROCHESTER, NY, 14614	0.06/W	0.0	This listing does not appear to be a REC based on the status of the spill.
NY SPILLS (1902791 - Inactive)	PARKING LOT AND AIR	47 SOUTH FITZHUGH STREET, ROCHESTER, NY, 14614	0.06/ESE	3.0	This listing does not appear to be a REC based on the status of the spill.
NY SPILLS (1711749 - Inactive)	ABANDONED UST	50 NORTH PLYMOUTH AVE, ROCHESTER, NY,	0.06/NNW	-5.0	This listing does not appear to be a REC based on the status of the spill.

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
NY SPILLS (1109383 - Inactive)	SUPERIOR PLUS	210 W MAIN ST, ROCHESTER, NY,	0.08/W	3.0	This listing does not appear to be a REC based on the status of the spill.
NY SPILLS (1110498 - Closed)	SUPERIOR PLUS ENERGY	210 WEST MAIN STREET OPEN DOOR MISSION, ROCHESTER, NY, 14614	0.08/W	3.0	This listing does not appear to be a REC based on the status of the spill.
HMIRS (I-2011110302)		210 W MAIN ST, ROCHESTER, NY,	0.08/W	3.0	This listing does not appear to be a REC based on the distance from the Site.
HMIRS (I-2011110302)		210 W MAIN ST, ROCHESTER, NY,	0.08/W	3.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (0608549 - Closed)	ABOVE	100 SPRING ST, Monroe, NY,	0.08/SSW	6.0	This listing does not appear to be a REC based on the status of the spill.
NY SPILLS (0611898 - Closed)	EQUIPTMENT FAILURE	100 SPRING ST, Monroe, NY,	0.08/SSW	6.0	This listing does not appear to be a REC based on the status of the spill.
NY SPILLS (0711381 - Closed)	CARPENTER & SMITH	100 SPRING STREET, MONROE, NY,	0.08/SSW	6.0	This listing does not appear to be a REC based on the status of the spill.
NY SPILLS (9514916 - Closed)	CARPENTER & SMITH	100 SPRING STREET, MONROE, NY,	0.08/SSW	6.0	This listing does not appear to be a REC based on the status of the spill.

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
NY SPILLS (9702221 - Closed)	CARPENTER AND SMITH	100 SPRING STREET, MONROE, NY,	0.08/SSW	6.0	This listing does not appear to be a REC based on the status of the spill.
NY SPILLS (1009357 - Inactive)	CARPENTER AND SMITH	100 SPRING ST LOADING DOCK, MONROE, NY,	0.08/SSW	6.0	This listing does not appear to be a REC based on the status of the spill.
NY SPILLS (1309574 - Inactive)	GROUND	100 SPRING STREET, MONROE, NY,	0.08/SSW	6.0	This listing does not appear to be a REC based on the status of the spill.
LST (0008473 - Closed)	CARPENTER & SMITH	100 SPRING ST, Monroe, NY,	0.08/SSW	6.0	This listing does not appear to be a REC based on the status of the spill.
LST (8907085 - Closed)	CARPENTER & SMITHS S/S	100 SPRING ST., MONROE, NY,	0.08/SSW	6.0	This listing does not appear to be a REC based on the status of the spill.
LST (0104815 - Inactive)	Spill Number 0104815	100 SPRING ST, Monroe, NY,	0.08/SSW	6.0	This listing does not appear to be a REC based on the status of the spill.
NY SPILLS (1601115 - Inactive)	PAVEMENT	100 SPRING STREET, MONROE, NY,	0.08/SSW	6.0	This listing does not appear to be a REC based on the status of the spill.
NY SPILLS (8400169 - Closed)	RYDER TRUCK RENTAL	226 N WASHINGTON ST, ROCHESTER, NY,	0.09/WNW	-6.0	This listing does not appear to be a REC based on the status of the spill.

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
NY SPILLS (8400716 - Closed)	RYDER TRUCK RENTAL	WASHINGTON STREET, ROCHESTER, NY, 14603	0.09/WNW	-6.0	This listing does not appear to be a REC based on the status of the spill.
NY SPILLS (8908790 - Closed)	RYDER TRUCK	26 NORTH WASHINGTON ST, ROCHESTER, NY, 14614	0.09/WNW	-7.0	This listing does not appear to be a REC based on the status of the spill.
NY SPILLS (8806024 - Closed)	CITY OF ROCHESTER	FITZHUGH & CHURCH STREET, ROCHESTER, NY,	0.11/NNE	-8.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (9307552 - Inactive)	MOLLENBERG BETZ INC	BROAD & EXCHANGE WAR MEM, ROCHESTER, NY,	0.12/E	2.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (8380811 - Closed)	ROCHESTER GAS & ELECTRIC	EXCHANGE & BROAD STREETS, ROCHESTER, NY,	0.12/E	2.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (8301007 - Inactive)	ROCHESTER GAS & ELECTRIC	EXCHANGE & BROAD STREET, ROCHESTER, NY,	0.12/E	2.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (1911867 - Inactive)	RGE VAULT	2 STATE STREET, ROCHESTER, NY,	0.12/ENE	-7.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (8501166 - Closed)	CASCADE & INDUSTRIAL STS	CASCADE & INDUSTRIAL STS, ROCHESTER, NY,	0.13/W	-1.0	This listing does not appear to be a REC based on the distance from the Site.

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
NY SPILLS (9415388 - Closed)	FAIRPORT ELECTRIC	43 STATE STREET, ROCHESTER, NY,	0.13/NE	-8.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (8201606 - Closed)	NORTH WASHINGTON STREET	36 NORTH WASHINGTON, ROCHESTER, NY,	0.13/WNW	-8.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (8281222 - Inactive)	WASHINGTON STREET SPILL	36 NORTH WASHINGTON, ROCHESTER, NY,	0.13/WNW	-8.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (9612788 - Closed)	ROCHESTER CITY HALL	30 CHURCH STREET, ROCHESTER, NY,	0.13/NNE	-8.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (1301299 - Closed)	SPIDERMAN PRODUCTION	30 CHURCH STREET CORNER BY BUILDING, ROCHESTER, NY, 14614	0.13/NNE	-8.0	This listing does not appear to be a REC based on the distance from the Site.
SWF/LF ([28D22])	Rochester (C) C & D Lf	City Hall 30 Church Street, Rochester, NY, 14614	0.13/NNE	-8.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (9710030 - Closed)	GANNETT ROCHESTER NEWS	55 EXCHANGE ST, ROCHESTER, NY, 14614	0.13/E	-4.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (9309233 - Closed)	GANNETT ROCHESTER NEWSPAP	55 EXCHANGE STREET, ROCHESTER, NY,	0.13/E	-4.0	This listing does not appear to be a REC based on the distance from the Site.

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
NY SPILLS (0811921 - Inactive)	DEMOCRAT & CHRONICLE NEWSPAPER	55 EXCHANGE BOULEVARD, ROCHESTER, NY, 14614	0.13/E	-4.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (9213136 - Closed)	SAFETY KLEEN	55 EXCHANGE STREET, ROCHESTER, NY,	0.13/E	-4.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (9102115 - Closed)	WAR MEMORIAL	100 EXCHANGE STREET, ROCHESTER, NY,	0.15/ESE	-10.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (9307647 - Inactive)	WAR MEMORIAL	100 EXCHANGE STREET, ROCHESTER, NY,	0.15/ESE	-10.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (1410390 - Inactive)	BLUE CROSS ARENA	100 EXCHANGE STREET, ROCHESTER, NY,	0.15/ESE	-10.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (0108488 - Inactive)	ROUTE 490	ROUTE 490 NEAR ROUTE 31 S, ROCHESTER, NY,	0.16/W	4.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (9870429 - Inactive)	FEDERAL BUILDING	100 STATE STREET, ROCHESTER, NY,	0.17/NNE	-11.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (9000376 - Closed)	FEDERAL BLDG - 5TH FLOOR	100 STATE STREET, ROCHESTER, NY,	0.17/NNE	-11.0	This listing does not appear to be a REC based on the distance from the Site.

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
NY SPILLS (0485692 - Closed)	FEDERAL BUILDING	100 STATE STREET, ROCHESTER, NY, 14614	0.17/NNE	-11.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (0170411 - Inactive)	490 WEST/ PLYMOUTH ROAD	490 WEST/ PLYMOUTH ROAD, ROCHESTER, NY, 14624	0.17/SSE	8.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (8402958 - Closed)	MVA	ROUTE 490 E/ PLYMOUTH AVE, ROCHESTER, NY,	0.17/SSE	8.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (8907071 - Closed)	GREYHOUND BUS LINES	ROUTE 490 TO PLYMOUTH AVENUE, ROCHESTER, NY, 14614	0.17/SSE	8.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (0070067 - Inactive)	I GORDAN CORPORATION	28 EAST MAIN STREET, ROCHESTER, NY,	0.19/ENE	-11.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (9602246 - Closed)	CITY OF ROCHESTER	EAST MAIN & GRAVES STREET, ROCHESTER, NY,	0.19/ENE	-11.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (8603193 - Closed)	COURT STREET	NEAR 10 COURT STREET, ROCHESTER, NY,	0.20/ESE	-18.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (9210452 - Closed)	ROCHESTER GAS & ELECTRIC	ALLEN ST & MONTGOMERY ST, ROCHESTER, NY,	0.21/NNW	-9.0	This listing does not appear to be a REC based on the distance from the Site.

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
NY SPILLS (1610447 - Inactive)	ROCHESTER GAS AND ELECTRIC	55 TROOP ST, ROCHESTER, NY,	0.21/SE	15.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (8402516 - Closed)	RT 490 AT INNER LOOP MVA	ROUTE 490 AT INNER LOOP, ROCHESTER, NY,	0.23/WNW	-7.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (1507961 - Inactive)	ABANDONED DRIVEWAY SEALER TOTE	INNER LOOP RAMP TO I490 WEST BETWEEN PLYMOUTH AVE ON RIGHT SHOULDER, ROCHESTER, NY, 14604	0.23/WNW	-7.0	This listing does not appear to be a REC based on the distance from the Site.
LST (9207170 - Closed)	TORREY (MAUREEN) RESIDENC	93 1/2 SOUTH WASHINGTON, ROCHESTER, NY,	0.23/S	7.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (9706853 - Inactive)	FREDERICK DOUGLAS SITE	CLARISSA ST/ TROOP ST, ROCHESTER, NY,	0.23/SW	9.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (8903448 - Closed)	TOM'S ONE-HOUR DRY CLEAN	320 WEST MAIN STREET, ROCHESTER, NY,	0.23/W	7.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (8803163 - Closed)	NORY CONSTRUCTION	MAIN STREET BRIDGE, ROCHESTER, NY,	0.23/ENE	-15.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (0302206 - Inactive)	GENESEE RIVER	MAIN STREET BRIDGE, ROCHESTER, NY,	0.23/ENE	-15.0	This listing does not appear to be a REC based on the distance from the Site.

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
NY SPILLS (8080932 - Closed)	TANDY OIL COMPANY	MAIN STREET BRIDGE, ROCHESTER, NY, 14626	0.23/ENE	-15.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (0170513 - Inactive)	MONROE COUNTY 911	321 WEST MAIN STREET, ROCHESTER, NY, 14608	0.24/W	7.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (0070040 - Inactive)	MONROE COUNTY SHERIFF	180-182 EXCHANGE STREET, ROCHESTER, NY, 14614	0.24/ESE	4.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (0550305 - Closed)	150 STATE STREET	150 STATE STREET, ROCHESTER, NY, 14614	0.24/NNE	-17.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (0750690 - Inactive)	FORMER ELKS CLUB	285 CLARISSA STREET, ROCHESTER, NY, 14608	0.24/SW	9.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (1700275 - Inactive)	CSX ENGINE	MILE MARKER QC371.5 STATE ST AND ALLEN ST, ROCHESTER, NY,	0.24/N	-11.0	This listing does not appear to be a REC based on the distance from the Site.
NY SPILLS (0070200 - Inactive)	PUBLIC SAFETY BUILDING	185 EXCHANGE STREET, ROCHESTER, NY,	0.25/ESE	6.0	This listing does not appear to be a REC based on the distance from the Site.
SHWS (57976)	Artco Industrial Laundries	331-337 West Main Street, Rochester, NY, 14608	0.26/W	8.0	This listing does not appear to be a REC based on the distance from the Site.

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
SHWS (828102)	Artco Industrial Laundries	331-337 West Main Street, Rochester, NY, 14608	0.26/W	8.0	This listing does not appear to be a REC based on the distance from the Site.
BROWNFIELDS (C828102)	Former Artco Industrial Laundries	331-337 West Main Street, Rochester, NY, 14608	0.26/W	8.0	This listing does not appear to be a REC based on the distance from the Site.
CERCLIS (NYD981130032)	ARTCO INUDSTRIAL LAUNDRIES, INC.	333 W. MAIN ST., ROCHESTER, NY, 14608	0.26/W	8.0	This listing does not appear to be a REC based on the distance from the Site.
VCP (V00073)	RGE - Front St.	Front and Andrews Streets, Rochester, NY, 14614	0.27/NNE	-17.0	This listing does not appear to be a REC based on the distance from the Site.
LST (8906306 - Closed)	ROCHESTER GAS & ELECTRIC	FRONT & ANDREWS STREET, ROCHESTER, NY,	0.27/NNE	-17.0	This listing does not appear to be a REC based on the distance from the Site.
MGP (V00073)	RGE - Front St.	Front and Andrews Streets, Rochester, NY, 14614	0.27/NNE	-17.0	This listing does not appear to be a REC based on the distance from the Site.
LST (0070382 - Inactive)	CINTAS UNIFORM COMPANY	333 WEST MAIN STREET, ROCHESTER, NY,	0.27/WSW	8.0	This listing does not appear to be a REC based on the distance from the Site.
BROWNFIELDS (C828118)	Artco Industrial Laundries	333 West Main Street, Rochester, NY, 14604	0.27/WSW	8.0	This listing does not appear to be a REC based on the distance from the Site.

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
VCP (V00270)	Artco Industrial Laundries	333 West Main Street, Rochester, NY, 14604	0.27/WSW	8.0	This listing does not appear to be a REC based on the distance from the Site.
SEMS (NYD981130032)	ARTCO INUDSTRIAL LAUNDRIES, INC.	333 W. MAIN ST., ROCHESTER, NY, 14608	0.27/WSW	8.0	This listing does not appear to be a REC based on the distance from the Site.
PFAS (BSF0095)	Cintas Corp - Rochester	333 W Main St, Rochester, NY,	0.27/WSW	8.0	This listing does not appear to be a REC based on the distance from the Site.
LST (9204888 - Inactive)	REFINERS GAS STATION	362 WEST MAIN STREET, ROCHESTER, NY, 14608	0.30/W	5.0	This listing does not appear to be a REC based on the distance from the Site.
LST (9307363 - Closed)	ROCHESTER GAS & ELECTRIC	84 ANDREWS STREET, ROCHESTER, NY,	0.31/NNE	-23.0	This listing does not appear to be a REC based on the distance from the Site.
LST (9410290 - Inactive)	ROCHESTER GAS & ELECTRIC	84 ANDREWS STREET, ROCHESTER, NY,	0.31/NNE	-23.0	This listing does not appear to be a REC based on the distance from the Site.
LST (8181824 - Inactive)	ROCHESTER GAS & ELECTRIC	84 ANDREWS STREET/FRONTS, ROCHESTER, NY,	0.31/NNE	-23.0	This listing does not appear to be a REC based on the distance from the Site.
LST (9000159 - Closed)	FORD ST ASSOC PROPERTY	4 VANAUKER STREET, ROCHESTER, NY, 14608	0.32/WSW	6.0	This listing does not appear to be a REC based on the distance from the Site.

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
BROWNFIELDS (C828217)	65 Trowbridge Street Site	65 Trowbridge Street, Rochester, NY, 14608	0.36/W	3.0	This listing does not appear to be a REC based on the distance from the Site.
LST (8702841 - Closed)	ROCHESTER (C) FIRE DEPT	242 ALLEN STREET, ROCHESTER, NY,	0.37/WNW	-2.0	This listing does not appear to be a REC based on the distance from the Site.
SHWS (58775)	Mill Street Drums	208 Mill Street, Rochester, NY,	0.38/N	-22.0	This listing does not appear to be a REC based on the distance from the Site.
SHWS (828058)	Mill Street Drums	208 Mill Street, Rochester, NY,	0.38/N	-22.0	This listing does not appear to be a REC based on the distance from the Site.
BROWNFIELDS (C828206)	Canal Street Manufacturing Site	67 & 89 Canal Street, Rochester, NY, 14608	0.40/W	7.0	This listing does not appear to be a REC based on the distance from the Site.
VCP (V00001)	Speedy Cleaners- Court Street Site	Court Street, Rochester, NY,	0.42/E	26.0	This listing does not appear to be a REC based on the distance from the Site.
FUDS (C02NY1073)	NAVY & MARINE CNTR #1	, ROCHESTER, NY,	0.43/ESE	22.0	This listing does not appear to be a REC based on the distance from the Site.
BROWNFIELDS (C828184)	Carriage Factory	33 Litchfield Street, Rochester, NY, 14608	0.44/W	10.0	This listing does not appear to be a REC based on the distance from the Site.

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
BROWNFIELDS (C828184A)	Carriage Factory - Off-Site	33 Litchfield Street, Rochester, NY, 14608	0.44/W	10.0	This listing does not appear to be a REC based on the distance from the Site.
LST (7881018 - Closed)	RAE OIL COMPANY	195 ST PAUL BOULEVARD, ROCHESTER, NY,	0.45/NE	7.0	This listing does not appear to be a REC based on the distance from the Site.
LST (8804512 - Closed)	CONSTRUCTION SITE	CLINTON & BROAD STREET, ROCHESTER, NY, 14620	0.45/E	28.0	This listing does not appear to be a REC based on the distance from the Site.
RCRA TSD (NYD980784680)	EASTMAN KODAK COMPANY	343 STATE STREET, ROCHESTER, NY, 14650	0.45/NNW	-12.0	This listing does not appear to be a REC based on the distance from the Site.
CERCLIS (NYD043069996)	ROCHESTER GAS & ELECTRIC BEEBEE STATION	254 MILL ST, ROCHESTER, NY, 14614	0.46/NNW	-29.0	This listing does not appear to be a REC based on the distance from the Site.
CERCLIS NFRAP (NYD043069996)	ROCHESTER GAS & ELECTRIC BEEBEE STATION	254 MILL ST, ROCHESTER, NY, 14614	0.46/NNW	-29.0	This listing does not appear to be a REC based on the distance from the Site.
VCP (V00593)	RGE - West Station	254 Mill Street, Rochester, NY, 14614-	0.46/NNW	-29.0	This listing does not appear to be a REC based on the distance from the Site.
VCP (V00014)	RG&E - Beebee Station	254 Mill Street, Rochester, NY, 14445	0.46/NNW	-29.0	This listing does not appear to be a REC based on the distance from the Site.

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
LST (9006681 - Closed)	ROCHESTER GAS & ELECTRIC	254 MILL STREET BEEBEE STATION, ROCHESTER, NY, 14614	0.46/NNW	-29.0	This listing does not appear to be a REC based on the distance from the Site.
SHWS (828010)	RG&E - Beebee Station	254 Mill Street, Rochester, NY, 14445	0.46/NNW	-29.0	This listing does not appear to be a REC based on the distance from the Site.
SHWS (58961)	RG&E - Beebee Station	254 Mill Street, Rochester, NY, 14445	0.46/NNW	-29.0	This listing does not appear to be a REC based on the distance from the Site.
SEMS ARCHIVE (NYD043069996)	ROCHESTER GAS & ELECTRIC BEEBEE STATION	254 MILL ST, ROCHESTER, NY, 14614	0.46/NNW	-29.0	This listing does not appear to be a REC based on the distance from the Site.
SHWS (567734)	RGE - West Station	254 Mill Street, Rochester, NY, 14614-	0.46/NNW	-29.0	This listing does not appear to be a REC based on the distance from the Site.
SHWS (828205)	RGE - West Station	254 Mill Street, Rochester, NY, 14614-	0.46/NNW	-29.0	This listing does not appear to be a REC based on the distance from the Site.
MGP (V00593)	RGE - West Station	254 Mill Street, Rochester, NY, 14614-	0.46/NNW	-29.0	This listing does not appear to be a REC based on the distance from the Site.
SHWS (828186)	Former Silver Cleaners	245 Andrews Street, Rochester, NY, 14604	0.47/NE	20.0	This listing does not appear to be a REC based on the distance from the Site.

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
SHWS (480128)	Former Silver Cleaners	245 Andrews Street, Rochester, NY, 14604	0.47/NE	20.0	This listing does not appear to be a REC based on the distance from the Site.
BROWNFIELDS (C828186)	Silver Cleaners Site	245 Andrews Street, Rochester, NY, 14604	0.47/NE	20.0	This listing does not appear to be a REC based on the distance from the Site.
BROWNFIELDS (C828127)	Kirstein Building and Parking Lot	242 Andrews Street & 37 Bittner Street, Rochester, NY, 14604	0.47/NE	19.0	This listing does not appear to be a REC based on the distance from the Site.
BROWNFIELDS (C828195)	113-117 Clinton North	113-117 N Clinton Avenue, Rochester, NY, 14604	0.48/ENE	22.0	This listing does not appear to be a REC based on the distance from the Site.
LST (8707019 - Closed)	KODAK/JAMRO SERVICE CTR	118 BROWN STREET, ROCHESTER, NY,	0.49/NW	-2.0	This listing does not appear to be a REC based on the distance from the Site.
RCRA CORRACTS (NYD000799247)	BURROUGHS CORPORATION-RSP	215 TREMONT AVE, ROCHESTER, NY, 14608	0.51/SW	15.0	This listing does not appear to be a REC based on the distance from the Site.
SHWS (526194)	Former Hall-Welter Site	38-46 Mt. Hope Avenue, Rochester, NY, 14620	0.56/SE	8.0	This listing does not appear to be a REC based on the distance from the Site.
SHWS (828194)	Former Hall-Welter Site	38-46 Mt. Hope Avenue, Rochester, NY, 14620	0.56/SE	8.0	This listing does not appear to be a REC based on the distance from the Site.

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
HSWDS (HS8012)	Erie Canal Industrial Park B2	Smith and Oak Streets Rochester 14608, , NY,	0.72/WNW	-1.0	This listing does not appear to be a REC based on the distance from the Site.
HSWDS (HS8012)	Erie Canal Industrial Park	Smith and Oak Streets Rochester 14608, , NY,	0.72/WNW	-1.0	This listing does not appear to be a REC based on the distance from the Site.
HSWDS (HS8012)	Erie Canal Industrial Park B2	Smith and Oak Streets Rochester 14608, , NY,	0.72/WNW	-1.0	This listing does not appear to be a REC based on the distance from the Site.
SHWS (338881)	Erie Canal Industrial Park	524 Oak, 480 Smith, & 900 W. Broad Sts., Rochester, NY, 14608	0.83/WNW	-3.0	This listing does not appear to be a REC based on the distance from the Site.
SHWS (828087)	Erie Canal Industrial Park	524 Oak, 480 Smith, & 900 W. Broad Sts., Rochester, NY, 14608	0.83/WNW	-3.0	This listing does not appear to be a REC based on the distance from the Site.
MGP (V00594)	RGE - Canal St.	Canal Street, Rochester, NY, 14608-	0.85/NNE	0.0	This listing does not appear to be a REC based on the distance from the Site.
SHWS (440986)	Former Elite Vogue Dry Cleaners	527-533 East Main Street, Rochester, NY, 14604	0.87/ENE	14.0	This listing does not appear to be a REC based on the distance from the Site.
SHWS (828164)	Former Elite Vogue Dry Cleaners	527-533 East Main Street, Rochester, NY, 14604	0.87/ENE	14.0	This listing does not appear to be a REC based on the distance from the Site.

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
SHWS (58263)	Former Rochester Metal Etching Company	100 Lake Avenue, Rochester, NY, 14608	0.90/NW	-13.0	This listing does not appear to be a REC based on the distance from the Site.
SHWS (828100)	Former Rochester Metal Etching Company	100 Lake Avenue, Rochester, NY, 14608	0.90/NW	-13.0	This listing does not appear to be a REC based on the distance from the Site.
HSWDS (HS8049)	Rochester Metal Etching	100 Lake Ave Rochester 14608, , NY,	0.90/NW	-13.0	This listing does not appear to be a REC based on the distance from the Site.
HSWDS (HS8049)	Rochester Metal Etching	100 Lake Ave Rochester 14608, , NY,	0.90/NW	-13.0	This listing does not appear to be a REC based on the distance from the Site.
HSWDS (HS8049)	Rochester Metal Etching	100 Lake Ave Rochester 14608, , NY,	0.90/NW	-13.0	This listing does not appear to be a REC based on the distance from the Site.
SHWS (567727)	RGE - East Station	Suntru Street, Rochester, NY, 14605	0.91/NNW	-98.0	This listing does not appear to be a REC based on the distance from the Site.
SHWS (828204)	RGE - East Station	Suntru Street, Rochester, NY, 14605	0.91/NNW	-98.0	This listing does not appear to be a REC based on the distance from the Site.

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
MGP (V00358)	RGE - East Station	Suntru Street, Rochester, NY, 14605	0.91/NNW	-98.0	This listing does not appear to be a REC based on the distance from the Site.
SHWS (57004)	Former Raeco Products	24 Spencer Street, Rochester, NY, 14608	0.93/NNW	-27.0	This listing does not appear to be a REC based on the distance from the Site.
SHWS (828107)	Former Raeco Products	24 Spencer Street, Rochester, NY, 14608	0.93/NNW	-27.0	This listing does not appear to be a REC based on the distance from the Site.

Due to the urban nature of the area in which the Site is located, the spills search radius has been reduced from 0.50 mile to 0.25 mile, per ASTM E1527-13.

5.1.2 Site Listings

19 South Plymouth Avenue/West Main Street

Former Cumberland Farms - NYSDEC Spill #9314846 (Closed)

According to this spill listing, dated March 17, 1994, contaminated soil was encountered during the removal of a 1,000-gallon fiberglass UST. The Site was formerly utilized as a gasoline filling station. Contaminated soils were excavated until confirmatory samples were non-detect. The NYSDEC did not require further action and the spill was closed on November 1, 1994.

30 South Plymouth Avenue (81-97 West Main Street)

Mariner Site - NYSDEC PBS #8-601455

The following table summarizes the NYSDEC PBS Facility Information listing associated with the Site.

Tank No.	Location	Capacity (gallons)	Product Stored	Tank Type	Secondary Containment	Date Installed	Status
001	Underground	500	Gasoline	01 - Steel/ Carbon Steel/ Iron	None	Not listed	Closed - Removed March 1, 2010

002	Underground	1,000	Gasoline	01 - Steel/ Carbon Steel/ Iron	None	Not listed	Closed - Removed March 1, 2010

Main & Plymouth Avenue - NYSDEC Spill #0708687 (Inactive)

According to this spill listing, dated November 9, 2007, contaminated soils and two tanks were encountered during a Phase II investigation completed by LaBella in February 2008. Remedial activities completed in March 2010 included the decommissioning of four orphan underground storage tanks (USTs) and the removal of 1,290-tons of contaminated soils. Residual contamination was left along a north wall as it was limited by the West Main Street Right-of Way. Residual contamination was also identified in the groundwater. A Soil and Groundwater Management Plan (SGMP) was prepared and approved by the NYSDEC. The NYSDEC inactivated the spill on April 16, 2010.

A copy of the SGMP is included in Appendix 1.

87-89 West Main Street

Old Rochester Hotel - NYSDEC PBS #8-600710

The following table summarizes the NYSDEC PBS Facility Information listing associated with the Site.

Tank No.	Location	Capacity (gallons)	Product Stored	Tank Type	Secondary Containment	Date Installed	Status
001	Underground	10,000	#6 fuel oil (on-site consumption)	01 - Steel/ Carbon Steel/ Iron	None	Not listed	Closed - Removed February 1, 2000

103 West Main Street

Rotary Site - NYSDEC PBS #8-601456

The following table summarizes the NYSDEC PBS Facility Information listing associated with the Site.

Tank No.	Location	Capacity (gallons)	Product Stored	Tank Type	Secondary Containment	Date Installed	Status
001	Underground	3,000	Gasoline	01 - Steel/ Carbon Steel/ Iron	None	Not listed	Closed - Removed March 10, 2010

002	Underground	3,000	Gasoline	01 - Steel/ Carbon Steel/ Iron	None	Not listed	Closed - Removed March 10, 2010
003	Underground	3,000	Gasoline	01 - Steel/ Carbon Steel/ Iron	None	Not listed	Closed - Removed March 10, 2010
004	Underground	1,000	Gasoline	01 - Steel/ Carbon Steel/ Iron	None	Not listed	Closed - Removed March 10, 2010

99 West Main Street (103 West Main Street)

Broad & Plymouth LLC - NYSDEC Spill #0708686 (Inactive)

According to this spill listing, dated November 9, 2007, a Phase II investigation identified contaminated soils and two orphan USTs, one 1,000-gallon and one 500-gallon tanks. Remedial action included the decommissioning and removal of the USTs and the removal of impacted soils. Impacted soils were removed until NYSDEC cleanup objectives were met, except for the western sidewall of the excavation area along the South Plymouth Avenue Right-of-Way. Non-impacted soils were separated for use as fill material. Residual contamination on-Site should be handled under the Soil Management Plan (SMP) prepared by Labella in 2010. The SMP provides guidance in the identification and management of petroleum-impacted soil that may be encountered during potential future construction-related excavations at the Site. Based on the remedial action completed at the Site and SMP in place, the NYSDEC did not require further action and the spill was inactivated on March 31, 2010. The status of the spill is subject to reactivation should new information become available, or if impacts are discovered in the future. If impacted soil is uncovered or encountered, the NYSDEC must be notified and the SMP must be followed.

Copies of the SMP and NYSDEC closure letter are included in Appendix 1.

140, 146, 150 West Broad Street (16 South Washington Street)

140, 146, 150 West Broad Street - NYSDEC Spill #0270428 (Inactive)

According to this spill listing, dated October 25, 2002, three subsurface investigations completed at the Site indicated the presence of low-level petroleum contamination in the soils. It was noted that the Site was utilized as a gasoline filling station from the early 1920's through 1952 with records indicating the presence of one 1,000-gallon UST and two 550-gallon USTs. Records reviewed by the NYSDEC did not indicate that the tanks had been removed and subsurface investigations did not identify the presence of these tanks, only the presence of low-level petroleum contamination. The

NYSDEC approved for contaminated soils to be addressed at the time of future development. The spill was inactivated on February 5, 2004.

A CREC has been identified associated with NYSDEC Spill #0708687, 0708686, and 0270428 regarding known contamination on-Site. Residual contamination left under spill #0708687 and 0708686 is to be handled as outlined in the March 2010 SMP. As of the date of this report submission LaBella has not received information regarding the remediation of spill #0270428. Guidance from the NYSDEC may be warranted regarding the remediation of known low-level petroleum contamination on-Site.

5.1.3 Adjacent Property Listings

Adjacent North - 50 West Main Street

RIT City Center - RCRA Generator ID #NYD987020229

The property is a listed RCRA Non Gen. The presence of the property on this listing implies that the property formerly generated hazardous waste but does not currently do so. The listing does not imply that the release of hazardous waste has occurred to the subsurface of the property. Violations were not identified as of April 2021.

Monroe County Yardwaste Composing - Activity #[28Y08]

Solid Waste Information Management System (SWIMS) is an inventory containing active and inactive facilities throughout the state. This list is made available by Department of Environmental Conservation's Solid Waste Information Management System (SWIMS). The property is listed as an inactive yard waste composting facility.

Based on the lack of evidence of release, there does not appear to be a REC associated with this north adjacent property.

Adjacent North - 116 West Main Street

Martini Construction - NYSDEC Spill #1215841 (Closed)

According to this spill listing, dated February 25, 2013, a defective dispenser nozzle leaked diesel fuel to the pavement from a temporary 500-gallon aboveground storage tank. The spill was cleaned up using sawdust. No further action was required by the NYSDEC and the spill was closed on February 26, 2013.

Based on the clean up of the spill and closed status, there does not appear to be a REC associated with this north adjacent property.

Adjacent North - 140 West Main Street

Datco Industries Inc - RCRA Generator ID #NYD067910349

The property is a listed RCRA Non Gen. The facility handled spent nonhalogenated solvents in 1980. Violations were not identified as of April 2021.

Based on the nature of the regulatory listing and lack of evidence of release, there does not appear to be a REC associated with this north adjacent property.

Adjacent North – Intersection of West Main Street and South Plymouth Avenue

Silverole Vehicle - NYSDEC Spill #1800097 (Inactive)

According to this spill listing, dated April 4, 2018, hydraulic oil was spilled from a truck to the paved roadway. A small amount of oil was located on a storm sewer grate cover. Speedy dry was used to clean up the spill. The responsible party was to have swept up and properly disposed of the waste. A no further action letter was issued and the spill was closed on April 4, 2018.

Based on the apparent cleanup and inactive status of the spill, there does not appear to be a REC associated with this north adjacent property.

Adjacent East - 13 South Fitzhugh Street

Edwards Restaurant - NYSDEC Spill #9714269 (Inactive)

According to this spill listing, dated March 22, 1998, a 55-gallon drum was being used to store used cooking oil. The owner of the restaurant was notified and was told to dispose of the cooking oil properly. The MCHD was going to follow up on the disposal. The spill was inactivated on March 25, 1998.

Based on the nature of this spill listing, there does not appear to be a REC associated with this east adjacent property.

Adjacent East - 17 South Fitzhugh Street

St. Luke St. Simon Church - RCRA Generator ID #NYR000043067

The property is a listed RCRA Non Gen. The facility handled lead in 1997. Violations were not identified as of April 2021.

Based on the nature of the regulatory listing and lack of evidence of release, there does not appear to be a REC associated with this east adjacent property.

Adjacent South - 131 West Broad Street

Rochester City Schools District - Facility ID #110011778610

The USEPA Facility Registry Service (FRS) is a centrally-managed database that identifies facilities or places subject to environmental regulations or of environmental interest. FRS creates high-quality, accurate, and authoritative facility identification records through rigorous verification and management procedures that incorporate information from program national systems, state master facility records, and data collected from USEPA's Central Data Exchange registrations and data management personnel. The property is identified in the FRS database in association with the National Compliance Database (NCDB) listings.

Rochester City School District - NYSDEC PBS #8-381411

The following table summarizes the NYSDEC PBS Facility Information listing associated with the property.

Tank No.	Location	Capacity (gallons)	Product Stored	Tank Type	Secondary Containment	Date Installed	Status
023	Underground	10,000	#2 fuel oil (on-site consumption)	01 - Steel/ Carbon Steel/ Iron	None	December 1, 1977	Closed - Removed July 1, 1992

Rochester School District - NYSDEC Spill #9213309 (Closed)

According to this spill listing, dated March 1, 1993, an elevator failure caused hydraulic oil to spill from the lift shaft into the shaft boring below the building. New equipment was installed and disposal receipts were received by the NYSDEC. No further action was required and the spill was closed on May 18, 1995.

Based on the nature of the spill and closed status, there does not appear to be a REC associated with this south adjacent property.

Adjacent South - 85 West Broad Street

Monroe County Crime Laboratory - Facility ID #110067548684

The property is identified in the FRS database in association with the Resource Conservation and Recovery Act (RCRA) listings.

Monroe County Crime Laboratory - RCRA Generator and Manifest ID #NYR000226290

The property is a listed RCRA Very Small Quantity Generator (VSQG). The presence of the property on this listing implies that the property generates 100 kilograms or less per month of hazardous waste, or 1 kilogram or less per month of acutely hazardous waste. The listing does not imply the release of hazardous waste has occurred to the subsurface of the property. The property handled lead in 2016. Violations were not identified as of April 2021.

Additionally, the property is listed on the New York Hazardous Waste Manifest. The database has been compiles from hazardous waste manifest shipments to, from, or within New York State. The Bureau of Program Management in the Division of Environmental Remediation is responsible for maintaining hazardous waste manifest records. The property generated lead in 2016.

Based on the nature of the regulatory listings and lack of evidence of release, there does not appear to be a REC associated with this south adjacent property.

Adjacent South - 101 South Plymouth Avenue

County Parking Lot - NYSDEC Spill #1401205 (Closed)

According to this spill listing, dated May 5, 2014, less than one ounce of mercury was estimated to have been spilled from an unknown source onto the county parking lot. A mercury spill kit was used to clean up the spill. The spill was closed on May 6, 2014.

Based on the cleanup of the spill and closed status, there does not appear to be a REC associated with this south adjacent property.

Adjacent South - 130 South Plymouth Avenue

Monroe County Sherrif's Department - NYSDEC PBS #8-051292

The following table summarizes the NYSDEC PBS Facility Information listing associated with the property.

Tank No.	Location	Capacity (gallons)	Product Stored	Tank Type	Secondary Containment	Date Installed	Status
001	Underground	1,000	Gasoline	01 - Steel/ Carbon Steel/ Iron	None	December 1, 1984	Closed - Removed August 1, 1999
002	Underground	8,000	Diesel	01 - Steel/ Carbon Steel/ Iron	None	February 1, 1985	Closed - Removed August 1, 1999

Rochester Police Department - NYSDEC Spill #8900514 (Closed)

According to this spill listing, dated April 17, 1989, approximately 30-gallons of hydraulic oil was spilled from a truck to the ground. The spill was reportedly cleaned up and the materials were placed into a drum. No further action was required by the NYDEC and the spill was closed on April 17, 1989.

Monroe County Jail - NYSDEC Spill #9108228 (Closed)

According to this spill listing, dated October 1991, petroleum contamination was encountered during a jail expansion project. Contamination was suspected to have been from a waste oil UST 100-feet from the excavated area. The waste oil tank was removed. The NYSDEC checked the excavated areas and did not identify evidence of contamination. The soil was to be tested and properly disposed. The spill was closed on November 4, 1991.

Monroe County Jail - NYSDEC Spill #9201435 (Closed)

According to this spill listing, dated April 28, 1992, gasoline contaminated soil was encountered during a jail expansion project. Monroe County planned to remove two USTS (one 1,000-gallon and one 8,000-gallon). Remediation was handled under spill #9206456 below. The spill was closed on December 30, 1992.

Monroe County Jail - NYSDEC Spill #9206456 (Closed)

According to this spill listing, dated September 2, 1992, contamination was encountered in the vicinity of a 1,000-gallon gasoline UST that was going to be closed in place. It was noted that groundwater contamination had been previously encountered during a construction project. A passive vapor extraction system (VES) was installed. Readings from the VES were collected in April and July of 1994. The readings were not detected above background levels. Based on these readings, the NYSDEC did not require further action and the spill was closed on August 1, 1994.

Monroe County Jail - NYSDEC Spill #9814809 (Inactive)

According to this spill listing, dated March 12, 1999, an oil stain was located on a basement wall and floor. An 8,000-gallon UST was located adjacent to the area. The UST stored fuel oil for an emergency generator at the jail. Free product or a petroleum odor was not located in the basement, or the sump pump in an adjacent shop. The UST was removed as part of the jail expansion. Approximately 270-tons of soil was excavated and properly disposed. Soil samples were collected from each sidewall of the excavation area. A bottom sample was not collected as the excavation reached bedrock. A follow up of the spill is listed under spill #9870479 below. The spill was inactivated on July 23, 1999.

Monroe County Jail - NYSDEC Spill #9870479 (Inactive)

According to this spill listing, dated February 1, 1999, contaminated soils were encountered while excavating soils to place new water lines. A sample collected indicated diesel fuel contamination. A diesel UST was located approximately 40-feet away from the excavated area. All USTs in the area were removed; one 1,000-gallon and one 8,000-gallon UST (PBS #8-051292). An additional 12,000-gallon UST (PBS #8-393592) was also to have been removed. Based on the review of soil removal activities, past subsurface investigations, and analytical results, the spill was closed on April 28, 2005.

Based on the closed and inactive statuses and apparent clean up of contaminated soils, there does not appear to be a REC associated with this south adjacent property. However, as with any Site located in the immediate vicinity of several reported NYSDEC spills, CSD Housing LLC should be aware of the potential for the migration of residual subsurface impairment to the Site from this adjacent property.

Adjacent South - 150 Plymouth Avenue

Public Safety Building Laboratory - RCRA Generator ID #NYD981481013

The property is a listed RCRA Very Small Quantity Generator (VSQG). The facility handled corrosive waste, tetrachloroethylene, spent halogenated solvents, carbon disulfide, acetaldehyde (I) or ethanol (I), 1-Butanol (I) or n-butyl alcohol, chloroform or methane, trichloro-, benzene, hexahydro-(I) or cyclohexane, methane, dichloro- or methylene chloride, acetic acid, ethyl ester (I) or ethyl acetate (I), formaldehyde, 1-propanol, 2-methyl-(I,T) or isobutyl alcohol (I,T), methanol (I) or methyl alcohol, 2-butanone (I,T) or methyl ethyl ketone (MEK) (I,T), pyridine, carbon tetrachloride or methane, tetrachloro-, benzene, methyl- or toluene, benzene, dimethyl-(I,T) or xylene (I) in 1991. No violations were identified as of April 2021.

City of Rochester Public Safety Building - NYSDEC PBS #8-393592

The following table summarizes the NYSDEC PBS Facility Information listing associated with the property.

Tank No.	Location	Capacity (gallons)	Product Stored	Tank Type	Secondary Containment	Date Installed	Status
001	Underground	12,000	Gasoline	01 - Steel/ Carbon Steel/ Iron	Double-walled (underground)	June 1, 1986	Closed - Removed July 1, 1999

Public Safety Building - NYSDEC Spill #8280094 (Inactive)

According to this spill listing, dated April 15, 1982, a nozzle fell out of a filler pipe while a UST was being filled. Approximately 10-gallons of product was spill to the pavement. The fire department flushed the product to the storm sewer. The spill was inactivated on April 22, 1982.

Public Safety Building - NYSDEC Spill #8503272 (Closed)

According to this spill listing, dated December 12, 1985, a fuming yellow liquid was reported to have been spilled. Upon further investigation the substance was actually water from a water line break. No cleanup was necessary and the spill was closed on June 1, 1986.

Crossett Inc - NYSDEC Spill #8705097 (Closed)

According to the spill listing, dated September 15, 1987, a tank was overfilled and approximately two-gallons of gasoline was spilled to the ground. The spilled product was flushed from the area and the spill was closed on September 16, 1987.

Rochester Public Safety - NYSDEC Spill #9211980 (Closed)

According to this spill listing, dated January 18, 1993, fumes were noticed in the public safety building. Upon further investigation the fumes were from a floor sealer being used at the time and lack of proper ventilation. There was not a release to the environment identified. The spill was closed on January 19, 1993.

Public Safety Building - NYSDEC Spill #9307558 (Closed)

According to this spill listing, dated September 17, 1993, gasoline spilled from a gasoline pump onto the pavement. An absorbent was applied to clean up the spill. No further action was required by the NYSDEC and the spill was closed on September 17, 1993.

Public Safety Building - NYSDEC Spill #9706970 (Inactive)

According to this spill report, dated September 10, 1997, an environmental assessment identified contamination in two borings that exceeded Spills Technology and Remediation Series (STARS) Memo #1. The 12,000-gallon UST underwent tightness testing and failed. A union on the tank vent line was repaired the tank passed additional testing. The contaminated soil and the UST were removed during the jail expansion project (see also spill #9814809 and 9870479). Contaminated soil identified in a previous test pit investigation was excavated and removed from the property for disposal. Groundwater was not encountered. Based on the review of the spill investigation and remediation closure report, and past subsurface investigations, the spill was inactivated on January 15, 2008.

Waste Management - NYSDEC Spill #1111775 (Closed)

According to this spill listing, dated January 6, 2012, a ruptured line on an automobile spilled 10-gallons of oil to the asphalt. Speedy dry was used to clean up the spill. No further action was required by the NYSDEC and the spill was closed on January 1, 2012.

Based on the closed and inactive statuses and apparent clean up of contaminated soils, there does not appear to be a REC associated with this south adjacent property. However, as with any Site located in the immediate vicinity of several reported NYSDEC spills, CSD Housing LLC should be aware of the potential for the migration of residual subsurface impairment to the Site from this adjacent property.

Adjacent South – Intersection of South Plymouth Avenue and West Broad Street

Plymouth Road - NYSDEC Spill #7981925 (Closed)

According to this spill listing, dated October 29, 1979, fumes were affecting the basement of the Mariner Hotel and fumes were suspected to have been caused by a leaking UST at a gasoline filling station on the corner of South Plymouth Avenue and West Broad Street. The UST was tested. No further information was provided in the ERIS Database Report. The spill was closed on October 31, 1979.

Based on the nature of the spill and closed status, there does not appear to be a REC associated with this south adjacent property.

Adjacent West - 1 South Washington Street

Bergmann Associates NA P.C. - Facility ID # 110019641253

The property is identified in the FRS database in association with the New York Facility Information System (FIS) listings pertaining to an air program.

Bergman Associates - NYSDEC Spill #8901885 (Closed)

According to this spill listing, dated May 19, 1989, six to eight five-gallon pails containing an unknown substance were abandoned at the facility. Some of the substance leaked from the pails, however the medium affected by the spill was not specified. The substance was suspected to have been oil or glycol used to clean cooling towers The spill was referred to the Abandoned Drum Program and was closed on May 24, 1989.

Based on the nature of the spill and closed status, there does not appear to be a REC associated with this west adjacent property.

5.1.4 Surrounding Properties

Nearby West Adjacent - 179-191 West Main Street

179-191 West Main Street - Federal Brownfield #105121

Brownfields are real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Cleaning up and reinvesting in these properties protects the environment, reduces blight, and takes development pressures off greenspaces and working lands. This database is made available by the United States Environmental Protection Agency (EPA).

The property was assessed in June 2009 and was identified as a former gasoline station and a laundromat or dry cleaning facility. An inactive spill (#0911013) was identified as associated with this property. According to the inactive spill report, dated January 12, 2010, petroleum impacted soil was encountered during the removal of an approximately 350-gallon UST from the parking lot. An Environmental Investigation and Corrective Action Plan, prepared by LaBella in March 2010, was

received by the NYSDEC for review. Contaminated soil was excavated and transported to Mill Seat Landfill. Soil samples were collected from the sidewalls of the excavation and analyzed. Results were submitted for review and a Soil Management Plan (SMP) was to be prepared. A closure letter was issued by the NYSDEC on June 10, 2010. No further information was provided in the ERIS Database Report listing.

Based on the inactive status of the spill and the implementation of an SMP, there are no apparent RECs related to regulatory records identified associated with the west nearby property at this time.

Nearby West Adjacent - 201-217 West Main Street

201-217 West Main Street - Federal Brownfield #105122

The property was assessed in June 2009 and was identified as a former dry-cleaning facility. No further information was provided in the ERIS Database Report listing.

Based on the lack of records of release and the implementation of an SMP, there are no apparent RECs related to regulatory records identified associated with the west nearby property at this time.

5.1.5 Unplottable Listings

A total of 42 unmapped facilities from various databases, of which 33 were attributed to closed or inactive spills are potentially located within a 0.5-mile radius of the Site. These listings are considered "unmapped" as such have an incomplete or inaccurate address; therefore, the specific location of the listings could not be determined. Based on the limited address information available for the listings, they do not appear to be located on the Site or adjacent properties.

5.1.6 Assessment of the Potential for Vapor Encroachment Condition

Vapor intrusion is the entry of volatile organic compounds (VOCs) to indoor air from underlying contamination in soil and groundwater. The goal of conducting a vapor encroachment screening (VES), as established by this guide, on a parcel of
property is to identify a vapor encroachment condition (VEC),

A vapor encroachment condition (VEC) is the presence or likely presence of any chemical(s) of concern (COC) in the indoor air environment of existing or planned structures on a property caused by the release of vapor from contaminated soil or groundwater either on the property or within close proximity to the property, at a concentration that presents or may present an unacceptable health risk to occupants. A COC is a chemical in the subsurface environment that is known or reasonably expected to be present, that can potentially migrate as a vapor into an existing or planned structure on a Site, and that is generally recognized as having the potential for an adverse impact on human health. COC generally meet specific criteria for volatility and toxicity, and include volatile organic compounds, semi-volatile organic compounds and volatile inorganic analytes (such as mercury).

The area of concern is the area closely and completely surrounding a Site, plus the area further away but only hydrogeologically up-gradient from a Site that, if sources of known or suspect contamination with COC are identified within, could result in a VEC at the target property. For Tier 1 screening purposes, the up-gradient area may be inferred by the environmental professional based upon groundwater flow direction experience in the area, hydrogeological and hydrologic considerations, topographical gradients, and/or available groundwater flow information collected in Phase II delineation of contamination reports associated with nearby contaminated sites.

LaBella conducted a Tier 1 VEC in accordance with ASTM 2600-15 for the Site. Each listing was evaluated for a VES based on distance, gradient/presumed and/or known groundwater flow, COC released, nature of release, media impacted (i.e. soil and/or groundwater), remediation reported to have been conducted, and regulatory status of release. A copy of the Vapor Report with Database Details is included in Appendix 1.

Based on the results of this Tier 1 VES, it appears unlikely that a vapor intrusion concern is present in connection with nearby releases. Based on distance, gradient/presumed groundwater flow, COC released, nature of release, media impacted (i.e. soil and/or groundwater), remediation reported to have been conducted, and regulatory status of the releases identified within the area of concern do not appear to represent a VES to the Site at this time. Based on the results of this Tier 1 VES, no further VES Tiers appears warranted at this time.

5.2 Additional Environmental Record Sources

5.2.1 Review of Previous Environmental Reports

Previous environmental reports obtained are discussed in Section 5.1.2.

5.2.2 Other Records

No other records were obtained or were reasonably ascertainable for review.

5.3 Historical Resources Reviewed

LaBella attempted to review reasonably ascertainable and readily available standard sources of historical information as defined by the ASTM Standard Practice E1527-13 in order to identify all obvious uses of the Site back to the first developed use or 1940, whichever is earlier (i.e., the historical research objective according to ASTM). Uses of the properties adjacent to the Site are identified in this report only to the extent that this information is revealed in the course of researching the Site itself and were determined at the discretion of the Environmental Analyst. As such, LaBella reviewed only as many of these sources as necessary to achieve the historical research objective. It should be noted that the lack of availability of reasonably ascertainable and readily available standard ASTM required sources have the potential to affect the findings of this assessment and can impact

the ability of the Environmental Professional or Analyst to identify RECs and may result in a data failure (defined in Section 1.4.1 of this report). A data failure may represent a significant data gap. Data failures and data gaps are identified, defined, and evaluated for their significance in Section 1.4 of this report. Standard historical sources LaBella attempted to review are outlined in the table below.

Historical Source	Years Reviewed	Source / Comments
Fire Insurance Maps	1892, 1912, 1938, 1950, and 1971	ERIS
Aerial Photographs	1930, 1951, 1960, 1969, 1971, 1981, 1994, 2004, 2006, 2008, 2009, 2011, 2013, 2015, 2017, and 2019	ERIS
City Directories	1926, 1930, 1935, 1940, 1945, 1950, 1955, 1959, 1965, 1970, 1975, 1980, 1985, 1990, 1995, 1998, 2000, 2005, 2008, 2012, 2016, and 2020	ERIS
Municipal Records	Not applicable	City of Rochester, Landmax Data Systems Inc., and Monroe County GIS website
Topographic Maps	1895, 1898, 1912, 1920, 1931, 1935, 1952, 1969, 1971, 1978, and 2016	ERIS

5.3.1 Sanborn Fire Insurance Maps

The apparent historical use of the Site, as depicted by the Sanborn maps, is summarized in the table below. Copies of the Sanborn maps are included in Appendix 2.

Northwest Parcels

Address	Date	Apparent Use/Occupancy
119-145 West Main Street 6-12 South Washington Avenue	1892	The parcels were developed with row-type buildings occupied by commercial stores, a warehouse, harvesting machines, a carriage factory with a blacksmith and printing shop, and an ink factory.
119-145 West Main Street 2-12 South Washington Avenue	1912	The parcels were developed with row-type buildings that were occupied by commercial stores, a tire vulcanizing shop, an auction house, a warehouses, a tin shop, a paper box manufacturing shop, and a chemist manufacturer.
119-141 West Main Street 4-12 South Washington Avenue	1938	The parcels were developed with row-type buildings that were occupied by commercial stores, a motorcycles sales and services shop, and a warehouse.
119-141 West Main Street 4-12 South Washington Avenue	1950	The parcels were developed with row-type buildings that were occupied by commercial stores, a paint and varnish shop, a restaurant, a cigar factory, and a potato chip factory.
129-141 West Main Street 4-12 South Washington Avenue	1971	The parcels were developed with a parking lot and a building occupied by commercial stores, a restaurant, and storage.

Southwest Parcel

Address	Date	Apparent Use/Occupancy
Not addressed	1892	The parcel was developed with two warehouses.
18 South Washington Avenue	1912	The parcel was developed with one warehouse and one building used to store oil and brooms.
16 South Washington Avenue 136-154 Broad Street	1938	The parcel was developed with a building occupied by commercial stores, a motor freight station, a tire sales and service shop, and a gasoline filling station. Three gasoline tanks were depicted on the west portion of the parcels.
16 South Washington Avenue 136-154 Broad Street	1950	The parcel was developed with a building occupied by a commercial store, a motor freight station, a restaurant, a church, and a labor union hall, and a gasoline filling station. Three gasoline tanks were depicted on the west portion of the parcels.
16 South Washington Avenue 136-154 Broad Street	1971	The parcel was developed with a parking lot and a building used as a loft, restaurant, and a labor union hall.

Central Parcels

Address	Date	Apparent Use/Occupancy
107 - 117 West Main Street	1892	The parcels were developed with row-type buildings occupied by a livery, a carriage repository, a steam laundry shop, and an undertaker.
107 - 117 West Main Street	1912	The parcels were developed a row-type building occupied by commercial stores, an auto repair shop, a parking garage, and an office.
105 - 117 West Main Street	1938	The north portion was developed with a building occupied by commercial stores and a gasoline filling station with a car wash, grease pit, and one gasoline tank. The south portion was developed with a parking garage and a gasoline filling station with four gasoline tanks.
105 - 117 West Main Street 110 Broad Street	1950	The north portion was developed with a building occupied by a gasoline filling station with a car wash, grease pit, and one gasoline tank. The south portion was developed with a parking garage and a gasoline filling station with four gasoline tanks.
109 West Main Street	1971	The parcels were developed with a parking lot and a gasoline filling station.

East Parcel

Address	Date	Apparent Use/Occupancy
71-87 West Main Street	1892	The parcel was developed with the Consitory Hall occupied by commercial stores, a public hall, a printing shop, and storage. The parcels were also developed with the National Hotel.
73-93 West Main Street 20-30 South Plymouth Avenue	1912	The parcel was developed with Hotel Rochester and the Sam S. Shobert Theater including a pool room, saloon, and a livery.
81-93 West Main Street 20-30 South Plymouth Avenue	1938 1950	The north portion was developed with the Hotel Rochester, Capitol Theater, commercial stores, and a photo shop. The south portion was developed with a parking garage with two gasoline tanks.
81-93 West Main Street	1971	The north portion was developed with the Hotel Rochester, Capitol Theater, commercial stores, and a photo shop. The south portion was used as a parking lot.

According to the Sanborn maps, the adjacent properties were historically utilized for commercial, educational, religious, residential, and undeveloped purposes. The following adjacent property uses of potential concern were identified.

- The west adjacent property historically addressed as 149 West Main Street was identified as a coal yard in at least 1892.

- The adjacent property historically addressed as 99 West Main Street was identified as a printing shop in at least 1912.
- The adjacent property historically addressed as 15 South Plymouth Avenue was identified as a leather working shop in at least 1912.
- Seven gasoline tanks were located immediately east of the portion of the Site addressed as 105 West Main Street in at least 1938 and 1950. The gasoline tanks appears to be associated with the gasoline filling station located on the Site.
- One gasoline tank was located immediately east of the portion of the Site addressed as 29 South Plymouth Avenue in at least 1938 and 1950. The gasoline tank appears to be associated with the gasoline filling station located on the Site.
- The southwest adjacent property historically addressed as 201 Broadway was identified as a gasoline filling station including five gasoline tanks, and a washing and grease pit in at least 1938.
- The south adjacent property historically addressed as 89 and 101 Broadway was identified as a gasoline filling station in at least 1938. Four gasoline tanks were depicted on the property in at least 1938 and two gasoline tanks in 1950.
- The northeast adjacent property addressed as 150 and 152 West Main Street was identified as a paint and varnish shop in at least 1950 and 1971.
- The north adjacent property addressed as 100 and 102 West Main Street was identified as a used auto sales business with an auto repair shop and paint and varnish building in at least 1950.
- One gasoline tank was located on the east adjacent property historically addressed as 68 Broadway in at least 1938 and 1950.

5.3.2 Aerial Photography

The table below outlines observations of the Site obtained from the review of aerial photographs. Copies of aerial photographs are included in Appendix 3.

Date	Observation
1930	The Site appeared to be densely developed. Based on the quality of the historical aerial photograph, no further pertinent information could be discerned.
1951	The Site appeared to be densely developed with several buildings and parking lots.
1960	The Site appeared to be densely developed. Based on the quality of the historical aerial photograph, no further pertinent information could be discerned.
1969	The buildings were removed from the central parcels and the south portion of the east parcels. The remainder of the Site appeared unchanged.

Date	Observation
1971	A building was constructed on the central parcels. The remainder of the Site appeared unchanged.
1981 and 1994	A building was removed from the east portion of the eastern parcels. The remainder of the Site appeared unchanged.
2004, 2006, 2008, 2009, 2011, 2013, 2015, 2017, and 2019	All buildings appeared to be removed and the Site was converted to a parking lot.

According to aerial photographs, the adjacent properties were historically densely developed and utilized for commercial and undeveloped purposes.

5.3.3 Local City Directories

Listings identified associated with the Site in the Sampson Murdock, Polks, Haines, and Digital Business street directories are detailed in the table below. The following should be noted: Copies of street directories are included in Appendix 2.

81-97 West Main Street Parcel

Address	Year	Occupant Listing
73 West Main Street	1926	Kenealy's Restaurant
75 West Main Street	1926	Fay's Theatre
81 West Main Street	1935	VanDyk Jas. Co., tea and coffee
	1940	Plymouth Photo Studio, private individual, real estate
	1950	Plymouth Photo Studio, private individual, lawyer
	1970	Earl's Magazine Store
	1995 and 2000	Four Corners Shoe Repair
	2005	Bianchi-Trison Corp. and Four Corner Shoe Repair
83 West Main Street	1935 and 1940	Comerford's Capitol Theatre
	1950	Capitol Theatre
	1995	Dave's Tee Shirts
	2000	Precision Hair Styles
85 West Main Street	1926	Fenyvessy Building: Private individuals, dentist, hairdresser, private club, office and Salerno & Brother, tailors
	1935	Fenyvessy Building: Rossiter Employment Bureau, private individual, and tailor

Address	Year	Occupant Listing
	1940 and 1945	Fenyvessy Building: Fenyvessy Enterprises, sign department, private individual, and commercial offices
	1950	Fenyvessy Building: Various commercial businesses, offices, unions, real estate, photography studio, Comerford's Capitol Theatre, and Laura Burns Assembly Hall
	1970	Fenyvessy Building: Private individuals, Capitol Theatre, Bricklayers LCL, and International Associations of Machinists
	1980	Capitol Theatre and Ted Boylan Presents
	1995	Private individuals and attorneys
	2000	Foster & Zambito LLP, private individuals, and attorneys
	2005	Private individuals and attorneys
87 West Main Street	1926	Private individual, confectioner
	1935 and 1940	Private individual, restaurant
	1945, 1950, 1955	Capitol Grill
	1970	West Manor Restaurant
	1980	Dynalec Corp. Edward's Pub
89 West Main Street	1926	Vacant
	1935	Private individual, liquors
	1995 and 2000	Galleria Pizza
91 West Main Street	1926	Private individual, photographer
	1935	Private individual, photographer
	1940	Private individual, liquors
	1950	Rochester Pants Shop
	1955	Three Hour Laundry
	1970, 1980, 1995, and 2005	Plymouth Photo Studio
95 West Main Street	1926	Hotel Rochester, Rochester Ad Club, Faber Inc. tobacconists, private individuals, barber and public stenographer
	1935	Hotel Rochester, private individuals, cigars, barber, public stenographer, and tailor
	1940	Hotel Rochester, Farber Inc., cigars and news stand, private individuals, barber, beauty shop, tailor
	1945	Hotel Rochester, Farber Inc., cigars and news stand, private individuals, barber and purchase agent

Address	Year	Occupant Listing
	1950	Hotel Rochester, private individuals, barber, cigar, manager Hotels Inc., Rochester Hotel Beauty Shop
	1955	Hotel Rochester, private individuals, barber, beauty shop, valet, Manager Hotels Inc.
	1970	Mariner Motor Inn, private individual
	1975	Mariner House, Mediscreen, and private individuals
	1980	Mariner House and private individuals
	1985	Mariner House, PACE Long Distance, Volunteers of America, private individuals
	1990	Mariner House, private individuals, RMHC VOA
	1995	Cornerstone, NY Grade Distributors Inc, NY State International Club, RMHC VOA, private individuals
	2000 and 2005	NY State Mental Health Cornerstone
24 South Plymouth Avenue	1926	U. S. Taxi
	1935	U. S. Lunch
26 South Plymouth Avenue	1926	Rochester Garage and Rochester Battery & Welders Service Inc.
	1930 and 1935	Hotel Rochester Garage

99 West Main Street Parcel

Address	Year	Occupant Listing
99 West Main Street	1926	Private individual, coal yard
101 West Main Street	1926	Covill & Covill Jewelers Private individual, optometrist
	1940, 1945, and 1950	Gulf Oil Corp., gasoline station
	1955	Archibald Service, gasoline station

103 West Main Street Parcel

Address	Year	Occupant Listing
107-109 West Main Street	1926	Gloversville Glove Store
	1965	Main & Plymouth Service Station, private individual, service station
	1970	Richard Cocilova & Sons

Address	Year	Occupant Listing
	1975 and 1980	Richard Cocilova & Sons Maine & Plymouth Towing
	1985	Downtown NSI
111-113 West Main Street	1926	Private individual, hardware
115 West Main Street	1935, 1940, 1945	Private individuals, barber, dentist
117 West Main Street	1926	Cash Auto Supply House
	1935, 1940, 1945	Private individual, tailor

119-125 West Main Street Parcel

Address	Year	Occupant Listing
119 West Main Street	1926	Riley William S. Co., butter
	1940	Levy Brothers auctioneers
	1945, 1950, and 1955	Rochester Harley-Davidson Corp., motorcycles
121 West Main Street	1940	Levy Brothers auctioneers
123 West Main Street	1926	Private individuals, barber, contractor, photographer, Shoe Workers Protective Union
	1940	Levy Brothers auctioneers
125 West Main Street	1926	Singer Sewing Machine Co.

129-131 West Main Street Parcel

Address	Year	Occupant Listing
127 West Main Street	1945 and 1950	Private individuals, cigars
129 West Main Street	1926, 1935, and 1940	Rochester Harley Davidson Corp., motorcycles
	1945, 1950, 1955, 1965, 1970, 1975, 1980, and 1985	Christie Specialties Co. Inc.
131 West Main Street		

133 West Main Street Parcel

Address	Year	Occupant Listing
133 West Main Street	1926 and 1935	Private individual, tailor
	1945 and 1950	Highland Merchandising Co. and private individual
	1955	Private individual, tailor
	1975	Sir Cedric Cocktail Lounge
	1980	My Place
	1985, 1990, and 1995	The Gavel Inc.
	1998	Delvin's Taproom The Rabbit Hole
135 West Main Street	1926	Private individuals
	1935 and 1940	Apartments, private individuals, tailor
	1945, 1950, 1955, 1965, 1975, 1985, and 2000	Apartments, private individuals

139 West Main Street Parcel

Address	Year	Occupant Listing
137 West Main Street	1926	Vacant
139 West Main Street	1926	Vacant
	1935	Private individual, cigars
	1940	Direct Dealers Service Inc.
	1945 and 1950	Noble Sales notions
	1955	Private individual, cigars and tobacco
	1970, 1975, and 1980	Tempa Quick Delivery and Tempa Temporary Emp.

141 West Main Street Parcel

Address	Year	Occupant Listing
141 West Main Street	1926	Not listed
	1935	Private individual, liquors
	1940	Washington Restaurant
	1995	First International Commercial

Address	Year	Occupant Listing
	2000	The Powers Building
143 West Main Street	1926	Pearce Electric Co. Inc. Private individuals
145 West Main Street	1926	Perrez Provision Co. Inc.
	1935	Private individual, liquors
	1940, 1945, 1950, and 1955	Washington Restaurant
	1970 and 1975	Past Time Restaurant
	1980	Papa Joe's Sub & Sandwich, Past Time Tavern, and Shorcal Inc.
	1985	Past Time Sub Shop and Shorcal Inc.
	1990	Past Time Sub Shop
	1995	Past Time Tavern
	1998	Chena's
6 South Washington Street	1926	James, C. W. & Co. Inc., broom manufacturers
	1930, 1935, 1940, 1945, 1950, 1955, and 1959	Wallington Hotel
	1965, 1970, 1975, 1995, 2000	Private individual
8 South Washington Street	1940, 1945, and 1950	Vacant
	1955	Monroe Music Co, automatic phonographs
	1959	Columbia Dry Cleaners
	1975	Light Impressions
	1980	Mattiex Data Entry
	1990 and 1995	Private individual, attorney
	2000	Private individual, attorney

19-29 South Plymouth Avenue Parcel

Address	Year	Occupant Listing
19 South Plymouth Avenue	1945	Private individual, parking station
21 South Plymouth Avenue	1926, 1930, 1935	Hill J. Lawrence Co. Inc. garage
100 West Broad Street	1930, 1935, 1940, 1945, and 1950	Hotel Rochester Garage

10 South Washington Street Parcel

Address	Year	Occupant Listing
10 South Washington Street	1926 and 1930	Yost P. George auction house, furniture
	1940	The National Paper Co.
	1945, 1950, 1955, and 1959	Rochester Maid Inc. Potato Chips
	1970	Pinnacle Builders
	1975	Extra Care Facilities
	1985	Private individual, attorney
	1995	Club Mahara
12 South Washington Street	1965	C&C Wholesale Supply, Manufacturers Well Supply, Nu Design Machine Co., Safe Soft Aqua, Weber Donald Association

16 South Washington Street Parcel

Address	Year	Occupant Listing
16 Washington Street	1926	Broad Street Gasoline Station and Roe Window Cleaning Co.
	1930, 1935, 1940, 1945, and 1950	Sinclair Refining Co., gasoline
136 West Broad Street	1926	Rochester Motor Freight Station
	1930	Highway Express Terminal, trucking, Overland Express, Tubbs Michael trucking
	1935	Miller's Express Terminal, trucking, Randall Geo. trucking, Roch. Bradford & Olean Express, Perry Motor Express, Splane Motorways Inc.
	1940	American Freightways Co., Eastern Motor Dispatch Inc., Liberty Forwarding & Distributors Corp., Middle Atlantic Transportation Corp., Paul's Transportation Service trucking, Trans-American Freight
	1945	Vacant store
	1950	Jackson Welding Supply, Co. Inc.
	1955	Vacant
140 West Broad Street	1930	Pi-K Products building materials
	1935, 1940, 1945	Vacant store

Address	Year	Occupant Listing
	1955, 1959, 1970, 1975, 1980, and 1985	Private individuals, physicians
	1998	Morrison, Morrision, & Associates Architects
142 West Broad Street	1940 and 1945	Vacant
144 West Broad Street	1926	Private individuals, lawyers, and United Protective Association
	1935	Public Employment Center
146 West Broad Street	1950 and 1955	Public Hall
	1959	Amsden-Connor-Mitchell Inc., insurance
	1970	Amsden-Connor-Mitchell Inc., insurance, private individuals
	1975	Amsden-Connor-Mitchell Inc., insurance, private individuals, Genesee Authority Supply
	1980	Monroe Compensation Service, private individuals
	1985	Morgan Stanwix Appraisers, Morgan Stanwix Realty, private invidividuals
	1998	Morgan Stanwix Appraisal Associates Inc., Home Inspection Service, private individual
	2000	Morgan Stanwix Appraisal Associates Inc. Private individuals
148 West Broad Street	1930	State Public Employment Bureau
	1959	Russell Shumway & Utz Inc., contractor and builders
150 West Broad Street	1930	Roadland Express trucking and Alger Transportation Co. trucking
	1945, 1950, 1955, and 1959	Private individuals, pump manufacturers
	1980	Century 21, Morgan Stanwix Associates, and private individuals
	1985	Private individuals, attorneys and certified public accountant
	1998	Private individuals, attorneys
	2000	Kroners & Gamble LLP, private individuals, attorneys
152 West Broad Street	1930	Florack, Schnorr & Englert Co., sheet metal works
	1935	Larkin Home Service, house furnishings goods
	1940, 1945, 1950, and 1955	Private individual, restaurant

Address	Year	Occupant Listing
	1959	Bab's Restaurant
	1970	Bob's Restaurant
154 West Broad Street	1945 and 1950	Jehovah's Witnesses Kingdom Hall
	1955	Washington Hall
	1970	Almac Sprinkler Co.

Review of the street directories indicated that properties surrounding the Site were historically utilized for industrial, commercial, educational, religious, and residential purposes. The following adjacent property uses of potential concern were identified.

- The adjacent property addressed as 99 and 103 West Main Street was identified as:
  - A printing shop in at least 1926
  - A coal yard in at least 1926
- The adjacent property addressed as 5-9 South Plymouth Avenue was identified as laundry businesses between at least 1926 and 1930.
- The adjacent property addressed as 3 South Plymouth Avenue was identified as a tailor in at least 1926.
- The north adjacent property addressed as 120 West Main Street was identified as a laundry business in at least 1955.
- The south addressed property addressed as 54 South Plymouth Avenue was identified as the following:
  - An auto repair shop in at least 1926
  - A gasoline filling station in at least 1930
- The south adjacent property addressed as 101 Broad Street was identified as a gasoline filling station in at least 1955.
- The southwest adjacent property addressed as 201 Broad Street and was identified as a gasoline filling station between at least 1930 and 1950.
- The west adjacent property addressed as 155 West Main Street was identified as a coal yard in at least 1926.
- The west adjacent property addressed as 126 West Main Street was identified as a tailor in at least 1950.

5.3.4 Municipal Records

LaBella obtained municipal records from the City of Rochester.. The following information was obtained from these records.

- The Site, Tax IDs # 121.30-1-20.001, #121.30-1-19, #121.30-1-18, #121.30-1-15, #121.30-1-14, #121.30-1-13, #121.30-1-12, #121.30-1-11, #121.30-1-17, #121.30-1-10, #121.30-1-16, measures approximately 2.25 acres in total and is developed with parking lots.
- The current owners of the Site are listed as Main and Plymouth LLC and Broad and Plymouth LLC.
- Former owners are listed as Rochester Rotary.
- Prior uses of the Site are listed as a gas station, restaurant, residential apartments, theater, offices, hotel, commercial store, public hall, warehouse, and dance hall.
- The Site Building is listed as including all public utilities.
- Fire Department records indicate multiple minor releases of transmission oil and gasoline from commercial and personal vehicles between 1990 and 2000.

Permits were issued between 1955 and 2010 related to construction, demolition, and improvements to structures and buildings on the Site. Significant permits are outlined in the table below.

Year	Structure and Date
1936	Demolish a canopy on a gasoline filling station
1955	Four 2,000-gallon tanks and two pump dispensers were installed.
1956	Demolish a gasoline filling station and reconstruct a new building Install three 3,000-gallon gasoline USTs and five dispensers
1957	Install one 2,000-gallon gasoline UST
1969	A gasoline filling station was demolished Construct a gas station with four dispensers
1972	Installation one 6,000-gallon gasoline tank
1974	Remove three gasoline pumps and pump island Test three 4,000-gallon and one 2,000-gallon gasoline USTs Test one 1,000-gallon fuel oil UST Test one 550-gallon waste oil UST
1975	Replace seven gasoline pumps
1977	Replace one single gasoline pump Replace a damaged gasoline dispenser
1978	Remove one single gasoline pump and replace with a duel gasoline pump
1979	Remove three 4,000-gallon and one 2,000-gallon gasoline tanks Install two 6,000-gallon gasoline tanks Test three 4,000-gallon, one 6,000-gallon, and one 2,000-gallon gasoline USTs
1980	Demolish the theater Replace five single dispenser pumps
1984	Remove six dispenser pumps and install four dispenser pumps
1986	Replace one 550-gallon waste oil UST with one 1,000-gallon fiber glass UST Tank test of one 1,000-gallon fuel oil and one 550-gallon waste oil UST

Year	Structure and Date
1988	Remove three 6,000-gallon gasoline USTs and one 1,000-gallon waste oil UST Remove seven gasoline dispenser pumps
1993	Demolish a store and warehouse building
1994	Remove one 2,000-gallon fuel oil UST
1999	Explosive demolition of former hotel
2000	Remove a #6 fuel oil tank on the corner of West Main Street and South Plymouth Avenue
2003	Construct a parking attendant booth
2010	Removal of three 2,000-gallon fuel USTs Removal of two 500-gallon and 1,000-gallon USTs

In addition, limited assessment information was obtained from the Landmax Data Systems, Inc. website and Monroe County GIS website. This information is outlined in Sections 3.1. Copies of records obtained from the City of Rochester are included in Appendix 6.

5.3.5 Historical Topographic Maps

The table below outlines observations of the Site and adjacent properties obtained from the review of available historical topographic maps. Copies of historical topographic maps are included in Appendix 2.

Date	Observation
1895, 1898, 1912, 1920, 1931, 1935	The Site and adjacent properties were depicted as being densely developed.
1952, 1969, 1971, and 1978	The Site and surrounding properties were shaded red indicating the area was densely developed.
2016	No structures were depicted on the map.

5.3.6 Recorded Land Title Records

According to the ASTM Standard Practice E1527-13, "the user should either engage a title company or title professional to undertake a review of reasonably ascertainable land title records and lien records for environmental liens or activity and use limitations currently recorded against or relating to the property or to negotiate such an engagement of a title company or title professional as an addition to the Scope of Work to be performed by the Environmental Professional." Title records were not provided to LaBella for review. As such, title records were not reviewed as part of this Phase I ESA report.

5.3.7 Summary of Historical Use

Based on the historical records reviewed, the following information was obtained related to the Site:

Northwest Parcels (119-145 West Main Street and 2-12 South Washington Street)

- Beginning in at least 1892, the parcels were developed with several row-type buildings. The buildings were used occupied by commercial stores, restaurants, an auction house, and warehouses. The following uses of potential concern were identified:
    - A carriage factory with a blacksmith and printing shop in at least 1892
    - An ink factory in at least 1892
    - A tire vulcanizing in at least 1912
    - A motorcycle sales and service shop between at least 1926 and 1955
    - A paint and varnish shop in at least 1950
    - A tailor between at least 1926 and 1955
    - A broom manufacturing facility between at least 1912 and 1926
    - A dry cleaner in at least 1959

Southwest Parcel (16 South Washington Avenue and 136-154 Broad Street)

- Beginning in at least 1892, the parcels were developed with several building utilized for various commercial purposes including a public hall, church, restaurant, commercial stores, and storage. The following uses of potential concern were identified:
    - A broom manufacturing facility between 1912 and 1926
    - A motor freight station between at least 1926 and 1940
    - A tire sales and service shop between at least 1930 and 1940
    - A gasoline filling station between at least 1926 and 1950. Also, three gasoline tanks were located on the parcels between at least 1938 and 1950.
    - Pump manufacturers between at least 1945 and 1959
    - A sheet metal work shop in at least 1930
- Central Parcels (107-117 West Main Street, 110 Broad Street, and 15-33 South Plymouth Avenue)
    - Beginning in at least 1892, the parcels were developed with several row-type buildings that were used as a livery, steam laundry shop, an undertaker, parking garage, offices, and commercial stores. The following occupants of potential concern were identified:
        - Auto repair shop between in at least 1912
        - The north portion of the parcels was developed with a gasoline filling station between at least 1938 and 1950. Also, a grease and wash pit were located within the filling station in at least 1938 and 1950. One gasoline tank was depicted on the Site in 1938 and 1950. An additional seven gasoline tanks were depicted immediately east of the parcels (offsite).

        - The south portion of the parcels was developed with a gasoline filling station between at least 1938 and 1950. Also, four gasoline tanks were depicted near the filling station in at least 1938 and 1950. One gasoline tank was depicted immediately east of the parcels (off-site) in at least 1938 and 1950.
        - The central portion was developed with a gasoline filling station between at least 1965 and 1971.
        - A tailor between at least 1935 and 1945
- East Parcels (71-93 West Main Street and 20-30 South Plymouth Avenue)
    - The parcels were developed with several buildings beginning in at least 1892 that were utilized as a hotel, theater, commercial stores, restaurants, storage, and a parking garage. The following occupants of concern were identified:
        - A printing shop in at least 1892
        - A photo shop between at least 1938 and 1971
        - Various tailors between at least 1926 and 1940
        - A dry cleaner in at least 1955
        - An auto service shop between at least 1926 and 1935
        - Two gasoline tanks were depicted on the south portion of the parcels between at least 1938 and 1950.
- Municipal records list the installation and removal of numerous gasoline, waste oil, and fuel oil USTs between 1956 and 2010. Also, records indicated gasoline filling stations were constructed in 1956 and 1969 and demolished in 1936, 1956, and 1969. See table in Section 5.3.4 for further details.

See Section 5.1.2 for regulatory records associated with the historical uses of the property.

Based on the historical records reviewed, it appears the adjacent properties were historically utilized for industrial, commercial, educational, religious, residential, and undeveloped purposes. The following historical adjacent property uses of potential concern were identified.

- The adjacent property addressed as 99 and 103 West Main Street was identified as
    - A printing shop between at least 1912 and 1926
    - A coal yard between at least 1892 and 1926
- The adjacent property addressed as 5-9 South Plymouth Avenue was identified as laundry businesses between at least 1926 and 1930.
- The adjacent property historically addressed as 15 South Plymouth Avenue was identified as a leather working shop in at least 1912.
- The adjacent property addressed as 3 South Plymouth Avenue was identified as a tailor in at least 1926.
- The north adjacent property addressed as 120 West Main Street was identified as a laundry business in at least 1955.

- The north adjacent property addressed as 100 and 102 West Main Street was identified as a used auto sales business with an auto repair shop and paint and varnish building in at least 1950.
- The northeast adjacent property addressed as 150 and 152 West Main Street was identified as a paint and varnish shop in at least 1950 and 1971.
- One gasoline tank was located on the east adjacent property historically addressed as 68 Broadway in at least 1938 and 1950.
- The south addressed property addressed as 54 South Plymouth Avenue was identified as the following:
    - An auto repair shop in at least 1926
    - A gasoline filling statin in at least 1930
- The south adjacent property addressed as 101 Broad Street was identified as a gasoline filling station between at least 1938 and 1955. Also, four gasoline tanks were depicted on the property in at least 1938 and two gasoline tanks in 1950.
- The southwest adjacent property addressed as 201 Broad Street and was identified as a gasoline filling station between at least 1930 and 1950. Also five gasoline tanks, and a washing and grease pit were depicted on the property in at least 1938.
- The west adjacent property addressed as 155 West Main Street was identified as a coal yard between in at least 1926.
- The west adjacent property addressed as 124 West Main Street was identified as a tailor between at least 1950.

See Section 5.1.3 for regulatory records associated with the adjacent properties.

6.0 SITE RECONNAISSANCE

Conducted by: Alexandra Shipman Messner, Environmental Analyst

Date of site visit: September 3, 2021

Representative photographs from the site visit are included in the Photographs Appendix. In addition, observations discussed in this Section are outlined on Figure 3. Copies of the field notes taken during the site visit are included in Appendix 4.

At the time of the site visit, a representative portion of the Site was visually inspected. It should be noted that LaBella was not provided access to the lot attendant station. In addition, visual observations were limited at the time of the site visit due to parked automobiles. Additional site visit limitations are discussed in Section 8.2 below.

6.1 Exterior Observations

Observation	Noted	Site
Historical Use	No	No apparent indicators (i.e., signs, equipment, etc.) were observed at the Site at the time of the site visit that would indicate historical uses of the Site.
Hazardous Substances and Petroleum Products	No	No apparent hazardous substances or petroleum products were observed at the Site at the time of the site visit.
Storage Tanks	No	No apparent indications of aboveground or underground storage tanks (i.e. fill ports, vent pipes, access ways) were observed at the Site at the time of the site visit.
Odors	No	No apparent strong, pungent, or noxious odors were observed at the Site at the time of the site visit.
Pools of Liquid	No	No apparent pools, sumps, or standing water containing liquids likely to be hazardous substances or petroleum products were observed at the Site at the time of the site visit.
Unidentified Substance Containers	No	No apparent unidentified substance containers were observed at the Site at the time of the site visit.
Heating and Cooling	No	Not applicable.
Stains and Corrosion	No	No apparent staining was observed at the Site at the time of the site visit.
Drains and Sumps	No	No apparent drains or sumps were observed at the Site at the time of the site visit.
Polychlorinated Bi-phenyls (PCBs)-Containing Equipment	No	No apparent electrical or hydraulic equipment potentially containing PCBs were observed at the Site at the time of the site visit.
Pits, Ponds, or Lagoons	No	No apparent pits, ponds, or lagoons were observed at the Site at the time of the site visit.
Stained Soil or Pavement	No	No apparent stained soils or pavement were observed at the Site at the time of the site visit.
Stressed Vegetation	No	No apparent stressed vegetation was observed at the time of the site visit.
Solid Waste	No	No apparent solid waste disposal areas were observed on the exterior of the Site at the time of the site visit.

Observation	Noted	Site
Wastewater	Yes	Two storm drains were located in the central portion of the Site on the west side of South Plymouth Avenue. The drains collect storm water runoff that is suspected to discharge to the public storm sewer system.
Wells	Yes	One monitoring well was located on the southeast portion of the Site (located west of South Plymouth Avenue). This monitoring well is suspected to be associated with a monitoring well left from a previous subsurface investigation (MW-4).
Septic Systems	No	No apparent indications of on-Site septic systems or cesspools were observed on the Site at the time of the site visit.

7.0 INTERVIEWS

7.1 Site Representative

Mike Spoleta, Owner, was interviewed as part of this assessment. According to information obtained through the interview, the Site was formerly developed with commercial buildings and a gasoline filling station. Since that time, remedial activities have been conducted at the Site. Following the remedial activities, the Site was utilized as a parking lot. The notes from the interview are included in Appendix 5.

7.2 Local Government Official

A FOIL request was submitted to the City of Rochester Records Access Officer, Joseph Fratta, on June 9, 2021, requesting copies of building department, assessment, and fire marshal records on file for the Site. A response was received from the City of Rochester on June 24, 2021. Refer to Section 5.3.4 for historical information obtained from the City of Rochester. Refer to Sections 3.1 for current records associated with the Site. Copies of the FOIL request and the records obtained from the City of Rochester are included in Appendix 6.

7.3 Tribal Records

There do not appear to be any Native American Sovereign Territories on or within one mile of the Site. In accordance with ASTM Standard Practice E1527-13, tribal records will only be reviewed if the subject Site falls on or within one mile of Native American Sovereign Territory. Therefore, tribal government representatives were not contacted as part of this AAI Phase I ESA report.

7.4 New York State Department of Environmental Conservation

A FOIL request was submitted to the NYSDEC on June 9, 2021. Records were obtained from the NYSDEC on June 23, 2021 and are discussed in further detail in Section 5.1.2. A copy of the

documents obtained are included in Appendix 1. A copy of the FOIL request is included in Appendix 6.

7.5 Monroe County Health Department

A FOIL request was submitted to the MCHD June 9, 2021. A response received from the MCHD on June 22, 2021 indicated that three MC Confirmed Sites (RO150, RO193, and RO200) and 16 NYSDEC Registry sites are located within one-half mile of the Site. Based on the distance of the facilities from the Site (over 1,000 feet), these facilities do not appear to represent an environmental concern at this time. Additionally, the MCHD provided a copy of a Spill report (#0708686). Refer to Section 5.1.2 for additional information. Copies of the FOIL request and the records obtained from the MCHD are included in Appendix 6.

8.0 ASSUMPTIONS, LIMITATIONS, TERMS AND RELIANCE

8.1 Significant Assumptions

As a result of the unavailability or lack of receipt of information, the following assumptions were made in order to complete the Scope of Work in the timeframe desired by CSD Housing LLC.

- Groundwater flow direction in the vicinity of the Site was estimated based on review of area topographic maps and the Generalized Groundwater Contour Map of Monroe County. Determination of site-specific groundwater flow direction typically requires installing at least three groundwater monitoring wells, surveying the wells, and collecting groundwater elevation data.
- According to review of historical resources, the Site appears to be historically addressed as the following:
    - 71-93, 105-117, 119-145 West Main Street
    - 2-12, 16, 18 South Washington Avenue
    - 109, 110, 136-154 West Broad Street
    - 20-30 South Plymouth Avenue

  As such, records obtained under the Scope of Work of this assessment for these addresses will be assumed to be associated with the Site.

8.2 Limitations and Exceptions of Assessment

ASTM Standard Practice E1527-13 expressly recognized the fact that no ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with a property. LaBella's work is intended

to reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with the Site, and its Scope of Work reflects recognition of the reasonable limits of time and cost.

The actual presence of radon, lead-based paint, contaminants in drinking water [e.g., lead, VOCs, "perfluorinated" compounds (PFCs), etc.], mold-related issues, electromagnetic frequencies, asbestos-containing building materials, polychlorinated biphenyl (PCB) caulk, soil vapor intrusion (SVI), wetlands, cultural and historic resources, ecological resources, and endangered species are not included in the Scope of Work of this assessment. Additionally, regulatory compliance, industrial hygiene, health and safety, indoor air quality, and drinking water quality are not included in the Scope of Work of this assessment. Should CSD Housing LLC want these services, LaBella can complete them; however, they are not included in the Scope of Work of the Phase I ESA. In addition, NYSDEC Part 360 Regulations indicate that fill material is defined as "*soil and similar material excavated for the purpose of construction or maintenance*". The user should be aware that this Phase I ESA has not assessed the Site for fill materials. Any fill material generated as part of a construction project is subject to NYSDEC Part 360 Regulations, which could include chemical testing.

It is further noted that due to post 9/11 terrorist-related concerns, the NYSDEC has limited the availability of PBS, CBS, and MOSF details, and detailed spill information to the public. However, LaBella does have access to the addresses of current PBS, CBS, and MOSF locations accessed from the database from the NYSDEC website. In addition, this information can usually be acquired by a FOIL to the regulating agency to attempt to obtain this relevant and reasonably ascertainable environmental information for AAI Phase I ESA reports. If this information is not obtainable, then it will be discussed as a data gap in Section 1.4.2.

The site visit was limited to visual observations of accessible areas only. No attempt was made to observe conditions in spaces not generally accessible, including but not limited to:

1. Crawlspaces
2. Attics and roofs
3. Pipe chases or plenums
4. Spaces concealed by walls, floors, or ceilings
5. Materials concealed by paneling, carpeting, or wallpaper

The site visit was also limited to visual observations within the perimeter of the Site and other accessible areas only. Visual observations were limited at the time of the site visit due to parked automobiles.

8.3 Special Terms and Conditions

CSD Housing LLC and LaBella have agreed that the Scope of Work described in Section 2.2, and the Limitations and Exceptions described in Section 8.2 above, are acceptable to you and that to the fullest extent permitted by law, LaBella shall not be liable to you for limiting its investigation to the

Scope of Work described. Based on the engagement and Scope of Work agreed upon, our evaluation of the Site is as presented herein.

8.4 User Reliance

CSD Housing LLC may rely upon the findings of this report and should be aware of the agreed upon Scope of Work and the limitations associated with this Scope of Work.

8.5 Subsurface Risks/Unanticipated Hazardous Materials

The work for this report has been performed in accordance with generally accepted environmental engineering practices for the applicable region. The conclusion and recommendations of this report are based upon the opinion and judgment of an Environmental Professional (EP), and are dependent upon LaBella's knowledge, information supplied by the present owner and managers of the Site, and data and information solicited from governmental agencies. LaBella makes no other warranty or representation, either expressed or implied, nor is one intended to be included as part of its services, proposals, contracts, or reports.

In addition, LaBella cannot provide guarantees, certifications, or warranties that the property is or is not free of environmental impairment without a subsurface investigation involving drilling, vapor analysis, laboratory soil analysis, groundwater monitoring well installation, and laboratory groundwater analysis. Even with such a program, the data and samples from any given soil boring or monitoring well will indicate conditions that apply only at that particular location, and such conditions may not necessarily apply to the general Site as a whole.

9.0 ADDITIONAL SERVICES

No additional services were provided or agreed upon as part of this assessment.

10.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

We declare that, to our knowledge and belief, we meet the definition of Environmental Professional as defined in ASTM Standard Practice E1527-13 and §312.20 of 40 CFR §312. We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting at the subject property.

We have developed and performed the Scope of Work for this assessment in conformance with the standards, practices, and limitations set forth in ASTM Standard Practice E1527-13.

Kimberly Cichon
Phase I Technical Manager
Environmental Professional

Michaela Freeman
Environmental Analyst

11.0 REFERENCES

	Source
USGS 7.5 Minute Topographic Quadrangle Map of Rochester East, New York	USGS Website
Monroe County Soil Survey	ERIS PSR
Federal Environmental Regulatory Listings	ERIS
State Environmental Regulatory Listings	ERIS
Local Landfill or Solid Waste Information	ERIS
Sanborn Fire Insurance Maps	ERIS
Street Directories	ERIS
Aerial Photographs	ERIS
Historical Topographic Maps	ERIS
Previous Reports	LaBella

APPENDIX 2

Community Air Monitoring Plan

Appendix 1A
New York State Department of Health
Generic Community Air Monitoring Plan

Overview

A Community Air Monitoring Plan (CAMP) requires real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the downwind perimeter of each designated work area when certain activities are in progress at contaminated sites. The CAMP is not intended for use in establishing action levels for worker respiratory protection. Rather, its intent is to provide a measure of protection for the downwind community (i.e., off-site receptors including residences and businesses and on-site workers not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of investigative and remedial work activities. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, the CAMP helps to confirm that work activities did not spread contamination off-site through the air.

The generic CAMP presented below will be sufficient to cover many, if not most, sites. Specific requirements should be reviewed for each situation in consultation with NYSDOH to ensure proper applicability. In some cases, a separate site-specific CAMP or supplement may be required. Depending upon the nature of contamination, chemical- specific monitoring with appropriately-sensitive methods may be required. Depending upon the proximity of potentially exposed individuals, more stringent monitoring or response levels than those presented below may be required. Special requirements will be necessary for work within 20 feet of potentially exposed individuals or structures and for indoor work with co-located residences or facilities. These requirements should be determined in consultation with NYSDOH.

Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs, dust, and odors at a minimum around the work areas.

Community Air Monitoring Plan

Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for VOCs and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary. Most sites will involve VOC and particulate monitoring; sites known to be contaminated with heavy metals alone may only require particulate monitoring. If radiological contamination is a concern, additional monitoring requirements may be necessary per consultation with appropriate DEC/NYSDOH staff.

Continuous monitoring will be required for all ground intrusive activities and during the demolition of contaminated or potentially contaminated structures. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells.

Periodic monitoring for VOCs will be required during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. “Periodic” monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or

overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence.

VOC Monitoring, Response Levels, and Actions

Volatile organic compounds (VOCs) must be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a continuous basis or as otherwise specified. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions, particularly if wind direction changes. The monitoring work should be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment should be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment should be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

1. If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.

2. If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.

3. If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.

4. All 15-minute readings must be recorded and be available for State (DEC and NYSDOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

Particulate Monitoring, Response Levels, and Actions

Particulate concentrations should be monitored continuously at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations. The particulate monitoring should be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (PM-10) and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level. The equipment must be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration should be visually assessed during all work activities.

1. If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m^3) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m^3 above the upwind level and provided that no visible dust is migrating from the work area.

2. If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m^3 above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m^3 of the upwind level and in preventing visible dust migration.

3. All readings must be recorded and be available for State (DEC and NYSDOH) and County Health personnel to review.

December 2009

APPENDIX 3

LaBella Health and Safety Plan

Health and Safety Plan

Project:

Center City Courtyard
(Former Rotary Site)
141, 139, 133, 129, 119, 103, and 99 West Main Street,
10 and 16 South Washington Street, and 19 South Plymouth Avenue
Rochester, New York 14614

Client:

CSD Housing, LLC
642 Kreag Road, Suite 301
Pittsford, NY 14534

LaBella Project No. 2221127

February 2023

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SITE HEALTH AND SAFETY PLAN

Project Title: Center City Courtyard (Former Rotary Site)

LaBella Project Number: 2221127

Project Location (Site): 141, 139, 133, 129, 119, 103, and 99 West Main Street, 10 and 16 South Washington Street, and 19 South Plymouth Avenue Rochester, New York 14614

Project Manager: Drew Brantner
dbrantner@labellapc.com
(585) 287-9089

LaBella Safety Supervisor: Catherine Monian
cmonian@labellapc.com
(845) 486-1557

Site Contact: To Be Determined

Safety Director: To Be Determined

Proposed Date(s) of Field Activities: To Be Determined (Estimated 2023-2024)

Site Conditions: The Site totals approximately 1.34 acres and is bound by West Main Street to the north, South Plymouth Ave to the east, West Broad Street to the south, and South Washington Street to the west. The Site presently consists of asphalt surface parking lots and concrete sidewalks. Historic environmental assessment has identified petroleum impacted media and historic/urban fill.

Site Environmental Information Provided By:

Report Title	Report Date	LaBella Project No.
Phase I ESA	May 2007	207367.01
Phase II ESA	February 2008	207367
Remedial Action Report	April 2010	209645
SGMP	April 2010	209645
Phase I ESA	September 2021	2212099

Air Monitoring Provided By: LaBella Associates, DPC

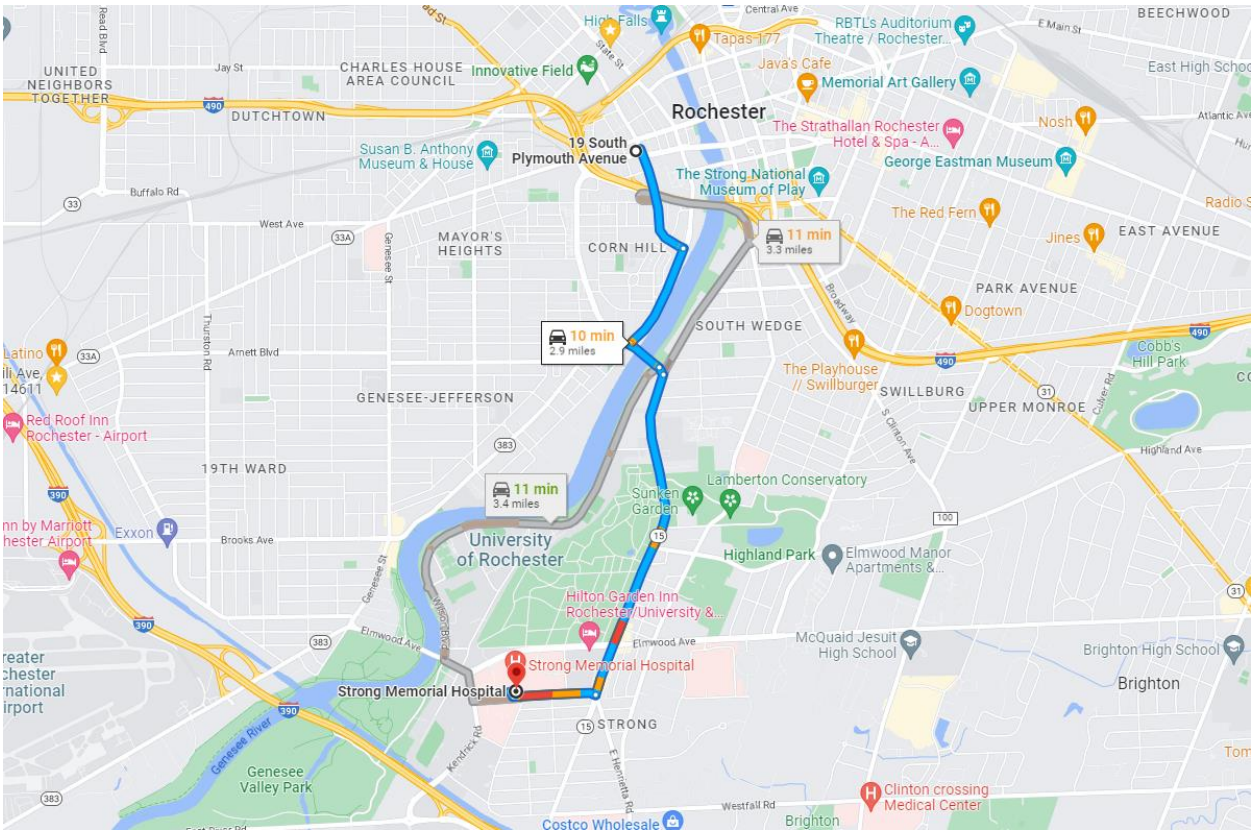
EMERGENCY CONTACTS

	Name	Phone Number
Ambulance:	As Per Emergency Service	911
Hospital Emergency:	Strong Memorial Hospital	(585) 275-2100
Poison Control Center:	Finger Lakes Poison Control	585-273-5151
Police (local, state):	Rochester Police Department	911
Fire Department:	Rochester Fire Department	911
Site Contact:	To Be Determined	
LaBella Project Manager:	Drew Brantner	(585) 287-9089
Site Safety Supervisor:	To Be Determined	
Safety Director	To Be Determined	

MAP AND DIRECTIONS TO THE MEDICAL FACILITY - STRONG MEMORIAL HOSPITAL

Total Est. Time: 8 minutes **Total Est. Distance:** 2.5miles

1:	Head SOUTH on SOUTH PLYMOUTH AVENUE	0.5 mile
2:	Turn RIGHT onto EXCHANGE BOULEVARD	0.5 mile
3:	Turn LEFT onto FORD STREET	0.2 mile
3:	Turn RIGHT onto MT HOPE AVENUE	1.4 miles
4:	Turn RIGHT onto CRITTENDEN BLVD (immediately after McDonald's)	0.3 mile
5:	End at **601 ELMWOOD AVE** Rochester, NY 14642	



1.0 Introduction

The purpose of this Health and Safety Plan (HASP) it to provide guidelines for responding to potential health and safety issues that may be encountered during earthwork-related development activities at the Center City Courtyard Project (Former Rotary Site) located in the City of Rochester, Monroe County, New York (the Site). This HASP only reflects the policies of LaBella Associates, D.P.C. The requirements of this HASP are applicable to LaBella personnel at the work site. It is the responsibility of each contractor to follow their own company HASP. This document's project specifications should be consulted for guidance in preventing and quickly abating any threat to human safety or the environment. The provisions of the HASP were developed in general accordance with 29 CFR 1910 and 29 CFR 1926 and do not replace or supersede any regulatory requirements of the USEPA, NYSDEC, OSHA or and other regulatory body.

2.0 Responsibilities

This HASP presents guidelines to minimize the risk of injury to project personnel, and to provide rapid response in the event of injury. The HASP is applicable only to activities of approved LaBella personnel. It is the responsibility of LaBella employees to follow the requirements of this HASP, or HASPs specific to individual activities, and all applicable company safety procedures.

3.0 Activities Covered

The activities covered under this HASP are limited to the following:

- Environmental Monitoring associated with intrusive activities at the Site including but not limited to:
  - Excavation
  - Grading
- Soil, Surface Water, and Groundwater Characterization/Sampling

4.0 Work Area Access and Site Control

Site control during the project will be the responsibility of the Contractor performing the work. LaBella will have primary responsibility for maintaining a safe work area for all activities conducted by LaBella personnel. Such work area controls will consist of:

- Temporary fencing
- Signs and notices
- Air monitoring
- Use of Personal Protective Equipment (PPE)

5.0 Potential Health and Safety Hazards

This section lists some potential health and safety hazards that project personnel may encounter at the project site and some actions to be implemented by approved personnel to control and reduce the associated risk to health and safety. This is not intended to be a complete listing of any and all potential health and safety hazards. New or different hazards may be encountered as site and work conditions change. The suggested actions to be taken under this plan are not to be substituted for good judgment on the part of project personnel. At all times, the Site Safety Officer has responsibility

for site safety and his instructions must be followed.

5.1 Hazards Due to Heavy Machinery and Equipment

Potential Hazard:
Heavy machinery including trucks, drilling rigs, trailers, etc. will be in operation at the site. The presence of such equipment presents the danger of being struck or crushed. Use caution when working near heavy machinery.

Protective Action:
Make sure that operators are aware of your activities, and heed operator's instructions and warnings. Wear bright colored clothing and walk safe distances from heavy equipment. A hard hat, safety glasses and steel toe shoes are required.

5.2 Excavation Hazards

Potential Hazard:
Excavations and trenches can collapse, causing injury or death. Edges of excavations can be unstable and collapse. Toxic and asphyxiant gases can accumulate in confined spaces and trenches. Excavations that require working within the excavation will require air monitoring in the breathing zone (refer to Section 9.0).

Excavations left open create a fall hazard which can cause injury or death.

Protective Action:
Personnel must receive approval from the Project Manager to enter an excavation for any reason. Subsequently, approved personnel are to receive authorization for entry from the Site Safety Officer. Approved personnel are not to enter excavations over 4 feet in depth unless excavations are adequately sloped. Additional personal protective equipment may be required based on the air monitoring.

Personnel should exercise caution near all excavations at the site as it is expected that excavation sidewalls will be unstable. Do not proceed closer than 3 feet to an unsupported or non-sloped excavation side wall.

Fencing and/or barriers accompanied by "no trespassing" signs should be placed around all excavations when left open for any period of time when work is not being conducted.

5.3 Cuts, Punctures and Other Injuries

Potential Hazard:
In any excavation or construction work site there is the potential for the presence of sharp or jagged edges on rock, metal materials, and other sharp objects. Serious cuts and punctures can result in loss of blood and infection.

Protective Action:
The Project Manager is responsible for making First Aid supplies available at the work site to treat minor injuries. The Site Safety Officer is responsible for arranging the transportation of authorized on-site personnel to medical facilities when First Aid treatment in not sufficient. Do not move seriously injured workers. All injuries requiring treatment are to be reported to the Project Manager. Serious injuries are to be reported immediately to the Site Safety

Officer.

5.4 Injury Due to Exposure of Chemical Hazards

Potential Hazards:
Contaminants identified in testing locations at the Site include various volatile organic compounds (VOCs), primarily VOCs associated with petroleum contamination. Volatile organic vapors, chlorinated solvents or other chemicals may be encountered during subsurface activities at the project work site. Inhalation of high concentrations of volatile organic vapors can cause headache, stupor, drowsiness, confusion and other health effects. Skin contact can cause irritation, chemical burn, or dermatitis. The Safety Data Sheet is included as Appendix 1 of the IRM Work Plan.

Protective Action:
The presence of organic vapors may be detected by their odor and by monitoring instrumentation. Approved employees will not work in environments where hazardous concentrations of organic vapors are present. Air monitoring will be performed in accordance with the NYSDOH Generic CAMP. Personnel are to leave the work area whenever PID measurements of ambient air exceed 25 ppm consistently for a 5 minute period. In the event that sustained total volatile organic compound (VOC) readings of 25 ppm is encountered personnel should upgrade personal protective equipment to Level C (refer to Section 8.0) and an Exclusion Zone should be established around the work area to limit and monitor access to this area (refer to Section 6.0).

5.5 Injuries Due to Extreme Hot or Cold Weather Conditions

Potential Hazards:
Extreme hot weather conditions can cause heat exhaustion, heat stress and heat stroke or extreme cold weather conditions can cause hypothermia.

Protective Action:
Precaution measures should be taken such as dress appropriately for the weather conditions and drink plenty of fluid. If personnel should suffer from any of the above conditions, proper techniques should be taken to cool down or heat up the body and taken to the nearest hospital if needed.

6.0 Work Zones

In the event that conditions warrant establishing various work zones (i.e., based on hazards - Section 5.4), the following work zones should be established:

Exclusion Zone (EZ):
The EZ will be established in the immediate vicinity and adjacent downwind direction of site activities that elevate breathing zone VOC concentrations to unacceptable levels based on field screening. These site activities include contaminated soil excavation and soil sampling activities. If access to the site is required to accommodate non-project related personnel then an EZ will be established by constructing a barrier around the work area (yellow caution tape and/or construction fencing). The EZ barrier shall encompass the work area and any equipment staging/soil staging areas necessary to perform the associated work. The contractor(s) will be responsible for establishing the EZ and limiting access to approved personnel. LaBella will not enter the EZ unless deemed necessary to do so. Depending on

the condition for establishing the EZ, access to the EZ may require adequate PPE (e.g., Level C).

Contaminant Reduction Zone (CRZ):
The CRZ will be the area where personnel entering the EZ will don proper PPE prior to entering the EZ and the area where PPE may be removed. The CRZ will also be the area where decontamination of equipment and personnel will be conducted as necessary.

7.0 Decontamination Procedures

Upon leaving the work area, approved personnel shall decontaminate footwear as needed. Under normal work conditions, detailed personal decontamination procedures will not be necessary. Work clothing may become contaminated in the event of an unexpected splash or spill or contact with a contaminated substance. Minor splashes on clothing and footwear can be rinsed with clean water. Heavily contaminated clothing should be removed if it cannot be rinsed with water. Personnel assigned to this project should be prepared with a change of clothing whenever on site.

8.0 Personal Protective Equipment

Generally, site conditions at this work site require level of protection of Level D or modified Level D. However, air monitoring will be conducted to determine if up-grading to Level C PPE is required (refer to Section 9.0). Descriptions of the typical safety equipment associated with Level D and Level C are provided below:

Level D:
Hard hat, safety glasses, rubber nitrile sampling gloves, steel toe construction grade boots, etc.

Level C:
Level D PPE and full or ½-face respirator and tyvek suit (if necessary). [*Note: Organic vapor cartridges are to be changed after each 8-hours of use or more frequently.*]

9.0 Air Monitoring

According to 29 CFR 1910.120(h), air monitoring shall be used to identify and quantify airborne levels of hazardous substances and health hazards in order to determine the appropriate level of employee protection required for personnel working onsite. Air monitoring will consist at a minimum of the procedure listed below. Air monitoring instruments will be calibrated and maintained in accordance with the manufacturer's specifications.

The Air Monitor will utilize a photoionization detector (PID) to screen the ambient air in the work areas (drilling, excavation, soil staging, and soil grading areas) for total Volatile Organic Compounds (VOCs) and a DustTrak tm Model 8520 aerosol monitor or equivalent for measuring particulates. Work area ambient air will generally be monitored in the work area and downwind of the work area. Air monitoring of the work areas and downwind of the work areas will be performed at least every 60 minutes using a PID and the DustTrak meter.

If sustained PID readings of greater than 25 ppm are recorded in the breathing zone, either personnel are to leave the work area until satisfactory readings are obtained or approved personnel

may re-enter the work areas wearing at a minimum a ½ face respirator with organic vapor cartridges for an 8-hour duration (i.e., upgrade to Level C PPE). Organic vapor cartridges are to be changed after each 8-hour use or more frequently, if necessary. If PID readings are sustained, in the work area, at levels above 50 ppm for a 5 minute average, work will be stopped immediately until safe levels of VOCs are encountered or additional PPE will be required (i.e., Level B).

If downwind PID measurements reach or exceed 25 ppm consistently for a 5 minute period downwind of the work area, PID readings will be taken within the buildings (if occupied) on Site to ensure that the vapors are not penetrating any occupied building and effecting the personnel working within. If the PID measurements reach or exceed 25 ppm within the nearby buildings, the personnel should be evacuated via a route in which they would not encounter the work area. The building should then be ventilated until the PID measurements within the building are at or below background levels. It should be noted that the site buildings are currently vacant.

10.0 Emergency Action Plan

In the event of an emergency, employees are to turn off and shut down all powered equipment and leave the work areas immediately. Employees are to walk or drive out of the Site as quickly as possible and wait at the assigned 'safe area'. Follow the instructions of the Site Safety Officer.

Employees are not authorized or trained to provide rescue and medical efforts. Rescue and medical efforts will be provided by local authorities.

11.0 Medical Surveillance

Medical surveillance will be provided to all employees who are injured due to overexposure from an emergency incident involving hazardous substances at this site.

12.0 Employee Training

Personnel who are not familiar with this site plan will receive training on its entire content and organization before working at the Site.

Individuals involved with the fieldwork must be 40-hour OSHA HAZWOPER trained with current 8-hour refresher certification.

TABLE 1
Exposure Limits and Recognition Qualities

Compound	PEL-TWA (ppm)(b)(d)	TLV-TWA (ppm)(c)(d)	STEL	LEL (%)(e)	UEL (%)(f)	IDLH (ppm)(g)(d)	Odor	Odor Threshold (ppm)	Ionization Potential
Acetone	750	500	NA	2.15	13.2	20,000	Sweet	4.58	9.69
Anthracene	0.2	0.2	NA	NA	NA	NA	Faint aromatic	NA	NA
Benzene	1	0.5	5	1.3	7.9	3000	Pleasant	8.65	9.24
Benzo (a) pyrene (coal tar pitch volatiles)	0.2	0.1	NA	NA	NA	700	NA	NA	NA
Benzo (a)anthracene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo (b) Fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo (g,h,i)perylene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo (k) Fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Bromodichloromethane	NA	NA	NA	NA	NA	NA	NA	NA	10.88
Carbon Disulfide	20	1	NA	1.3	50	500	Odorless or strong garlic type	0.096	10.07
Chlorobenzene	75	10	NA	1.3	9.6	2,400	Faint almond	0.741	9.07
Chloroform	50	2	NA	NA	NA	1,000	ethereal odor	11.7	11.42
Chrysene	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichloroethylene	200	200	NA	9.7	12.8	400	Acrid	NA	9.65
1,2-Dichlorobenzene	50	25	NA	2.2	9.2		Pleasant		9.07
Ethylbenzene	100	100	NA	1	6.7	2,000	Ether	2.3	8.76
Fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fluorene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Methane	NA	NA	NA	5	15	NA	NA	NA	12.98
Methylene Chloride	500	50	NA	12	23	5,000	Chloroform-like	10.2	11.35
Naphthalene	10, Skin	10	NA	0.9	5.9	250	Moth Balls	0.3	8.12
n-propylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Phenanthrene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pyrene	NA	NA	NA	NA	NA	NA	NA	NA	NA
p-Isopropylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
sec-Butylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA
Tetrachloroethane	NA	NA	NA	NA	NA	NA	Sweet	NA	NA
Toluene	100	100	NA	0.9	9.5	2,000	Sweet	2.1	8.82
Trichloroethylene	100	50	NA	8	12.5	1,000	Chloroform	1.36	9.45
1,2,4-Trimethylbenzene	NA	25	NA	0.9	6.4	NA	Distinct	2.4	NA
1,3,5-Trimethylbenzene	NA	25	NA	NA	NA	NA	Distinct	2.4	NA
Vinyl Chloride	1	1	NA	NA	NA	NA	NA	NA	NA
Xylenes (o,m,p)	100	100	NA	1	7	1,000	Sweet	1.1	8.56
Metals									
Arsenic	0.01	0.2	NA	NA	NA	100, Ca	Almond	NA	NA
Cadmium	0.2	0.5	NA	NA	NA	NA	NA	NA	NA
Chromium	1	0.5	NA	NA	NA	NA	NA	NA	NA
Lead	0.05	0.15	NA	NA	NA	700	NA	NA	NA
Mercury	0.05	0.05	NA	NA	NA	28	Odorless	NA	NA
Selenium	0.2	0.02	NA	NA	NA	Unknown	NA	NA	NA
Other									
Asbestos	0.1 (f/cc)	NA	1.0 (f/cc)	NA	NA	NA	NA	NA	NA

(a) Skin = Skin Absorption

(b) OSHA-PEL Permissible Exposure Limit (flame weighted average, 8-hour): NIOSH Guide, June 1990

(c) ACGIH – 8 hour time weighted average from Threshold Limit Values and Biological Exposure Indices for 2003

(d) Metal compounds in mg/m3

(e) Lower Exposure Limit (%)

(f) Upper Exposure Limit (%)

(g) mmediately Dangerous to Life or Health Level: NIOSH Guide, June 1990

Notes:

1. All values are given in parts per million (PPM) unless otherwise indicated
2. Ca = Possible Human Carcinogen, no IDLH information