



**CONESTOGA-ROVERS
& ASSOCIATES**

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July 24, 2013

Reference No. 081618

Mr. Stephen Scharf
New York State Department of Environmental Conservation
Division of Solid & Hazardous Materials
Bureau of Solid Waste and Corrective Action
625 Broadway
Albany, NY 12233-7258

Dear Mr. Scharf:

Re: Bayer Material Science LLC 125 New South Road Hicksville, New York
USEPA ID#: NYD002920312
Soil Vapor Investigation Work Plan-Revision No. 2

On behalf of Bayer Material Science LLC (Bayer) and Glenn Springs Holdings, Inc. (GSH), this letter presents a revised Work Plan for a soil vapor investigation to identify the current potential for off-site migration of soil vapor from the former Bayer facility in Hicksville, New York. This Work Plan is being presented to the New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) pursuant to ongoing discussions regarding soil vapor and in response to the NYSDEC/NYSDOH comments dated April 25, 2013 and July 18, 2013. If the following approach is acceptable to the Departments, the Work Plan will be implemented on an expedited schedule by Bayer and GSH pursuant to an Order on Consent.

As described in this document, numerous activities have occurred at the site since 2004 that have reduced the concentrations of on-site volatile organic compounds (VOCs) thereby reducing the current possibility of off-site migration of soil vapors from the site and any residual off-site soil vapor that may have been sourced by the site in the past. This letter summarizes relevant information from soil, soil vapor, and groundwater investigations and remediation activities performed to date, and propose a Work Plan to determine current soil vapor conditions and to evaluate the potential for soil vapors to migrate off-site. The planned actions described in this Work Plan follow the protocols and procedures outlined in NYSDOH 2006 Final Guidance for Evaluating Soil Vapor Intrusion in the State of New York (Guidance), and are consistent with the soil vapor investigations previously approved by NYSDEC/NYSDOH for this site.



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GROUNDWATER INVESTIGATIONS

The groundwater beneath the site has been investigated extensively over the past 30 years. The investigations have demonstrated that the groundwater flows in a southerly direction and that the groundwater table is about 50 feet below the ground surface (ft bgs). Thus, the vadose zone is about 50 feet thick. The results of the groundwater sample analyses have confirmed that, with limited exception, the groundwater immediately beneath the site meets New York State Class GA drinking quality groundwater standards. Additionally, the highest concentrations of PCE, TCE, and vinyl chloride recorded at the site in the past 15 years were low (85 µg/L for PCE in 2002; 14 µg/L for TCE in 1998; and 17 µg/L for vinyl chloride in 2002). Now, 12 to 15 years later, the concentrations of these VOCs are expected to be at or below the Class GA drinking quality groundwater standards due to natural attenuation processes. Therefore, the focus of the soil vapor investigation should be vadose zone soils.

SOIL INVESTIGATIONS

Under NYSDEC's RCRA program, the vadose zone soils across the site were extensively investigated through a comprehensive series of seven successive phases of study over the period from 2004 to 2009. Initial phases of the investigations did not assess soils under the on-site buildings and structures existing at that time. However, the most recent sampling investigations (Phases IV through VII) were performed after the buildings were removed, providing access to all of the site soils. Soil samples were analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), and metals. Consequently, over the course of the seven phases of soil investigation, a thorough assessment of the presence of VOCs and VOC-impacted soil that could contribute to soil vapors has been completed. Moreover, of particular significance, when an area of VOC-impacted soil was identified, the horizontal and vertical extent of such impacted area was delineated and the soils removed as a RCRA Interim Corrective Measure.

During these seven phases, soil samples from over 450 locations have been analyzed for VOCs. The results of the VOC sampling events identified only two areas in the middle of the site, one beneath former Plant 1 and one immediately east of Plant 1, where VOC concentrations in excess of 1 mg/kg were present. Subsequent additional sampling was performed in these areas to fully delineate the horizontal and vertical extent of the elevated VOC concentrations. The primary VOCs present in these areas were tetrachloroethene (PCE) and trichloroethene (TCE). Figures 1 and 2 provide a color-coded depiction of the PCE and TCE concentrations found in the soil samples.



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As previously stated, the primary VOCs were PCE and TCE. Additionally, cis-1,2-dichloroethene (a product of PCE and TCE degradation) was also present in some of the PCE and TCE impacted soil locations. Methylene chloride, toluene, MIBK, and styrene were present in four, two, one, and one sample locations respectively in the former Plant 1 area at concentrations greater than 1 mg/kg. Outside the Plant 1 areas, no VOCs, other than acetone (a common laboratory artifact) were detected in soils at concentrations exceeding the soil guidance values presented in the NYSDEC Technical and Administrative Guidance Memorandum (TAGM) titled "Determination of Soil Cleanup Objectives and Cleanup Levels," HWR-94-4046, dated January 24, 1994 (TAGM 4046) or above current 6 NYCRR Part 375 soil cleanup objectives. The identified elevated VOC-impacted soils in the former Plant 1 area were removed in 2009 as a RCRA Interim Corrective Measure.

There are no known remaining areas of soil with elevated concentrations of VOCs on the site. Other than five locations in the vicinity of former Plant 1 where PCE concentrations ranged from 0.05 to 1 mg/kg, the total VOC concentrations were either less than 0.05 mg/kg or were non-detect across the remainder of the site. Given that more than 450 sample locations have been tested, it is not expected that there are any residual sources of VOCs that remain in soil on the site. Figures 1 and 2 illustrate the limited pre-remedial areal extent of VOCs in soil and indicate that the localized areas of elevated concentrations of PCE and TCE were removed in 2009. With this known source removed, it is expected that any residual soil vapors will have begun to reduce in concentration and mass through natural attenuation processes including biodegradation, advection, dispersion, and diffusion since the last on-site soil vapor sampling events in 2009.

Details of the VOC soil sampling programs are included in the following documents, which have been reviewed and approved by the NYSDEC:

- RCRA Facility Investigation Report (ARCADIS BBL, June 2004)
- Phase II RFI Report contained in a letter from ARCADIS BBL to the NYSDEC dated January 5, 2005
- Interim Corrective Measure Certification Report (ARCADIS BBL, November 2005)
- Phase III soil results letter report, May 2006
- Phase IV Sampling Plan contained in a letter from ARCADIS BBL to the NYSDEC dated July 6, 2006
- Phase IV soil sample results and Proposed Phase V Scope Report, October 2006
- Phase V soil results letter report, October 2006
- Phase VI soil results letter report, June 2007



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- Phase VII soil results letter report, June 2008

SOIL VAPOR INVESTIGATIONS

Soil vapor samples were first collected in 1989 during the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Remedial Investigation at 55 locations across the site, except for areas covered by pavement or buildings at the time. Soil vapor field screening was performed using a photoionization detector (PID) and confirmatory soil vapor analysis for site-related VOCs, including TCE, PCE, trans-1,2- dichloroethene, and vinyl chloride was performed using portable gas chromatography. Based on the analytical results, PCE was the only VOC detected in the soil vapor samples, and then only in two sampling locations; one location southeast of Plant 1 and one location northwest of Plant 2. Details of this soil vapor sampling program are presented in the Remedial Investigation Report (Leggette, Brashears & Graham, Inc., revised August 1992).

Between September 2008 and August 2009, Bayer collected soil vapor samples from 28 sampling locations (locations SG-1 through SG-28, shown on Figure 3). The sampling locations were approved by NYSDEC/NYSDOH and selected to provide coverage across the site, including areas within/near the footprints of the former plant buildings and the various paved areas. Several samples were also collected along the entire property boundary to measure the soil vapors adjacent to neighboring properties. The results of the soil vapor sampling were presented in the reports submitted in 2007 through 2009. The results indicate that elevated VOC concentrations were present in the middle of the site, primarily in the location of former Plant 1. This finding is consistent with the results of the soil sampling program. Also consistent with the VOC concentrations in the soil, the highest soil vapor concentrations were those for PCE and TCE. Figures 3 and 4 show the historical soil vapor concentration contours for PCE and TCE respectively, and as can be seen on the figures, the elevated concentrations of PCE and TCE are centered in the former VOC source area in the soils beneath the former Plant 1 area that were removed in May through August 2009.

With regard to the prior soil vapor samples that were collected from along the property boundaries, the following conditions were identified:

- There were no exceedances of the NYSDOH Indoor Air Guidance Values along the north property boundary.
- There was one location (SG-21) with a PCE concentration of 430 $\mu\text{g}/\text{m}^3$ and TCE concentration of 170 $\mu\text{g}/\text{m}^3$ near the southwest corner of the site. However, follow-up sampling at four additional locations around this location identified no VOC concentrations



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greater than the NYSDOH Indoor Air Guidance Values at these four locations, confirming that the one identified location is isolated and of limited areal extent.

- There was one other location with elevated VOC concentrations (at SG-11 the PCE concentration was 3,000 $\mu\text{g}/\text{m}^3$ and the TCE concentration was 32 $\mu\text{g}/\text{m}^3$) along the southwest property boundary proximal to the former Plant 1 source area.
- The sampling on the eastern property boundary did identify some locations of elevated VOC concentrations with the highest VOC concentration being PCE at 8,100 $\mu\text{g}/\text{m}^3$.

In April 2011, a supplemental soil vapor investigation was conducted beneath and inside the neighboring warehouse located to the east of the site. This investigation determined that while soil vapors were detected in some of the sub-slab areas beneath the building, no soil vapors were detected at actionable levels within the indoor air when compared to the NYSDOH soil vapor intrusion matrices. Some of the sub-slab soil vapor concentrations were higher than those observed on the Bayer property (with the highest VOC concentration being PCE at 32,000 $\mu\text{g}/\text{m}^3$ vs. the highest east property boundary on-site concentration of 8,100 $\mu\text{g}/\text{m}^3$), indicating that there are potential VOC sources on the warehouse property contributing to soil vapor in these areas. Also, considerable variability in the sub-slab samples was observed which is indicative that multiple sources exist. The results of this supplemental investigation were submitted to the NYSDEC in the report entitled "Vapor Intrusion Investigation Summary Report" (August 2011). Based upon a holistic evaluation of the existing soil vapor data, it is possible that VOC sources on the warehouse property are affecting the east side of the Bayer property.

The results of these investigations have been discussed with the NYSDEC and NYSDOH. This Work Plan proposes additional investigation to assess current soil vapor conditions at the site and the potential for off-site soil vapor migration.

REMEDIAL ACTION AND OTHER RELEVANT FACTORS

Since the start of the on-site soil vapor assessment in 2007, several activities have been performed that have the potential to reduce the on-site VOC concentrations. These activities have also reduced the potential for the presence of off-site vapor related to the site. The significant activities that have taken place include the following:

- In 2009, Bayer removed the only known pockets of elevated VOC-impacted soil from the site. Considering that over 450 soil samples were analyzed for VOCs, it is expected that any remaining pockets of soil with elevated VOC concentrations would be small and of limited extent. The 2009 remedial action removed approximately 1,450 cubic yards of soil primarily



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impacted with PCBs and the VOCs PCE and TCE. Removal of this material eliminated the only known locations of elevated VOCs in soil that would be contributing to soil vapors. This removal action will have had a significant effect on soil vapor concentrations and is expected to have substantially eliminated the generation of new soil vapors. This was confirmed by a subsequent soil gas sample collected in the area that was non-detect (see Figure 3). With the source removed, residual soil vapor concentrations in the surrounding areas will continue to dissipate and new soil vapor generation potential will have been minimalized. Given that the last on-site soil vapor samples were collected only 1 or 2 months after the 2009 removal activities, and almost 4 years ago, they are not believed to be representative of current concentrations.

- In 2009, a number of soil excavation projects were completed, primarily for PCBs. The opening of excavations to remove these soils promoted soil vapor movement in the immediate vicinity of the excavations. The degree of enhanced soil vapor movement depends on the size of the excavation, the duration for which the excavation remains open, and the fluctuations in the atmospheric conditions (wind, barometric pressure, temperature, etc.). Since the removal action, the subsurface conditions have had a few years to stabilize. Therefore the soil vapor concentrations detected in the last sampling event may not be representative of current conditions.
- In 2006, the former building foundations and floor slabs on the site were removed and, in the process, some of the pavement areas were broken up by the heavy equipment and some of the pavement was removed. The removal of the floor slabs and disturbance/removal of the pavement opens the pathway for soil vapor release to the atmosphere and for replenishment of clean air into the soil. The exposed soil is also subject to diurnal and seasonal variations in temperature and pressure that promotes vertical movement of soil vapor. The 2009 soil vapor samples were collected only 3 years after the removal of the relatively impervious cover layer across large areas of the site. Seven years have now passed and it is expected that the soil vapor concentrations will have decreased since the time of the last sampling event.

Based upon these events and circumstances, soil vapor migration/generation theory suggests that it would be most appropriate to collect a set of additional on-site soil vapor samples to provide a clearer understanding of current site conditions relevant to assessing the potential for off-site migration of soil vapor and to determine the most appropriate locations for certain off-site soil vapor sampling locations (i.e., biased locations in areas of greatest potential impact). There are no underground utilities (i.e., electric, gas, etc.) that cross the east or southwest property boundaries that could provide a preferential pathway for off-site migration of soil vapors. Clearly, (1) the lack of any identifiable preferential pathway such as a utility corridor that would allow soil vapors to migrate onto the neighboring property and (2) the presence of



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the soil vapor concentrations that are higher on the neighboring property to the east than along the eastern property boundary, make it necessary to obtain current data from the site. Evaluation of these data may resolve the question of whether on-site soil vapor has the potential to affect off-site property and whether the off-site soil vapors beneath the warehouse east of the property are related to past activities at the site.

PROPOSED PLAN

The proposed plan of investigation has been developed with a phased implementation approach to allow for the best decisions to be made with respect to sample location selection. The phased approach will begin with a set of on-site and off-site samples being collected to determine the current conditions across the site, more particularly along the property boundaries and to the east of the commercial building located east of the site. Based on the results of the first sample phase, the appropriate locations for sampling on adjacent properties to the west/southwest will be selected. The intent will be to locate the westerly/southwesterly off-site sampling stations adjacent to on-site locations that exhibit the highest soil vapor concentrations, thereby biasing the off-site sampling stations in the area of highest probabilities of detecting soil vapor emanating from the site.

At the conclusion of each phase of sampling, and prior to issuance of a formal report, the NYSDEC and NYSDOH will receive the final soil vapor analytical data and a figure showing the sampling locations in a monthly progress report. Bayer and GSH will evaluate the data and make a written recommendation to the NYSDEC/NYSDOH with regard to the appropriate next actions. After reviewing the data, NYSDEC / NYSDOH can, as needed, provide their recommendations. To expedite the completion of this work, it is recommended that a conference call be held by the parties, one week after each such submittal to review the recommendations and to move to the next phase as expeditiously as possible. At the conclusion of Phase II, a formal soil vapor investigation report will be presented to NYSDEC / NYSDOH.

The details of the proposed sampling program are as follows:

PHASE I

- Collection of vadose zone soil vapor samples from along the perimeter of the site as shown on Figure 5. The samples will be collected from locations spaced approximately 150 ft apart along the eastern and southwestern property boundaries. To the extent practical, the sampling locations will match those locations that were sampled in 2009 to help determine



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whether the passage of time and the completed on-site remediation work have resulted in any improvement in soil vapor conditions. Consistent with the 2009 investigation, the probes will be installed with a screened interval that is 5 to 5.5 ft bgs.

- Collection of three soil vapor samples in the previously identified high soil concentration areas to help assess the changes that have occurred as a result of the on-site remediation work. Comparison to the historic data should demonstrate the effect of the remedial actions that have been performed. The locations of these three sampling points are also shown on Figure 5.
- Collection of pairs of soil vapor samples at three of the perimeter locations to help assess the potential for off-site migration of soil vapors. One of the probes will be installed immediately adjacent to the property boundary and the other probe will be installed 20 ft inward, perpendicular to the property boundary. Comparison of the results obtained at each probe pair will help assess whether there is a concentration gradient leading onto the adjacent neighboring properties off-site. The locations of these probe pairs are shown on Figure 5.
- Three of the sampling locations will be installed as vertical pairs to help assess the concentration gradients with depth. The shallow soil vapor probe of each pair will be installed at a depth of 5 to 5.5 ft to match the zone measured at all of the other probe locations. The deeper soil vapor probe will be installed and screened to collect samples from a depth of 15 to 15.5 ft bgs. The locations of these deep probes are shown on Figure 5.
- Collection of soil vapor samples from three off-site locations to the east of the commercial building bordering the east property boundary. The locations of these probes are shown on Figure 5.

PHASE II

- Based on the results of the first phase of sampling, appropriate additional off-site sample locations will be selected from areas adjacent to the on-site sample locations that exhibit elevated soil vapor concentrations. It is planned that three off-site sample locations will be completed along each of the following property boundaries (a total of six additional off-site sample locations):
 - Three off-site samples on the commercial property to the southwest of the railroad trenches
 - Three off-site samples along New South Road between the site and the residential neighborhood



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- Tentative locations for the above off-site sampling are presented on Figure 5. It is noted that these locations are tentative and may be adjusted as necessary based upon the on-site concentrations of soil vapors and to accommodate property owner access permission and utility locations. In the event that no significant on-site concentrations of VOCs are detected, the proposed locations on Figure 5 will be utilized to provide sufficient coverage for the targeted off-site investigation.
 - Each off-site sample will be collected from the 5 to 5.5 foot depth below ground surface (bgs) to be consistent with the 2009 investigation.

Following receipt of final analytical data, a monthly progress report will be submitted to NYSDEC / NYSDOH containing a site map, the final analytical data received during the reporting period, an evaluation of the data, and recommendations. A final soil vapor investigation report will be prepared at the conclusion of Phase II as provided by the Order on Consent. The report will include a comparison of previous data to the current data to evaluate the impact of the completed remedial activities on the site and to assess potential migration of vapors. The report will also include comparison of the soil vapor data to the NYSDOH Indoor Air Guidance values. Based on these comparisons and other relevant scientific principles and concepts, the report will include a recommendation for consideration of NYSDEC / NYSDOH as to the next appropriate action under the Order on Consent.

The analytical data will include a Data Usability Summary.

SAMPLING PROCEDURES AND PROTOCOLS

Before the soil vapor sampling begins, a field survey crew will field- identify the proposed sampling locations using coordinates obtained from the sampling locations map. The sampling locations will be adjusted in the field, if needed, for equipment access and to match as closely as possible with previous sampling locations, where appropriate. Each proposed final sampling location will then be located and recorded utilizing latitude/longitude GPS coordinates and marked using a flagged, wooden stake.

The methods for collecting soil vapor and ambient air samples are detailed in the Standard Operating Procedures (SOPs) provided in Attachments 1 and 2, respectively. The NYSDOH's Guidance was considered in the development of these SOPs. In accordance with the NYSDOH's Guidance, samples will be collected at depths greater than 5 ft bgs to reduce the likelihood of atmospheric air being introduced into the samples. Sample collection is proposed for the 5.0 to 5.5-foot interval bgs at each shallow location. The deep soil vapor probes will be set at a depth of 15 to 15.5 ft bgs. The sampling interval will be limited to approximately 6 inches to reduce



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potential sample dilution that could otherwise occur across a larger interval. To the extent that any soils are returned to the surface during the installation process, they will be screened using a photoionization detection unit (PID) to provide an indication of the vertical profile of the VOC content within the soils encountered.

At each proposed soil vapor sampling location, the Geoprobe® rig will be used to advance an assembly consisting of interconnected 4-foot lengths of 1.25"-diameter steel probe rod, affixed with an expendable point holder and expendable point at the downhole end, to the desired sampling depth (5.5/15.5 ft bgs). Hydrated bentonite will be used to seal the annular space (if any) between the steel rod and borehole wall to isolate the subsurface interval from the atmospheric air. After the target depth is reached, the expendable point will be disengaged by hydraulically retracting the steel probe rods upwards approximately 0.5 feet to create a void in the subsurface soil for soil vapor collection. A high-density polyethylene (HDPE) or fluoropolymer sample delivery tube (3/16" or 1/4" inside diameter) with an attached Post-Run-Tubing (PRT) threaded adapter will be lowered through the 1.25"-diameter steel rod and threaded into the expendable point holder. Digital photos will be taken to document the soil gas probe installations.

An initial gas draw (purging) will be performed immediately prior to sampling. At the ground surface, the sample delivery tube will be attached to an air sampling pump, and a minimum of one volume will be evacuated from the sampling system. An electronic flow sensor will be used to measure pump flow rate (not to exceed 100 milliliters per minute [mL/min] during purging activities), and the desired volume will be purged based on pumping duration. After one full purge volume (equivalent to 1½ times the volume inside the sampling line) has been expelled from the sampling system, the pump will be disconnected and a PID equipped with a 10.6 electron volt lamp will be attached to the tubing to measure approximate total organic vapor levels. A Swagelock™ valve will be closed prior to disconnecting the pump and connecting the PID to prevent atmospheric air from entering the tubing.

Sample collection and analysis will be conducted in accordance with USEPA Compendium Method TO-15, titled "Determination of VOCs in Air Collected in Specially-Prepared Canisters and Analyzed by Gas Chromatography/Mass Spectrometry (GC/MS)" and the USEPA Method TO-15 Standard Operating Procedure. At each sampling location, a pre-cleaned stainless-steel canister (a 6-liter SUMMA® canister) with an attached flow regulator will be connected to the sample tubing and slowly opened to collect the soil vapor sample. Batch-certified-clean canisters will be provided by the laboratory with an initial vacuum of at least 26 inches of mercury. Flow regulators will be pre-set to draw soil vapor at a flow rate of 200 mL/min. Each soil vapor sample will be collected over an approximately 30-minute period. When the canister vacuum reaches approximately 2 inches of mercury, the valve on the canister will be closed,



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leaving a vacuum in the canister as a means for the laboratory to verify the canister does not leak while in transit. Four sets of vacuum readings will be obtained in connection with sampling and analysis:

1. Following canister cleaning for shipping to the field
2. Prior to sampling, with all the connections and leak checks completed
3. At the end of sampling
4. Prior to analysis in the laboratory

A tracer gas (helium) will be used in connection with the soil vapor sampling to provide a means to evaluate whether the soil vapor samples are diluted by surface air. A 5-gallon plastic pail will be placed over the soil vapor sampling location, and hydrated bentonite will be used to create a seal between the pail and the ground surface and penetration for the downhole tooling (at the top of the pail) to create a containment unit within the pail. Prior to sampling, helium will be introduced into the pail through a fitting on the side of the pail to create a minimum 50 percent helium content level within the pail. The helium levels in the purge gas and in the pail (prior to and immediately after sampling) will be measured using a gas detector. In the event that the helium meter measures a helium content within the sampling assembly of greater than 10 percent of the helium content measured within the containment unit (e.g., 5 percent for 50 percent helium in the containment unit), the soil gas probe will be considered to permit significant leakage such that the collected soil gas sample will not be considered reliable or representative of soil gas concentrations. In such case, the sample will be recollected following appropriate remedial steps to eliminate surface air inclusion in the sample.

An upwind ambient air sample will be collected each day of soil vapor sampling. Consistent with the soil vapor sampling approach, the proposed air sampling will also involve use of a pre-cleaned 6-liter SUMMA® canister with an attached flow regulator. However, the regulator for the soil vapor sampling will be adjusted by the laboratory to provide uniform sample collection over an approximate 8-hour sampling period.

Prior to moving to the next sampling location, the sampling location will be confirmed by measurement to the survey marker and all down-hole equipment (i.e., steel rods, expendable point holder) will be decontaminated. Following completion of the sampling activities, the boreholes will be backfilled with bentonite grout. Soil sample liners, recovered soil samples, and used soil vapor sample tubing will be placed in steel 55-gallon drums for off-site transportation and disposal.



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The air sample and soil vapor sample Summa canisters will be submitted to TestAmerica Laboratories, Inc. located in Burlington, Vermont for laboratory analysis for VOCs in accordance with USEPA Compendium Method TO-15. The samples will be analyzed for the complete VOC TO-15 analyte list and tentatively identified compounds (TICs). These constituents and their associated detection limits are identified in Table 1. Soil vapor samples from the Summa canisters will also be analyzed for helium using American Society for Testing and Materials (ASTM) Method D1946 to determine if surface air infiltration has occurred. TestAmerica is certified in the State of New York to perform air sample analyses. Laboratory analysis will be performed on a standard turnaround for reporting of analytical results (i.e., 3 to 4 weeks following sample collection).

REPORTING

As provided in the Order on Consent, written progress reports will be provided by the 10th day of each month. Following completion of the second phase of the investigation, a final soil vapor investigation report will be prepared. The final report will include:

- A summary of work activities performed and analytical results obtained for the soil vapor investigation
- An evaluation of the soil vapor results to the NYSDOH Indoor Air Guidance values
- Data tables presenting laboratory analytical results
- Figures showing the surveyed air and soil vapor sampling locations and corresponding laboratory analytical results
- Copies of the full laboratory report (including a Data Usability Summary)
- A CD containing the full laboratory analytical data reports
- An assessment of the results
- A review of any NYSDEC / NYSDOH preliminary recommendations
- Proposed future actions under the Order on Consent

The report will be submitted to the NYSDEC/NYSDOH approximately 6 weeks after receipt of the final analytical data from the laboratory.



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ANTICIPATED SCHEDULE

Bayer/GSH is prepared to implement the proposed soil vapor sampling activities within 60 days following NYSDEC/NYSDOH approval of this sampling plan and execution of the Order on Consent. The proposed field activities for the first phase will take approximately 2 weeks to arrange and 2 weeks to complete. Preliminary laboratory analytical results for the soil vapor sampling activities will be available approximately 3 to 4 weeks following sampling. As indicated above, a progress report will be submitted to the NYSDEC/NYSDOH after receipt of the final laboratory analytical data. Thereafter, arrangements for the second phase of sampling will be made and implemented.

We request NYSDEC/NYSDOH approval of the proposed soil vapor sampling activities. Please do not hesitate to contact David Schnelzer of Bayer at 412-777-7603 or Roger Smith at GSH at 972-687-7516 if you have any questions or require additional information.

Yours truly,

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James K. Kay, P. Eng.

JK/mg/2
Encl.

cc: Thomas Taccone, USEPA
Mark Fisher, The ELM Group
Roger Smith, GSH
David Schnelzer, Bayer