April 30, 2020

Mr. James Haklar, Ph.D
USEPA Region 2
Clean Air and Sustainability Division
290 Broadway
New York, NY 10007-1866

RE: Concrete Chip Sampling Work Plan
700 Smith Boulevard at the Port of Albany, New York
NYSDEC Spill No.: 401080(P)
CHA Project No.: 28592

Dear Mr. Haklar:

On behalf of the Albany Port District Commission, CHA Consulting, Inc. (CHA) is pleased to provide this Concrete Chip Sampling Work Plan (Work Plan) for your information. Based on recent correspondence between EPA and CHA, EPA is requiring that additional characterization efforts be completed pertaining to the concrete floor slabs in the two buildings (Office Building and Garage) at site. EPA has indicated that collection and analysis of concrete floor chip samples from within the locker room of the office building and within the garage are required. This Work Plan has been prepared to outline the activities to meet EPA requirements and ensure that the methods and procedures are performed in a manner acceptable to EPA.

FIELD ACTIVITIES

The scope of work presented in this section has been developed pursuant to the EPA Standard Operating Procedure for Sampling Porous Surfaces for PCBs (EPA Office of Environmental Measurement and Evaluation, May 2011) and the New York State Department of Environmental Conservation (NYSDEC) Division of Environmental Remediation (DER) Technical Guidance for Site Investigation and Remediation (DER-10).

Pre-Sampling Inspection

On March 10, 2020 a pre-sampling inspection was completed in the site buildings to assess the current conditions of the floors and identify probable sample locations. The findings of this inspection are summarized below.

Office Building – Locker Room – An inspection was made of the concrete floor of the locker room, the doorway area, and the paved areas immediately outside the doorway. The inspection included a thorough visual examination of the floor and a photographic log was made during the inspection (Attachment A). The floor was found to be generally in good condition, with no significant cracks and only some accumulated dust and minor debris. There were no observed areas of oil-type staining

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within the locker room. The locker room is entered and exited from the exterior of the building only and exits to the paved driveway along the east end of the site. There were no oil-type stains observed on the asphalt driveway adjacent the locker room door.

Garage Building –A floor plan of the garage building is provided as Figure 1 and photos of the garage interior are provided in Attachment A. The entire garage floor was inspected including the open areas on the east and north, and the raised platform area in the southwest corner of the building. There were a number of oil-type stains observed on the floor of the garage. A large stained /discolored area was observed on the platform area, and staining was seen in a few smaller areas along the north wall and along the east wall. Minor accumulations of surface dirt/dust/material were also observed on the platform area.

Concrete Chip Sampling

Based on the findings of the pre-sampling inspection the following samples are planned. As discussed above there were no areas of oil-type staining found on the locker room floor or on the paved area immediately outside the doorway. In accordance with EPA's request, CHA will collect a single concrete chip sample from the concrete floor on the interior side of the doorway of the locker room. At the time of the field investigation, one to two additional samples may be collected at the direction of NYSDEC.

In the garage building, CHA will collect 5 concrete floor chip samples at the approximate locations shown in Figure 1. The proposed locations are biased solely to areas exhibiting oil-type staining. These locations include multiple areas within the garage and include stains of varying color and appearance.

The sample collection methodology to be used is detailed below.

Equipment List

- Rotary impact hammer variable speed drill;
- 1/2-inch or other suitable (3/4", 1", etc.) diameter carbide tip drill bits (dedicated/disposable to each sample location);
- Hammer and steel chisels or sharp cutting tools (dedicated/disposable to each location). Disposable scoops or sample spoons to collect the sample, as necessary;
- Disposable brush and cloths to clean areas; Polyethylene sheeting, aluminum foil, or other material to capture and collect the powder sample; and,
- Sample tags/labels, custody seals, and Chain of Custody form.

Sample Collection

For easy identification, sample locations will be pre-marked using a marker or paint. (Actual drilling points will not be marked). Sample collection will consist of the following steps:

- Remove any surface dust or debris with a brush or cloth prior to drilling from sample area.

- Lock a l/2-inch or another size diameter carbide drill bit into the impact hammer drill and plug the drill into an appropriate power source.
- Polyethylene sheeting, aluminum foil, or other material will be used to contain the powdered sample. Begin drilling in the designated locations.
- Samples will be collected from the top 0.5 inch of the concrete floors. Multiple holes located closely adjacent to each other may be needed to generate sufficient sample volumes for laboratory analysis.
- Using the impact drill and manual tools (e.g., chisel and hammer or similar, as necessary), the sample material will be pulverized to the extent feasible. A new chisel or drill bit will be used at each location. Disposable spoons or scoops will be utilized when necessary to collect concrete powder and place into sample jars.

Sample Handling, Preservation, and Storage

Samples will be collected into 2-oz. wide-mouth glass jars with a Teflon-lined cap. Samples will be submitted for analysis for PCBs by Method 8082A. A Chain-of-Custody will be maintained to document the transfer of all samples. Each sample container will be properly sealed. Sample container labels will include sample number, place of collection and date and time of collection. Sample containers will be delivered to the Contract Laboratory at 4°C (±2°C) in sealed coolers.

Decontamination and Investigation Derived Waste (IDW)

It is not anticipated that the investigation will generate excess concrete powder or chips as all of this material will be included in the samples sent for analysis. Nor will any water or other decontamination fluids be generated during sampling activities as all materials used to collect the samples will be disposed of. Cleanup wastes generated during the investigation which came in contact with concrete material (e.g., PPE, sampling tools, polyethylene or aluminum foil) will be placed in appropriate containers which will be temporarily staged on-site for proper characterization at a future time, based on the results of the concrete samples.

Quality Assurance/Quality Control Samples

To assess the quality of data resulting from the field sampling program, a field duplicate sample and laboratory matrix spike/matrix spike duplicate (MS/MSD) samples will be collected and submitted to the contract laboratory. The field duplicate sample will be collected and analyzed as a check on the aggregate analytical and sampling protocol precision, and MS/MSD samples will be analyzed as a check on the analytical method's accuracy and precision. Required QA/QC samples are analyzed at a frequency of one (1) per 20 site characterization samples, therefore based on the total number of primary samples to be collected for this effort we anticipate that a single QA/QC sample will be obtained.

REPORTING

All laboratory reports will be provided as NYSDEC Analytical Services protocol (ASP), Category B Deliverables. The laboratory will also be required to provide the data in an electronic data deliverable (Equis format) for electronic submission to the NYSDEC. Following receipt of laboratory data, a

qualified third party will conduct an independent evaluation of the Category B data reduction and reporting by the laboratory and will subsequently submit a Data Usability Summary Report (DUSR).

The results of the additional site characterization will be provided to the EPA in a letter report, including a summary of the sampling methods, results, and recommendations.

SCHEDULE

It is anticipated that field work will be initiated within 1 week after written approval of this Work Plan is obtained from EPA. Field activities are anticipated to be complete in one day. The sample results will be analyzed on a 48-hour laboratory deliverables schedule. It is anticipated that data validation will be completed in 2 weeks from the receipt of laboratory results and a letter report summarizing the sampling can be completed within 1 week of completion of data validation.

Should you have any questions regarding this Work Plan, please do not hesitate to contact Rich Totino at (518) 281-5436 or rtotino@chacompanies.com or myself.

Sincerely,

Seth H. Fowler, CHMM
Principal Scientist

RT/SF
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CC: Patrick Jordan – APDC
Rich Hendrick – APDC
John Privitera – McNamee, Lochner, Titus & Williams, P.C.
Kyle Forster, NYSDEC

ENCLOSURE Attachment A – Pre-Sampling Inspection Photo Log
Figure 1 - Proposed Concrete Chip Sample Location Plan

Attachment A

Photograph 1: Office Building Locker Room Floor

Photograph 2: Office Building Locker Room Floor

CHA

SITE PHOTOGRAPHS

Albany Port District Commission

700 Smith Boulevard, Albany, NY

Photograph 3: Office Building Locker Room Floor

Photograph 4: Office Building Locker Room Floor

Photograph 5: Entrance Doorway to Locker Room

Photograph 6: Pavement Outside Locker Room

Photograph 7: Warehouse Building Looking Northwest

Photograph 8: Warehouse Building Raised Platform Area

Photograph 9: Warehouse Building Raised Platform Area

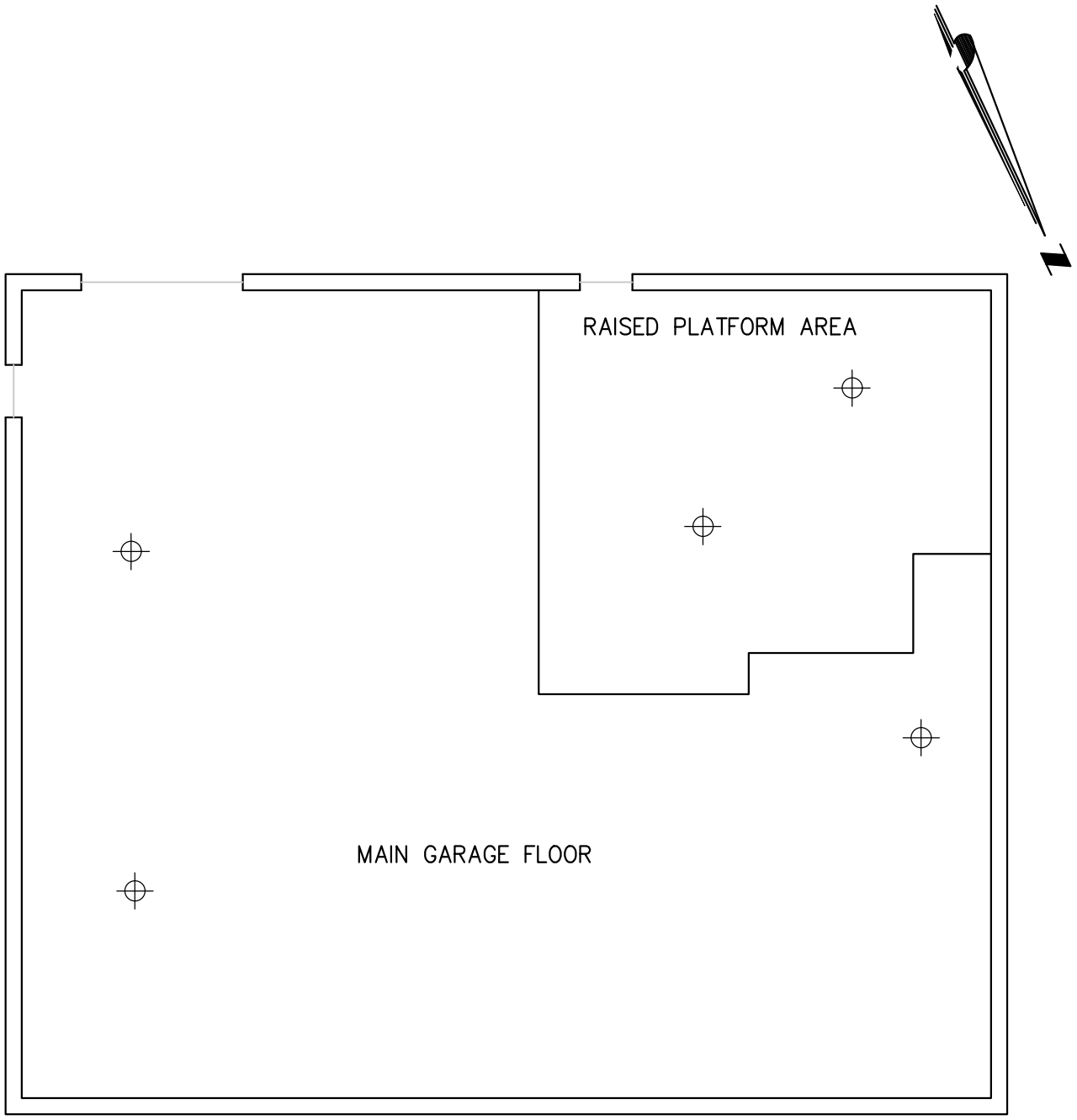
Photograph 10: Warehouse Building Looking Northeast

Photograph 11: Warehouse Building Looking Southeast

Photograph 12: Warehouse Building Stained Areas Along East Wall

Photograph 13: Warehouse Building Stained Areas Along East Wall

Figure 1



LEGEND

⊕ PROPOSED CONCRETE CHIP SAMPLE LOCATION

0 10 20

Scale in feet

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PROPOSED SAMPLE LOCATION PLAN
GARAGE BUILDING

700 SMITH BOULEVARD
ALBANY, NEW YORK

PROJECT NO. 28952

DATE: 04/2020

FIGURE 1