



April 7, 2026

Ms. Nicole L. Hinze
New York State Department of Environmental Conservation
625 Broadway
Albany, New York 12233

**RE: FOURTH ADDENDUM TO REMEDIAL INVESTIGATION WORK PLAN
Rickett's Dry Cleaners – Site # 546058
2017-2019 DOUBLEDAY AVENUE, BALLSTON SPA, NEW YORK
(HRP # DEC1002.P3)**

Dear Ms. Hinze:

On February 27, 2020, HRP Associates, Inc. (HRP) was authorized to complete this New York State Department of Environmental Conservation (NYSDEC) Work Assignment (WA) No. 2 (D009808-02) for Remedial Investigation/Feasibility Study (RI/FS) at the Rickett's Dry Cleaners site, located at 2017-2019 Doubleday Avenue, Ballston Spa, New York (the Site). The Site is depicted on **Figure 1**.

HRP completed the initial phase of the investigation in accordance with the RI Work Plan (RIWP) dated July 15, 2020. During this initial phase of RI work, the source area of Site contamination, which was suspected to exist beneath the former dry-cleaning building, was not accessible due to the building's dilapidated condition and the presence of friable asbestos. In March 2022, demolition of the Site building was completed, allowing for additional investigation within the building footprint.

Source area investigations were completed in May and June 2022 in accordance with the First RIWP Addendum dated May 17, 2022. This work included installation of soil borings within the former building footprint, targeted soil sampling at key depth intervals, and collection of surface water and sediment or sludge samples from features exposed during demolition. These activities were completed to evaluate potential source materials beneath the former structure and to refine the understanding of subsurface conditions contributing to the groundwater impacts identified during the initial phase of the RI.

In April 2024, consistent with the RIWP Second Addendum dated August 3, 2023, HRP conducted supplemental soil, groundwater, surface water, and sediment sampling and analysis, to refine the characterization of the onsite source area and better define the horizontal and vertical extent of contamination.

In September 2025, consistent with the Third Addendum to the RIWP dated July 2025, additional investigation was completed upgradient of the suspected waste disposal area and within remaining onsite data gap locations. Surface water and sediment were investigated in 2 storm water catch basins and an outfall tied to on-site surface water discharge. Soil vapor intrusion

(SVI) was also evaluated at four nearby properties to assess the potential for vapor migration into adjacent residences.

Based on analysis of the data collected during the RI investigation to date, additional delineation is needed to define the horizontal and vertical extent of contaminants migrating downgradient of the Site through overburden groundwater transport and SVI.

The purpose of this RIWP Addendum is to outline the proposed additional RI activities. The activities described in this work plan addendum are to be completed in general accordance with the RIWP, including the Field Activities Plan (FAP), Health and Safety Plan (HASP), Community Air Monitoring Program (CAMP, **Appendix A**), Quality Assurance Project Plan (QAPP), as well as HRP's generic FAP, HASP, and QAPP.

Based on analysis of Site data collected to date, field observations made during and following the completion of remedial investigation sampling and discussions with NYSDEC, HRP proposes additional investigation tasks be completed as outlined below.

- Install and sample groundwater from two new overburden monitoring wells to refine delineation of the downgradient contaminant plume.
- Install and sample soil vapor from probes placed adjacent to the newly installed monitoring wells. The purpose of this sampling is to evaluate potential downgradient soil vapor impacts.
- Resample three overburden wells (HRP-MW-17, HRP-MW-29, and PES-3) to refine the delineation of the on-site contaminant plume.
- Resample bedrock well HRP-MW-23 using a packer to isolate the targeted bedrock fracture zone and collect groundwater from the isolated interval.
- Resample one residential property for SVI due to potential matrix interference on the original indoor air sample.

Proposed investigation locations are depicted in **Figure 2**. Sample types and locations are summarized in **Table 1** and sample Quality Assurance/ Quality Control (QA/QC) details (analyses, containers, hold times etc.) are summarized in **Table 2**.

Investigation, Environmental Sampling, and Implementation

HRP proposes the following field activities be completed in general accordance with the RIWP:

Preliminary Activities:

- Call in Underground Utility Clearance through NYS Code Rule 753/Dig Safe System.
- Complete a new Ground Penetrating Radar (GPR) survey to locate utilities and/or obstructions in the ground that may affect the locations of soil borings and/or monitoring wells.

Soil Boring / Monitoring Well Installation and Sampling:



- Install two soil borings southeast of monitoring well HRP-MW-17 and northwest of monitoring well HRP-MW-31. Soil borings will be installed to a depth between 15 to 30 feet (ft) to the depth of refusal at clay or bedrock. Proposed soil boring locations are depicted on **Figure 2**. Final locations may be adjusted in the field based on results of the GPR survey.
- Collect up to three soil samples from each boring for laboratory analysis. Samples should be selected for analysis based on observed indications of contamination (photoionization detector (PID) readings, odor, staining, etc.). If no indications of contamination are observed, samples should be collected from the top of the first soil horizon, at the water table interface, and from the terminal depth of the soil boring. Up to six soil samples plus 3 QA/QC samples (1 field duplicate (FD), 1 matrix spike (MS), and 1 matrix spike duplicate (MSD)) will be analyzed for Target Compound List (TCL) volatile organic compounds (VOCs) +10 via EPA Method 8260 and per and polyfluoroalkyl substances (PFAS) via EPA Method 537 (modified). Soil cuttings will be stored in 55-gallon DOT shippable steel drums as investigation derived waste (IDW) in accordance with the RIWP and FAP.
- The two soil borings will be converted to permanent overburden monitoring wells. The wells will be screened in the overburden saturated zone above the silt/clay confining layer, or above bedrock if there is no overburden confining layer present. The wells will be constructed of 2-inch PVC with slotted screen installed from the confining layer to 2 feet above the water table. The wells will be fitted with a sand pack installed from the bottom of the boring to 1 foot above the well screen, then sealed with hydrated bentonite to approximately 6 inches below the ground surface. The wells will be finished with flush-mounted protective casings and locking covers or a locking protective steel stick-up as appropriate. Preliminary proposed monitoring well location is depicted in **Figure 2**. The soil sampling summary is provided **Table 1** and the analytical methods and quality assurance summary is provided in **Table 2**.
- The two monitoring wells will be developed at least 24 hours after installation. Development will consist of pumping and surging at least three well volumes, continuing until field parameters stabilize within 10% over three readings and turbidity is below 50 nephelometric turbidity units (NTUs), or until five volumes are removed, whichever comes first. Field parameters should include temperature, pH, specific conductance and turbidity. All purge water removed during well development and sampling will be containerized and managed in accordance with the RIWP and FAP.
- Groundwater samples will be collected from each of the two newly installed overburden monitoring wells and from three existing overburden monitoring wells including HRP-MW-17, HRP-MW-29, and PES-3 for laboratory analysis. Groundwater samples will be collected in accordance with low-flow groundwater sampling procedures with up to five groundwater samples and five QA/QC samples (1 FD, 1 MS, 1 MSD, and 1 trip blank (TB)) collected for analysis of TCL VOCs +10 via EPA Method 8260 and PFAS via EPA Method 537 (modified). The groundwater sampling summary is provided **Table 1** and the analytical methods and quality assurance summary is provided in **Table 2**.

- At bedrock monitoring well HRP-MW-23 a well packer will be used to isolate the bedrock zone before sampling. During well construction of HRP-MW-23 bedrock was encountered at approximately 14.2 ft below ground surface (bgs) with a total depth of 26.3 ft. The well riser is socketed into bedrock from 14.2 to 16.3 ft bgs and the annular space was sealed with grout to the surface, below the rock socket the well consists of an open borehole from 16.3 to 26.3 ft bgs.

To isolate groundwater within the open borehole, a packer will be installed at approximately 17 ft bgs, and one groundwater sample will be collected from approximately 24 ft bgs. The packer will then be moved up to approximately 14 ft bgs and the well will be purged dry to evaluate whether water infiltrates from the overburden. If groundwater returns to the well, a second groundwater sample will be collected from approximately 13 ft bgs. Groundwater sampling procedures for HRP-MW-23 will be consistent with the overburden monitoring wells discussed above.

Soil Vapor Monitoring Probe Installation and Sampling:

- A soil vapor monitoring point (VMP) will be installed adjacent to each soil boring at a depth approximately 2 feet above the water table, resulting in an estimated total depth of 5 to 10 ft bgs.
- Each VMP will consist of a 1-foot stainless steel screen installed to a depth at least 2 feet above the groundwater level. The VMP screen will be connected to the surface by ¼-inch (in.) high-density polyethylene (HDPE) tubing. VMP borings will be backfilled with coarse sand and finished to grade with a 2-ft bentonite seal. Each VMP will be protected at the surface with a road graded flush mount casing and concrete collar.
- Each VMP will be screened for organic vapors using a PID. Screening samples will be collected in 1-liter Tedlar bags filled using a SKC Vac-U-Chamber or equivalent vacuum sampler. Two soil vapor samples will be collected and analyzed for VOCs via EPA Method TO-15. Samples will be collected using individually certified 6-liter summa canisters equipped with 2-hour regulators.

Soil Vapor Intrusion Investigation:

- Resampling of one residential property for SVI due to potential matrix interference in the original indoor air sample (L2604358-02) collected on January 22, 2026. Soil Vapor Intrusion investigation to be completed to evaluate the potential exposure pathway to VOCs through SVI during the 2026 heating season. SVI investigations will be conducted in accordance with the NYSDOH *Guidance for Evaluating Soil Vapor Intrusion in the State of New York* (NYSDOH SVI guidance, NYSDOH 2006). The SVI investigation will consist of installation and sampling of one sub-slab soil vapor point on the lowest floor, the collection of an indoor air sample on the lowest occupied floor, and at least one outdoor air sample. Sub-slab soil vapor points will be installed with a ½" hammer drill bit to a depth of approximately 6" below the slab. Temporary vapor points will be backfilled with #0 filter

sand and sealed at grade with clay. The soil vapor points will be removed and sealed with a concrete patch after collection of the sub-slab soil vapor sample.

- Three SVI samples (1 sub-slab soil vapor, 1 indoor air, and 1 outdoor air samples) plus 1 additional QA/QC field duplicate will be collected and analyzed for VOCs via EPA Method TO-15. Samples will be collected using individually certified 6-liter summa canisters equipped with 24-hour regulators not exceeding flow rates of 0.2 liters per minute.
- Analytical results for SVI samples will be compared to the NYSDOH *Soil Vapor/Indoor Air Matrices A, B, C, D, E and F* (Decision Matrices, NYSDOH 2017). Recommendations will be made based on laboratory analytical results and comparisons of sub-slab soil vapor concentrations to indoor air concentrations on the Decision Matrices.
- A chemical inventory of products within the sample collection areas will be documented as well as completion of the NYSDOH SVI guidance questionnaire.

Decontamination Procedures

Non-dedicated sampling equipment will be subject to decontamination procedures prior to each sample collected to reduce the potential for cross-contamination, as described in the RIWP and the FAP.

Disposal of Investigation Derived Waste

Investigation derived waste (IDW) shall be handled and disposed of in general accordance with the RIWP and the FAP. Representative samples of soil cuttings and well development water will be analyzed to determine classification, treatment, and disposal of IDW.

Each drum of soil generated as IDW will be sampled to assess hazardous waste toxicity using toxic characteristics leachate protocol (TCLP) analysis (TCL VOCs by EPA Method 8260, TCL semi-volatile organic compounds (SVOCs) by EPA Method 8270, Resource Conservation and Recovery Act (RCRA) 8 metals by EPA Method 6010 and 7471, pesticides by EPA Method 8081, and herbicides by EPA Method 8151) corrosivity, reactivity, and ignitability, as well as analysis for polychlorinated biphenyls (PCBs) by EPA Method 8082, and PFAS by EPA Method 1633. To assess F listed contained-in determination each drum of soil will also be sampled for TCL VOCs. Samples for VOC and SVOC analysis are to be collected as grab samples from each soil drum, while other analysis may be collected as a composite sample from all soil drums.

Each drum of development water generated as IDW will be sampled to assess waste toxicity consistent with analysis for soil waste (TCL VOCs, TCL SVOCs, PFAS, PCBs, RCRA 8 metals, pesticides, herbicides, corrosivity, reactivity, and ignitability). The TCL VOC results will also be used to assess F listed waste contained-in determination. Samples collected for VOC analysis are to be collected as grab samples from each development water drum, while other analyses may be collected as a composite from all development water drums.



The analysis provided in this section is subject to change based on the Treatment, Storage, and Disposal Facility (TSDF) review of the waste profiles.

Analytical Data Quality Evaluation

As per the RIWP, all laboratory analysis will be completed by an Environmental Laboratory Approval Program (ELAP) laboratory selected by the NYSDEC. The selected laboratory will provide data deliverables in formats acceptable to the NYSDEC and data validator (NY ASP B and NYSDEC EQuIS formats). All laboratory data will be reviewed by a third-party data validator according to the requirements referenced in the RIWP and HRP's Quality Assurance Performance Plan (QAPP).

Site Survey

Upon completion of investigation field work, a survey will be conducted to properly locate additional sample locations (including monitoring wells). The sample locations will be surveyed by a New York State licensed land surveyor as per the RIWP and will be added to the existing Site base map. The elevations of all monitoring well casings will be established within an accuracy of plus or minus 0.01 feet based on an arbitrary local vertical benchmark. A notch will be etched in all interior casings, or a permanent black mark, to provide a reference point for all future groundwater elevation measurements.

Remedial Investigation Report, Feasibility Study and Alternatives Analysis

Following the completion of additional RI field work, HRP will complete a Remedial Investigation Report (RIR), Feasibility Study (FS), and Alternatives Analysis (AA) as per the RIWP.

HRP has the responsibility of the overall management of this project and will respond to any NYSDEC requests. A proposed project schedule, key milestones, key project personnel, and project-specific subcontractors follow.

Project Schedule and Key Milestones

The proposed project schedule for this work assignment is outlined below. Key milestones are identified to monitor work progress. The following milestones will be applicable for this project:

	<u>Est. Start Date</u>
Milestone 1: Subsurface soil sampling	April 2026
Milestone 2: Installation and sampling of monitoring wells and IDW	April 2026
Milestone 3: Removal of any investigation-derived waste	June 2026
Milestone 4: Complete Data Validation	June 2026
Milestone 5: Review Addendum 4 analytical results	May 2026
Milestone 6: Draft Remedial Investigation Report (RIR)	July 2026
Milestone 7: Draft Feasibility Study and Alternatives Analysis	September 2026



The field work associated with soil and groundwater sampling (Milestones 2 and 3) will begin within 1-2 weeks of NYSDEC review and approval of all site-specific plans, contingent upon availability of subcontractors and upon receiving access to off-site properties. Soil and groundwater samples will be submitted for laboratory analysis within 24 hours of field collection, and laboratory results can generally be expected within 30 days of submission.

The RIR will be submitted as a draft report within 60 days after HRP receives the last round of analytical data from the laboratory. A second draft RIR will be submitted, if needed, within two weeks after the data validation company has reviewed the final analytical submitted for the investigation. A final version of the RIR will be submitted within two weeks after the NYSDEC Project Manager’s comments on both draft reports are received by HRP.

Key Project Personnel

A list of the project personnel of the prime consultant and subcontractors responsible for performance of the investigation has been submitted to the NYSDEC for approval. Primary project staff are listed below:

Personnel	Company	Title for this Work Assignment	Responsibility
<u>Kevin Ballou</u> (Project Manager)	HRP Associates, Inc. (Prime Consultant)	Project Manager	Overall management of the WA
<u>Bryan Sherman, ASP</u> (Project Manager)	HRP Associates, Inc.	Office Health & Safety Manager	Approval of HASP and responsible for overall health and safety issues with the WA
<u>Michael Varni</u> (Project Manager)	HRP Associates, Inc.	Corporate QA/QC Officer	Responsible for QA/QC on the WA
Noah Zaffino (Senior Project Consultant)	HRP Associates, Inc.	Field Manager and Site Health & Safety Officer	Responsible for the on-site sampling and investigative tasks

Subcontractors for this project will include:

- Survey – Susan M. Anacker Professional Land Surveyor, PLLC
- GPR – American Geophysics, Inc.
- Drilling – LaBella Associates, Inc.
- Laboratory – NYSDEC Call-Out Laboratory (Pace)
- Data Validation – Environmental Data Services
- Investigation Derived Waste Disposal – US Ecology (now Republic Services)



Ms. Nicole L. Hinze, NYSDEC
April 7, 2026
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If you have any questions or require additional information, please feel free to contact HRP at (518) 877-7101.

Sincerely,
HRP Associates, Inc.



Kevin Ballou
Project Manager

Attachments:

Tables

Table 1 – Sampling Summary

Table 2 - Analytical Methods/Quality Assurance Summary

Figures

Figure 1 – Site Location

Figure 2 – Proposed Additional Groundwater and Soil Investigation Locations

Appendix

Appendix A – Community Air Monitoring Program



TABLES

**Table 1
Sampling Summary
Remedial Investigation**

Activity/ Matrix	Number of Sample Locations	Proposed Sample Locations	Number of Samples to be Collected	Analyses
Soil Boring Sampling	2	Up to three soil samples will be collected from each boring for VOC and PFAS analysis	9 (6 env., 3 QA/QC)	TCL VOCs+10 by EPA Method 8260 PFAS by EPA Method 537 (modified) QA/QC includes field duplicate, MS, MSD
Groundwater Sampling	7	One sample to be collected from 3 existing overburden monitoring wells, Up to 2 samples from one existing bedrock well, and one sample from 2 newly installed monitoring wells	11 (7 env., 4 QA/QC)	TCL VOCs+10 by EPA Method 8260 PFAS by EPA Method 537 (modified) QA/QC includes field duplicate, MS, MSD, trip blank
Soil Vapor Monitoring Point Sampling	2	One sample per VMP	2	VOCs by EPA Method TO-15 QA/QC to be completed on the SVI samples
Soil Vapor Intrusion Sampling	1	One sub slab soil vapor sample and one indoor air sample, one outdoor air sample, and one duplicate	4 (3 env., 1 QA/QC)	VOCs by EPA Method TO-15 QA/QC includes field duplicate (on indoor air sample)

Acronym List:

PFAS: Per- and polyfluoroalkyl substances

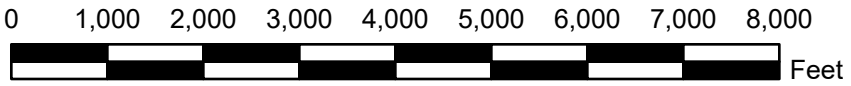
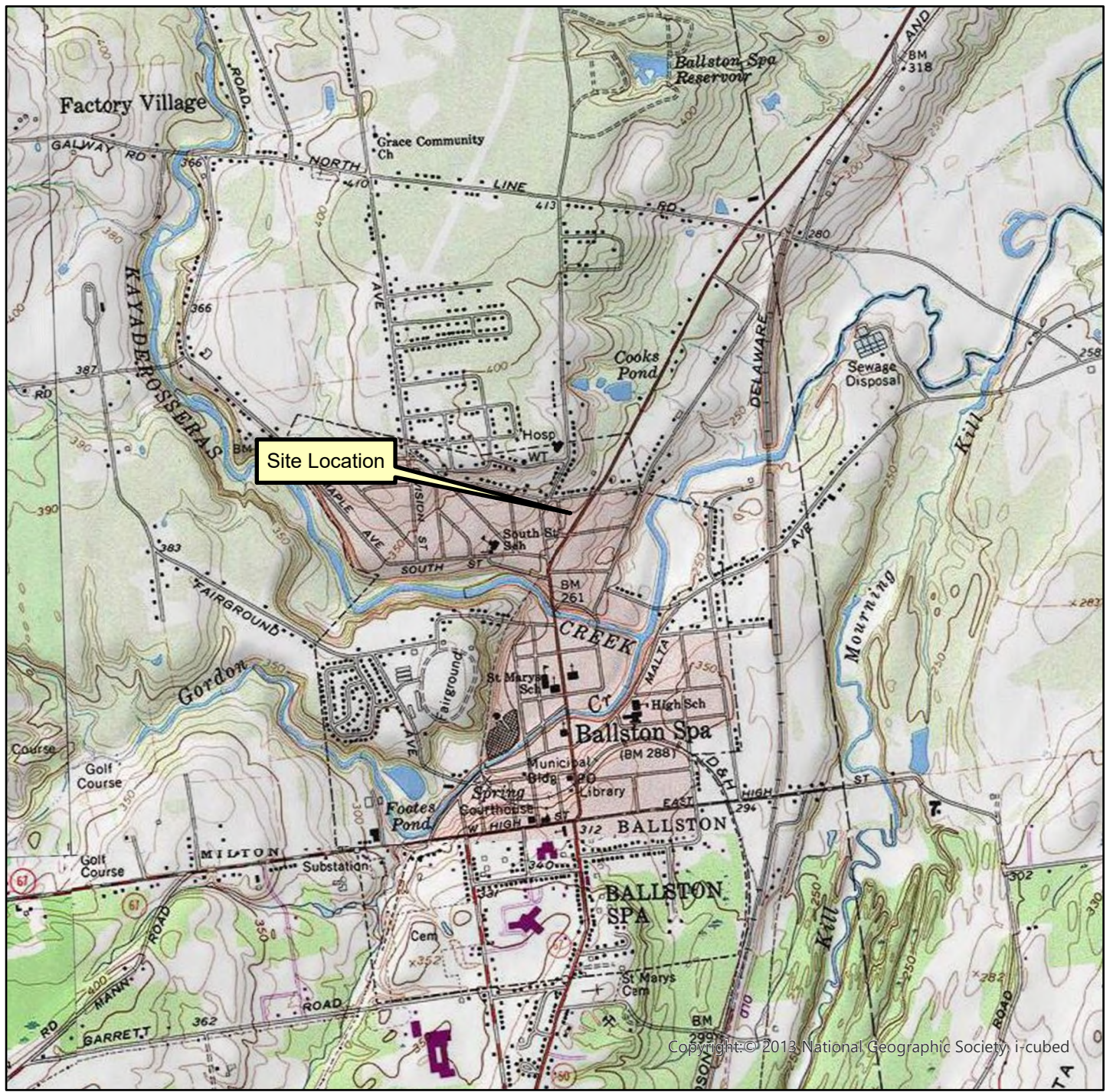
TCL: Total compound list

VOCs: Volatile organic compounds

**Table 2
Analytical Methods/Quality Assurance Summary
Remedial Investigation**

Parameter	Matrix	Number of Samples (including Field QC)	Preparation Method	Analytical Method	Containers per Sample			Preservation Requirements			Maximum Holding Time
					No.	Size	Type	Temp.	Light Sensitive	Chemical	
SOIL											
VOCs by GC/MS	Soil	9	5035A	SW-846 Method 8260B	1	2 oz	clear glass jar	2-6° C	No	NA	14 days
PFAS		9	NA	Method 537 (modified)	2	8 oz	polypropylene	2-6° C	No	NA	90 days
GROUNDWATER											
VOCs by GC/MS	Aqueous	11	5035	SW-846 Method 8260B	3	40 ml	glass vial	2-6° C	No	HCL	14 days
PFAS		11	NA	Method 537 (modified)	3	250 ml	polypropylene	2-6° C	No	NA	28 days
SOIL VAPOR											
VOCs	Soil Vapor, Air	6	NA	EPA TO-15	1	6-liter	summa canister, (2) 2-hour regulator, (4) 24-hour regulator	NA	No	NA	30 days (summa canister)

FIGURES



1 inch = 2,000 feet

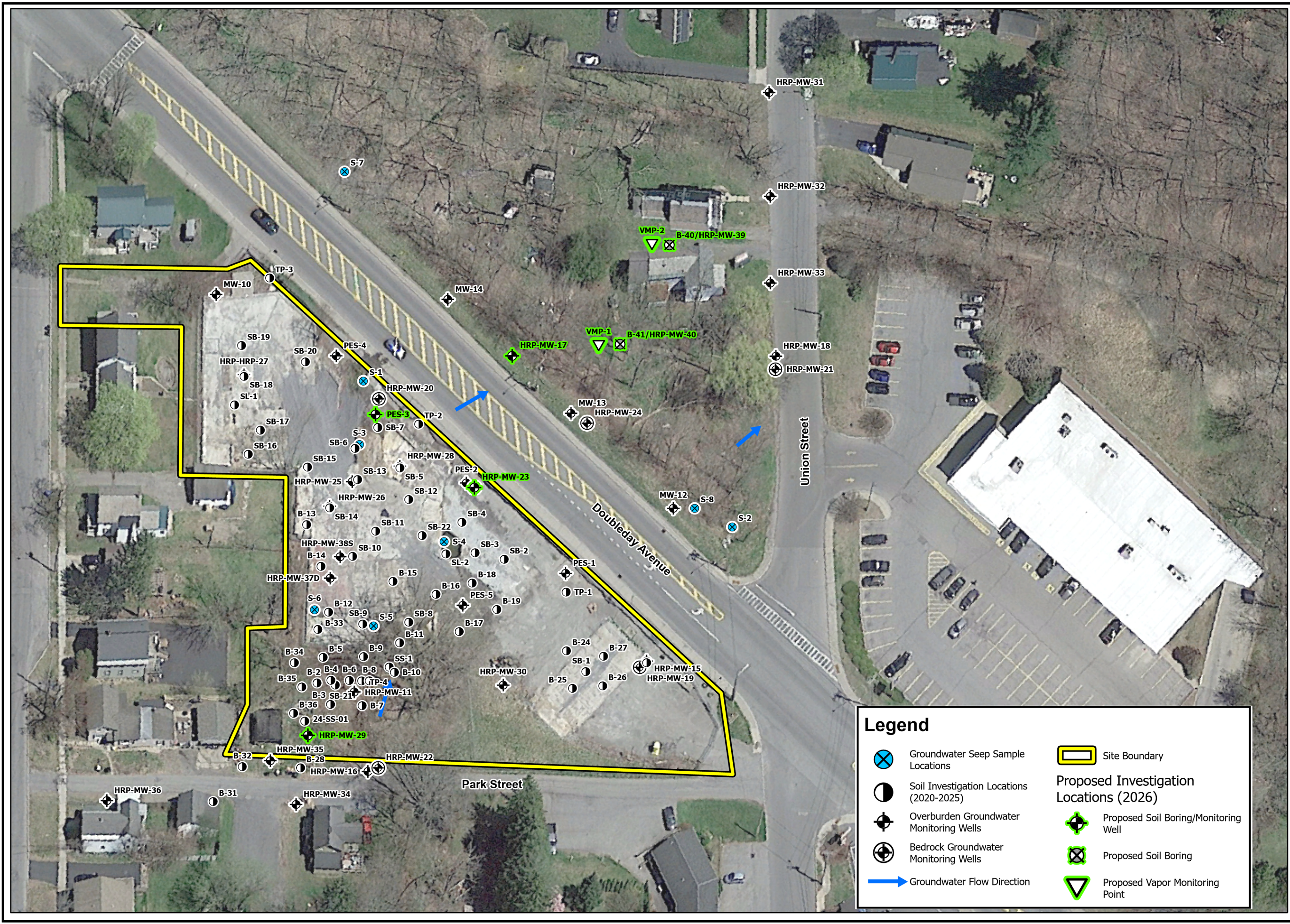


USGS Quadrangle Information
 Quad ID: 43073-A7
 Name: Saratoga Springs, New York
 Date Pub: 1970

Figure 1
Site Location
Rickett's Dry Cleaners
2017-2019 Doubleday Avenue
Ballston Spa, New York
HRP # DEC1002.P3
Scale 1" = 2,000'

ONE FAIRCHILD SQUARE
 SUITE 110
 CLIFTON PARK, NY 12065
 (518) 877-7101
 HRPASSOCIATES.COM

Path: \\hrp-ny-fs2\shared\Data\NYDEC\1002P3\GIS\Rickettis2022\Rickettis2022.aprx



Legend

- Groundwater Seep Sample Locations
- Soil Investigation Locations (2020-2025)
- Overburden Groundwater Monitoring Wells
- Bedrock Groundwater Monitoring Wells
- Groundwater Flow Direction
- Site Boundary
- Proposed Investigation Locations (2026)**
- Proposed Soil Boring/Monitoring Well
- Proposed Soil Boring
- Proposed Vapor Monitoring Point



Revisions	
No.	Date

Designed By:	CMS
Drawn By:	EY
Reviewed By:	

Issue Date:	04/06/2026
Project No:	DEC1002.P3
Sheet Size:	11X17

Proposed Additional Soil and Groundwater Investigation Locations

Rickett's Dry Cleaners
 Site #546058
 2017-2019 Doubleday Avenue
 Ballston Spa, New York

Figure No.
2

APPENDIX A

Community Air Monitoring Plan

Community Air Monitoring Plan
2017 Doubleday Ave, Ballston Spa, New York

This 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 during remedial activities at the site. The CAMP is not intended for use in establishing action levels for workers 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.

Reliance on the CAMP should not preclude simple, common sense measures to keep VOCs, dust, and odors at a minimum around the work areas.

Depending on the nature of known or potential contaminants at the site, real-time air monitoring for VOCs and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary.

Continuous monitoring will be required for all ground intrusive activities. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching.

Periodic monitoring for VOCs will be required during non-intrusive activities such as the collection of soil samples. "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, continuing monitoring may be required during sampling activities.

Particulate Monitoring, Response Levels, and Actions

Particulate concentrations will be monitored continuously at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations. The particulate monitoring will 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 will be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration will be visually assessed during all work activities.

- If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m^3) greater than the background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques will be employed. Work may continue with dust suppression techniques provided that no visible dust is migrating from the work area.
- If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m^3 above the upwind level, work will 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/m³ of the upwind level and in preventing visible dust migration.

All readings will be recorded and be available for State (DEC and DOH) personnel to review.

VOC Monitoring, Response Levels, and Actions

VOCs will 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 will be measured at the start of each workday and periodically thereafter to establish background conditions. The monitoring work will be performed using a photo ionization detector (PID) equipped with a 10.2 eV bulb. The PID will be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment will be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

- 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.
- 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 will be halted, the source of the 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.
- If the organic vapor level is above 25 ppm at the perimeter of the work area, activities will be shutdown.

All 15-minute readings will be recorded and be available for State (DEC and DOH) personnel to review. Instantaneous readings, if any, used for decision purposes will also be recorded.