

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8  
6274 East Avon-Lima Road, Avon, NY 14414-9516  
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[www.dec.ny.gov](http://www.dec.ny.gov)

May 13, 2019

Dennis P. Maguire  
95 Mt. Read Blvd, LLC  
770 Rock Beach Road  
Rochester, NY 14617

Dear Mr. Maguire:

**Re: Supplemental Work Plan – SVI Corrective Measures, SSDS Expansion  
May 9, 2019  
General Circuits, Inc. Site #828085  
City of Rochester, Monroe County**

The New York State Departments of Environmental Conservation (NYSDEC) and Health (the Departments) have completed their review of the document entitled “*Supplemental Work Plan – SVI Corrective Measures, SSDS Expansion*” (the Work Plan), dated May 9, 2019 and prepared by Day Engineering, P.C. for the General Circuits, Inc. site in the City of Rochester, Monroe County. In accordance with 6 NYCRR Part 375-1.6, the Departments have determined that the Work Plan, with modifications and clarifications, substantially addresses the requirements of the Order on Consent. The modifications are outlined as follows:

1. An additional SSDS extraction point will be located as shown on the revised Figure 1 (attachment 1). The added location addresses an area that had insufficient sub-slab vacuum in 2016 (see figure in attachment 2). Vacuum in this area was not re-measured after the most recent SSDS expansion. Alternatively, additional sub-slab vacuum readings can be collected from this area to determine if adequate vacuum has been achieved.
2. Consistent with 6 NYCRR Part 375-1.6, an employee of Day Engineering will always be on-site to supervise the activities undertaken to implement the Work Plan. In addition, Day Engineering will provide the NYSDEC project manager with advance notice of the work schedule throughout the course of the project.
3. Post mitigation indoor air samples will be collected during the 2019-2020 heating season. Results will include ASP Category B-like deliverables and Data Usability Summary Reports. The validated data will be submitted in an acceptable electronic data deliverable (EDD).
4. As described in the November 2017, SVI Corrective Measures Design Plan, the letter report will also provide recommendations for the next submittal (which will either be a Supplemental Work Plan for additional mitigation measures or a Construction Completion Report/Final Engineering Report and revised Site Management Plan). The summary report will be submitted within two months of the indoor air sample collection date. The subsequent submittal package (Supplemental Work Plan, Construction Completion Report/Final Engineering Report, and/or revised Site Management Plan, as applicable)



Department of  
Environmental  
Conservation

will be completed within four months of receipt of concurrence from NYSDEC concerning the summary letter's findings and recommendations.

With the understanding that the above noted modifications are agreed to, the Work Plan is hereby approved. If you choose not to accept these modifications, you are required to notify this office within 20 days after receipt of this letter and prior to the start of field activities. In this event, I suggest a meeting be scheduled to discuss your concerns prior to the end of this 20-day period. Please notify me at least 7 days in advance of the start of field activities.

Thank you for your cooperation in this matter and please contact me at (585) 226-5357 if you have any questions regarding these comments.

Sincerely,



Frank Sowers, P.E.  
Professional Engineer 1

Enclosure

Attachment 1: Revised Figure 1

Attachment 2: 2016 Vacuum Pressure Site Plan

ec: w/encl.

B. Schilling

J. Deming

W. Silkworth

D. Loew

P. Sylvestri

S. Karpinski

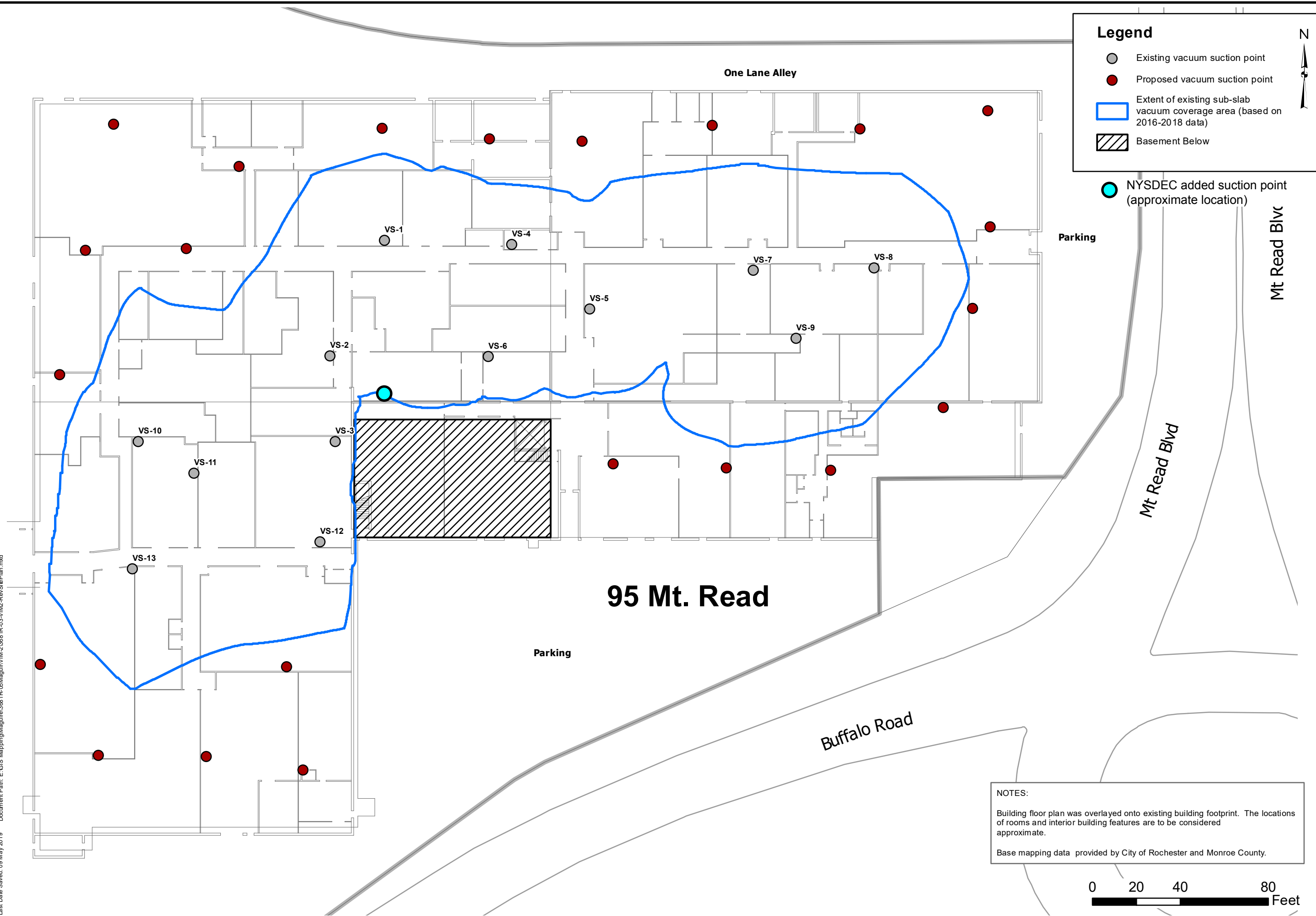
S. Berninger

B. Kline

M. Cruden

**ATTACHMENT 1:  
REVISED FIGURE 1**

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Field Verified By	TER	DATE	05-2019
Drawn By	CPS	DATE DRAWN	05-2015
AS NOTED	SCALE	DATE ISSUED	05-06-2019

**day** DAY ENVIRONMENTAL, INC.  
Environmental Consultants  
Rochester, New York 14606  
New York, New York 10170

Project Title  
95 MT READ BOULEVARD  
ROCHESTER, NEW YORK

Drawing Title  
SVI CORRECTIVE MEASURES - SUPPLEMENTAL WORK PLAN

Project No.  
3681R-05

SSDS Expansion Site Plan

FIGURE 1

**ATTACHMENT 2:**  
**2016 Vacuum Pressure Site Plan**





DAY ENGINEERING, P.C.

ENVIRONMENTAL ENGINEERING CONSULTANTS  
AN AFFILIATE OF DAY ENVIRONMENTAL, INC.

May 9, 2019

Mr. Frank Sowers, P.E.  
New York State Department of Environmental Conservation  
Division of Environmental Remediation, Region 8  
6274 East Avon-Lima Road  
Avon, New York 14414-8519

RE: Supplemental Work Plan - SVI Corrective Measures, SSDS Expansion  
General Circuits, Inc. Site #828085  
Site Index #B8-0701-05-08  
95 Mount Read Boulevard, Rochester, New York

Dear Mr. Sowers:

Day Engineering, P.C. (DAY) is submitting this Supplemental Work Plan on behalf of 95 Mt. Read Blvd., LLC. This Work Plan describes the proposed activities to expand the soil vapor intrusion (SVI) mitigation being implemented under the SVI Corrective Measures Design Plan (November 2017) for the former General Circuits, Inc. site located at 95 Mt. Read Blvd., Rochester, New York (Site).

The SVI Corrective Measures Design Plan provides a summary of the pre-mitigation site characterization and the mitigation measures completed as of 2017. In accordance with the SVI Corrective Measures Design Plan, additional SVI work activities were subsequently completed to increase the effectiveness of the Site SVI mitigation measures. This Supplemental Work Plan expands on the scope of the SVI Corrective Measures Design Plan activities. Specifically, the sub-slab depressurization system (SSDS) in Area of Concern #1 (AOC#1, first floor) will be expanded to cover the remainder of the first floor, to essentially provide complete building coverage following completion of the Work Plan activities.

#### Scope of Work

It is proposed to expand the current SSDS radius of influence and coverage area by installing 22 additional SSDS extraction points at the approximate locations indicated in Figure 1. These locations may be modified slightly at time of installation based upon field conditions. The design detail for the proposed extraction points will be the same as approved for installation under the SVI Corrective Measures Design Plan. Soil and fill material removed from the extraction point suction pits will be placed in NYSDOT-approved 55-gallon steel drum(s) for off-site transport and disposal in accordance with applicable regulations.

It is planned to utilize existing roof penetrations where available to connect the SSDS vent piping to new rooftop-mounted fans. Where feasible, larger curb-box mounted rooftop fans (Fantech RE/REC 10 series or equal) or inline fans (Fantech FR, Radonaway GP series or equal) will be utilized to provide suction to multiple SSDS extraction points. Where not feasible, single inline fans may be installed above the roofline to service individual extraction points.

### Effectiveness Monitoring

In accordance with the SVI Corrective Measures Design Plan, the effectiveness of the Work Plan SSDS expansion activities will be determined by assessing the pressures induced by the SSDS, and by completing confirmatory indoor air testing and comparing the results to prior analytical test results and applicable NYSDOH guidance criteria, as applicable.

As the addition of 22 suction points under this Work Plan has the potential to significantly impact the indoor air quality and overall effectiveness of the SSDS mitigation measures, confirmatory indoor air samples for AOC #1 (first floor) will be collected following completion of the Work Plan SSDS expansion activities (i.e. confirmatory sampling for the original Corrective Measures Design Plan AOC#1 activities will be delayed until the additional Work Plan SSDS expansion activities have been completed). In accordance with the SVI Corrective Measures Design Plan, and as further detailed under the “Schedule” section of this Work Plan, the confirmatory indoor air sampling event will be conducted between 30 and 45 days of completion of the SVI mitigation systems installation, start-up and pressure testing. A minimum of 30 days is required prior to air sampling to allow time for the indoor air quality to stabilize following completion of the work.

#### 1. Pressure Monitoring

Pressure monitoring will be completed in accordance with the SVI Corrective Measures Design Plan procedures. Following completion and start-up of the additional SSDS suction points, sub-slab vacuum pressure relative to indoor air will be measured at select locations as needed to document the influence created by the SSDS throughout the AOC#1 area. If location(s) are identified that do not meet the minimum pressure differential requirement (0.002 inches water gage), the SSDS may be modified to increase coverage to the area, or alternatively for difficult locations, the area may be designated for paired sampling (i.e. testing of both sub-slab soil vapors and indoor air to demonstrate compliance with applicable NYSDOH SVI guideline matrices).

#### 2. Air Monitoring

Indoor air monitoring will be completed in accordance with the SVI Corrective Measures Design Plan procedures. Prior to collection of the initial confirmatory indoor air samples, the NYSDOH Indoor Air Quality Questionnaire and Building Inventory survey will be completed. After the pressure monitoring, building inspection and product inventory is completed, DAY will collect indoor air samples from: (i) locations in which exceedances of NYSDOH indoor air guidance values were previously detected for parameters of concern (i.e. TCE, PCE and/or chloroform); (ii) central indoor air monitoring locations that have been routinely sampled since 2007 (including the AOC#2 basement sampling location); and (iii) locations at which adequate sub-slab soil vacuum was not established, if any (paired sampling to be conducted at any such locations, as described above). In addition, one background outdoor air sample will be collected.



### Schedule

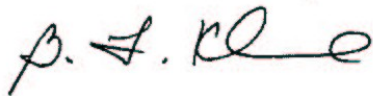
An updated work schedule including a breakdown of the proposed SVI mitigation activities is provided in Figure 2. Based on the current understanding of this work, the time frames for this project are as follows:

- The proposed first floor AOC#1 SSDS construction work (installation of 22 new SSDS extraction points) will be completed within 4.5 months of receipt of Work Plan approval by NYSDEC;
- Start-up, testing and pressure monitoring of the SSDS will be completed within 1.5 months of completion of construction. (Note: this allows time for minor modifications to the SSDS to improve coverage to select locations as needed based on pressure test results. NYSDEC will be notified if more major modifications are needed that would impact the proposed schedule.)
- Indoor air sample collection will be completed in 30 to 45 days of completion of startup, testing and pressure monitoring. (Note: if these activities are completed prior to start of the 2019-2020 heating season, this timeframe may be extended as necessary to collect the samples under representative heating season conditions).

Upon completion of the activities identified above, and subsequent receipt of analytical results, DAY will prepare a brief letter report summarizing the test results and apparent systems effectiveness, as described in the SVI Corrective Measures Design Plan.

If there are any questions, please contact this office.

Very truly,  
Day Engineering, P.C.



Barton F. Kline, P.E.  
Associate Principal

### Attachments:

#### Certification Statement

Figure 1: SSDS Expansion Site Plan

Figure 2: Supplemental Work Plan Schedule

## CERTIFICATION STATEMENT

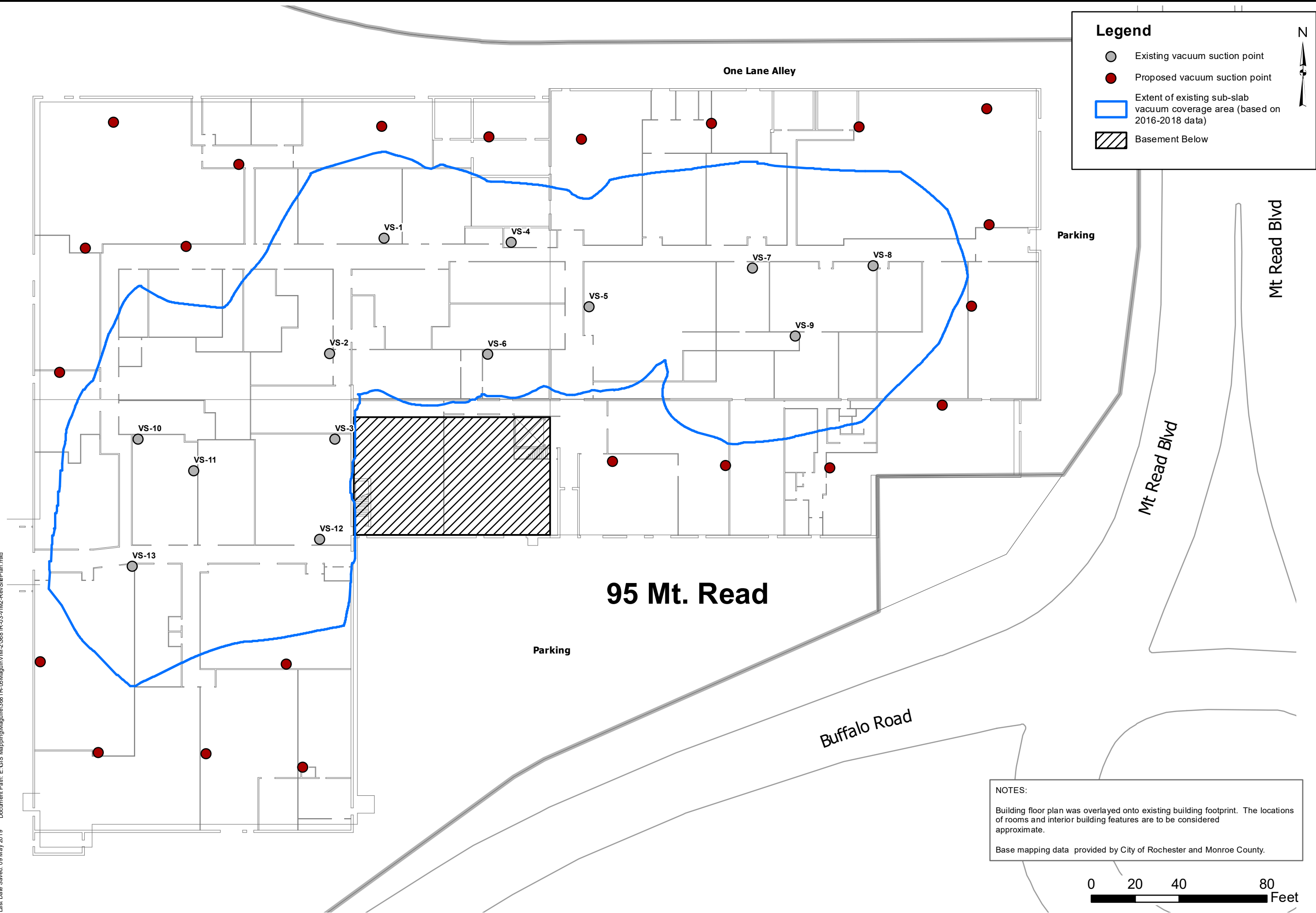
I, Barton F Kline, certify that I am currently a NYS registered professional engineer as defined in 6 NYCRR Part 375 and that this *Supplemental Work Plan - SVI Corrective Measures, SSDS Expansion* was prepared in accordance with applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10), and that all activities were performed in accordance with the DER-approved work plan and any DER-approved modifications.

B. F. Kline P.E.

May 10, 2019 DATE



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Project Title 95 MT READ BOULEVARD ROCHESTER, NEW YORK		Project No. 3681R-05	
Drawing Title SSDS Expansion Site Plan		FIGURE 1	
SVI CORRECTIVE MEASURES - SUPPLEMENTAL WORK PLAN			
DAY ENVIRONMENTAL, INC. Environmental Consultants Rochester, New York 14606 New York, New York 10170			
Field Verified By TER	DATE 05-2019	Drawn By CPS	DATE DRAWN 05-2015
AS NOTED		DATE ISSUED 05-06-2019	

FIGURE 2

## SVI MITIGATION SUPPLEMENTAL WORK PLAN SCHEDULE

