Interim Remedial Measure Work Plan
BCP Site #C828131
NYSDEC Index #B8-0705-05-08

Location:

Carriage Cleantown
1600 Penfield Road
Penfield, New York 14526

Prepared for:

Springs Land Company, LLC
P.O. Box 262
Port Gibson, New York 14537

LaBella Project No. 205237.01

August 2006

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LaBella Project No. 205237.01

August 2006

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

Table of Contents

1.0 Introduction

LaBella Associates P.C. ("LaBella") prepared this Interim Remedial Measure (IRM) Work Plan on behalf of Springs Land Company, LLC (Springs Land) for the former Carriage Cleantown facility located at 1600 Penfield Road in the Town of Penfield, Monroe County, New York, herein after referred to as the "Site". A Project Location Map is included as Figure 1. Springs Land entered the Brownfield Cleanup Program (BCP) under volunteer status and recently purchased the property as part of a redevelopment plan.

This IRM Work Plan proposes work to be completed at the Site as an initial step in remediating the Site. The IRM is intended to significantly reduce the volume of contamination at the Site and mitigate potential off-site migration issues prior to conducting a Remedial Alternatives Analysis (RAA) and implementing a final site remedy.

1.1 Site Description

The Site consists of approximately 0.60 acres of land improved by an approximately 4,550 square foot building, which is currently vacant. The remainder of the Site is predominantly paved with a grass area along the northeast and northwest portions of the Site. The surrounding properties are commercial properties with some residential beyond. The properties directly adjacent to the Site and the occupants are indicated below:

- North – 1606 Penfield Road: Day Care Facility and Dance Studio
- East – 1610 Penfield Road: Unoccupied Automated Banking Facility
- South – Right of Way (ROW): Penfield Road (with parking lot for commercial plaza beyond)
- West – 1598 Penfield Road: Commercial office space with three tenants

A Site Plan (included as Figure 2), illustrates the Site boundaries and the adjacent properties.

1.2 Site History

The current building was constructed in approximately 1961 and was reportedly operated as a dry cleaner from that time until approximately 2005. However, on-site dry cleaning operations may not have been implemented for the entire time. A plumbing diagram (unknown date) indicated that drain lines from the building discharged to a 1,500-gallon pre-cast concrete wastewater holding tank located adjacent to the northern portion of the building. Pertinent information from the plumbing diagram is illustrated on Figure 3.

1.3 Nature and Extent of Contamination

LaBella conducted a preliminary Phase II Environmental Site Assessment (ESA) in August 2002 at the Site as part of a potential real estate transaction. The preliminary Phase II ESA identified the presence of solvent-impaired soil and shallow groundwater at the Site. Subsequently, the Site was entered into the BCP and a Remedial Investigation (RI) was conducted. A RI Report was recently completed, which defined the nature and extent of contamination at the Site.

The contamination at the Site is from PCE used as part of former dry cleaning operations. The sources of subsurface contamination appear to be predominantly from the concrete wastewater holding tank north of the building and to a lesser extent the former PCE Still in the southern corner of the building. These two areas appear to have impacted soil and groundwater and as such, the extent of contamination has been separated into three areas of concern (AOCs), which are described below.

AOC #1: Concrete Wastewater Holding Tank Area

The soil borings advanced as part of the Phase II ESA and RI defined the extent of soil that exceeds NYSDEC Standards, Criteria, and Guidelines (SCGs), which were identified in the RI Report. In addition, the RI work defined the extent of soil that exceeds the hazardous waste criteria in the area of the wastewater holding tank. The horizontal extent of hazardous waste appears to be limited to immediately adjacent to the concrete wastewater holding tank area and to the north/northeast to around borings B-1, B-27, and B-28, refer to Figure 3. The vertical extent of hazardous waste impacts appears to be limited to approximately 10 feet in depth around B-27 and about 13 ft. to 14 ft. in depth around B-28. Although the deepest soil sample from B-28 exceeded hazardous waste criteria, it is not anticipated that significant contamination extends beyond 14 or 15 feet below the ground surface (BGS). This assumption is based on the decreasing PID readings observed in this boring and only minimal detections in the deep soil samples and groundwater samples collected from MW-6M/6D. Based on the data, the estimated extent of soil exceeding hazardous waste criteria is approximately 800 square feet and is illustrated on Figure 3.

The remaining area of contamination from the concrete wastewater holding tank appears to be within the saturated zone and is discussed as part of the extent of groundwater contamination.

AOC #2: Former PCE Still Area

The soil borings advanced as part of the RI generally defined the extent of contamination from the former PCE Still area. Contamination from the former PCE Still appears to have migrated from the Still through the floor and into the shallow overburden soil and groundwater. The horizontal extent of impacted soil from the former PCE Still within the vadose zone appears to be limited to soil beneath the southern corner of the building. Although elevated PID readings were measured in soil from borings B-44 and B44R, soil samples from these borings did not indicate concentrations of VOCs that exceed the NYSDEC guidance. However, the actual location of the former PCE Still is approximately 10 ft. to the southeast and as such soils in this area may require remedial actions. Additional evaluation of this area does not appear warranted at this time since the extent of contamination appears limited based on borings within the area (B-44, B-45, B-48, B-52, B-53, B-54, and B-55). Any additional evaluation and/or remediation should be conducted at the time of (or subsequent to) building demolition. The extent of vadose zone soil exceeding SCGs has been conservatively estimated at 425 square feet and is illustrated on Figure 3.

AOC #3: Groundwater Contamination

The area of groundwater contamination has been defined at the Site based on eight (8) shallow groundwater monitoring wells and the deep monitoring wells installed as part of the RI work. In addition, one previous shallow groundwater monitoring well was installed as part of the initial

Phase II ESA conducted in August 2002. Based on the groundwater sampling conducted on the deep monitoring wells (MW-6M/6D), it appears that significant groundwater contamination has not migrated to the deep groundwater and is limited to the shallow groundwater. The vertical extent of shallow groundwater impacts appears to be approximately 15 feet in depth based on the deep soil and groundwater sampling detecting only minimal concentrations of contaminants at depths greater than 15 feet. In addition, PID readings and soil samples from within the saturated zone generally decreased with depth. The horizontal extent of groundwater contamination is relatively widespread across the Site and summarized below:

- Northern Extent – The groundwater sample from monitoring well MW-3 only detected minor concentrations of chlorinated volatile organic compounds (CVOCs) and soils observed from numerous borings in the northern portion of the property (B-14 through B-20) did not detect significant evidence of impairment. Based on this data, the northern extent of groundwater contamination has been generally defined and is limited to groundwater south of B-16 through B-20.
- Eastern Extent – Soils observed from borings B-24, B-29, and B-34 did not encounter evidence of impairment and PID readings were less than 10 ppm from within the saturated zone. Furthermore, a soil sample from boring B-29 from within the saturated zone (8'-10.6') detected only minor concentrations of CVOCs that were below the NYSDEC Technical and Administrative Guidance Memorandum #4046 (TAGM 4046) Recommended Soil Cleanup Objectives (RSCOs) to protect groundwater quality. A groundwater sample from MW-5 detected only minor concentrations of CVOCs, which were below Part 703 Groundwater Standards.
- Southern Extent – Soil borings B-53, B-54 and B-55 did not detect evidence of impairment and PID readings from the saturated zone within these borings were below 2 ppm.
- Western Extent – Groundwater contamination appears to extend up to and beyond the western/northwestern property line. This is based on groundwater samples collected from wells MW-2 and MW-7 which are approximately 10 ft. from the property line and contained concentrations of CVOCs above the Part 703 Groundwater Standards.

2.0 Project Objectives

This IRM is intended to address AOC #1 and does not address AOC #2 or AOC #3, it is intended that these AOCs would be addressed as part of the final site remedy. The concrete wastewater holding tank source area (AOC #1) contains the highest concentrations of contaminants at the Site. Based on the RI data, soil immediately adjacent to the concrete wastewater holding tank contains contaminant concentrations in excess of characteristic hazardous waste criteria. The removal of the concrete wastewater holding tank source area is estimated to reduce the contaminant mass by over 50%. [*Note: This estimate is based calculations of the mass of CVOCs in the removal area and the mass of CVOCs throughout the Site (based on soil samples).*] As such, an IRM for addressing this source area is being proposed in order to quickly remove a significant portion of the total contaminant mass from the Site and reduce the potential for off-site impacts from the CVOCs in groundwater.

3.0 Soil Excavation Work

The soils exceeding characteristic hazardous waste criteria from the concrete wastewater holding tank area will be excavated to the extent practicable. The anticipated steps to be completed as part of the soil excavation work are outlined below.

1. The estimated extent of soil to be removed is shown on Figure 3. As shown, this area is approximately 800 square feet. The vertical extent of contamination will depend on Site conditions at the time of removal. Since the top 4-feet of soil appears to be generally 'clean' this soil will be segregated and reused as backfill material. Soil screening will be conducted in the field in order to segregate apparently 'clean' soil for reuse as backfill material. Prior to reusing soils as backfill, samples will be collected and tested for Target Compound List VOCs using United States Environmental Protection Agency (USEPA) Method 8260.

2. The excavated soil will be temporarily staged on and covered by poly sheeting prior to off-site disposal. The anticipated location of soil staging areas are illustrated on Figure 3. The temporary on-site staging of soil will be required due to the potential for select soil to require pre-treatment by the landfill. As such, it appears that representative samples of the excavated soil will be submitted to a laboratory for characterization testing. Currently the following sampling is anticipated as part of waste characterization testing:

    - USEPA TCL VOCs using USEPA Method 8260; and,
    - TCL VOCs using USEPA Method 8260 subsequent to a Toxicity Characteristic Leachate Procedure (TCLP) extraction via USEPA Method 1311.

    The results of this sampling will be provided to the landfills for approval prior to disposal. [*Note: The results will also be provided to NYSDEC as part of an IRM Report.*] Depending on the results of the waste characterization sampling, the staged soils will be transported to the appropriate landfill(s). Currently, it is anticipated that soil will be transported to either the Environmental Quality (EQ) Landfill in Michigan (for soil requiring pretreatment) and/or the Model City Landfill in Niagara Falls, New York. In addition, the concrete from the wastewater holding tank and the contents of the tank will also be sent off-site for disposal.

3. A LaBella geologist will be on-site during the soil excavation work in order to field screen the excavated soils and collect post-excavation soil samples. Soil at the bottom and along the sidewalls of the excavation will be sampled in general accordance with the NYSDEC DER-10 (*Technical Guidance for Site Investigation and Remediation*). The soil samples will be tested for USEPA TCL VOCs using USEPA Method 8260. Currently it is anticipated that up to ten (10) post-excavation soil samples will be collected/analyzed. These post-excavation soil samples will be collected in order to evaluate the extent of contamination left in-place.

4. Subsequent to excavating the concrete wastewater holding tank area to the extent practicable, the excavation will be backfilled with clean fill material. The backfilling of the excavation will not be completed each day. As such, the Site will require securing at the end each workday.

4.0 Groundwater Management Plan

The section identifies proper handling, treatment and discharge procedures for groundwater and/or rainwater that may enter the excavation area. The specific steps are identified below:

1. Initially, LaBella will contact the Town of Penfield and/or Monroe County Pure Waters in order to obtain a sewer use permit for discharging (subsequent to testing and treatment, if necessary) groundwater and/or rainwater that may collect in the excavation.

2. A minimum of two 20,000-gallon tractor-trailer type frac tanks will be mobilized to the Site and staged at a location close to the excavation (refer to Figure 3 for anticipated location). The appropriate number and size of trash pumps to dewater the excavation will be mobilized. The pumps will be able to generate enough head to pump the water to the frac tanks. [*Note: In the event a water or vac truck is used for this purpose, this truck will be dedicated to this purpose (i.e., not used to water construction areas for dust suppression) and will be decontaminated at the end of the project.*] Site conditions may warrant the need for additional frac tanks at the Site.

3. When the frac tank becomes full, one sample of water from the tank will be collected and submitted to a New York State Department of Health (NYSDOH) Environmental Laboratory Approval (ELAP) certified laboratory. The groundwater samples will be sampled for halocarbon VOCs using USEPA Method 8260 and any additional parameters required by Monroe County Pure Waters for sewer use.

4. The laboratory test results will be compared to the applicable sanitary sewer discharge requirements. In the event that contaminant concentrations exceed the discharge requirements established with the local municipality, the water in the frac tank will be treated using an appropriate system (e.g., carbon, air stripper, etc.) to remove contaminants and discharged to the second frac tank. At which time a second sample of the water will be collected in order to confirm that contaminants were removed to concentrations below the appropriate criteria. This process will be repeated if necessary. [*Note: In the event that concentrations of VOCs are not reduced to below the concentrations required under the discharge permit, the water will be transported off-site for disposal.*]

5. Subsequent to obtaining samples of the containerized water that are below the applicable criteria, the water will be discharged in accordance with the sewer use permit to the nearest sanitary sewer discharge location. [*Note: In the event that discharge criteria can not be met, the water will be sent off-site for disposal at an approved facility.*]

5.0 Post Soil Removal Groundwater Sampling

Subsequent to conducting the soil removal, groundwater samples will be collected from select monitoring wells in the area of the concrete wastewater holding tank. Specifically, downgradient monitoring well MW-2 will be sampled. The groundwater sampling will be conducted approximately 60-days after the soil removal work has been completed. The post soil removal groundwater sampling is intended to further evaluate the effectiveness of the IRM in reducing dissolved phase groundwater concentrations and potential off-site migration of CVOCs. [*Note: Depending on cave-in issues during the soil removal*

work, a groundwater monitoring well may also be installed in the soil removal area at the time of backfilling. In the event a monitoring well can be installed, this well will be included in the post removal groundwater monitoring.]

The groundwater samples will be analyzed for TCL VOCs using USEPA Method 8260.

6.0 Quality Assurance/Quality Control

Quality Assurance/Quality Control (QA/QC) for the IRM will include the following:

- One duplicate sample and one Matrix Spike/Matrix Spike Duplicate (MS/MSD) sample will be collected/analyzed during the confirmatory soil sampling;
- One duplicate sample will be collected/analyzed during the groundwater sampling; and,
- Laboratory results will be provided in a Category B Deliverables package.

In addition to the above, the QA/QC procedures for fieldwork/sampling identified in the RI Work Plan will also be implemented.

7.0 Site-Specific Health and Safety Plan

A site-specific Health and Safety Plan (HASP) has been developed for the Site and is included as Appendix 1.

8.0 Community Air Monitoring Plan

The NYSDOH Generic Community Air Monitoring Plan (CAMP) referenced in NYSDEC DER-10 is included as Appendix 2. The procedures provided in the CAMP will be implemented during the IRM work, which include procedures for the daily air monitoring to be conducted at the Site during intrusive work. The air monitoring includes procedures for site perimeter monitoring of VOCs and particulates. This monitoring will be conducted in order to ensure vapor emissions do not impact the surrounding area during the IRM work at the Site.

9.0 Schedule

The anticipated schedule for completing the IRM work is included as Appendix 3. The schedule is dependent on regulatory approvals and coordination with contractors and the landfill.

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LABELLA
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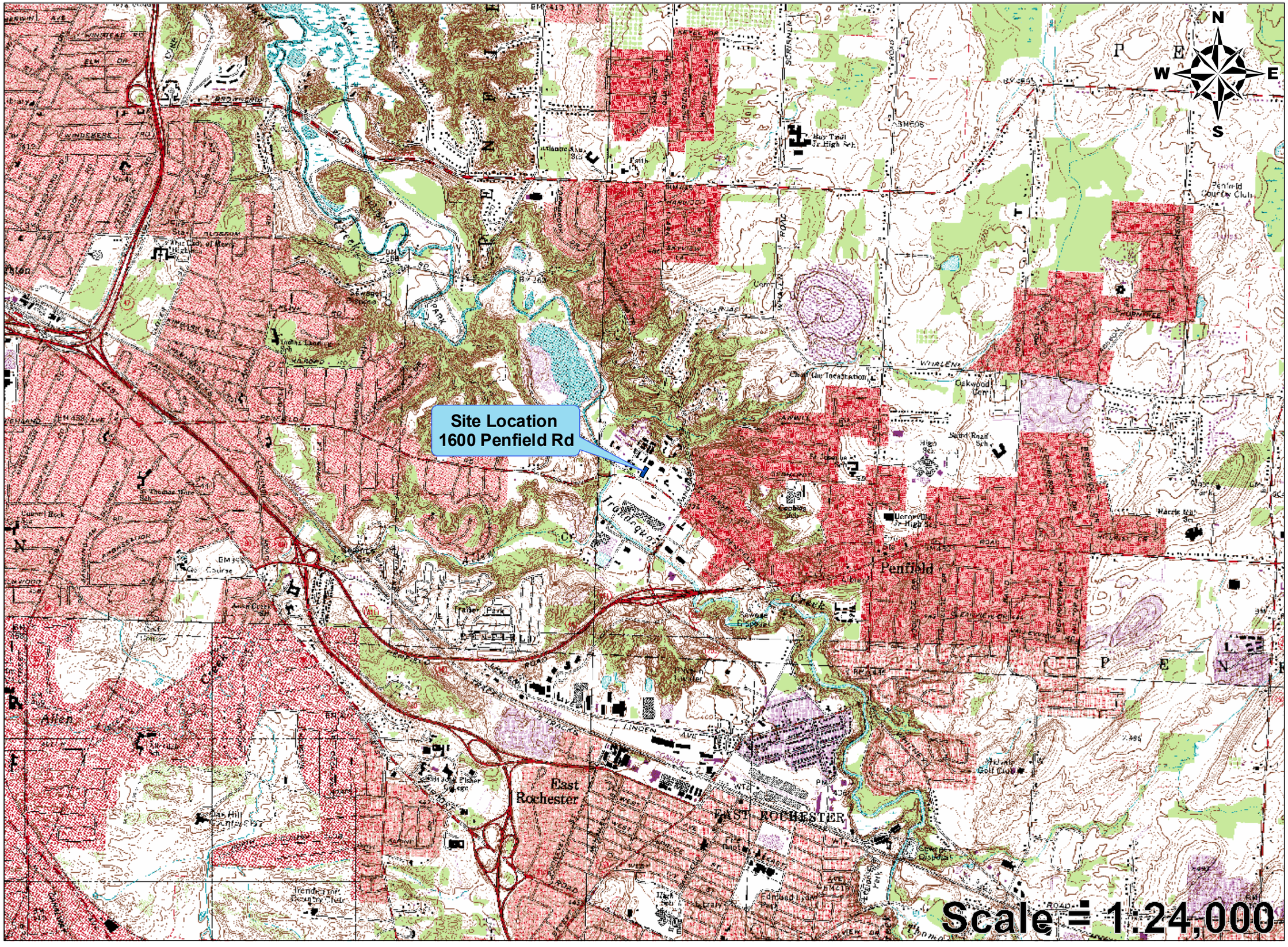
Figures



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P: (585) 454-6110
F: (585)454-3066
www.labellapc.com

PROJECT/CLIENT

CARRIAGE CLEANTOWN
INTERIM REMEDIAL MEASURE
WORK PLAN

SPRINGS LAND COMPANY, LLC

1600 PENFIELD ROAD
PENFIELD, NEW YORK

DRAWING TITLE

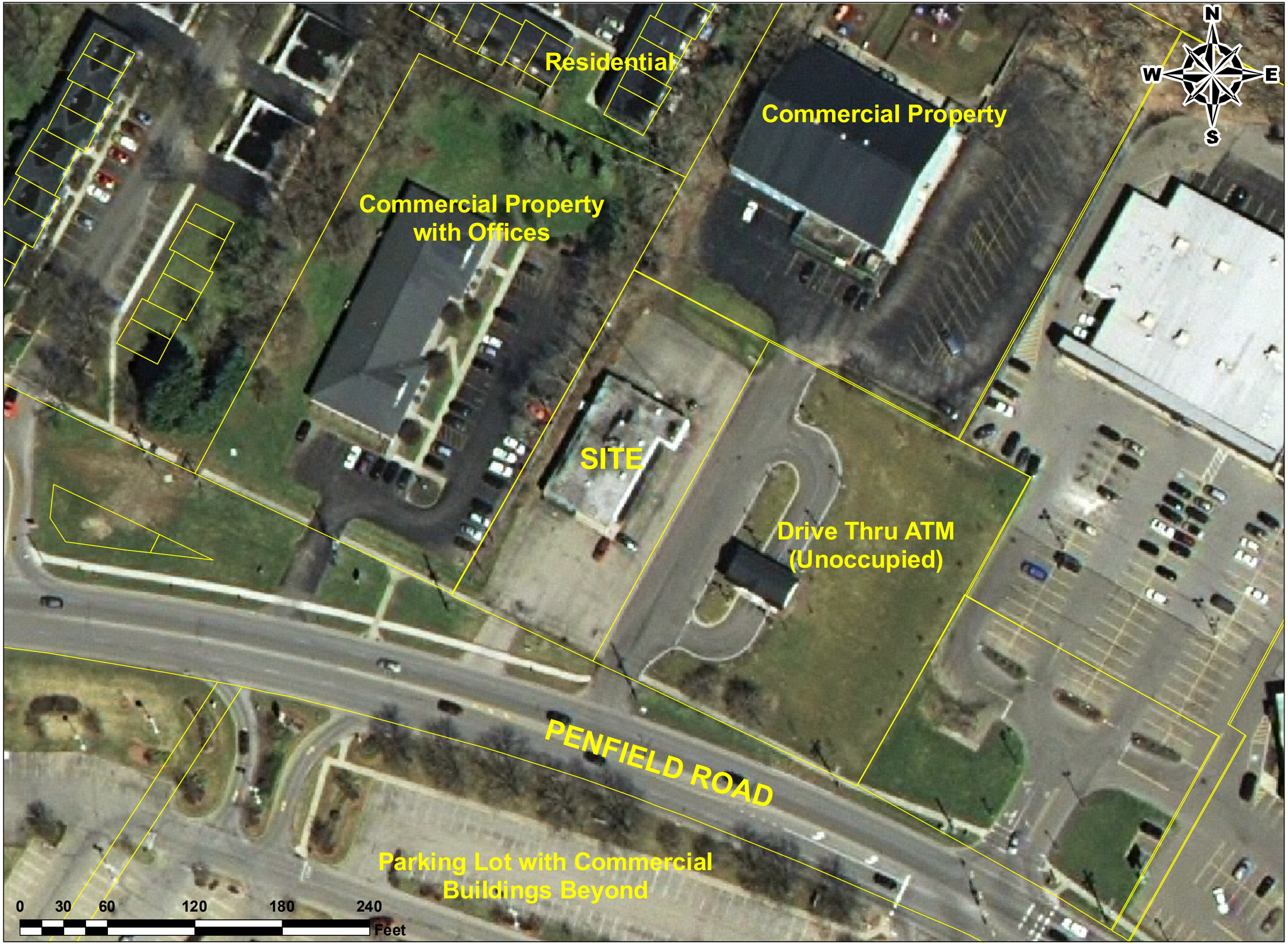
SITE LOCATION MAP
WITH USGS QUADRANGLE
TOPOGRAPHY MAP

ISSUED FOR: FINAL
DATE: JULY, 2006
ACCOMPLISHED BY: JJW
DRAWN BY: JJW
REVIEWED BY: DPN

PROJECT/DRAWING NUMBER

205237.01

FIGURE 1



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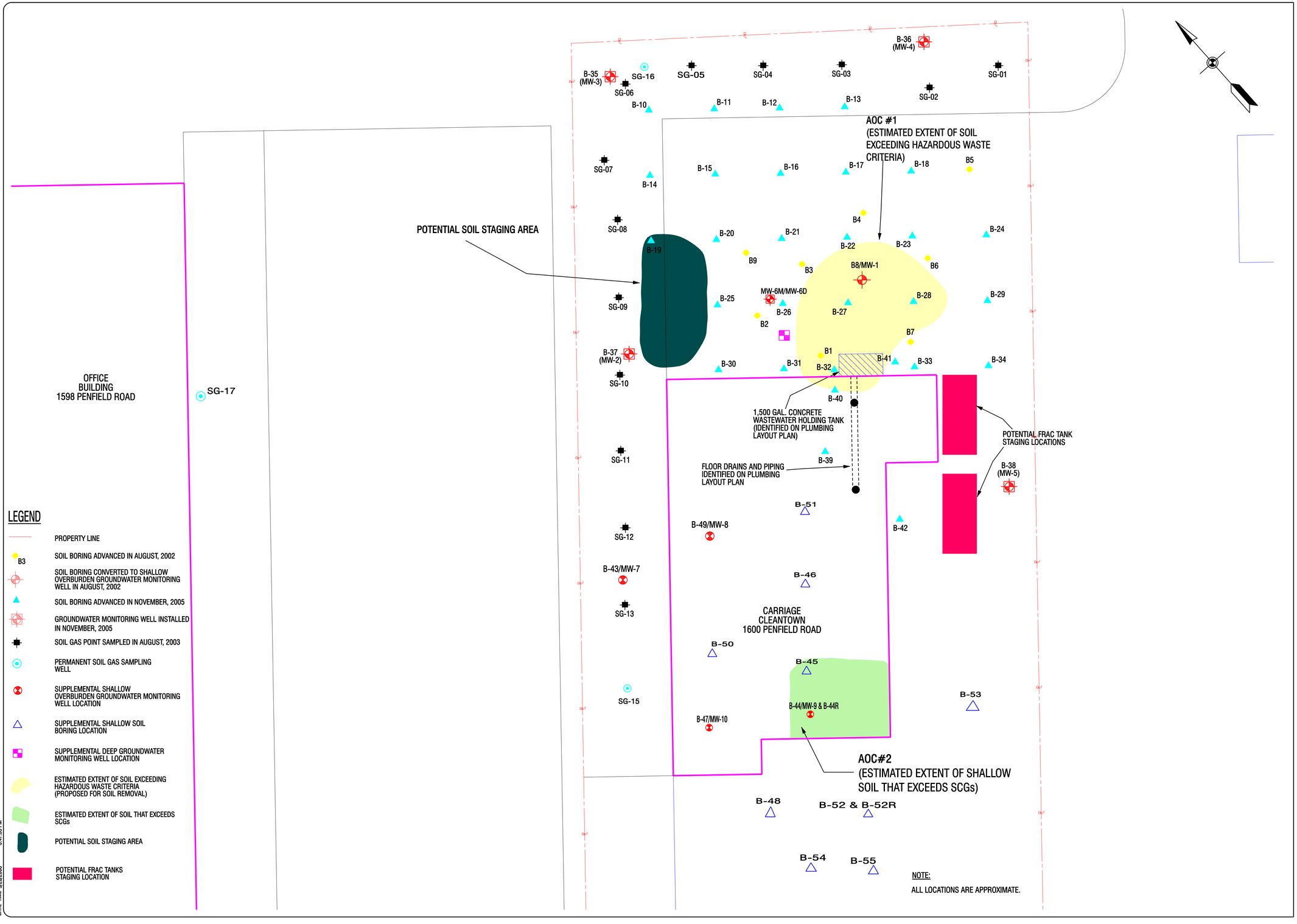
PROJECT/CLIENT
CARRIAGE CLEANTOWN
INTERIM REMEDIAL MEASURE
WORK PLAN
SPRINGS LAND COMPANY, LLC
1600 PENFIELD ROAD
PENFIELD, NEW YORK

DRAWING TITLE
SITE PLAN
WITH ADJACENT
PROPERTIES

ISSUED FOR: FINAL
DESIGNED BY: JJW
DRAWN BY: JJW
REVIEWED BY: DPN
DATE: JULY, 2006

PROJECT/DRAWING NUMBER
205237.01
FIGURE 2



LEGEND

- PROPERTY LINE
- B3 — SOIL BORING ADVANCED IN AUGUST, 2002
- SOIL BORING CONVERTED TO SHALLOW OVERBURDEN GROUNDWATER MONITORING WELL IN AUGUST, 2002
- SOIL BORING ADVANCED IN NOVEMBER, 2005
- GROUNDWATER MONITORING WELL INSTALLED IN NOVEMBER, 2005
- SOIL GAS POINT SAMPLED IN AUGUST, 2003
- PERMANENT SOIL GAS SAMPLING WELL
- SUPPLEMENTAL SHALLOW OVERBURDEN GROUNDWATER MONITORING WELL LOCATION
- SUPPLEMENTAL SHALLOW SOIL BORING LOCATION
- SUPPLEMENTAL DEEP GROUNDWATER MONITORING WELL LOCATION
- ESTIMATED EXTENT OF SOIL EXCEEDING HAZARDOUS WASTE CRITERIA (PROPOSED FOR SOIL REMOVAL)
- ESTIMATED EXTENT OF SOIL THAT EXCEEDS SCGs
- POTENTIAL SOIL STAGING AREA
- POTENTIAL FRAC TANKS STAGING LOCATION

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PROJECT/CLIENT
CARRIAGE CLEANTOWN
INTERIM REMEDIAL MEASURE WORK PLAN
SPRINGS LAND COMPANY, LLC
1600 PENFIELD ROAD
PENFIELD, NEW YORK

DRAWING TITLE
SITE PLAN
WITH ESTIMATED EXTENT OF VADOSE ZONE SOIL WHICH EXCEEDS SOIL CLEANUP GUIDELINES

ISSUED FOR: DRAFT
SCALE: 1" = 10'
DESIGNED BY: DPN
DRAWN BY: GK
REVIEWED BY: DPN
DATE: JULY 2006

PROJECT NUMBER
205237.01

DRAWING NUMBER
FIGURE 3

SHEET 1 OF 1

LABELLA
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Rochester, New York 14614

Appendix 1
Health and Safety Plan

LABELLA Associates, P.C.

Engineering
Architecture
Environmental

Site-Specific Health and Safety Plan

BCP Site #C828131
NYSDEC Index #B8-0705-05-08

Location:

Carriage Cleantown
1600 Penfield Road
Penfield, New York 14526

Prepared for:

Springs Land Company, LLC
P.O. Box 262
Port Gibson, New York 14537

LaBella Project No. 205237.01

July 2006

Site-Specific Health and Safety Plan

BCP Site #C828131

NYSDEC Index #B8-0705-05-08

Location:

Carriage Cleantown
1600 Penfield Road
Penfield, New York 14526

Prepared for:

Springs Land Company, LLC
P.O. Box 262
Port Gibson, New York 14537

LaBella Project No. 205237.01

July 2006

SITE HEALTH AND SAFETY PLAN

Project Title:	Carriage Cleantown
Project Number:	205237.01
Project Location (Site):	1600 Penfield Road, Penfield, New York
Project Manager:	Daniel P. Noll, P.E.
Plan Approval Date:	_____
Plan Review Date:	_____
Site Safety Supervisor:	Michael Pelychaty
Site Contact	Michael Pelychaty
LaBella Safety Director	Richard Rote, CIH
Proposed Date(s) of Field Activities:	August 2006 through December 2007
Site Conditions:	Generally level, encompassing approximately 0.6 +/- acres
Site Environmental Information Provided By:	Phase II ESA and Remedial Investigation, LaBella Associates
Air Monitoring Provided By:	LaBella Associates
Site Control Provided By:	General Contractor

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EMERGENCY CONTACTS

	Name	Phone Number
Ambulance:	As Per Emergency Service	911
Hospital Emergency:	Highland Hospital	585-473-2200
Poison Control Center:	Finger Lakes Poison Control	585-275-3232
Police (local, state):	Rochester Police Deparment	911
Fire Department:	City of Rochester Fire Department	911
Site Contact:	Michael Pelychaty	585-451-6225
Agency Contact	NYSDEC – David Pratt MCDOH – Joseph Albert NYSDOH – Matthew Farcucci	585-226-5355 585-274-6904 716-847-4513
Project Manager	Daniel P. Noll, P.E.CHMM LaBella Associates, P.C.	Direct: 585-295-6611
LaBella Site Safety Officer	Michael Pelychaty LaBella Associates, P.C.	Direct: 585-295-6253 Cell: 585-451-6225
LaBella Associates Safety Director	Richard Rote, CIH	Direct: 585-295-6241

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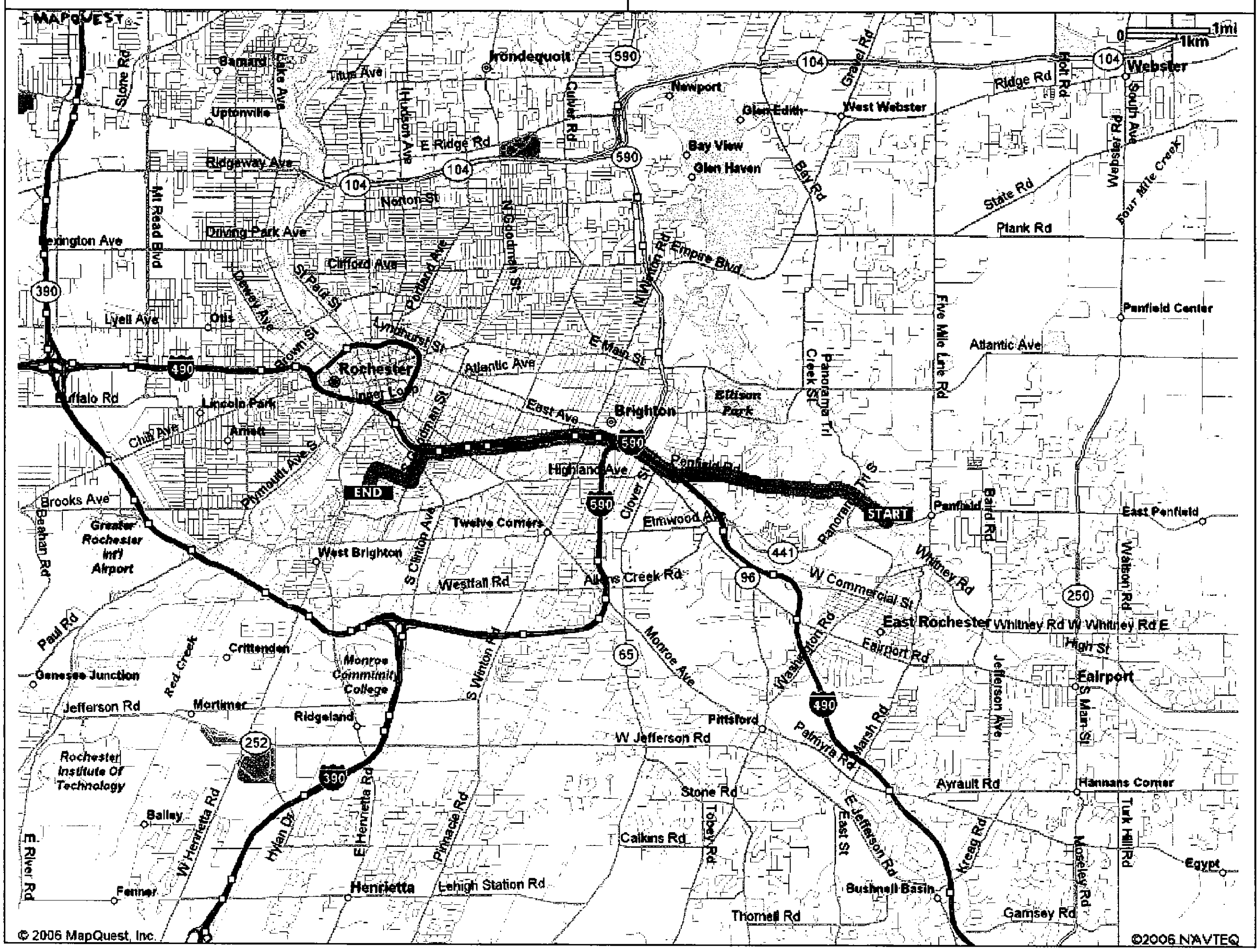
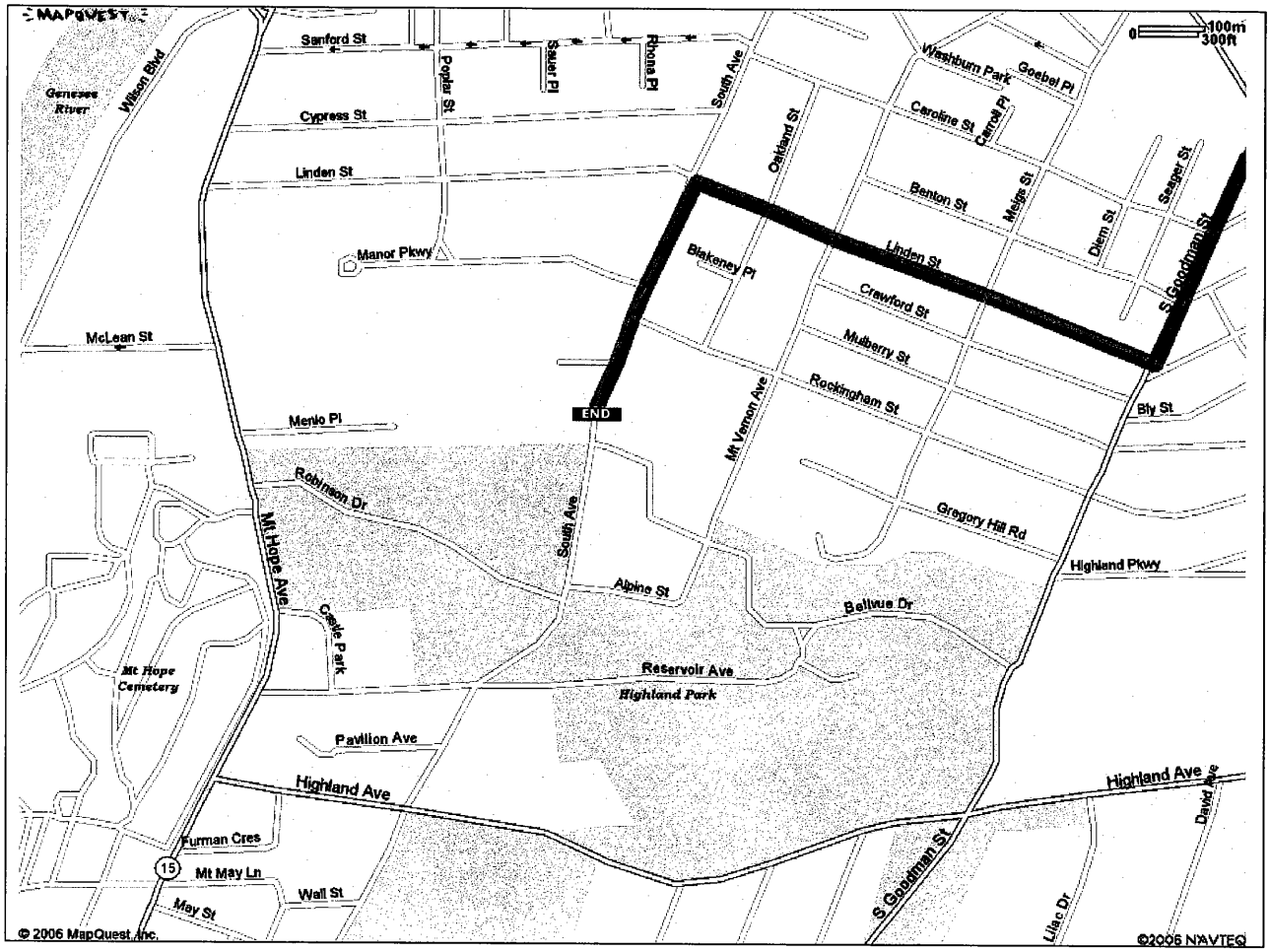
MAP AND DIRECTIONS TO THE MEDICAL FACILITY HIGHLAND HOSPITAL

FROM: 1600 Penfield Road Penfield, NY 14526	TO: 1000 South Avenue Rochester, NY 14620

Directions:	Distance
1. Start out going West on PENFIELD RD.	2.3 mi
2. Turn RIGHT onto I-490 WEST.	2.9 mi
3. Take the GOODMAN ST Exit (#17) and turn LEFT (South) onto GOODMAN ST.	0.4 mi
4. Turn RIGHT onto LINDENT ST.	0.4 mi
5. Turn LEFT onto SOUTH AVE.	0.2 mi
6. Turn LEFT into Hospital.	0.0 mi
Total Distance:	**6.2 mi**
Estimated Drive Time:	**14 minutes**

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100m
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Sauer Pl
Rhone Pl
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Oakland St
Washburn Park
Goebel Pl
Caroline St
Carroll Pl
Seager St
Genesee River
Wilson Blvd
Cypress St
Linden St
Benton St
Meigs St
Diem St
S Goodman St
Manor Pkwy
Blakeney Pl
Linden St
Crawford St
Mulberry St
McLean St
Rockingham St
Bly St
END
Menlo Pl
Mt Vernon Ave
Robinson Dr
Mt Hope Ave
South Ave
Gregory Hill Rd
Highland Pkwy
Alpine St
Bellvue Dr
Castle Park
Mt Hope Cemetery
Reservoir Ave
Highland Park
Pavilion Ave
Highland Ave
Highland Ave
David Ave
Furman Cres
15
Mt May Ln
Wall St
May St
S Goodman St
Lilac Dr
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Table of Contents

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 remedial work and subsequent redevelopment work at 1600 Penfield Road, Penfield, New York, herein after referred to as the "Site". The requirements of this HASP are applicable to all LaBella Associates personnel and their authorized visitors at the work site. This HASP and the Community Air Monitoring Plan (CAMP) are to be consulted for guidance in preventing and quickly abating any threat to human safety or the environment. The provisions of the HASP do not replace or supersede any regulatory requirements of the USEPA, NYSDEC, OSHA or and other regulatory body.

2.0 Responsibilities

The HASP presents guidelines to minimize the risk of injury, to project personnel, and to provide rapid response in the event of injury. The LaBella Associates HASP is applicable only to activities of LaBella personnel and their authorized visitors. The LaBella Associates Project Manager shall implement the provisions of this HASP for the duration of the project. It is the responsibility of employees to follow the requirements of this HASP, and all applicable company safety procedures.

3.0 Activities Covered

The activities covered under this HASP are limited to the following:

- Observation and inspection of remediation and redevelopment activities
- Environmental Monitoring
- Collection of samples
- Assistance with the on-Site management of excavated soil, fill, and groundwater.

4.0 Work Area Access and Site Control

The general contractor will have primary responsibility for work area access and site control.

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 LaBella Associates 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 environmental and site 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 or her instructions must be followed.

5.1 Hazards Due to Heavy Machinery

Potential Hazard:
Heavy machinery including trucks, excavators, backhoes, 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 safety orange vest, hard hat, and steel toe shoes are required.

5.2 Excavation Hazards

Potential Hazard:
Excavations and trenches can collapse, causing injury or death. Edges of excavation can be unstable and collapse. Toxic and asphyxiant gases can accumulate in confined spaces and trenches.

Protective Action:
LaBella Associates personnel are not to enter excavations over 4 feet in depth unless excavations are adequately sloped. LaBella Associates personnel must receive approval from the LaBella Project Manager to enter an excavation for any reason. Subsequently, LaBella personnel are to receive authorization for entry from the Site Safety Officer.

LaBella Associates personnel should exercise caution near all excavations at the site as it is expected that excavation sidewalls will be unstable.

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 LaBella Associates Project Manager is responsible for making First Aid supplies available at the work site to treat minor injuries. The First Aid supplies will be kept in the work trailer. 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 LaBella Project Manager. Serious injuries are to be reported immediately (see Section 9.0 - Emergency Action Plan).

5.4 Injury Due to Exposure of Chemical Hazards

Potential Hazards:
Volatile organic vapors from petroleum products, chlorinated solvents or other chemicals and dust with heavy metals or semi-volatile compounds may be encountered during excavation activities at the project work site. Inhalation of high concentrations of organic vapors or dusts can cause headache, stupor, drowsiness, confusion and other health effects. Skin contact can cause irritation, chemical burn, or dermatitis.

Protective Action:
The presence of organic vapors may be detected by their odor and by monitoring instrumentation. LaBella Associates employees will not work in environments where hazardous concentrations of organic vapors or dusts are present. Air monitoring performed by LaBella Associates (see Section 8.0) of the work area will be performed at least every 120 minutes or more often using a Photoionization Detector (PID) or a Flame Ionization Detector (FID). LaBella Associates personnel are to leave the work area whenever PID or FID measurements of ambient air exceed 10 ppm consistently for a 10 minute period. In addition, real time particulate monitoring will be conducted in the work area at least every 120 minutes or more often (e.g., visible dusts) utilizing DustTrak™ Model 8520 aerosol monitor (or equivalent). LaBella Associates personnel are to leave the work area whenever dust concentrations exceed the upwind concentration by 100 $\mu g/m^3$ consistently for a 10 minute period.

6.0 Decontamination Procedures

Upon leaving the work area, LaBella Associates 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. LaBella Associates personnel should be prepared with a change of clothing whenever on site.

LaBella will use the contractor's disposal container for disposal of PPE.

7.0 Personal Protective Equipment

Conditions requiring a level of protection greater than Level D are not expected at this work site. Typical safety equipment identified in company safety and health procedures is required, i.e., hard hat, safety glasses, orange vest, rubber nitrile sampling gloves, splash resistant coveralls, construction grade boots, etc. Additional site-specific personal protective equipment is not necessary when working under the conditions of this plan.

8.0 Air Monitoring

The LaBella Associates representative/Environmental Monitor will utilize a PID to screen the ambient air in the work areas (excavation, soil staging, and soil grading areas) for total Volatile Organic Compounds (VOCs) and a dust meter to monitor for fugitive dusts. Work area ambient air will generally be

monitored downwind of the excavation or earthwork area in the general breathing zone. In addition, ambient air upwind of the excavation areas should also be conducted in order to determine background concentrations of dust.

Air monitoring of the work areas will be performed at least every 120 minutes or more often using PID and dust meter. LaBella Associates personnel are to leave the work area whenever PID measurements of ambient air exceed 10 ppm consistently for a 10 minute period and/or if dust concentrations exceed the upwind concentration by 100 $\mu g/m^3$ consistently for a 10 minute period.

LaBella personnel may re-enter the work areas wearing a ½ face respirator with organic vapor cartridges for an 8-hour duration when VOC concentrations average between 10-50 ppm. Organic vapor cartridges are to be changed after each 8-hour of use. If PID readings are sustained at levels above 50 ppm for a 10 minute average, work will be stopped immediately until safe levels of VOCs are encountered.

LaBella personnel may not re-enter the work area until dust concentrations in the work area decrease below 100 $\mu g/m^3$, which may be accomplished by the construction manager implementing dust control or suppression measures.

In addition, at the beginning of the excavation work, air samples will be collected and tested for metals in order to evaluate the concentration of metals in the worker breathing zone. In the event that the air samples contain concentrations of metals that exceed regulatory levels, work will be immediately stopped until dust control measure can be implemented. Subsequent to re-starting work at the Site routine air sampling will be conducted in order to confirm the dust control measures are adequate.

At all times, the Site Safety Officer has authority over actions of LaBella Associates personnel and their guests at the site and his or her requests for evacuation are to be heeded without delay. Skin and clothing should be rinsed with clean water if chemical exposure has occurred as a result of splash or spill. Contaminated clothing must be removed; LaBella personnel should bring a change of clothes to the site. Water repellant suits will be provided to help prevent contamination of clothing. Medical attention should be provided if skin irritation has occurred. Please refer to Table 1 outlining chemical compounds detected in soil, groundwater and soil gas samples collected at the Site.

9.0 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. [*Note: The 'safe area' should be determined prior to beginning work based on discussions with the Site Safety Officer and the construction manager. In the event that Site conditions change the designated 'safe area' may require reevaluation.*]

LaBella Associates employees are not authorized or trained to provide rescue and medical efforts. Rescue and medical efforts will be provided by local authorities. The Site Safety Officer will report all emergencies to the Project Manager as soon as possible.

10.0 Medical Surveillance

LaBella Associates will provide medical surveillance to all LaBella employees who are injured due to overexposure from an emergency incident involving hazardous substances at this site.

11.0 Employee Training

LaBella personnel who are not familiar with this site plan will receive training on its entire content and organization before working at the Site.

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Table 1
Exposure Limits and Recognition Qualities

Compound	PEL-TWA[(a)] (ppm)	LEL [(b)] (%)	UEL[(c)] (%)	IDLH [(d)] (ppm)	Odor	Odor Threshold (ppm)	Ionization Potential
PCE	100	NA	NA	150	Chloroform	Not Listed	9.32
TCE	100	8	10.5	1,000	Chloroform	Not Listed	9.45
1,2-DCE	200	5.6	12.8	1,000	Chloroform	Not Listed	9.65
1,1-DCE	Not Listed	6.5	15.5	Not Lised	Chloroform	Not Listed	10.00
VC	1	3.6	33.0	Not Listed	Pleasant	Not Listed	9.99

(a) OSHA-PEL Permissible Exposure Limit (flame weighted average, 8-hour): NIOSH Guide, June 1990
(b) Lower Exposure Limit (%)
(c) Upper Exposure Limit (%)
(d) Immediately 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.

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Appendix 2
NYSDOH Generic
Community Air Monitoring Plan

APPENDIX 1A

New York State Department of Health
Generic Community Air Monitoring Plan

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 volatile organic compounds (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 NYSDEC/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. 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.

- 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 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.

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

All 15-minute readings must be recorded and be available for State (DEC and DOH) 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.

- 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.

- 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.

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

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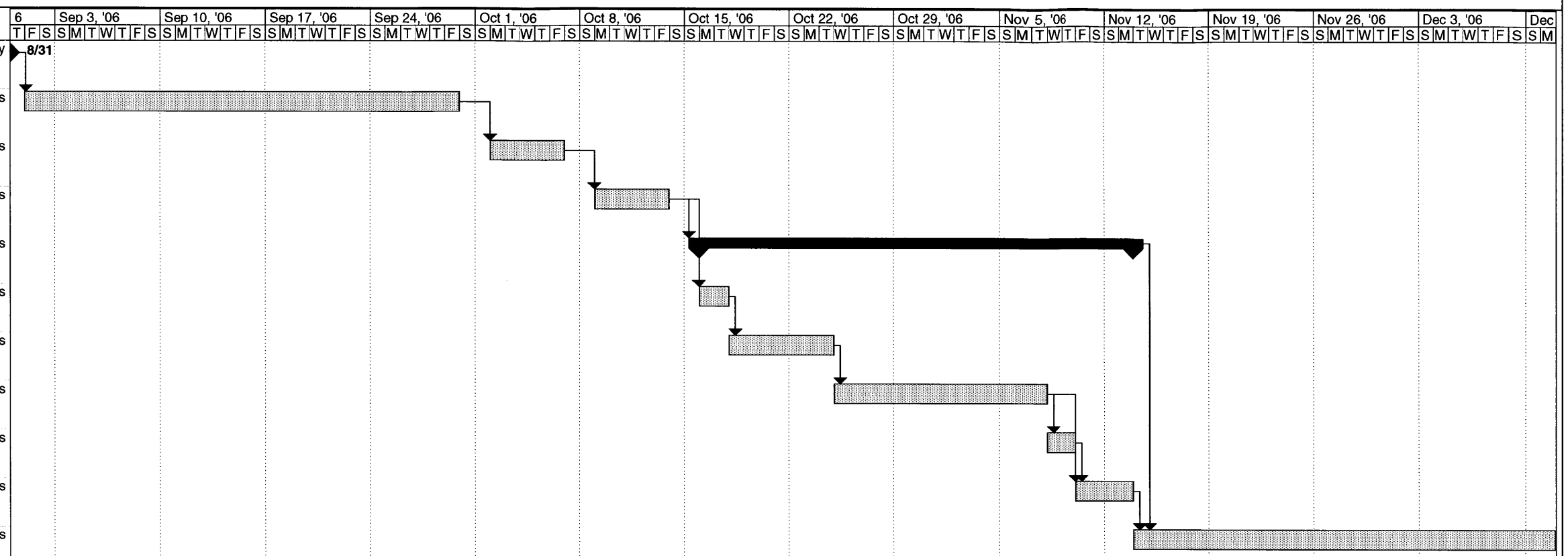
Appendix 3
Anticipated Schedule

Anticipated IRM Schedule

Carraige Cleantown
1600 Penfield Road
Penfield, New York

ID	Task Name	Duration
1	Submission of IRM Work Plan	1 day
2	Public Comment Period	21 days
3	Response to DEC Comments	5 days
4	Approval of Work Plan	5 days
5	IRM work	21 days
6	Site Preparation	2 days
7	Soil Excavation/Dewatering	5 days
8	Waste Characterization and Landfill Approval	10 days
9	Backfilling	2 days
10	Transport/Disposal of Excavated Soil	2 days
11	IRM Report	20 days



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