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300 State Street, Suite 261 Rocheste, W 146 12

February 25, 2008

Mr. David Pratt New York State Department of Environmental Conservation 6274 East Avon-Lima Road Avon, New York 14414 PERE 885,450680 Fax 585,454,3066 www.labellapc.com DER/HAZ. WASTE REMED REGION 8

Re: Supplemental Shallow Overburden Groundwater Sampling Work Plan
BCP Site #C828131, Former Carriage Cleaners

1600 Penfield Road, Penfield, New York LaBella Project No. 205267.02

Dear Mr. Pratt:

LaBella Associates P.C. ("LaBella") prepared this Supplemental Shallow Overburden Groundwater Sampling Work Plan on behalf of the 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". Springs Land entered the Brownfield Cleanup Program (BCP) under volunteer status (BCP #C828131), and has purchased the property as part of a redevelopment plan.

This Supplemental Shallow Overburden Groundwater Sampling Work Plan proposes work to be completed at the Site as a supplemental step in gauging the current condition of groundwater at the Site subsequent to the Interim Remedial Measure (IRM) conducted in July 2007. This work plan details the actions to be taken to sample Site groundwater in a safe, efficient, and accurate manner.

Scope of Work

The following Scope of Work will be undertaken for the project:

Task 1: Shallow Overburden Groundwater Sampling and Laboratory Analysis

Based on the request of the NYSDEC, a supplemental groundwater sampling event will be conducted at the Site to include the sampling and laboratory analysis of eight (8) existing shallow overburden groundwater monitoring wells at the Site. Specifically, monitoring wells MW-2, MW-3, MW-4, MW-5, MW-7, MW-8, MW-9 and MW-10 will be sampled. The attached Figure indicates the locations of the wells.

Prior to purging and sampling, static water levels will be measured from each well. The groundwater monitoring wells will then be purged prior to sampling using dedicated bailers. Field measurements of indicator parameters such as temperature, pH, specific conductance, and Eh will be utilized to determine the amount of water to purge and when to sample the wells. These parameters will be measured in the purge water until they stabilize. Purge water will be containerized pending waste characterization and disposal.

After purging of the wells, a groundwater sample will be collected from each well including one blind duplicate and submitted with a trip blank under chain-of-custody procedures to a New York State Department of Health (NYSDOH) Environmental Laboratory Assessment Program (ELAP) certified laboratory for halogenated volatile organic compounds (VOCs) by United States Environmental Protection Agency (USEPA) Method 8260B. The laboratory testing will be conducted in accordance with the Analytical Services Protocol (ASP) Category B deliverables.

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Task 2: Revision of Remedial Investigation Report

Once the groundwater sampling analytical results are received, the analytical data will be used to amend the Remedial Investigation Report, BCP Site #C828131, NYSDEC Index #B8-0705-05-08 previously submitted to NYSDEC in August 2006. The report will discuss the areas of subsurface impairment at the Site and compare the analytical data to the applicable regulations and guidelines.

Task 3: Remedial Alternatives Analysis Report and Remedial Work Plan

As required by the BCP, a Remedial Alternative Analysis Report (RAAR) and a Remedial Work Plan (RWP) will be developed. The AAR that will outline options, based on the requirements of DER-10, to address the remaining soil and groundwater impairment at the Site. The RWP will select a remedial option to address the remaining contamination at the Site. These reports will be submitted to the NYSDEC for review and comment. The NYSDEC comments will be addressed and a final AAR and RWP will be submitted.

Health and Safety Plan and Quality Control

Activities completed at the Site will be managed under the LaBella Associate's Site Health and Safety Plan and Quality Control Program. Copies of LaBella's Site Health and Safety Plan and Quality Control Program were included as Appendices to the Remedial Investigation Work Plan.

Schedule

It is anticipated that the supplemental groundwater samples can be collected within two weeks of approval of this work plan and laboratory analytical results can be available within three weeks of sampling. The AAR will be submitted approximately three weeks after receipt of the laboratory data.

If you have any questions regarding this Supplemental Shallow Overburden Groundwater Sampling Work Plan, please do not hesitate to call me at (585) 295-6611.

Respectfully submitted,

LABELLA ASSOCIATES, P.C.

Daniel P. Noll, PE Project Manager

DPN/lk

Enclosures Figure – Monitoring Well Locations

Dave Clements, Penfield Land Company, LLC cc: Bart Putzig, NYSDEC - Region 8 Matt Focucci, NYSDOH Maura Desmond, Esq., NYSDEC - Region 9 Joseph Albert, MCDOH Frank Pavia, Esq., Harris Beach, PLLC

