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REGION 8

August 17, 2009

Ms. Charlotte Theobald
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414

Re: Building Demolition
BCP Site #C828131, Former Carriage Cleaners
1600 Penfield Road, Penfield, New York
LaBella Project No. 205237.02

Dear Ms. Theobald:

LaBella Associates P.C. ("LaBella") is submitting this letter 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 New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP) under volunteer status (BCP #C828131), and has purchased the property as part of a redevelopment plan.

As part of the future redevelopment of the Site, the building is planned to be demolished. The concrete floor slab and footer will be demolished separately from the walls and roof. The building demolition work will consist of removal and off-site disposal or recycling of non-masonry building materials (e.g., piping, windows, etc.) and crushing the masonry building materials (e.g., cinder blocks and poured concrete slabs/footers) to be left on-site as sub-base for the future building. The redevelopment work will be completed in-conjunction with the remedy for the Site. [Note: A Remedial Alternatives Analysis is being submitted to NYSDEC for review.] To facilitate the building demolition work, this letter presents a work plan for addressing the potential for the concrete floor slab to be impacted with dry cleaning chemicals and addressing the potential for fugitive dust and volatile organic compounds (VOCs) to impact neighboring properties during removal of the slab and footers.

Concrete Sampling Work Plan

In order to facilitate the building demolition and ensure masonry materials are not impacted above the cleanup criteria, samples will be collected as part of the demolition activities. Prior to demolition, LaBella will evaluate the floor surface within the building for stained areas which could be due to former spillage of dry cleaning fluids. During demolition/crushing operations of the concrete floor slab and footers any areas of staining and the concrete from beneath the PCE Still area will be further segregated. The crushed concrete piles will be sampled for Halogenated Volatile Organic Compounds (VOCs) using United States Environmental Protection Agency (USEPA) Method 8260. The samples will be submitted to Mitkem Laboratories of Warwick, Rhode Island.

Currently it is proposed that three (3) concrete samples will be collected for analysis. The samples will come from the following locations: 1) crushed concrete from beneath the former tetrachloroethene (PCE) Still, 2) crushed concrete in proximity to one of the floor drains within the building, and 3) crushed concrete from the largest area of staining (if any) or if no significant staining is observed then from the other crushed floor slab. Each sample will consist of a minimum of 2-ounces of concrete. LaBella will attempt to obtain 'zero headspace' samples for submission to the laboratory. The sampling results will be compared to the NYSDEC

Part 375-6 Restricted Use Soil Cleanup Objectives for Commercial Use. In the event that VOC concentrations exceed these criteria, the concrete will be properly disposed of off-site at a NYSDEC approved landfill. *[Note: In this event, LaBella will contact the NYSDEC to discuss any additional concrete sampling that may be warranted to evaluate the other portions of the concrete floor slab.]* Subsequent to receiving the analytical results LaBella will submit a letter with the results to NYSDEC.

Air Monitoring

During the demolition work of the footer and concrete floor slab, air monitoring equipment/personnel shall be present at the Site. The NYSDOH Generic Community Air Monitoring Plan (CAMP) included as an attachment to this letter shall be implemented during the demolition activities. The action levels specified in the NYSDOH Generic CAMP shall be adhered to and in the event an action level is exceeded then the work shall stop until appropriate measures are implemented (e.g., dust suppression for elevated particulates or vapor suppression for elevated volatile organic compounds [VOCs], etc.). In addition to the frequency and location requirements specified in the Generic CAMP, particulate and vapor monitoring will also be conducted continuously along the northern property line (i.e., between the building demolition area and the day care facility to the north). The same action levels (5 ppm greater than background for vapors and 100 ug/m³ above background) will be used along the northern property line.

The requirements for vapor and particulate monitoring meters are included in the NYSDOH Generic CAMP and dust and vapor suppression techniques are discussed below.

Dust Suppression

If the particulate monitoring as defined in the NYSDOH Generic CAMP indicates a need for dust suppression, then one or more of the following methods shall be implemented:

- Wetting equipment and demolished materials
- Restricting vehicle speeds to 5 mph
- Hauling material in properly tarped containers

Vapor Suppression

If the vapor monitoring as defined in the NYSDOH Generic CAMP indicates a need for vapor suppression then one or more of the following methods shall be implemented:

- Vapor suppression utilizing foam vapor suppressants, polyethylene sheeting, or water
- Backfilling of excavations
- Covering emission sources with stockpiled materials

In the event that the above measures for dust and/or vapor suppression do not reduce particulate or VOC readings to acceptable levels, then the work shall be terminated until alternative measures are developed. In this event, the NYSDEC will be contacted for approval of the alternative measures prior to re-initiating work.

Ms. Charlotte Theobald
New York State Department of Environmental Conservation
August 17, 2009
Page 3

Health and Safety Plan and Quality Control

All LaBella 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.

If you have any questions regarding this Concrete 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

cc: Dave Clements, Penfield Land Company, LLC
Matt Focucci, NYSDOH
Maura Desmond, Esq., NYSDEC – Region 9
Joseph Albert, MCDOH

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