690 ST. PAUL STREET OFF-SITE

MONROE COUNTY

ROCHESTER, NEW YORK

SITE MANAGEMENT PLAN

NYSDEC Site Number: C828159A

Prepared for:

Bausch & Lomb

1400 North Goodman Street

Rochester, New York 14609

Prepared by:

LaBella Associates, D.P.C.

300 State Street, Suite 201

Rochester, New York 14614

(585) 454-6110

Revisions to Final Approved Site Management Plan:

Revision No.	Date Submitted	Summary of Revision	NYSDEC Approval Date

AUGUST 2019

CERTIFICATION STATEMENT

I DANIEL NOLL certify that I am currently a NYS registered professional engineer as in defined in 6 NYCRR Part 375 and that this Site Management Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

_____ P.E.

8/26/19 DATE

690 ST. PAUL STREET OFF-SITE

MONROE COUNTY

ROCHESTER, NEW YORK

SITE MANAGEMENT PLAN

Table of Contents

List of Tables

List of Figures

List of Appendices

1 Order On Consent Agreement
2 List of Site Contacts
3 Operations and Maintenance Manual
4 Quality Assurance Project Plan
5 Site Management Forms
6 Remedial Site Optimization Table of Contents
7 Responsibilities of Owner and Remedial Party
8 Health and Safety and Community Air Monitoring Plan

List of Acronyms

AS	Air Sparging
ASP	Analytical Services Protocol
BCA	Brownfield Cleanup Agreement
BCP	Brownfield Cleanup Program
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CAMP	Community Air Monitoring Plan
C/D	Construction and Demolition
CFR	Code of Federal Regulation
CLP	Contract Laboratory Program
COC	Certificate of Completion
CO2	Carbon Dioxide
CP	Commissioner Policy
DER	Division of Environmental Remediation
EC	Engineering Control
ECL	Environmental Conservation Law
ELAP	Environmental Laboratory Approval Program
ERP	Environmental Restoration Program
EWP	Excavation Work Plan
GHG	Green House Gas
GWE&T	Groundwater Extraction and Treatment
HASP	Health and Safety Plan
IC	Institutional Control
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
NYCRR	New York Codes, Rules and Regulations
O&M	Operation and Maintenance
OM&M	Operation, Maintenance and Monitoring
OSHA	Occupational Safety and Health Administration

OU	Operable Unit
PID	Photoionization Detector
PRP	Potentially Responsible Party
PRR	Periodic Review Report
QA/QC	Quality Assurance/Quality Control
QAPP	Quality Assurance Project Plan
RAO	Remedial Action Objective
RAWP	Remedial Action Work Plan
RCRA	Resource Conservation and Recovery Act
RI/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision
RP	Remedial Party
RSO	Remedial System Optimization
SAC	State Assistance Contract
SCG	Standards, Criteria and Guidelines
SCO	Soil Cleanup Objective
SMP	Site Management Plan
SOP	Standard Operating Procedures
SOW	Statement of Work
SPDES	State Pollutant Discharge Elimination System
SSD	Sub-slab Depressurization
SVE	Soil Vapor Extraction
SVI	Soil Vapor Intrusion
TAL	Target Analyte List
TCL	Target Compound List
TCLP	Toxicity Characteristic Leachate Procedure
USEPA	United States Environmental Protection Agency
UST	Underground Storage Tank
VCA	Voluntary Cleanup Agreement
VCP	Voluntary Cleanup Program

ES EXECUTIVE SUMMARY

The following provides a brief summary of the controls implemented for the Site, as well as the inspections, monitoring, maintenance and reporting activities required by this Site Management Plan:

Site Identification: C828159A 690 St. Paul Street Off-Site

Institutional Controls:	1. Operation, maintenance, monitoring, inspection, and reporting of any mechanical or physical component of the SSDS shall be performed as defined in this SMP.	
	2. All ECs must be inspected at a frequency and in a manner defined in the SMP.	
	3. Access to the site must be provided to agents, employees or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by the Order on Consent.	
	4. The potential for vapor intrusion must be evaluated for any buildings developed in the area within the IC boundaries noted on Figure 2, and any potential vapor intrusion impacts that are identified must be monitored or mitigated.	
Engineering Controls:	1. Sub-Slab Depressurization System (SSDS) including Drylock sealant	
Inspections:		Frequency
Sub-Slab Depressurization Systems		Annually
Monitoring:		
Sub-Slab Depressurization Systems		Annually

Site Identification: C828159A 690 St. Paul Street Off-Site

Drylock® Paint Sealant	Annually
Maintenance:	
1. Sub-Slab Depressurization Systems	As needed
2. Drylock® Paint Sealant	As needed
Reporting:	
1. Periodic Review Report	Annually

Further descriptions of the above requirements are provided in detail in the latter sections of this Site Management Plan.

1.0 INTRODUCTION

1.1 General

This Site Management Plan (SMP) is a required element of the remedial program for the 691St. Paul Street properties located in Rochester, New York (See Figure 1). The Site is currently identified as Site No. C828159A which is administered by New York State Department of Environmental Conservation (NYSDEC) under an Order on Consent and Administrative Settlement Index No. R8-20161013-107. This SMP manages impacts that have migrated off-site from the 690 St. Paul Street property (that is currently identified as Site No. C828159) and onto the 691St. Paul Street properties.

Bausch & Lomb (B&L) entered into an Order on Consent on January 25, 2017 with the NYSDEC to remediate the site. A figure showing the site location and boundaries is provided in Figure 2. The boundaries of the site are also described in the Order on Consent and Administrative Settlement provided in Appendix 1.

Engineering Controls (ECs) have been incorporated into the SMP to control exposure to remaining contamination to ensure protection of public health.

This SMP was prepared to manage remaining contamination at the site. This plan has been approved by the NYSDEC, and compliance with this plan is required by the grantor of the Order on Consent and Administrative Settlement and the grantor's successors and assigns. This SMP may only be revised with the approval of the NYSDEC.

It is important to note that:

- This SMP details the site-specific implementation procedures that are required by the Order on Consent and Administrative Settlement;
- Failure to comply with this SMP is a violation of Environmental Conservation Law, 6NYCRR Part 375 and the Order on Consent, (Index #R8-20161013-107; Site #C828159A) for the site, and thereby subject to applicable penalties.

All reports associated with the site can be viewed by contacting the NYSDEC or its successor agency managing environmental issues in New York State. A list of contacts for persons involved with the site is provided in Appendix 2 of this SMP.

This SMP was prepared by LaBella Associates, D.P.C. on behalf of Bausch & Lomb, in accordance with the requirements of the NYSDEC's DER-10 ("Technical Guidance for Site Investigation and Remediation"), dated August 2009, and the guidelines provided by the NYSDEC. This SMP addresses the means for implementing the ECs that are required for the site.

1.2 Revisions

Revisions to this plan will be proposed in writing to the NYSDEC's project manager. The NYSDEC may also request revisions to this plan. Revisions will be necessary upon, but not limited to, the following occurring: a change in media monitoring requirements, upgrades to or shut-down of a remedial system or other significant change to the site conditions. The NYSDEC will provide a notice of any approved changes to the SMP, and append these notices to the SMP that is retained in its files.

1.3 Notifications

Notifications will be submitted by B&L to the NYSDEC, as needed, in accordance with NYSDEC's DER – 10 for the following reasons:

- 7-day advance notice of any field activity associated with the remedial program.
- Notice within 48-hours of any known damage or defect to the foundation, structures or EC that reduces or has the potential to reduce the effectiveness of an EC, and likewise, any action to be taken to mitigate the damage or defect.
- Verbal notice by noon of the following day of any known emergency, such as a fire; flood; or earthquake that reduces or has the potential to reduce the effectiveness of ECs in place at the site, with written confirmation within 7 days that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public.
- Follow-up status reports on actions taken to respond to any known emergency event requiring ongoing responsive action submitted to the NYSDEC within 45 days describing and documenting actions taken to restore the effectiveness of the ECs.

Table 1.3 on the following page includes contact information for the above notification. The information on this table will be updated as necessary to provide accurate contact information. A full listing of site-related contact information is provided in Appendix 2.

Table 1.3: Notifications*

Name	Contact Information
Mr. Frank Sowers NYSDEC Project Manager	585-226-5357 frank.sowers@dec.ny.gov
Ms. Bernette Shilling NYSDEC Regional HW Engineer	585-226-5315 bernette.shilling@dec.ny.gov
Ms. Kelly Lewandowski NYSDEC Site Control	518-402-9553 kelly.lewandowski@dec.ny.us

* Note: Notifications are subject to change and will be updated as necessary.

2.0 SUMMARY OF PREVIOUS INVESTIGATIONS AND REMEDIAL ACTIONS

2.1 Site Location and Description

The site is located in the City of Rochester, Monroe County, New York and is identified as Section 106 Subsection 53 Block 01 and Lot 11, and with the address of the 691 St. Paul Street on the Monroe County Tax Map (see Figure 3). The site is an approximately 3.7-acre area and is bounded by a parking lot to the north, Smith Street and High Falls Brewery to the south, St. Paul Street and 690 St. Paul Street (NYSDEC BCP Site #C828159) to the east, and Suntru Street and RG&E Substation #34 to the west (see Figure 2 and 3). The owners of the site parcels at the time of issuance of this SMP are:

-691 St. Paul Street LLC (691 St. Paul Street parcel)

2.2 Physical Setting

2.2.1 Land Use

The Site consists of the following:

TABLE 2.2.1 – Site Description Summary

	691 Saint Paul Street
Acreage of Site	2.94
Approximate Building Footprint (square feet)	30,630
# of Stories	6
Foundation Type	Basement
Construction Date	1920
Current Use	Commercial office space
Zoned For	Industrial

The location of each property is shown on Figures 2 and 3.

The 691 Saint Paul Street parcel is primarily used as commercial office space by: 1) Monroe County Social Services (primary tenant) that occupies the upper basement and the remaining upper floors; 2) St. Michael's Woodshop that occupies the southern area of the lower basement; and 3) Newport Gratings (photonics company) that occupies the northern end of the upper and lower basements.

The properties adjoining the Site and in the neighborhood surrounding the Site primarily include commercial properties. The properties immediately south of the Site include commercial properties; the properties immediately north of the Site include commercial properties; the properties immediately east of the Site include commercial properties; and the properties to the west of the Site include commercial properties.

2.2.2 Geology

This section relies upon information obtained from the 690 Saint Paul Street NYSDEC BCP site environmental investigations. The overburden material ranges in depth up to approximately 12 feet (ft) below the ground surface (bgs) and consists primarily of glacial till. Fill material is anticipated to overly the till and may consist of sand, gravel, cinders, and ash.

The Decew Dolomite underlies the overburden material. The Decew Dolomite is the uppermost formation of the Clinton Group and consists of variably bedded, dark-gray to olive-gray, argillaceous to sandy, fine-grained dolomite that contains shaly partings and interbeds, as well as frequent pits and vugs. The thickness of this unit is generally 8 to 12 ft.

The Rochester Shale underlies the Decew Dolomite, and is a relatively uniform dark- to medium-gray, pale- and platy-weathering, highly calcareous to dolomitic mudstone. It contains abundant thin interbeds of medium gray, pale-buff weathering, laminated calcisiltites. Its thickness in Western New York is generally 58 to 65 ft.

The overburden groundwater table at the BCP site ranged from 4 to 9 ft bgs in the southern portion of the site and 8 to 10 ft bgs in the northern portion of the site. The overburden groundwater and flows generally to the west-southwest.

The shallow bedrock water-bearing interval was identified as the uppermost bedrock down to depths of approximately 20 ft bgs. This interval is the uppermost water-bearing unit within the bedrock, and no low permeability horizon separates this zone from the overburden. Groundwater flow direction is generally to the west.

2.3 Investigation and Remedial History

The following narrative provides a remedial history timeline and a brief summary of the available project records to document key investigative and remedial milestones for the Site. Full titles for each of the reports referenced below are provided in Section 8.0 – References. A list of the approved investigation and remedial reports are provided below:

- *Soil Gas Sampling Work Plan, NYSDEC Site #828159A, 691 and 705 St Paul Street, Rochester New York* dated January 30, 2017 prepared by LaBella Associates, D.P.C.
- *Soil Vapor Intrusion Work Plan, NYSDEC Site #828159A, 691 St Paul Street, Rochester New York* dated March 24, 2017 prepared by LaBella Associates, D.P.C.
- *Interim Remedial Measure: Remedial Action Plan, Sub-Slab Depressurization System – NYSDEC BCP Site #C828159A, 691 and 705 St Paul Street, Rochester New York* dated September 29, 2017 prepared by LaBella Associates, D.P.C.

Soil gas sampling was conducted along the eastern right-of-way of the site building on March 3, 2018 to evaluate the potential for impacted vapors from the 690 St. Paul Street property to have migrated onto the site. Soil gas sample locations are shown on Figure 4. VOCs were detected in two (2) of the four (4) soil gas samples above the laboratory method detection (MDL) limit as summarized in Table 2.3A. Soil gas samples SV-1 and SV-2 were collected adjacent to the 705 Saint Paul Street building and in the downgradient location of the northern chlorinated VOC groundwater plume at the 690 St. Paul Street site. Soil gas samples SV-1 and SV-2 did not detect any VOCs above the laboratory MDL, however, one VOC (chloroetheane) was identified as estimated below the MDL. The samples with VOCs detected above the laboratory MDL were soil gas samples SV-3 and SV-4 that are located adjacent to the southern end of the 691 Saint Paul Street site building and are in the downgradient area of the southern chlorinated VOC plume from the 690 St. Paul Street site. VOCs were not detected above the laboratory MDL in the outdoor ambient air/background air sample.

As required by the NYSDEC, SVI samples were collected from the 691 St. Paul Street site building on April 1, 2017 by LaBella. This sampling event included the collection of one (1) outdoor air sample (as a control sample) and seven (7) indoor air samples, and six (6) sub slab vapor samples as shown on Figures 5A and 5B. Please note that there were only six (6) interior sample locations and the extra or 7th interior sample (i.e. 691-B19-IAQ-2) was collected as a contingency sample during the testing work, as it appeared the gauge during the collection of a sample 691-B19-IAQ-1 may have malfunctioned.

The indoor air sampling on April 1, 2017 was completed in substantial accordance with the NYSDEC approved work plan. The work plan included analysis of SVI samples for contaminants of concern, specifically TCE and its breakdown products that were identified to be migrating from the 690 St. Paul Street site. The targeted VOCs were analyzed using United States Environmental Protection Agency (USEPA) Method TO-15. The targeted VOC sampling list is included in Table 2.3B.

TABLE 2.3B – Targeted VOC Sampling List

Targeted VOCs	
• TCE	• cis-1,2-dichloroethene (cis-1,2-DCE)
• trans-1,2-dichloroethene(trans-1,2-DCE)	• vinyl chloride
• 1,1-Dichloroethene (1,1-DCE)	• chloroethane

Targeted VOCs were detected above the laboratory MDL in each of the sub-slab vapor samples and were also detected above the laboratory MDL in five (5) of the six (6) corresponding ambient air sample locations. The outdoor air/background ambient air sample did not detect targeted VOCs above the laboratory MDL. SVI sample results are summarized on table 2.3C.

A comparison of the SVI results to the NYSDOH Ambient Air Guidelines, NYSDOH Decision Matrices (as updated May 2017), and the USEPA building assessment and survey evaluation (BASE) Database 90th Percentile values are summarized in Table 2.3D.

TABLE 2.3D

Summary of SVI Sample Results

Sample Location/ID	Result above USEPA Database – 90th Percentile	Indoor Ambient Air Result above NYSDOH Ambient Air Guideline	NYSDOH Decision Matrix	
			Result Above Minimum NYSDOH Decision Matrix	NYSDOH Recommendation
Upper Basement				
691-NE	None	None	None	None
691-B15	TCE	TCE	TCE	Mitigate
691-B19	TCE	TCE	TCE	Mitigate
Lower Basement				
691-SB5B	TCE, cis-1,2-DCE	TCE	TCE, cis-1,2-DCE	Mitigate
691-SB5A	TCE, cis-1,2-DCE	TCE	TCE, cis-1,2-DCE	Mitigate
691-SB1	TCE, cis-1,2-DCE	None	cis-1,2-DCE	Mitigate

Note: cis-1,2-DCE denotes cis-1,2-Dichloroethene

As indicated in Table 2.3D, TCE was detected above the NYSDOH Ambient Air Guideline in indoor air samples 691-B15 and 691-B19 from the upper basement and samples 691-SB5B and 691-SB5A in the lower basement. In addition, comparison of the results to the NYSDOH Decision Matrices recommends mitigation at five (5) of the six (6) sample locations.

2.4 Remedial Action Objectives

The Remedial Action Objectives (RAOs) for the Site is as follows:

Soil Vapor

RAOs for Public Health Protection

- Mitigate impacts to public health resulting from existing, or the potential for, soil vapor intrusion into buildings at a site.

2.5 Remaining Contamination

2.5.1 Soil Vapor

Sub-slab and indoor air sampling indicated actions were needed to address soil vapor intrusion within the 691 St. Paul Street building. SVI sampling of the upper and lower basements indicated the presence of chemicals of concern. TCE and cis-1,2-DCE were detected at levels above those which are expected to be found in indoor air. During the SVI sampling, TCE was detected at a concentration up to 6.8 µg/m^3 which exceeds the NYSDOH guidance value of 2 µg/m^3 and is also above typical indoor air concentrations. Sub-slab sampling results detected maximum concentrations of TCE at 220 µg/m^3 and cis-1,2-DCE at 170 µg/m^3. Based on these results, actions in the 691 St. Paul Street building were required to reduce the indoor air levels to within background levels.

A SSDS was installed in the 691 St. Paul Street building from November 2017 to January 2018 to mitigate the potential for contaminant vapors to migrate through the sub-slab floor and into the indoor air. In addition, a portion of the lower basement eastern wall was coated with Drylock® paint to limit the potential for contaminant vapors to enter the building.

Pressure field extension (PFE) points were installed during the installation of the SSDS to measure the influence of the SSDS within the upper and lower basement floor slabs. Based on PFE measurements, the SSDS provided a minimum of 0.004 inches of water column lower than indoor air pressure throughout the upper and lower basement slabs. PFE points along the lower basement west wall occasionally measured greater than 0.004 inches of water column or positive pressure during periods of moderate to high winds against the exposed western portion of the building foundation. This area was generally limited to the area of the wood shop space and did not affect reducing chemicals of concern below the NYSDOH Air Guideline and background levels in indoor air based on the post start-up indoor air sampling results (see below). PFE contours are shown on Figure 8A (upper basement) and Figures 8B and 8C for the lower basement. PFE contours shown on Figures 8B and 8C show the pressure differential gradient between periods of high and low wind speeds effects on the lower basement.

Post start-up indoor air sampling was conducted on March 16, 2018 to evaluate indoor air concentrations of chemicals of concern approximately 45 days subsequent to the installation and operation of the SSDS. The sampling was conducted during periods of winds speeds of low 20s miles per hour with gusts up to 35 miles per hour. Results indicate chemicals of concern are below the NYSDOH Air Guideline and background levels for samples collected within the 691 St. Paul Street building. The Post SSDS Start-Up Sampling Results are included in Table 2.5.1.

3.0 INSTITUTIONAL AND ENGINEERING CONTROL PLAN

3.1 General

Since remaining contamination exists at the site, Engineering Controls (ECs) are required to protect human health and the environment. This EC Plan describes the procedures for the implementation and management of all ECs at the site. The EC Plan is one component of the SMP and is subject to revision by the NYSDEC.

This plan provides:

- A description of all ECs on the site;
- The basic implementation and intended role of each EC;
- A description of the ECs to be evaluated during each required inspection and periodic review;
- A description of plans and procedures to be followed for implementation of ECs, and
- Any other provisions necessary to identify or establish methods for implementing the ECs required by the site remedy, as determined by the NYSDEC.

3.2 Engineering Controls

ECs required by the Order on Consent and Administrative Settlement to: (1) implement, maintain and monitor Engineering Control systems and prevent future exposure to remaining contamination. Adherence to these ECs on the site is required by and will be implemented under this SMP. ECs identified in this SMP may not be discontinued without an amendment to the SMP. These ECs are:

- All ECs must be operated and maintained as specified in this SMP;
- All ECs must be inspected at a frequency and in a manner defined in the SMP.
- Data and information pertinent to the ECs must be reported at the frequency and in a manner as defined in this SMP;
- Monitoring to assess the performance and effectiveness of the remedy must be performed as defined in this SMP;
- Operation, maintenance, monitoring, inspection, and reporting of any mechanical or physical component of the remedy shall be performed as defined in this SMP;
- Access to the site must be provided to agents, employees or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by the Order on Consent and Administrative Settlement; and
- The potential for vapor intrusion must be evaluated for any buildings developed in the area within the site boundaries noted on Figure 2, and any potential impacts that are identified must be monitored or mitigated.

3.2.1 Sub-Slab Depressurization Systems (SSDS)

Procedures for operating and maintaining the SSDS are documented in the Operation and Maintenance Plan (Section 5.0 of this SMP). As built drawings, signed and sealed by a professional engineer, are included in Appendix 3 – Operations and Maintenance Manual. Figures 6A and 6B shows the location of the ECs for the site.

The active SSDS, including maintaining Drylock sealant located on a portion of the eastern lower basement wall, will not be discontinued unless prior written approval is granted by the NYSDEC and the NYSDOH. In the event that monitoring data indicates that the SSDS may no longer be required, a proposal to discontinue the SSDS and use of the Drylock sealant will be submitted by the remedial party to the NYSDEC and NYSDOH.

Any work conducted pursuant to the SSDS must also be conducted in accordance with the procedures defined in a Health and Safety Plan (HASP) and associated

Community Air Monitoring Plan (CAMP) prepared for the site and provided in Appendix 8.

3.2.2 Criteria for Completion of Remediation/Termination of Remedial Systems

Generally, remedial processes are considered completed when monitoring indicates that the remedy has achieved the remedial action. The framework for determining when remedial processes are complete is provided in Section 6.4 of NYSDEC DER-10.

4.0 MONITORING AND SAMPLING PLAN

4.1 General

This Monitoring and Sampling Plan describes the measures for evaluating the overall performance and effectiveness of the remedy. This Monitoring and Sampling Plan may only be revised with the approval of the NYSDEC. Details regarding the sampling procedures, data quality usability objectives, analytical methods, etc. for all samples collected as part of site management for the site are included in the Quality Assurance Project Plan provided in Appendix 4.

This Monitoring and Sampling Plan describes the methods to be used for:

- Sampling and analysis of all appropriate media (e.g., indoor air, soil vapor);
- Assessing compliance with applicable NYSDEC standards, criteria and guidance (SCGs), and
- Evaluating site information periodically to confirm that the remedy continues to be effective in protecting public health and the environment;

To adequately address these issues, this Monitoring and Sampling Plan provides information on:

- Sampling locations, protocol and frequency;
- Information on all designed monitoring systems; and
- Annual inspection and periodic certification.

Reporting requirements are provided in Section 7.0 of this SMP.

4.2 Site – wide Inspection

Site-wide inspections will be performed at a minimum of once per year. Modification to the frequency or duration of the inspections will require approval from the NYSDEC. Site-wide inspections will also be performed after all severe weather conditions that may affect ECs or monitoring devices. During these inspections, an inspection form will be completed as provided in Appendix 5 – Site Management Forms. The form will compile sufficient information to assess the following:

- Compliance with all ECs;
- An evaluation of the condition and continued effectiveness of ECs; and
- General site conditions/usage at the time of the inspection.

Inspections of all remedial components installed at the site will be conducted. A comprehensive site-wide inspection will be conducted and documented according to the SMP schedule, regardless of the frequency of the Periodic Review Report. The inspections will determine and document the following:

- Whether ECs continue to perform as designed;
- If these controls continue to be protective of human health and the environment;
- Compliance with requirements of this SMP;
- Achievement of remedial performance criteria; and
- If site records are complete and up to date.

Reporting requirements are outlined in Section 7.0 of this plan.

Inspections will also be performed in the event of an emergency. If an emergency, such as a natural disaster or an unforeseen failure of any of the ECs occurs that reduces or has the potential to reduce the effectiveness of ECs in place at the site, verbal notice to the NYSDEC must be given by noon of the following day. In addition, an inspection of the site will be conducted within 5 days of the event to verify the effectiveness of the ECs implemented at the site by a qualified environmental professional, as determined by the NYSDEC. Written confirmation must be provided to the NYSDEC within 7 days of the event that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public.

4.3 Treatment System Monitoring and Sampling

4.3.1 Remedial System Monitoring

Monitoring of the SSDS will be performed on a routine basis, as identified in Table 4.3.1 Remedial System Monitoring Requirements and Schedule (see below). Modification to the frequency or sampling requirements will require approval from the NYSDEC. A visual inspection of the complete system will be conducted during each monitoring event. Unscheduled inspections and/or sampling may take place when a suspected failure of the SSDS system has been reported or an emergency occurs that is deemed likely to affect the operation of the system. SSDS system components to be monitored include, but are not limited to, the components included in Table 4.3.1 below.

Table 4.3.1 – Remedial System Monitoring Requirements and Schedule

Remedial System Component	Monitoring Parameter	Operating Range	Monitoring Schedule
Fans	Pressure	Should be within typical operating range	Annually or as-needed
Fans	Pressure Field Extension	Sub-Slab Pressures a minimum of 0.004 inches of water column lower than indoor air pressure or consistent with historic measurements*	Annually or as-needed
Alarms and piping	Operational/condition	Minimum 0.25 inches of water columns for fans or consistent with historic measurements.	Annually or as-needed
Drylock® Paint Sealant	Visual Condition **	Not Applicable	Annually or as-needed

*Please note the PFE points along the lower basement west wall occasionally measure greater than 0.004 inches of water column or positive pressure during periods of high winds against the exposed western portion of the building foundation.

**Visual Conditions refers to the visual integrity of the Drylock paint such as chips, pealing, or fading to determine if maintenance should be required.

A complete list of components to be inspected is provided in the Inspection Checklist, provided in Appendix 5 - Site Management Forms. If any equipment readings are not within their specified operation range, any equipment is observed to be malfunctioning or the system is not performing within specifications; maintenance and repair, as per the Operation and Maintenance Plan, is required immediately.

4.4 Post-Remediation Media Monitoring and Sampling

Samples shall be collected from the indoor air on an as-needed basis that will be based on the operations of the SSDS. In the event a fan malfunctions or part of the system is not operating for greater than 60 days, quarterly air monitoring will be conducted in accordance with the Appendix 3 – Operations and Maintenance Manual. Sampling locations, required analytical parameters and schedule are provided in Table 4.4 – Remedial System Sampling Requirements and Schedule below. Modification to the frequency or sampling requirements will require approval from the NYSDEC.

Table 4.4 – Post Remediation Sampling Requirements and Schedule

Sampling Location	Analytical Parameters	Schedule
	VOC (EPA Method TO-15 for Select VOCs)	
691 St. Paul Street Building		
Upper Basement: 691-AI-08, 691-AI-06, 691-AI-04 **Lower Basement:** 691-AI-02, 691-AI-10, 691-AI-12 (see Figures 7A and 7B for sample locations)	1,1-Dichloroethene, Chloroethane, Cis-1,2-Dichloroethene, trans-,12-Dichloroethene, Trichloroethene, vinyl chloride	**As Needed Only If:** 60 days after a fan has been shut down or has malfunctioned. If fan been restarted or repaired within 60 days, no sampling will be conducted.

Detailed sample collection and analytical procedures and protocols are provided in Section 4.4.1 and Appendix 4 – Quality Assurance Project Plan.

4.4.1 Indoor Air Sampling

Indoor air samples will be collected using Summa™ canisters equipped with a critical orifice flow regulation device to allow an air sample to be collected over an approximate 8-hour sampling period. Care will be taken to deploy the canisters away from the influence of any forces air emanating from air conditioned or heating unit vents. The indoor air sampling procedure is summarized as follows:

- Canisters will be deployed in areas not subject to disturbances and which will not interfere with the occupant's normal activities.
- Air sample canisters will be labeled with sample locations (i.e. previous sample IDS, building and/or building room ID) and recorded along with the unique canister and gauge number will provided by the laboratory in the field log book or field notes.
- The canister vacuum, date, and time will be measured and recorded in a field log book or field notes immediately upon sample deployment and immediately prior to the end of the sample period.
- Other information recorded will include: sampler same, sample period, if there is evidence of disturbance, and any comments.
- At the completion of the sampling work all samples will be sent under chain of custody procedures for analysis of TO-15 for parameters as listed in Table 2.3B.

Deliverables for the indoor air sampling program are specified in Section 7.0 – Reporting Requirements.

4.4.2 Monitoring and Sampling Protocol

All sampling and monitoring activities will be recorded in a field book and/or associated sampling log as provided in Appendix 5 - Site Management Forms. Other observations will be noted on the sampling log. The sampling log will serve as the inspection form for the monitoring network. Additional detail regarding monitoring and sampling protocols are provided in Appendix 4 – Quality Assurance Project Plan of this document.

5.0 OPERATION AND MAINTENANCE PLAN

5.1 General

This Operation and Maintenance Plan provides a brief description of the measures necessary to operate, monitor and maintain the mechanical components of the remedy selected for the site. This Operation and Maintenance Plan:

- Includes the procedures necessary to allow individuals unfamiliar with the site to operate and maintain the SSDS;
- Will be updated periodically to reflect changes in site conditions or the manner in which the SSDS are operated and maintained.

Further detail regarding the Operation and Maintenance of the SSDS is provided in Appendix 3 - Operation and Maintenance Manual. A copy of this Operation and Maintenance Manual, along with the complete SMP, is to be maintained at the site. This Operation and Maintenance Plan is not to be used as a stand-alone document, but as a component document of this SMP.

5.2 Remedial System (or other Engineering Control) Performance Criteria

The following operating requirements for the SSDS is summarized in Table 5.2. For each element, routine and non-routine maintenance will be documented in the Periodic Review Reports.

Table 5.2 - Remedial System Operating Requirements

Remedial System	Operating Requirements	Permit Requirements
SSDS (691 St. Paul Street)	-Annual inspection of system components -Annual inspection of system gauges and fans to confirm operation -Maintain 0.004 inches of water columns throughout target area or consistent with historical measurements* -Annual or as needed inspection of condensate water at locations of traps in SSDS piping. Condensate water will be removed as needed	None

*Please note the PFE points along the lower basement west wall occasionally measure greater than 0.004 inches of water column or positive pressure during periods of high winds against the exposed western portion of the building foundation.

5.3 Operation and Maintenance of the 691 St. Paul Street Sub-slab Depressurization System

The following sections provide a description of the operations and maintenance of SSDS. Cut-sheets and as-built drawings for the SSDS are provided in Appendix 3 - Operations and Maintenance Manual.

5.3.1 System Start-Up and Testing

After the SSDS is installed or modified, a start-up test will be performed to evaluate the effectiveness of the SSDS. The first step will be to start each of the SSDS fans on the roof of the building to document that the fans are functioning properly. Once the fans are fully operational at the roof level, a digital micromanometer will be used to collect vacuum readings from the pressure field extension (PFE) monitoring points in the buildings and vacuum gauge readings of each applicable SSDS will be recorded. PFE measurements will generally need to achieve a minimum of 0.004 inches of water vacuum or similar to historical readings in order to meet the performance requirements of the October 2006 NYSDOH Final Guidance for Evaluating Soil Vapor Intrusion in the State of New York. If these criteria are not met, adjustments will be made to the SSDS fans to increase air flow and vacuum influence including replacement of the fans with larger fans, if necessary.

The system testing described above will be conducted if, in the course of the SSDS lifetime, the system goes down or significant changes are made to the system and the system must be restarted.

5.3.2 Routine System Operation and Maintenance

All fans must be kept in continuous operation. Fans must restart automatically in event of power loss. Fans and gauges must be inspected annually to verify that values have not changed significantly and the SSDS is operating. Annual inspection forms will be included in the Periodic Review Report.

5.3.3 Non-Routine Operation and Maintenance

In the event of unusual fan noise, failure to start, physical damage or repeated circuit breaker trip, turn fan off and service or replace. Any changes in the structure, HVAC systems, slab conditions, etc. will require a re-evaluation of the SSDS.

5.3.4 System Monitoring Devices and Alarms

The SSDS has warning devices to indicate that the system is not operating properly within the upper basement near the loading dock located at the southwest corner of the 691 St. Paul Street building at the location shown on Figure 6A. In the event that the warning device is activated, applicable maintenance and repairs will be conducted, as specified in the Operation and Maintenance Plan, and the SSDS will be restarted. Operational problems will be noted in the Periodic Review Report to be prepared for that reporting period.

6.0 PERIODIC ASSESSMENTS/EVALUATIONS

6.1 Climate Change Vulnerability Assessment

Increases in both the severity and frequency of storms/weather events, an increase in sea level elevations along with accompanying flooding impacts, shifting precipitation patterns and wide temperature fluctuation, resulting from global climactic change and instability, have the potential to significantly impact the performance, effectiveness and protectiveness of a given site and associated remedial systems. Vulnerability assessments provide information so that the site and associated remedial systems are prepared for the impacts of the increasing frequency and intensity of severe storms/weather events and associated flooding.

This section provides a summary of vulnerability assessments that will be conducted for the site during periodic assessments, and briefly summarizes the vulnerability of the site and/or engineering controls to severe storms/weather events and associated flooding.

6.2 Green Remediation Evaluation

NYSDEC's DER-31 Green Remediation requires that green remediation concepts and techniques be considered during all stages of the remedial program including site management, with the goal of improving the sustainability of the cleanup and summarizing the net environmental benefit of any implemented green technology. This section of the SMP provides a summary of any green remediation evaluations to be completed for the site during site management, and as reported in the Periodic Review Report (PRR).

6.2.1 Timing of Green Remediation Evaluations

For major remedial system components, green remediation evaluations and corresponding modifications will be undertaken as part of a formal Remedial System Optimization (RSO), or at any time that the Project Manager feels appropriate, e.g. during significant maintenance events or in conjunction with storm recovery activities.

Modifications resulting from green remediation evaluations will be routinely implemented and scheduled to occur during planned/routine operation and maintenance activities. Reporting of these modifications will be presented in the PRR.

6.2.2 Remedial Systems

Remedial systems will be operated properly considering the current site conditions to conserve materials and resources to the greatest extent possible. Consideration will be given to operating rates and use of reagents and consumables. Spent materials will be sent for recycling, as appropriate.

6.2.3 Building Operations

Structures including buildings and sheds will be operated and maintained to provide for the most efficient operation of the remedy, while minimizing energy, waste generation and water consumption.

6.2.4 Frequency of System Checks, Sampling and Other Periodic Activities

Transportation to and from the Site and use of consumables in relation to visiting the Site in order to conduct system checks and or collect samples and shipping samples to a laboratory for analyses have direct and/or inherent energy costs. The schedule and/or means of these periodic activities have been prepared so that these tasks can be accomplished in a manner that does not impact remedy protectiveness but reduces expenditure of energy or resources.

6.2.5 Metrics and Reporting

As discussed in Section 7.0 and as shown in Appendix 5 – Site Management Forms, information on energy usage, solid waste generation, transportation and shipping, water usage and land use and ecosystems will be recorded to facilitate and document consistent implementation of green remediation during site management and to identify corresponding benefits; a set of metrics has been developed.

6.3 Remedial System Optimization

A Remedial Site Optimization (RSO) study will be conducted any time that the NYSDEC or the remedial party requests in writing that an in-depth evaluation of the remedy is needed. An RSO may be appropriate if any of the following occur:

- The remedial actions have not met or are not expected to meet RAOs;
- The management and operation of the remedial system is exceeding the estimated costs;
- The remedial system is not performing as expected or as designed;

- Previously unidentified source material may be suspected;
- Plume shift has potentially occurred;
- Site conditions change due to development, change of use, change in groundwater use, etc.;
- There is an anticipated transfer of the site management to another remedial party or agency; and
- A new and applicable remedial technology becomes available.

An RSO will provide a critique of a site's conceptual model, give a summary of past performance, document current cleanup practices, summarize progress made toward the site's cleanup goals, gather additional performance or media specific data and information and provide recommendations for improvements to enhance the ability of the present system to reach RAOs or to provide a basis for changing the remedial strategy.

The RSO study will focuses on overall site cleanup strategy, process optimization and management with the intent of identifying impediments to cleanup and improvements to site operations to increase efficiency, cost effectiveness and remedial time frames. Green remediation technology and principals are to be considered when performing the RSO.

7.0 REPORTING REQUIREMENTS

7.1 Site Management Reports

All site management inspection, maintenance and monitoring events will be recorded on the appropriate site management forms provided in Appendix 5. These forms are subject to NYSDEC revision.

All applicable inspection forms and other records, including media sampling data and system maintenance reports, generated for the site during the reporting period will be provided in electronic format to the NYSDEC in accordance with the requirements of Table 7.1 and summarized in the Periodic Review Report.

Table 7.1 - Schedule of Interim Monitoring/Inspection Reports

Task/Report	Reporting Frequency*
EDD submittals for EQuIS	As needed
Tenant Notification for Exceedance of Air Guideline	As needed
Other Reports Upon NYSDEC Request	As needed

* The frequency of events will be conducted as specified until otherwise approved by the NYSDEC.

All interim monitoring/inspections reports will include, at a minimum (if applicable):

- Date of event or reporting period;
- Name, company, and position of person(s) conducting monitoring/inspection activities;

- Description of the activities performed;
- Where appropriate, color photographs or sketches showing the approximate location of any problems or incidents noted (included either on the checklist/form or on an attached sheet);
- Type of samples collected (e.g., sub-slab vapor, indoor air, outdoor air, etc.);
- Copies of all field forms completed (e.g., chain-of-custody documentation, etc.);
- Sampling results in comparison to appropriate standards/criteria;
- A figure illustrating sample type and sampling locations;
- Copies of all laboratory data sheets and the required laboratory data deliverables required for all points sampled (to be submitted electronically in the NYSDEC-identified format);
- Any observations, conclusions, or recommendations; and
- A determination as to whether contaminant conditions have changed since the last reporting event.

Routine maintenance event reporting forms will include, at a minimum (if applicable):

- Date of event;
- Name, company, and position of person(s) conducting maintenance activities;
- Description of maintenance activities performed;
- Any modifications to the system;
- Where appropriate, color photographs or sketches showing the approximate location of any problems or incidents noted (included either on the checklist/form or on an attached sheet); and,
- Other documentation such as copies of invoices for maintenance work, receipts for replacement equipment, etc., (attached to the checklist/form).

Non-routine maintenance event reporting forms will include, at a minimum (if applicable):

- Date of event;
- Name, company, and position of person(s) conducting non-routine maintenance/repair activities;
- Description of non-routine activities performed;
- Where appropriate, color photographs or sketches showing the approximate location of any problems or incidents (included either on the form or on an attached sheet); and
- Other documentation such as copies of invoices for repair work, receipts for replacement equipment, etc. (attached to the checklist/form).

Data will be reported in digital format as determined by the NYSDEC. Currently, data is to be supplied electronically and submitted to the NYSDEC EQuIS™ database in accordance with the requirements found at this link http://www.dec.ny.gov/chemical/62440.html.

7.2 Periodic Review Report

A Periodic Review Report (PRR) will be submitted to the Department beginning sixteen (16) months after the Satisfactory Completion Letter is issued. After submittal of the initial Periodic Review Report, the next PRR shall be submitted annually or as otherwise determined by the Department or at another frequency as may be required by the Department. In the event that the site is subdivided into separate parcels with different ownership, a single Periodic Review Report will be prepared that addresses the site. The report will be prepared in accordance with NYSDEC's DER-10 and submitted within 30 days of the end of each certification period. Media sampling results (if applicable) will also be incorporated into the Periodic Review Report. The report will include (if applicable):

- Identification, assessment and certification of all ECs required by the remedy for the site.
- Results of the required annual site inspections and severe condition inspections, if applicable.
- All applicable site management forms and other records generated for the site during the reporting period in the NYSDEC-approved electronic format, if not previously submitted.
- A summary of any discharge monitoring data and/or information generated during the reporting period, with comments and conclusions.
- Data summary tables and graphical representations of contaminants of concern by media (soil vapor, etc.), which include a listing of all compounds analyzed, along with the applicable standards, with all exceedances highlighted. These will include a presentation of past data as part of an evaluation of contaminant concentration trends.

- Results of all analyses, copies of all laboratory data sheets, and the required laboratory data deliverables for all samples collected during the reporting period will be submitted in digital format as determined by the NYSDEC. Currently, data is supplied electronically and submitted to the NYSDEC EQuIS™ database in accordance with the requirements found at this link: http://www.dec.ny.gov/chemical/62440.html.

- A site evaluation, which includes the following (if applicable):

  - The compliance of the remedy with the requirements of the site-specific Decision Document;

  - The operation and the effectiveness of all treatment units, etc., including identification of any needed repairs or modifications;

  - Any new conclusions or observations regarding site contamination based on inspections or data generated by the Monitoring and Sampling Plan for the media being monitored;

  - Recommendations regarding any necessary changes to the remedy and/or Monitoring and Sampling Plan; and

  - Trends in contaminant levels in the affected media will be evaluated to determine if the remedy continues to be effective in achieving remedial goals.

  - The overall performance and effectiveness of the remedy.

- A performance summary for all treatment systems at the site during the calendar year, including information such as:

  - The number of days the system operated for the reporting period;

  - A description of breakdowns and/or repairs along with an explanation for any significant downtime;

- A description of the resolution of performance problems;
- Alarm conditions;
- Trends in equipment failure; and
- Comments, conclusions, and recommendations based on data evaluation.

7.2.1 Certification of Institutional and Engineering Controls

Following the last inspection of the reporting period, a Professional Engineer licensed to practice in New York State will prepare, and include in the Periodic Review Report, the following certification as per the requirements of NYSDEC DER-10:

"*For each institutional or engineering control identified for the site, I certify that all of the following statements are true:*

- *The inspection of the site to confirm the effectiveness of the engineering controls required by the remedial program was performed under my direction;*
- *The engineering control employed at this site is unchanged from the date the control was put in place, or last approved by the Department;*
- *Nothing has occurred that would impair the ability of the control to protect the public health and environment;*
- *Nothing has occurred that would constitute a violation or failure to comply with any site management plan for this control;*
- *Access to the site will continue to be provided to the Department to evaluate the remedy, including access to evaluate the continued maintenance of this control;*

- *If a financial assurance mechanism is required under the oversight document for the site, the mechanism remains valid and sufficient for the intended purpose under the document;*

- *The engineering control systems are performing as designed and are effective;*

- *To the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program and generally accepted engineering practices; and*

- *The information presented in this report is accurate and complete.*

I certify that all information and statements in this certification form are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law. I, [name], of [business address], am certifying as [Owner/Remedial Party or Owner's/Remedial Party's Designated Site Representative] [I have been authorized and designated by all site owners/remedial parties to sign this certification] for the site."

The signed certification will be included in the Periodic Review Report.

The Periodic Review Report will be submitted, in electronic format, to the NYSDEC Central Office, Regional Office in which the site is located and the NYSDOH Bureau of Environmental Exposure Investigation. The Periodic Review Report may need to be submitted in hard-copy format, as requested by the NYSDEC project manager.

7.3 Corrective Measures Work Plan

If any component of the remedy is found to have failed, or if the periodic certification cannot be provided due to the failure of an engineering control, a Corrective Measures Work Plan will be submitted to the NYSDEC for approval. This plan will explain the failure and provide the details and schedule for performing work necessary to correct the failure. Unless an emergency condition exists, no work will be performed pursuant to the Corrective Measures Work Plan until it has been approved by the NYSDEC.

7.4 Remedial Site Optimization Report

In the event that an RSO is to be performed (see Section 6.3, upon completion of an RSO, an RSO report must be submitted to the Department for approval. A general outline for the RSO report is provided in Appendix 6. The RSO report will document the research/ investigation and data gathering that was conducted, evaluate the results and facts obtained, present a revised conceptual site model and present recommendations. RSO recommendations are to be implemented upon approval from the NYSDEC. Additional work plans, design documents, HASPs etc., may still be required to implement the recommendations, based upon the actions that need to be taken. A final engineering report and update to the SMP may also be required.

The RSO report will be submitted, in electronic format, to the NYSDEC Central Office, Regional Office in which the site is located, Site Control and the NYSDOH Bureau of Environmental Exposure Investigation.

8.0 REFERENCES

6NYCRR Part 375, Environmental Remediation Programs. December 14, 2006.

NYSDEC DER-10 – "Technical Guidance for Site Investigation and Remediation".

Soil Gas Sampling Work Plan, NYSDEC Site #828159A, 691 and 705 St Paul Street, Rochester New York dated January 30, 2017 prepared by LaBella Associates, DPC

Soil Vapor Intrusion Work Plan, NYSDEC Site #828159A, 691 St Paul Street, Rochester New York dated March 24, 2017 prepared by LaBella Associates, DPC

Interim Remedial Measure: Remedial Action Plan, Sub-Slab Depressurization System – NYSDEC BCP Site #C828159A, 691 and 705 St Paul Street, Rochester New York dated September 29, 2017 prepared by LaBella Associates, DPC

TABLES

REFERENCE PAGE FOR SAMPLE RESULTS

690 Saint Paul Street Off-Site, NYSDEC Site #C828159A
691 Saint Paul Street, Rochester, New York

Concentrations displayed in micrograms per cubic meter (ug/m^3)

Samples analyzed by USEPA Method TO-15

NL denotes Not Listed

(1) *New York State Department of Health (NYSDOH), Guidance for Evaluating Soil Vapor Intrusion in the State of New York* , October 2006 (Updated May 2017). [Note: This Guidance uses a combination of indoor air and sub-slab soil vapor when comparing to the matrices. In addition, for compounds not listed in the matrices an overall site approach is employed which utilizes the USEPA BASE Database (see 2. below) as typical background for commercial buildings and also uses the outdoor air sample, refer to Guidance document for details.]

(2) USEPA 2001 Building Assessment and Survey Evaluation (BASE) Database (90th Percentile). As recommended in Section 3.2.4 of the NYSDOH Guidance (Refer to Footnote "1") this database is referenced for the indoor air sampling results. This database is also referenced to provide initial benchmarks for comparison to the air sampling data and does not represent regulatory standards or compliance values.

(3) No value was listed in NYSDOH Table C2 - USEPA Base Database. A value from Table C3 NYSDOH 1997: Control home database (90th Percentile) was used.

U indicates the value was detected below the reported laboratory method detection limit

UJ indicates the value was detected below the estimated reported laboratory method detection limit

J indicates an estimated value

BOLD type denotes that the compound was detected at a concentration that was found to exceed the NYSDOH Sub-Slab Vapor Concentration Decision Matrix (minimum action level).

UNDERLINED type denotes that the compound was detected at a concentration that was found to exceed the NYSDOH Indoor Air Concentration (minimum action level).

RED values are above Air Guideline Derived by NYSDOH in Table 3.1 of NYSDOH Guidance titled "Evaluating Soil Vapor Intrusion in the State of NY", October 2006 (and subsequent updates).

YELLOW HIGLIGHT indicates the compound was detected at a concentration that was found to exceed NYSDOH Guidance 90th Percentile Database Value

TABLE 2.3A

SOIL GAS SAMPLE RESULTS

690 Saint Paul Street Off-Site, NYSDEC Site #C828159A

691 Saint Paul Street, Rochester, New York

Sample ID	Units	SV-1		SV-2		SV-3		SV-4		DUPLICATE (SV-4)		AMBIENT AIR	
Sample Type		Soil Gas		Soil Gas		Soil Gas		Soil Gas		Outdoor Air		Outdoor Air	
Sample Date		3/3/2017		3/3/2017		3/3/2017		3/3/2017		3/3/2017		3/3/2017	
1,1-Dichloroethene	ug/m^3	0.59	U	0.59	U	0.59	U	0.59	U	0.59	U	0.59	U
Chloroethane	ug/m^3	0.34	J	0.40	U	0.29	J	0.40	U	0.40	U	0.40	U
cis-1,2-Dichloroethene	ug/m^3	0.59	U	0.59	U	0.71		4.1		3.9		0.59	U
trans-1,2-Dichloroethene	ug/m^3	0.59	U	0.59	U	0.59	U	0.59	U	0.59	U	0.59	U
Trichloroethene (TCE)	ug/m^3	0.81	U	0.81	U	40	J	48		47		0.21	U
Vinyl chloride	ug/m^3	0.38	U	0.38	U	0.38	U	0.38	U	0.38	U	0.10	U
Total Detected VOCs	ug/m^3	0		0		41.0		52.1		50.9		0	

TABLE 2.3C

SAMPLE LOCATION: 691-SB5B

Soil Vapor Intrusion Sampling Results

690 Saint Paul Street Off-Site, NYSDEC Site #C828159A

691 Saint Paul Street, Rochester, New York

Sample ID	Units	691-SB5B-SVI		691-SB5B-IAQ		691-OUTDOOR-04012017		NYSDOH Sub-Slab Vapor Concentration Decision Matrix (minimum action level)[1]	NYSDOH Indoor Air Concentration (minimum action level)[1] / NYSDON Indoor Air Guideline	NYSDOH Guidance Table C2 USEPA BASE Database - 90th Percentile[2]
Sample Type		Sub-Slab		Indoor Air		Outdoor Air				
Sample Date		4/1/2017		4/1/2017		4/1/2017				
1,1-Dichloroethene	ug/m^3	0.59	UJ	0.59	UJ	0.59	U	<6	<0.2	<1.4
Chloroethane	ug/m^3	0.40	UJ	0.40	UJ	0.40	U	NL	NL	<1.2
cis-1,2-Dichloroethene	ug/m^3	**23**	J	12	J	0.59	U	<6	<0.2	<1.8
trans-1,2-Dichloroethene	ug/m^3	0.71	J	0.59	UJ	0.59	U	NL	NL	<10[3]
Trichloroethene (TCE)	ug/m^3	**58**	J	6.8	J	0.21	U	<6	<0.2 / 2	1.3
Vinyl chloride	ug/m^3	0.28	J	0.15	J	0.10	U	<6	<0.2	<1.8

TABLE 2.3C

SAMPLE LOCATION: 691-SB5A

Soil Vapor Intrusion Sampling Results

690 Saint Paul Street Off-Site, NYSDEC Site #C828159A

691 Saint Paul Street, Rochester, New York

Sample ID	Units	691-SB5A-SVI		691-SB5A-IAQ		691-OUTDOOR-04012017		NYSDOH Sub-Slab Vapor Concentration Decision Matrix (minimum action level)[1]	NYSDOH Indoor Air Concentration (minimum action level)[1] / NYSDON Indoor Air Guideline	NYSDOH Guidance Table C2 USEPA BASE Database - 90th Percentile[2]
Sample Type		Sub-Slab		Indoor Air		Outdoor Air				
Sample Date		4/1/2017		4/1/2017		4/1/2017				
1,1-Dichloroethene	ug/m^3	0.59	U	0.59	U	0.59	U	<6	<0.2	<1.4
Chloroethane	ug/m^3	0.40	U	0.40	U	0.40	U	NL	NL	<1.2
cis-1,2-Dichloroethene	ug/m^3	**170**		**13**		0.59	U	<6	<0.2	<1.8
trans-1,2-Dichloroethene	ug/m^3	1.6		0.59	U	0.59	U	NL	NL	<10[3]
Trichloroethene (TCE)	ug/m^3	**20**	J	**6.5**		0.21	U	<6	<0.2 / 2	1.3
Vinyl chloride	ug/m^3	0.49		0.10	U	0.10	U	<6	<0.2	<1.8

TABLE 2.3C

SAMPLE LOCATION: 691-SB1

Soil Vapor Intrusion Sampling Results

690 Saint Paul Street Off-Site, NYSDEC Site #C828159A

691 Saint Paul Street, Rochester, New York

Sample ID	Units	691-SB1-SVI		691-SB1-IAQ		691-OUTDOOR-04012017		NYSDOH Sub-Slab Vapor Concentration Decision Matrix (minimum action level)[1]	NYSDOH Indoor Air Concentration (minimum action level)[1] / NYSDON Indoor Air Guideline	NYSDOH Guidance Table C2 USEPA BASE Database - 90th Percentile[2]
Sample Type		Sub-Slab		Indoor Air		Outdoor Air				
Sample Date		4/1/2017		4/1/2017		4/1/2017				
1,1-Dichloroethene	ug/m^3	0.59	U	0.59	UJ	0.59	U	<6	<0.2	<1.4
Chloroethane	ug/m^3	0.40	U	0.40	UJ	0.40	U	NL	NL	<1.2
cis-1,2-Dichloroethene	ug/m^3	**52**		**2.6**	J	0.59	U	<6	<0.2	<1.8
trans-1,2-Dichloroethene	ug/m^3	0.59	U	0.59	UJ	0.59	U	NL	NL	<10[3]
Trichloroethene (TCE)	ug/m^3	4.0		**1.3**	J	0.21	U	<6	<0.2 / 2	1.3
Vinyl chloride	ug/m^3	0.38		0.10	UJ	0.10	U	<6	<0.2	<1.8

TABLE 2.3C

SAMPLE LOCATION: 691-NE

Soil Vapor Intrusion Sampling Results

690 Saint Paul Street Off-Site, NYSDEC Site #C828159A

691 Saint Paul Street, Rochester, New York

Sample ID	Units	691-NE-SVI		691-NE-IAQ		691-OUTDOOR-04012017		NYSDOH Sub-Slab Vapor Concentration Decision Matrix (minimum action level)[1]	NYSDOH Indoor Air Concentration (minimum action level)[1] / NYSDON Indoor Air Guideline	NYSDOH Guidance Table C2 USEPA BASE Database - 90th Percentile[2]
Sample Type		Sub-Slab		Indoor Air		Outdoor Air				
Sample Date		4/1/2017		4/1/2017		4/1/2017				
1,1-Dichloroethene	ug/m^3	0.59	U	0.59	U	0.59	U	<6	<0.2	<1.4
Chloroethane	ug/m^3	0.40	U	0.40	U	0.40	U	NL	NL	<1.2
cis-1,2-Dichloroethene	ug/m^3	0.59	U	0.59	U	0.59	U	<6	<0.2	<1.8
trans-1,2-Dichloroethene	ug/m^3	0.59	U	0.59	U	0.59	U	NL	NL	<10[3]
Trichloroethene (TCE)	ug/m^3	3.9		0.21	U	0.21	U	<6	<0.2 / 2	1.3
Vinyl chloride	ug/m^3	0.10	U	0.10	U	0.10	U	<6	<0.2	<1.8

TABLE 2.3C

SAMPLE LOCATION: 691-B15

Soil Vapor Intrusion Sampling Results

690 Saint Paul Street Off-Site, NYSDEC Site #C828159A

691 Saint Paul Street, Rochester, New York

Sample ID	Units	691-B15-SVI		691-B15-IAQ		691-OUTDOOR-04012017		NYSDOH Sub-Slab Vapor Concentration Decision Matrix (minimum action level)[1]	NYSDOH Indoor Air Concentration (minimum action level)[1] / NYSDON Indoor Air Guideline	NYSDOH Guidance Table C2 USEPA BASE Database - 90th Percentile[2]
Sample Type		Sub-Slab		Indoor Air		Outdoor Air				
Sample Date		4/1/2017		4/1/2017		4/1/2017				
1,1-Dichloroethene	ug/m^3	0.59	U	0.59	U	0.59	U	<6	<0.2	<1.4
Chloroethane	ug/m^3	0.37	J	0.40	U	0.40	U	NL	NL	<1.2
cis-1,2-Dichloroethene	ug/m^3	0.59	U	**1.6**		0.59	U	<6	<0.2	<1.8
trans-1,2-Dichloroethene	ug/m^3	0.59	U	0.59	U	0.59	U	NL	NL	<10[3]
Trichloroethene (TCE)	ug/m^3	**220**		2.2		0.21	U	<6	<0.2 / 2	1.3
Vinyl chloride	ug/m^3	0.28		0.10	U	0.10	U	<6	<0.2	<1.8

TABLE 2.3C

SAMPLE LOCATION: 691-B19

Soil Vapor Intrusion Sampling Results

690 Saint Paul Street Off-Site, NYSDEC Site #C828159A

691 Saint Paul Street, Rochester, New York

Sample ID	Units	691-B19-SVI		691-B19-IAQ-1		691-B19-IAQ-2		691-OUTDOOR-04012017		NYSDOH Sub-Slab Vapor Concentration Decision Matrix (minimum action level)[1]	NYSDOH Indoor Air Concentration (minimum action level)[1] / NYSDON Indoor Air Guideline	NYSDOH Guidance Table C2 USEPA BASE Database - 90th Percentile[2]
Sample Type		Sub-Slab		Indoor Air		Indoor Air		Outdoor Air				
Sample Date		4/1/2017		4/1/2017		4/1/2017		4/1/2017				
1,1-Dichloroethene	ug/m^3	0.59	UJ	0.59	UJ	0.59	U	0.59	U	<6	<0.2	<1.4
Chloroethane	ug/m^3	0.40	UJ	0.40	UJ	0.40	U	0.40	U	NL	NL	<1.2
cis-1,2-Dichloroethene	ug/m^3	0.59	UJ	1.3	J	1.1		0.59	U	<6	<0.2	<1.8
trans-1,2-Dichloroethene	ug/m^3	0.59	UJ	0.59	UJ	0.59	U	0.59	U	NL	NL	<10[3]
Trichloroethene (TCE)	ug/m^3	**26**	J	2.1	J	2.1		0.21	U	<6	<0.2 / 2	1.3
Vinyl chloride	ug/m^3	**0.20**	J	0.10	UJ	0.10	U	0.10	U	<6	<0.2	<1.8

TABLE 2.5.1
Post SSDS Startup Indoor Ambient Air Sample Results
690 Saint Paul STREET OFF-SITE, NYSDEC Site #C828159A
691 Saint Paul Street, Rochester, New York
LaBella Project #2170820

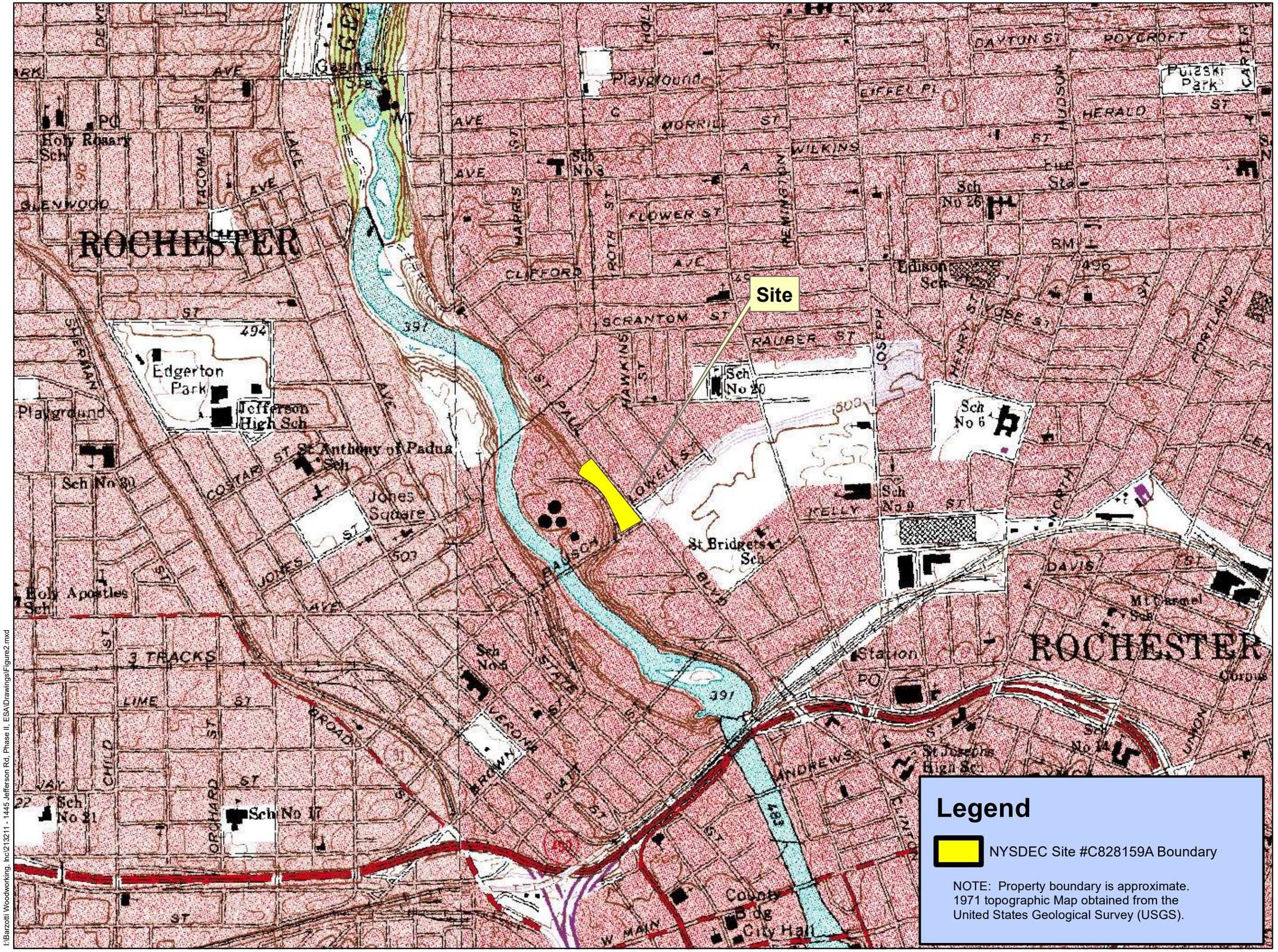
		UPPER BASEMENT SAMPLES													
Sample ID	**Units**	**691-AI-01**		**691-AI-03**		**691-AI-04**		**691-AI-05**		**691-AI-06**		**691-AI-07**		**691-AI-08**		**NYSDOH Indoor Air Guideline(1)**	**NYSDOH Guidance Table C2 USEPA BASE Database - 90th Percentile[2]**
Sample Type		**Ambient Air**		**Ambient Air**		**Ambient Air**		**Ambient Air**		**Ambient Air**		**Ambient Air**		**Ambient Air**			
Sample Date		**3/16/2018**		**3/16/2018**		**3/16/2018**		**3/16/2018**		**3/16/2018**		**3/16/2018**		**3/16/2018**			
1,1-Dichloroethene	ug/m^3	0.16	U	0.16	UJ	0.16	U	0.16	U	0.16	U	0.16	U	0.16	U	NL	<1.4
Chloroethane	ug/m^3	0.40	U	0.40	UJ	0.40	U	0.40	U	0.40	U	0.40	U	0.40	U	NL	<1.1
cis-1,2-Dichloroethene	ug/m^3	0.16	U	0.16	UJ	0.16	U	0.16	U	0.16	U	0.55		0.87		NL	<2.0
trans-1,2-Dichloroethene	ug/m^3	0.59	U	0.59	UJ	0.59	U	0.59	U	0.59	U	0.59	U	0.59	U	NL	<10[3]
Trichloroethene (TCE)	ug/m^3	0.16	U	0.16	UJ	0.21		0.32		0.32		0.54		0.75		2	4.2
Vinyl chloride	ug/m^3	0.10	U	0.10	UJ	0.10	U	0.10	U	0.10	U	0.10	U	0.20		NL	<1.9

		LOWER BASEMENT SAMPLES													
Sample ID	**Units**	**691-AI-02**		**691-AI-09**		**691-AI-10**		**691-AI-11/MS/MSD**		**691-AI-12**		**DUPLICATE (691-AI-10)**		**NYSDOH Indoor Air Guideline(1)**	**NYSDOH Guidance Table C2 USEPA BASE Database - 90th Percentile[2]**
Sample Type		**Ambient Air**		**Ambient Air**		**Ambient Air**		**Ambient Air**		**Ambient Air**		**Ambient Air**			
Sample Date		**3/16/2018**		**3/16/2018**		**3/16/2018**		**3/16/2018**		**3/16/2018**		**3/16/2018**			
1,1-Dichloroethene	ug/m^3	0.16	U	0.16	UJ	0.16	U	0.16	U	0.16	U	0.16	U	NL	<1.4
Chloroethane	ug/m^3	0.40	U	0.40	UJ	0.40	U	0.40	U	0.40	U	0.40	U	NL	<1.1
cis-1,2-Dichloroethene	ug/m^3	0.16	U	1.0	J	0.95		0.71		0.63		0.95		NL	<2.0
trans-1,2-Dichloroethene	ug/m^3	0.59	U	0.59	UJ	0.59	U	0.59	U	0.59	U	0.59	U	NL	<10[3]
Trichloroethene (TCE)	ug/m^3	0.16	U	0.64	J	0.75		0.75		0.38		0.70		2	4.2
Vinyl chloride	ug/m^3	0.10	U	0.10	UJ	0.10	U	0.10	U	0.10	U	0.10	U	NL	<1.9

Notes:

Concentrations in micrograms per cubic meter (ug/m^3)
Samples analyzed by USEPA Method TO-15
NL denotes Not Listed
(1) *New York State Department of Health (NYSDOH) Air Guideline Included in Table 3.1 of the Guidance for Evaluating Soil Vapor Intrusion in the State of New York* , October 2006 (and applicable updates).
(2) USEPA 2001 Building Assessment and Survey Evaluation (BASE) Database (90th Percentile). As recommended in Section 3.2.4 of the NYSDOH Guidance (Refer to Footnote "1") this database is referenced for the indoor air sampling results. This database is also referenced to provide initial benchmarks for comparison to the air sampling data and does not represent regulatory standards or compliance values.
(3) No value was listed in NYSDOH Table C2 - USEPA Base Database. A value from Table C3 NYSDOH 1997: Control home database (90th Percentile) was used.
"<" indicates the results was detected below the reported laboratory method detection limit

FIGURES



Legend

NYSDEC Site #C828159A Boundary

NOTE: Property boundary is approximate.
1971 topographic Map obtained from the United States Geological Survey (USGS).

LaBella
Powered by partnership.

TITLE
SITE LOCATIONMAP

PROJECT
SITE MANAGEMENT PLAN

690 SAINT PAUL ST OFF-SITE
NYSDEC SITE #C828159A
691 SAINT PAUL ST
ROCHESTER, NEW YORK

CLIENT
BAUSCH AND LOMB

N
W E
S

250 0 1,000

1 inch = 1,000 feet

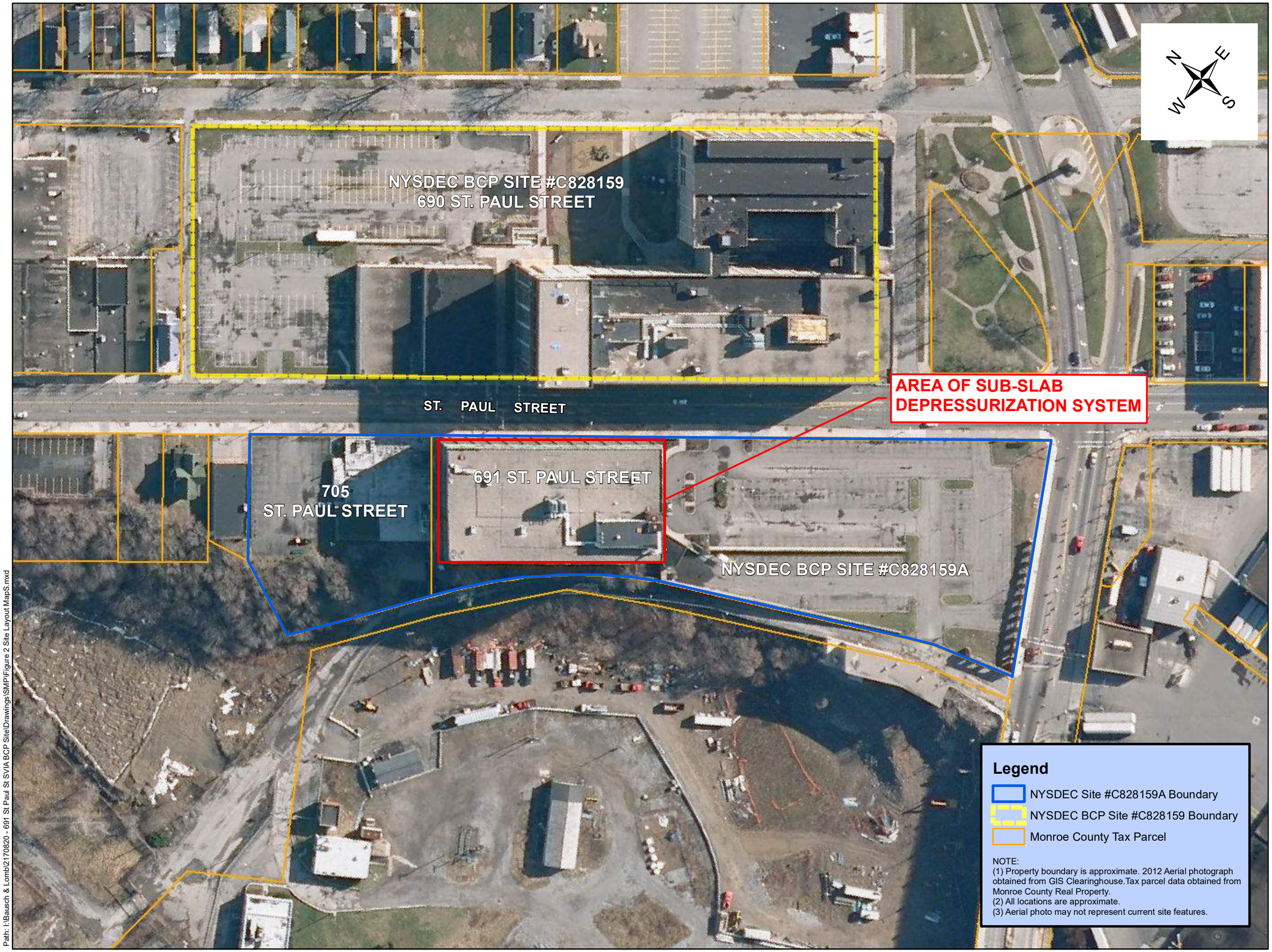
Tuesday, August 20, 2019

INTENDED TO PRINT 11"X17"

2170820

FIGURE 1

I:\Barzotti Woodworking, Inc\213211 - 1445 Jefferson Rd, Phase II, ESA\Drawings\Figure2.mxd



Path: I:\Bausch & Lomb\2170820 - 691 St Paul St SVIA BCP Site\Drawings\SMP\Figure 2 Site Layout MapS.mxd

LaBella
Powered by partnership.

TITLE
SITE MAP

PROJECT
SITE MANAGEMENT PLAN

690 SAINT PAUL ST OFF-SITE
NYSDEC SITE #C828159A
691 SAINT PAUL ST
ROCHESTER, NEW YORK

CLIENT
BAUSCH AND LOMB

STATE OF NEW YORK
DANIEL P. NOLL
No. 081696
LICENSED PROFESSIONAL ENGINEER

0 25 50 100 Feet

1 inch = 100 feet

Thursday, April 11, 2019

INTENDED TO PRINT 11"X17"

2170820

FIGURE 2

Path: I:\Bausch & Lomb\2170820 - 691 St Paul St SVIA BCP Site\Drawings\SMP\Figure 3 Site Area Map.mxd

LaBella
Powered by partnership.

TITLE
MONROE COUNTY TAX AND AREA MAP

PROJECT
SITE MANAGEMENT PLAN

690 SAINT PAUL ST OFF-SITE
NYSDEC SITE #C828159A
691 SAINT PAUL ST
ROCHESTER, NEW YORK

CLIENT
BAUSCH AND LOMB

STATE OF NEW YORK
DANIEL P. NOLL
No. 081996
LICENSED PROFESSIONAL ENGINEER

0 40 80 160 Feet

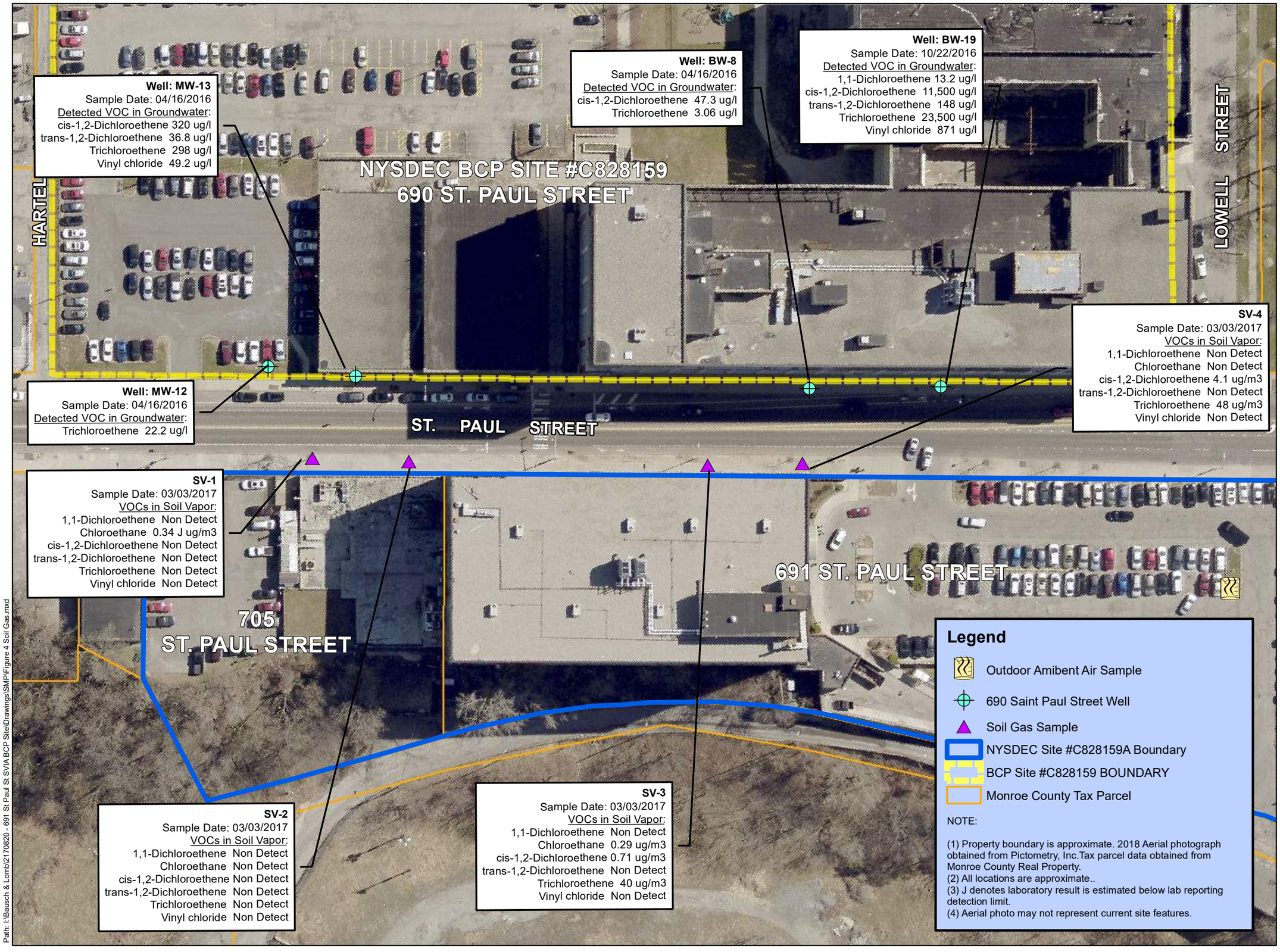
1 inch = 150 feet

Tuesday, August 20, 2019

INTENDED TO PRINT 11"X17"

2170820

FIGURE 3



Path: I:\Bausch & Lomb\2170820 - 691 St Paul St SVIA BCP Site\Drawings\SMP\Figure 4 Soil Gas.mxd

LaBella
Powered by partnership.

TITLE
SOIL GAS SAMPLE RESULTS

PROJECT
SITE MANAGEMENT PLAN

690 SAINT PAUL ST OFF-SITE
NYSDEC SITE #C828159A
691 SAINT PAUL ST
ROCHESTER, NEW YORK

CLIENT
BAUSCH AND LOMB

STATE OF NEW YORK
DANIEL P. NOLL
No. 091696
LICENSED PROFESSIONAL ENGINEER

N E W S

0 15 30 60 Feet

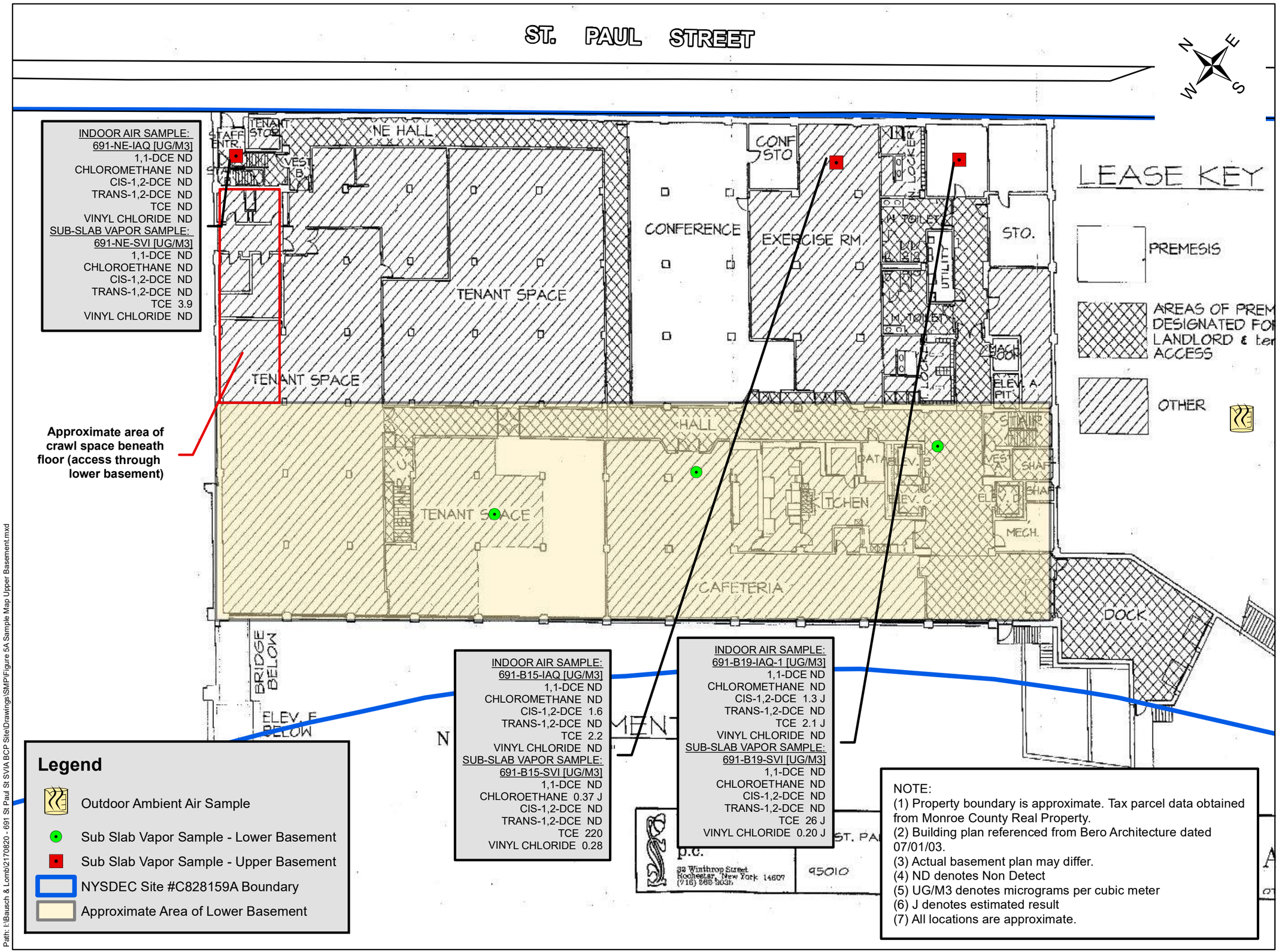
1 inch = 61 feet

Tuesday, August 20, 2019

INTENDED TO PRINT 11"X17"

2170820

FIGURE 4



Path: I:\Bausch & Lomb\2170820 - 691 St Paul St SVIA BCP Site\Drawings\SMP\Figure 5A Sample Map Upper Basement.mxd

LaBella
Powered by partnership.

TITLE
SOIL VAPOR INSTRUSION SAMPLE RESULTS - UPPER BASEMENT

PROJECT
SITE MANAGEMENT PLAN

690 SAINT PAUL ST OFF-SITE
NYSDEC SITE #C828159A
691 SAINT PAUL ST
ROCHESTER, NEW YORK

CLIENT
BAUSCH AND LOMB

0 12.5 25 Feet

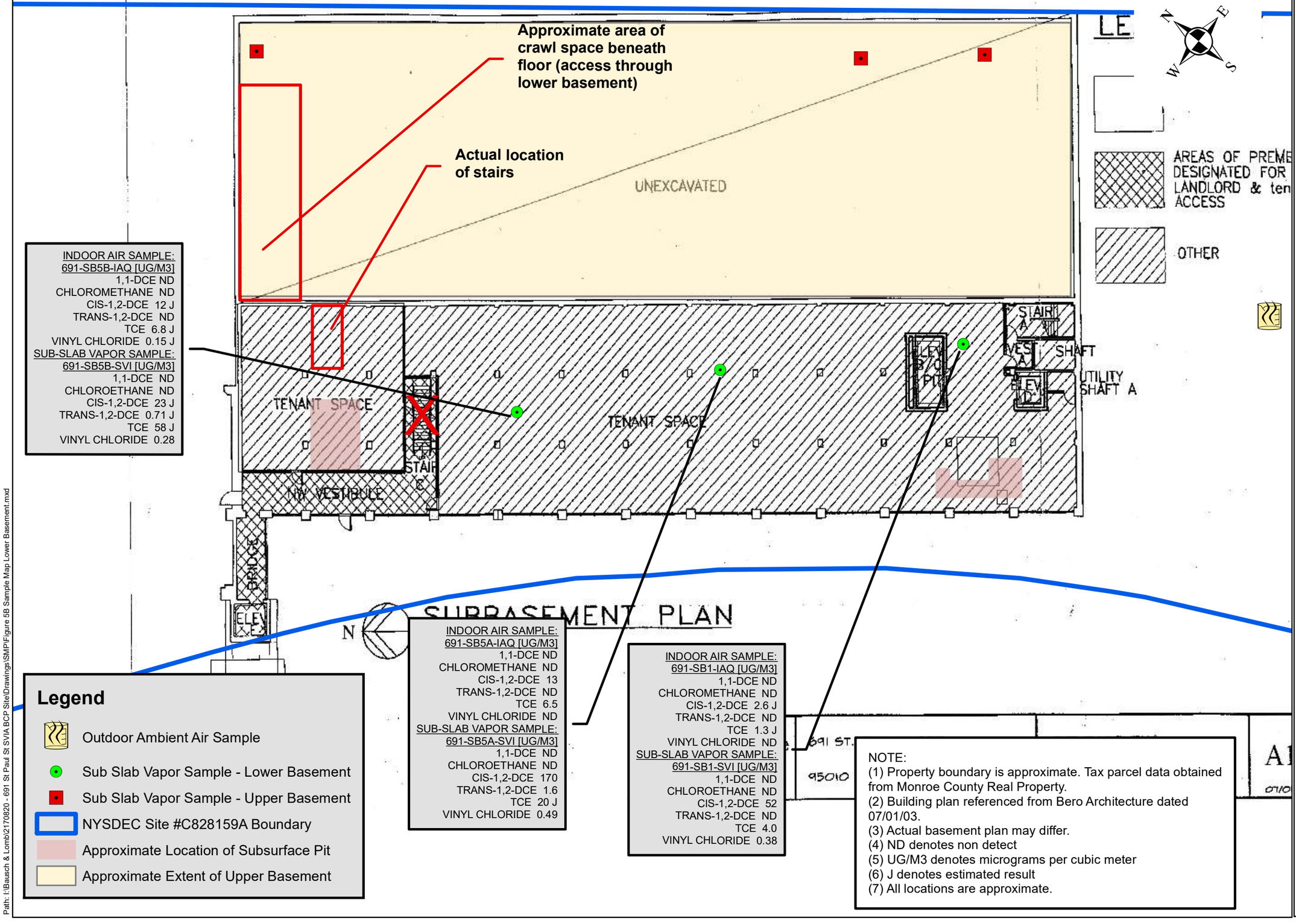
1 inch = 25 feet

Tuesday, August 20, 2019

INTENDED TO PRINT 11"X17"

2170820

FIGURE 5A



INDOOR AIR SAMPLE:
691-SB5B-IAQ [UG/M3]
1,1-DCE ND
CHLOROMETHANE ND
CIS-1,2-DCE 12 J
TRANS-1,2-DCE ND
TCE 6.8 J
VINYL CHLORIDE 0.15 J
SUB-SLAB VAPOR SAMPLE:
691-SB5B-SVI [UG/M3]
1,1-DCE ND
CHLOROETHANE ND
CIS-1,2-DCE 23 J
TRANS-1,2-DCE 0.71 J
TCE 58 J
VINYL CHLORIDE 0.28

INDOOR AIR SAMPLE:
691-SB5A-IAQ [UG/M3]
1,1-DCE ND
CHLOROMETHANE ND
CIS-1,2-DCE 13
TRANS-1,2-DCE ND
TCE 6.5
VINYL CHLORIDE ND
SUB-SLAB VAPOR SAMPLE:
691-SB5A-SVI [UG/M3]
1,1-DCE ND
CHLOROETHANE ND
CIS-1,2-DCE 170
TRANS-1,2-DCE 1.6
TCE 20 J
VINYL CHLORIDE 0.49

INDOOR AIR SAMPLE:
691-SB1-IAQ [UG/M3]
1,1-DCE ND
CHLOROMETHANE ND
CIS-1,2-DCE 2.6 J
TRANS-1,2-DCE ND
TCE 1.3 J
VINYL CHLORIDE ND
SUB-SLAB VAPOR SAMPLE:
691-SB1-SVI [UG/M3]
1,1-DCE ND
CHLOROETHANE ND
CIS-1,2-DCE 52
TRANS-1,2-DCE ND
TCE 4.0
VINYL CHLORIDE 0.38

Legend

- Outdoor Ambient Air Sample
- Sub Slab Vapor Sample - Lower Basement
- Sub Slab Vapor Sample - Upper Basement
- NYSDEC Site #C828159A Boundary
- Approximate Location of Subsurface Pit
- Approximate Extent of Upper Basement

NOTE:
(1) Property boundary is approximate. Tax parcel data obtained from Monroe County Real Property.
(2) Building plan referenced from Bero Architecture dated 07/01/03.
(3) Actual basement plan may differ.
(4) ND denotes non detect
(5) UG/M3 denotes micrograms per cubic meter
(6) J denotes estimated result
(7) All locations are approximate.

LaBella
Powered by partnership.

TITLE
SOIL VAPOR INSTRUSION SAMPLE RESULTS - LOWER BASEMENT

PROJECT
SITE MANAGEMENT PLAN

690 SAINT PAUL ST OFF-SITE
NYSDEC SITE #C828159A
691 SAINT PAUL ST
ROCHESTER, NEW YORK

CLIENT
BAUSCH AND LOMB

STATE OF NEW YORK
DANIEL P. NOLL
No. 081596
LICENSED PROFESSIONAL ENGINEER

0 12.5 25 Feet
1 inch = 25 feet

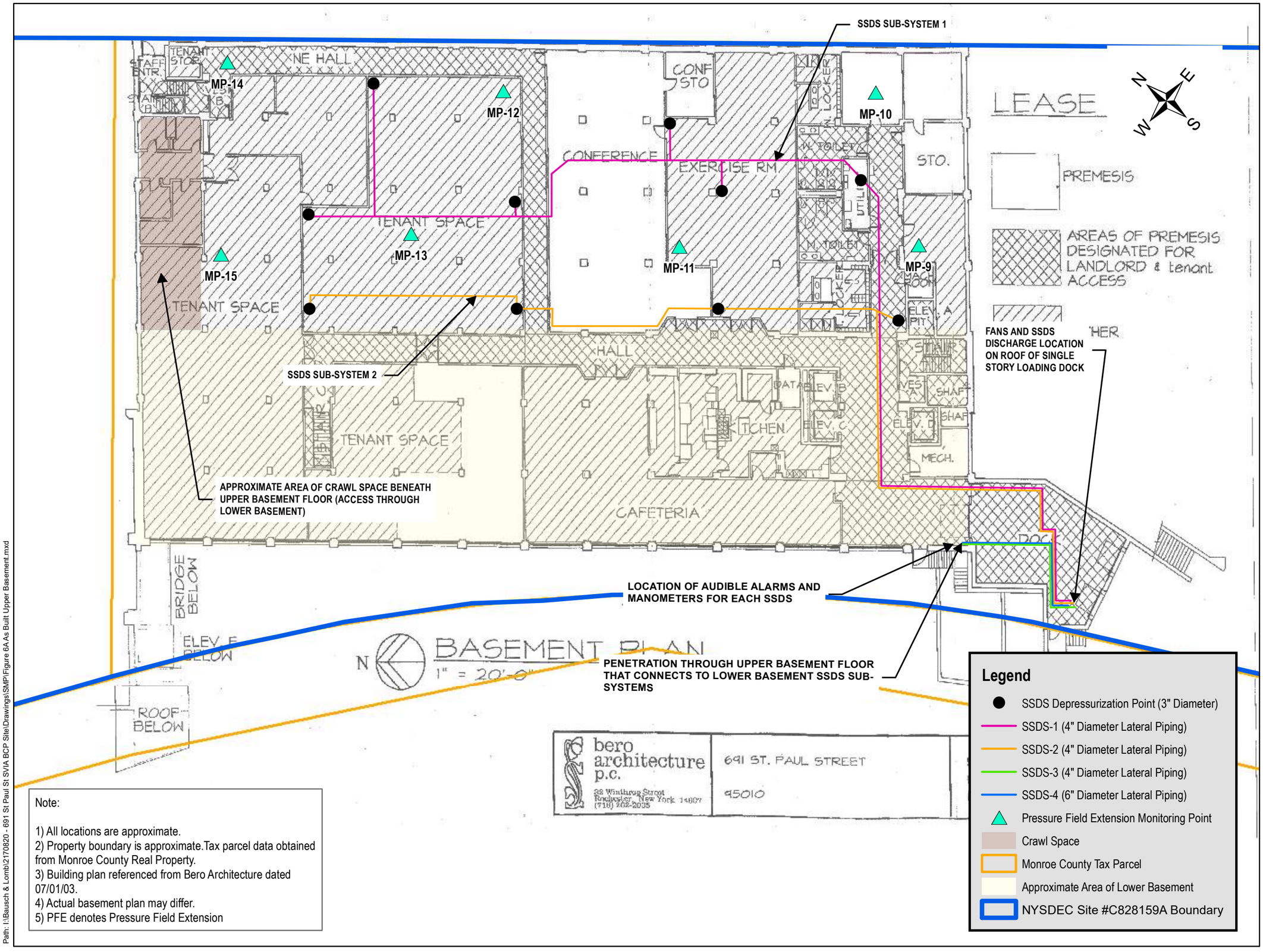
Tuesday, August 20, 2019

INTENDED TO PRINT 11"X17"

2170820

FIGURE 5B

Path: I:\Bausch & Lomb\2170820 - 691 St Paul St SVI\A BCP Site\Drawings\SMP\Figure 5B Sample Map Lower Basement.mxd



Note:

1) All locations are approximate.
2) Property boundary is approximate.Tax parcel data obtained from Monroe County Real Property.
3) Building plan referenced from Bero Architecture dated 07/01/03.
4) Actual basement plan may differ.
5) PFE denotes Pressure Field Extension

bero architecture p.c.
38 Winthrop Street
Rochester, New York 14607
(716) 262-2035

691 ST. PAUL STREET

45010

Legend

- SSDS Depressurization Point (3" Diameter)
- SSDS-1 (4" Diameter Lateral Piping)
- SSDS-2 (4" Diameter Lateral Piping)
- SSDS-3 (4" Diameter Lateral Piping)
- SSDS-4 (6" Diameter Lateral Piping)
- Pressure Field Extension Monitoring Point
- Crawl Space
- Monroe County Tax Parcel
- Approximate Area of Lower Basement
- NYSDEC Site #C828159A Boundary

LaBella
Powered by partnership.

TITLE
SUB-SLAB DEPRESSURIZATION AS BUILTS - UPPER BASEMENT

PROJECT
SITE MANAGEMENT PLAN

690 SAINT PAUL ST OFF-SITE
NYSDEC SITE #C828159A
691 SAINT PAUL ST
ROCHESTER, NEW YORK

CLIENT
BAUSCH AND LOMB

STATE OF NEW YORK
DANIEL P. NOLL
No. 081996
LICENSED PROFESSIONAL ENGINEER

0 12.5 25 Feet

1 inch = 25 feet

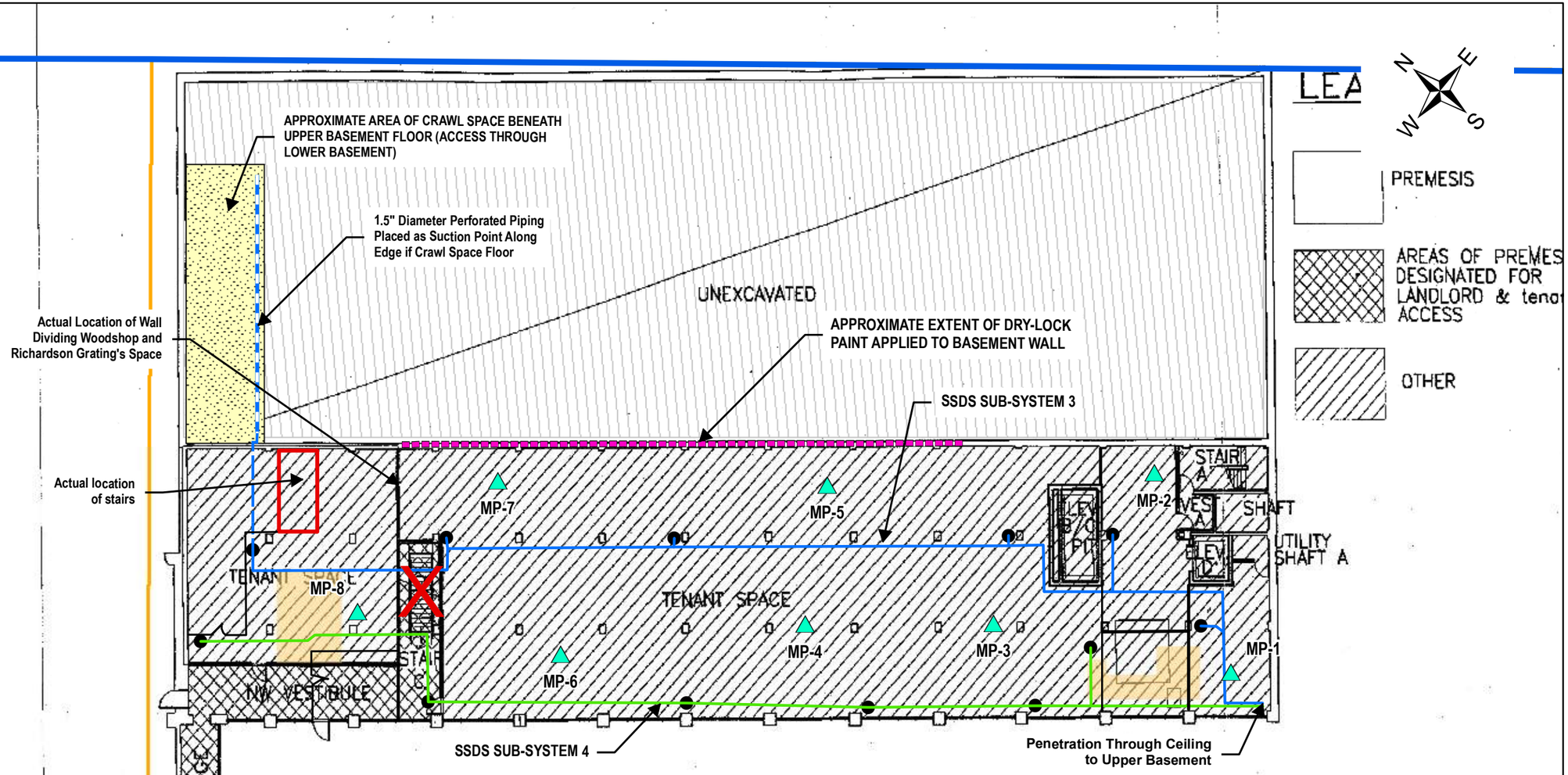
Tuesday, August 20, 2019

INTENDED TO PRINT 11"X17"

2170820

FIGURE 6A

Path: I:\Bausch & Lomb\2170820 - 691 St Paul St SVIA BCP Site\Drawings\SMP\Figure 6A As Built Upper Basement.mxd



Note:

1) All locations are approximate.
2) Property boundary is approximate.Tax parcel data obtained from Monroe County Real Property.
3) Building plan referenced from Bero Architecture dated 07/01/03.
4) Actual basement plan may differ.
5) PFE denotes Pressure Field Extension

bero architecture p.c.
82 Winthrop Street
Rochester, New York 14607
(716) 288-9035

691 ST. PAUL STREET

95010

Legend

- Pressure Field Exention Point
- Approxiamte Area of Drylock Paint
- SSDS-3 (4" Diameter Lateral Piping)
- SSDS-3 (1.5" Diameter Lateral Piping)
- SSDS-4 (6" Diameter Lateral Piping)
- Depressurization Point - 1.5" Diameter Perforated Piping
- Depressurization Point (3" Diameter)
- NYSDEC Site #C828159A Boundary
- Crawl Space
- Approximate Location of Subsurface Pit
- Approximate Extent of Upper Basement
- Monroe County Tax Parcel

LaBella
Powered by partnership.

TITLE
SUB-SLAB DEPRESSURIZATION AS BUILTS - LOWER BASEMENT

PROJECT
SITE MANAGEMENT PLAN

690 SAINT PAUL ST OFF-SITE
NYSDEC SITE #C828159A
691 SAINT PAUL ST
ROCHESTER, NEW YORK

CLIENT
BAUSCH AND LOMB

STATE OF NEW YORK
DANIEL P. NOLL
No. 081696
LICENSED PROFESSIONAL ENGINEER

0 12.5 25 Feet

1 inch = 25 feet

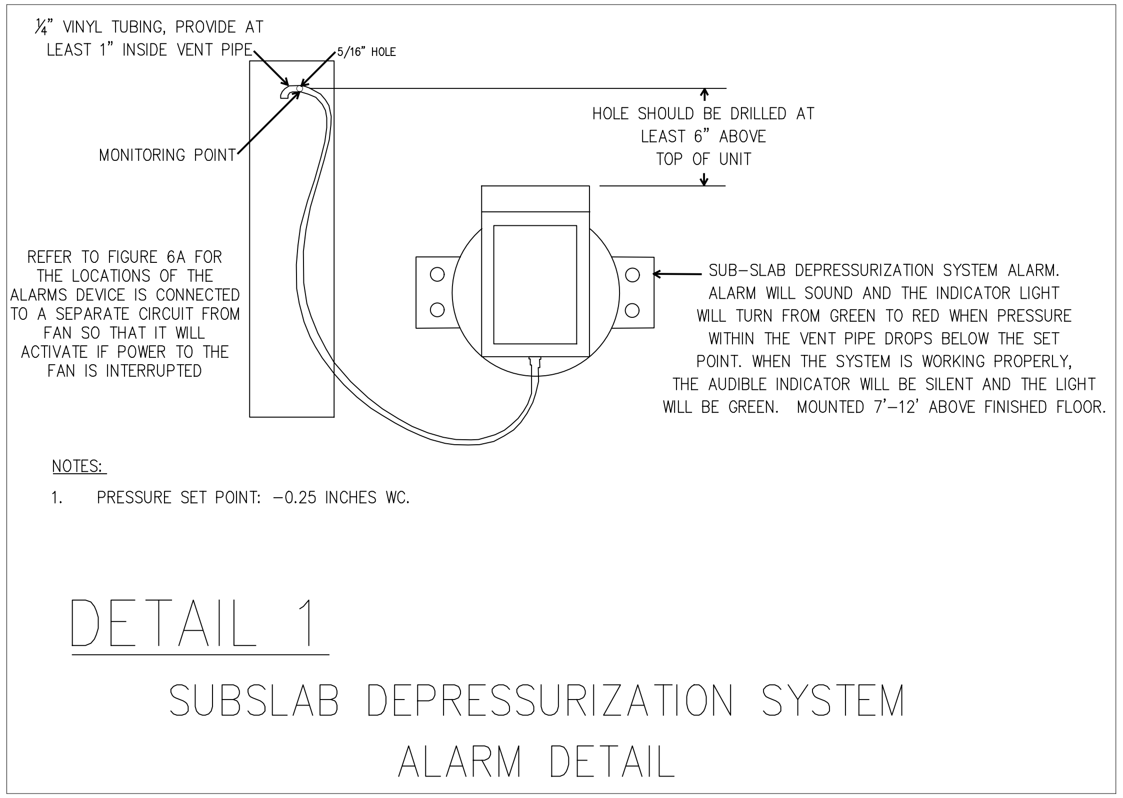
Tuesday, August 20, 2019

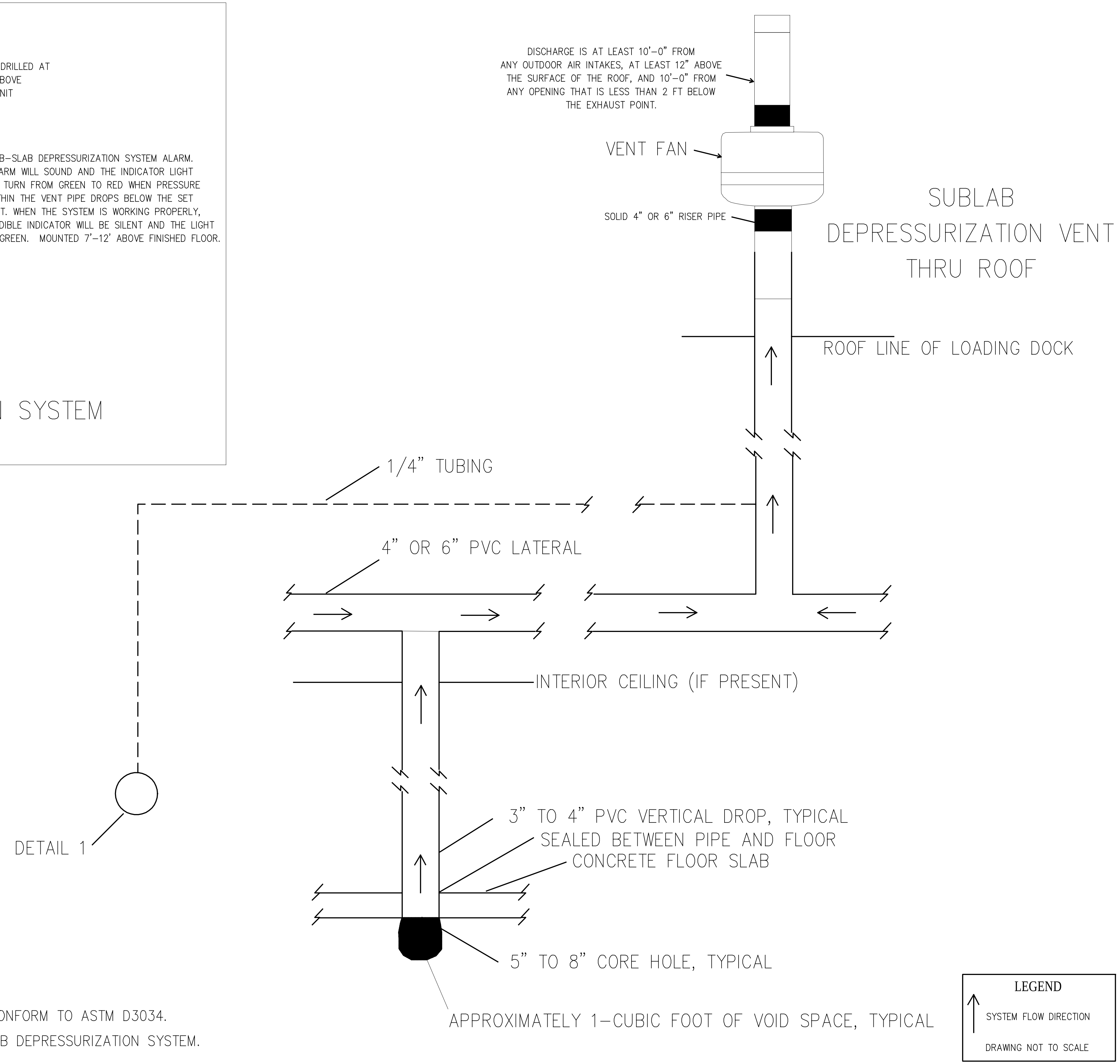
INTENDED TO PRINT 11"X17"

2170820

FIGURE 6B

Path: I:\Bausch & Lomb\2170820 - 691 St Paul St SVIA BCP Site\Drawings\SMP\Figure 6B As Built Lower Basement.mxd





SUBSLAB DEPRESSURIZATION SYSTEM PIPING NOTES:

A. POLYVINYL CHLORIDE (PVC) PIPE AND FITTINGS SHALL CONFORM TO ASTM D3034.

B. REFER TO FIGURE 6A AND 6B FOR LAYOUT OF SUB-SLAB DEPRESSURIZATION SYSTEM.

I:\Bausch & Lomb\2170820 - 691 St Paul St SVIA BCP Site\Drawings\RAWP SSDS

STATE OF NEW YORK · DANIEL P. NOLL · No. 081998 · LICENSED PROFESSIONAL ENGINEER

LABELLA Associates, P.C.
300 STATE STREET
ROCHESTER, NY 14614
P: (585) 454-6110
F: (585) 454-3066
www.labellapc.com

PROJECT/CLIENT
DEPRESSURIZATION SYSTEM DETAIL
BCP SITE #C828159A
691 SAINT PAUL STREET
ROCHESTER, NEW YORK

DRAWING TITLE
SUB-SLAB
DEPRESURIZATION SYSTEM DETAILS

DESIGNED BY: DPN
DRAWN BY: DRP
REVIEWED BY: DPN
ISSUED FOR: FINAL
DATE: AUGUST 2019

PROJECT/DRAWING NUMBER
2170820
FIGURE 6C

INDOOR AIR SAMPLE:
691-AI-03 [UG/M3]
1,1-DCE 0.16 UJ
CHLOROMETHANE 0.40 UJ
CIS-1,2-DCE 0.16 UJ
TRANS-1,2-DCE 0.59 UJ
TCE 0.16 UJ
VINYL CHLORIDE 0.10 UJ

INDOOR AIR SAMPLE:
691-AI-04 [UG/M3]
1,1-DCE 0.16 U
CHLOROMETHANE 0.40 U
CIS-1,2-DCE 0.16 U
TRANS-1,2-DCE 0.59 U
TCE 0.21
VINYL CHLORIDE 0.10 U

INDOOR AIR SAMPLE:
691-AI-06 [UG/M3]
1,1-DCE 0.16 U
CHLOROMETHANE 0.40 U
CIS-1,2-DCE 0.16 U
TRANS-1,2-DCE 0.59 U
TCE 0.32
VINYL CHLORIDE 0.10 U

INDOOR AIR SAMPLE:
691-AI-07 [UG/M3]
1,1-DCE 0.16 U
CHLOROMETHANE 0.40 U
CIS-1,2-DCE 0.55
TRANS-1,2-DCE 0.59 U
TCE 0.54
VINYL CHLORIDE 0.10 U

INDOOR AIR SAMPLE:
691-AI-08 [UG/M3]
1,1-DCE 0.16 U
CHLOROMETHANE 0.40 U
CIS-1,2-DCE 0.87
TRANS-1,2-DCE 0.59 U
TCE 0.75
VINYL CHLORIDE 0.20

INDOOR AIR SAMPLE:
691-AI-01 [UG/M3]
1,1-DCE 0.16 U
CHLOROMETHANE 0.40 U
CIS-1,2-DCE 0.16 U
TRANS-1,2-DCE 0.59 U
TCE 0.16 U
VINYL CHLORIDE 0.10 U

INDOOR AIR SAMPLE:
691-AI-05 [UG/M3]
1,1-DCE 0.16 U
CHLOROMETHANE 0.40 U
CIS-1,2-DCE 0.16 U
TRANS-1,2-DCE 0.59 U
TCE 0.32
VINYL CHLORIDE 0.10 U

691-AI-01
691-AI-02
691-AI-03
691-AI-04
691-AI-05
691-AI-06
691-AI-07
691-AI-08
691-AI-09
691-AI-10/Duplicate
691-AI-11/MS/MSD
691-AI-12

SSDS SUB-SYSTEM 1
SSDS SUB-SYSTEM 2

APPROXIMATE AREA OF CRAWL SPACE BENEATH UPPER BASEMENT FLOOR (ACCESS THROUGH LOWER BASEMENT)

PENETRATION THROUGH UPPER BASEMENT FLOOR THAT CONNECTS TO LOWER BASEMENT SSDS SUB-SYSTEMS

FANS AND SSDS DISCHARGE LOCATION ON ROOF OF SINGLE STORY LOADING DOCK

LEASE KEY

PREMESIS

AREAS OF PREMESIS DESIGNATED FOR LANDLORD & tenant ACCESS

BASEMENT PLAN
1" = 20'-0"

Note:

1) All locations are approximate.
2) Property boundary is approximate.Tax parcel data obtained from Monroe County Real Property.
3) Building plan referenced from Bero Architecture dated 07/01/03.
4) Actual basement plan may differ.
5) Samples collected on March 16, 2018

bero architecture p.c.
82 Windsor Street
Rochester, New York 14607
(716) 262-2035

691 ST. PAUL STREET
95010

Legend

- Ambint Air Sample - Upper Basement
- Ambient Air Sample - Lower Basement
- SSDS Depressurization Point (3" Diameter)
- SSDS-1 (4" Diameter Lateral Piping)
- SSDS-2 (4" Diameter Lateral Piping)
- SSDS-3 (4" Diameter Lateral Piping)
- SSDS-4 (6" Diameter Lateral Piping)
- NYSDEC Site #C828159A Boundary
- Crawl Space
- Monroe County Tax Parcel
- Approximate Area of Lower Basement

Path: I:\Bausch & Lomb\2170820 - 691 St Paul St SVIA BCP Site\Drawings\SMP\Figure 7A Post SSDS Sampling Upper Basement.mxd

LaBella
Powered by partnership.

TITLE
POST SUB-SLAB DEPRESSURIZATION INSTALLATION INDOOR AIR SAMPLE RESULTS - UPPER BASEMENT

PROJECT
SITE MANAGEMENT PLAN

690 SAINT PAUL ST OFF-SITE
NYSDEC SITE #C828159A
691 SAINT PAUL ST
ROCHESTER, NEW YORK

CLIENT
BAUSCH AND LOMB

STATE OF NEW YORK
DANIEL P. NOLL
No. 081998
LICENSED PROFESSIONAL ENGINEER

0 12.5 25 Feet

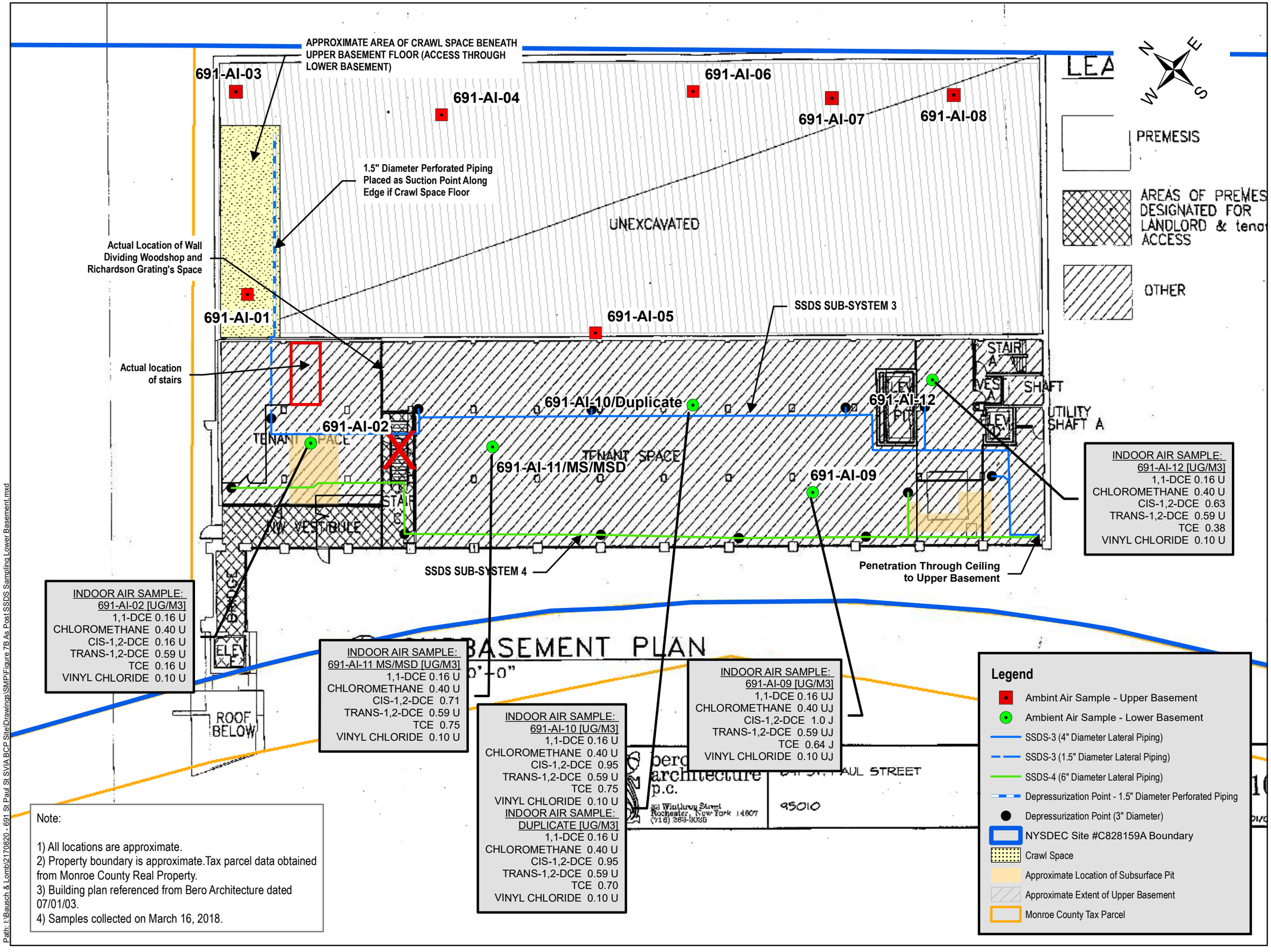
1 inch = 25 feet

Tuesday, August 20, 2019

INTENDED TO PRINT 11"X17"

2170820

FIGURE 7A



INDOOR AIR SAMPLE:
691-AI-02 [UG/M3]
1,1-DCE 0.16 U
CHLOROMETHANE 0.40 U
CIS-1,2-DCE 0.16 U
TRANS-1,2-DCE 0.59 U
TCE 0.16 U
VINYL CHLORIDE 0.10 U

INDOOR AIR SAMPLE:
691-AI-11 MS/MSD [UG/M3]
1,1-DCE 0.16 U
CHLOROMETHANE 0.40 U
CIS-1,2-DCE 0.71
TRANS-1,2-DCE 0.59 U
TCE 0.75
VINYL CHLORIDE 0.10 U

INDOOR AIR SAMPLE:
691-AI-10 [UG/M3]
1,1-DCE 0.16 U
CHLOROMETHANE 0.40 U
CIS-1,2-DCE 0.95
TRANS-1,2-DCE 0.59 U
TCE 0.75
VINYL CHLORIDE 0.10 U
INDOOR AIR SAMPLE:
DUPLICATE [UG/M3]
1,1-DCE 0.16 U
CHLOROMETHANE 0.40 U
CIS-1,2-DCE 0.95
TRANS-1,2-DCE 0.59 U
TCE 0.70
VINYL CHLORIDE 0.10 U

INDOOR AIR SAMPLE:
691-AI-09 [UG/M3]
1,1-DCE 0.16 UJ
CHLOROMETHANE 0.40 UJ
CIS-1,2-DCE 1.0 J
TRANS-1,2-DCE 0.59 UJ
TCE 0.64 J
VINYL CHLORIDE 0.10 UJ

INDOOR AIR SAMPLE:
691-AI-12 [UG/M3]
1,1-DCE 0.16 U
CHLOROMETHANE 0.40 U
CIS-1,2-DCE 0.63
TRANS-1,2-DCE 0.59 U
TCE 0.38
VINYL CHLORIDE 0.10 U

Note:

1) All locations are approximate.
2) Property boundary is approximate.Tax parcel data obtained from Monroe County Real Property.
3) Building plan referenced from Bero Architecture dated 07/01/03.
4) Samples collected on March 16, 2018.

Legend

- Ambint Air Sample - Upper Basement
- Ambient Air Sample - Lower Basement
- SSDS-3 (4" Diameter Lateral Piping)
- SSDS-3 (1.5" Diameter Lateral Piping)
- SSDS-4 (6" Diameter Lateral Piping)
- Depressurization Point - 1.5" Diameter Perforated Piping
- Depressurization Point (3" Diameter)
- NYSDEC Site #C828159A Boundary
- Crawl Space
- Approximate Location of Subsurface Pit
- Approximate Extent of Upper Basement
- Monroe County Tax Parcel

LaBella
Powered by partnership.

TITLE
POST SUB-SLAB DEPRESSURIZATION INSTALLATION INDOOR AIR LOWER BASEMENT

PROJECT
SITE MANAGEMENT PLAN

690 SAINT PAUL ST OFF-SITE
NYSDEC SITE #C828159A
691 SAINT PAUL ST
ROCHESTER, NEW YORK

CLIENT
BAUSCH AND LOMB

STATE OF NEW YORK
DANIEL P. NOLL
No. 081888
LICENSED PROFESSIONAL ENGINEER

0 12.5 25 Feet

1 inch = 25 feet

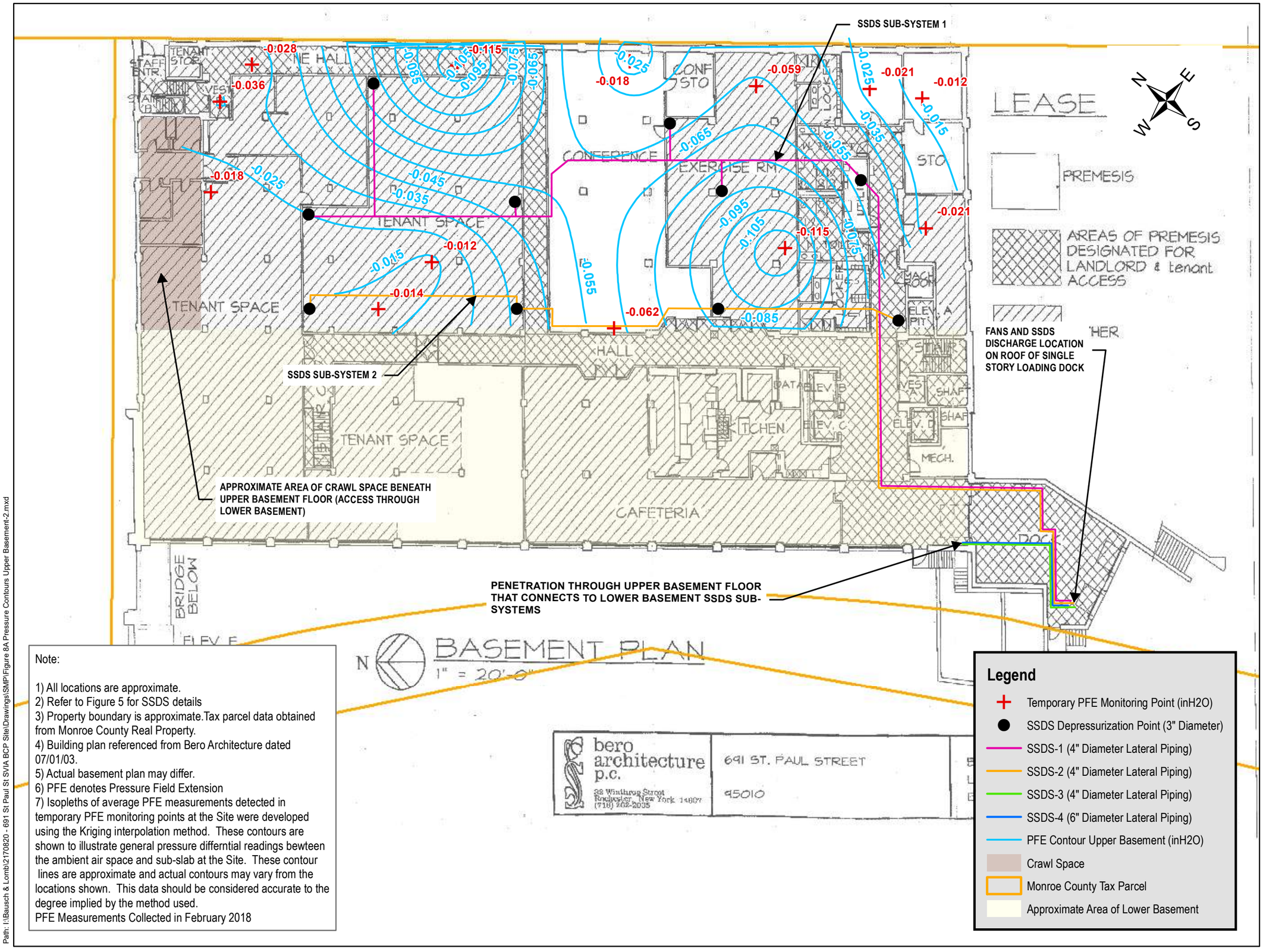
Tuesday, August 20, 2019

INTENDED TO PRINT 11"X17"

2170820

FIGURE 7B

Path: I:\Bausch & Lomb\2170820 - 691 St Paul St SVI\A BCP Site\Drawings\SMP\Figure 7B As Post SSDS Sampling Lower Basement.mxd



N

BASEMENT PLAN

1" = 20'-0"

Note:

1) All locations are approximate.
2) Refer to Figure 5 for SSDS details
3) Property boundary is approximate.Tax parcel data obtained from Monroe County Real Property.
4) Building plan referenced from Bero Architecture dated 07/01/03.
5) Actual basement plan may differ.
6) PFE denotes Pressure Field Extension
7) Isopleths of average PFE measurements detected in temporary PFE monitoring points at the Site were developed using the Kriging interpolation method. These contours are shown to illustrate general pressure differntial readings bewteen the ambient air space and sub-slab at the Site. These contour lines are approximate and actual contours may vary from the locations shown. This data should be considered accurate to the degree implied by the method used.
PFE Measurements Collected in February 2018

Legend

- Temporary PFE Monitoring Point (inH2O)
- SSDS Depressurization Point (3" Diameter)
- SSDS-1 (4" Diameter Lateral Piping)
- SSDS-2 (4" Diameter Lateral Piping)
- SSDS-3 (4" Diameter Lateral Piping)
- SSDS-4 (6" Diameter Lateral Piping)
- PFE Contour Upper Basement (inH2O)
- Crawl Space
- Monroe County Tax Parcel
- Approximate Area of Lower Basement

bero architecture p.c.
38 Winthrop Street
Rochester, New York 14607
(716) 262-2035

691 ST. PAUL STREET

45010

LaBella
Powered by partnership.

TITLE
PRESSURE FIELD EXTENSION CONTOURS - UPPER BASEMENT

PROJECT
SITE MANAGEMENT PLAN

690 SAINT PAUL ST OFF-SITE
NYSDEC SITE #C828159A
691 SAINT PAUL ST
ROCHESTER, NEW YORK

CLIENT
BAUSCH AND LOMB

STATE OF NEW YORK
DANIEL P. NOLL
No. 081986
LICENSED PROFESSIONAL ENGINEER

0 12.5 25 Feet

1 inch = 25 feet

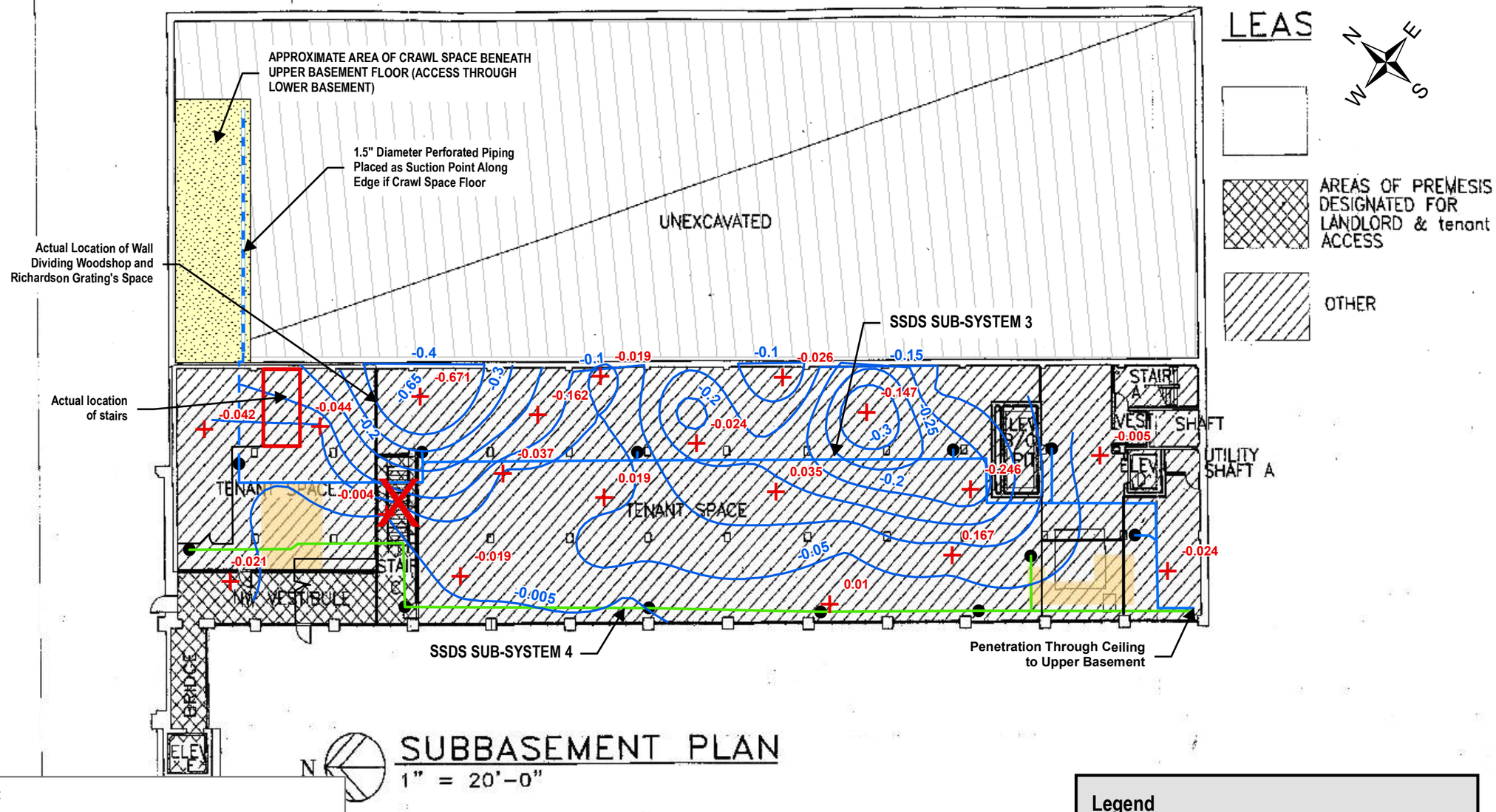
Wednesday, August 21, 2019

INTENDED TO PRINT 11"X17"

2170820

FIGURE 8A

Path: I:\Bausch & Lomb\2170820 - 691 St Paul St SVIA BCP Site\Drawings\SMP\Figure 8A Pressure Contours Upper Basement-2.mxd



SUBBASEMENT PLAN

1" = 20'-0"

Note:

1) All locations are approximate.
2) Refer to Figure 5 for SSDS details
3) Property boundary is approximate.Tax parcel data obtained from Monroe County Real Property.
4) Building plan referenced from Bero Architecture dated 07/01/03.
5) Actual basement plan may differ.
6) PFE denotes Pressure Field Extension
7) Isopleths of average PFE measurements detected in temporary PFE monitoring points at the Site were developed using the Kriging interpolation method. These contours are shown to illustrate general pressure differntial readings bewteen the ambient air space and sub-slab at the Site. These contour lines are approximate and actual contours may vary from the locations shown. This data should be considered accurate to the degree implied by the method used.
8) PFE measurements collected in February 2018.

bero architecture p.c.
33 Windsor Street
Rochester, New York 14607
(716) 262-2035

691 ST. PAUL STREET

95010

Legend

- Temporary PFE Monitoring Point (inH2O)
- PFE Contour Lower basement (inH20)
- SSDS-3 (4" Diameter Lateral Piping)
- SSDS-3 (1.5" Diameter Lateral Piping)
- SSDS-4 (6" Diameter Lateral Piping)
- Depressurization Point (3" Diameter)
- Depressurization Point - 1.5" Diameter Perforated Piping
- Crawl Space
- Approximate Location of Subsurface Pit
- Approximate Extent of Upper Basement

LaBella
Powered by partnership.

TITLE
PRESSURE FIELD EXTENSION CONTOURS - LOWER BASEMENT

PROJECT
SITE MANAGEMENT PLAN

690 SAINT PAUL ST OFF-SITE
NYSDEC SITE #C828159A
691 SAINT PAUL ST
ROCHESTER, NEW YORK

CLIENT
BAUSCH AND LOMB

STATE OF NEW YORK
DANIEL P. NOLL
No. 081998
LICENSED PROFESSIONAL ENGINEER

0 12.5 25 Feet

1 inch = 25 feet

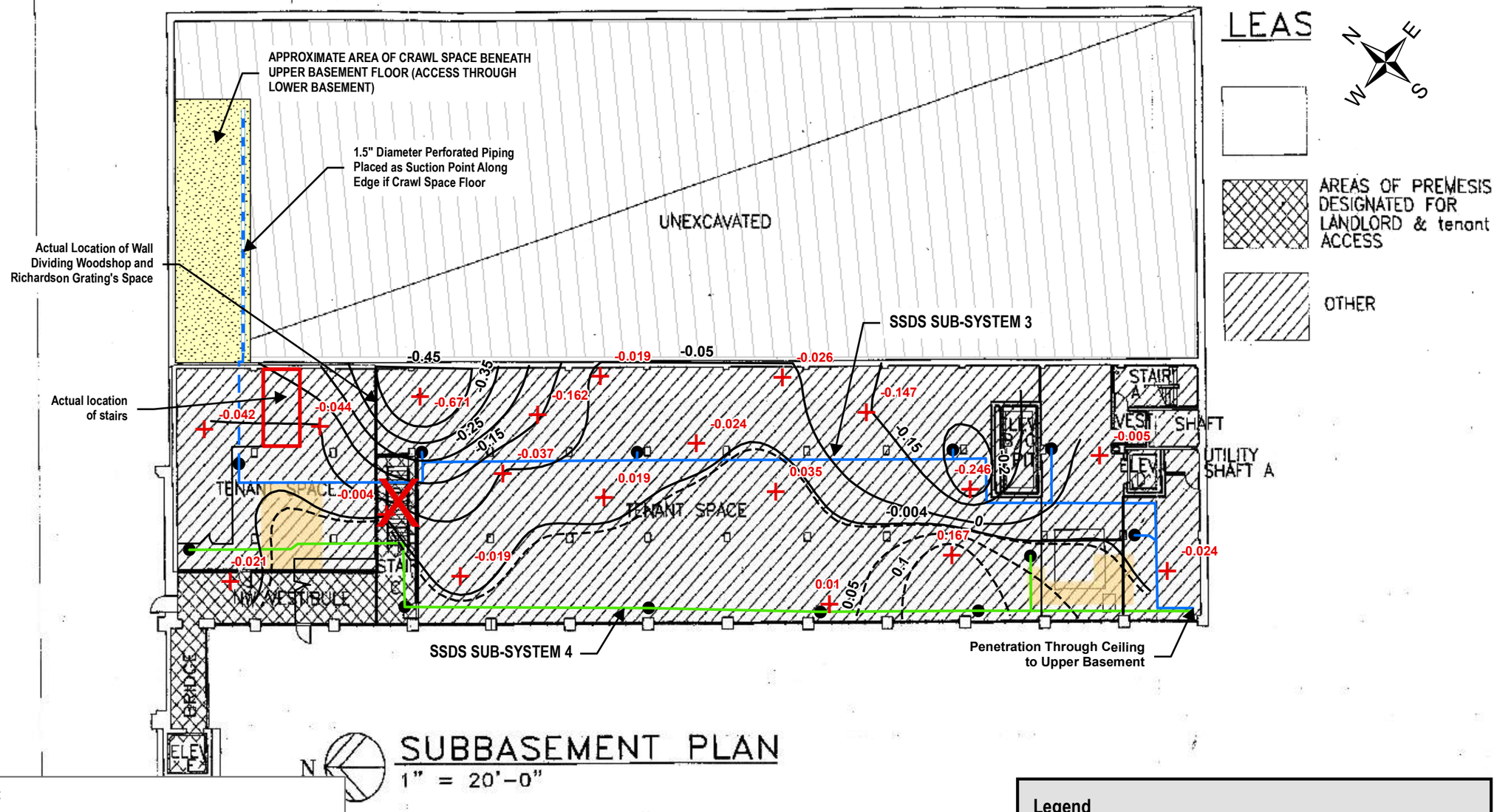
Wednesday, August 21, 2019

INTENDED TO PRINT 11"X17"

2170820

FIGURE 8B

Path: I:\Bausch & Lomb\2170820 - 691 St Paul St SVIA BCP Site\Drawings\SMP\Figure 8B Pressure Contours Lower Basement.mxd



LEAS

AREAS OF PREMESIS DESIGNATED FOR LANDLORD & tenant ACCESS

OTHER

SUBBASEMENT PLAN

1" = 20'-0"

Note:

1) All locations are approximate.
2) Refer to Figure 5 for SSDS details
3) Property boundary is approximate.Tax parcel data obtained from Monroe County Real Property.
4) Building plan referenced from Bero Architecture dated 07/01/03.
5) Actual basement plan may differ.
6) PFE denotes Pressure Field Extension
7) Isopleths of average PFE measurements detected in temporary PFE monitoring points at the Site were developed using the Kriging interpolation method. These contours are shown to illustrate general pressure differntial readings bewteen the ambient air space and sub-slab at the Site. These contour lines are approximate and actual contours may vary from the locations shown. This data should be considered accurate to the degree implied by the method used.
8) PFE measurements collected in March 2018.

bero architecture p.c.
33 Windsor Street
Rochester, New York 14607
(716) 262-2035

691 ST. PAUL STR

95010

Legend

- Temporary PFE Monitoring Point (inH2O)
- PFE Contour Lower Basement with Negative Pressure (inH20)
- PFE Contour Lower Basement with Positive Pressure (inH20)
- SSDS-3 (4" Diameter Lateral Piping)
- SSDS-3 (1.5" Diameter Lateral Piping)
- SSDS-4 (6" Diameter Lateral Piping)
- Depressurization Point (3" Diameter)
- Depressurization Point - 1.5" Diameter Perforated Piping
- Crawl Space
- Approximate Location of Subsurface Pit
- Approximate Extent of Upper Basement

LaBella
Powered by partnership.

TITLE
PRESSURE FIELD EXTENSION CONTOURS - LOWER BASEMENT

PROJECT
SITE MANAGEMENT PLAN

690 SAINT PAUL ST OFF-SITE
NYSDEC SITE #C828159A
691 SAINT PAUL ST
ROCHESTER, NEW YORK

CLIENT
BAUSCH AND LOMB

STATE OF NEW YORK
DANIEL P. NOLL
No. 081998
LICENSED PROFESSIONAL ENGINEER

0 12.5 25 Feet

1 inch = 25 feet

Wednesday, August 21, 2019

INTENDED TO PRINT 11"X17"

2170820

FIGURE 8C

Path: I:\Bausch & Lomb\2170820 - 691 St Paul St SVIA BCP Site\Drawings\SMP\Figure 8C Pressure Contours Lower Basement.mxd

APPENDIX 1

ORDER ON CONSENT AGREEMENT

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
STATE SUPERFUND PROGRAM
ECL §27-1301 *et seq.*

In the Matter of a Remedial Program for

ORDER ON CONSENT AND ADMINISTRATIVE SETTLEMENT
Index No. R8-20161013-107

DEC Site Name: **690 St. Paul Street** - off-site
DEC Site No.: C828159A
Site Address: 691 & 705 St. Paul Street
Rochester, NY 14605
Monroe County

Hereinafter referred to as "Site"

by: **Bausch + Lomb**

Hereinafter referred to as "Respondent"

---

1. A. The New York State Department of Environmental Conservation ("Department") is responsible for inactive hazardous waste disposal site remedial programs pursuant to Article 27, Title 13 of the Environmental Conservation Law ("ECL") and Part 375 of Title 6 of the Official Compilation of Codes, Rules and Regulations ("6 NYCRR") and may issue orders consistent with the authority granted to the Commissioner by such statute.

B. The Department is responsible for carrying out the policy of the State of New York to conserve, improve and protect its natural resources and environment and control water, land, and air pollution consistent with the authority granted to the Department and the Commissioner by Article 1, Title 3 of the ECL.

C. This Order is issued pursuant to the Department's authority under, *inter alia*, ECL Article 27, Title 13 and ECL 3-0301, and resolves Respondent's liability to the State for the Matters Addressed in this Order, as provided at 6 NYCRR 375-1.5(b)(5).

2. Site C828159 (690 St. Paul Street) is located across St. Paul Street from the Site and is currently subject to a Brownfield Cleanup Agreement; the Department believes that contamination from 690 St. Paul Street may have potentially migrated and may potentially still be migrating onto the Site. Said contamination at the Site is not subject to investigation or remediation under the existing Brownfield Cleanup Agreement.

3. The Site subject to this Order has been assigned number C828159A, and consists of approximately 2 acres, including two buildings and parking lots and other land surrounding the buildings; its location is found on Tax Map/Parcel No.: Section 106 Subsection 53 Block 01 Lot 11, and with an address of 691 St. Paul Street, Rochester, NY 14605 and Tax Map/Parcel No.: Section 106 Subsection 45 Block 01 Lot 49, and with an address of 705 St. Paul Street, Rochester, NY 14605. A map depicting the Site is found at Exhibit A of this Order

4. Solely with regard to the Matters Addressed, as set forth below, Respondent hereby waives any right to a hearing as may be provided by law, consents to the issuance and entry of this Order, and agrees to be bound by its terms. Respondent consents to and agrees not to contest the authority or jurisdiction of the Department to issue or enforce this Order, and agrees not to contest the validity of this Order or its terms or the validity of data submitted to the Department by Respondent pursuant to this Order.

NOW, having considered this matter and being duly advised, **IT IS ORDERED THAT**:

I. Matters Addressed

Matters Addressed by this Order include:

(1) Respondent will develop and submit to the Department for its review and approval a soil vapor intrusion (SVI) investigation Work Plan for the two occupied buildings located at the Site (691 and 705 St. Paul Street), as more fully described below.

2) Respondent will implement the approved Work Plan.

(3) Respondent will submit to the Department a SVI report that describes the results of the SVI.

(4) Respondent will conduct any further work necessary to implement a remedial program should such a program be required by the Department following its review of the SVI report.

II. SVI Work Plan and Report

(1) The SVI Work Plan shall be submitted to the Department within sixty (60) days after the effective date of this Order. The SVI Work Plan shall provide a detailed description of the proposed work that shall include at a minimum sub-slab soil vapor and indoor air monitoring in the two buildings, outdoor air monitoring, and provide a schedule for performing the SVI.

(2) The SVI report shall be submitted to the Department for its review within sixty (60) days following the completion of the SVI investigation. The SVI report shall include a recommendation whether a remedial program should be conducted pursuant to 6 NYCRR §§375-1.8 & 2.8 to address SVI.

III. Remedial Program

(1) Should the Department determine that a remedial program is necessary to address SVI at the site, Respondent agrees to submit within sixty (60) days following the

Department's determination a Work Plan and a schedule to the Department for its review to conduct IRMs, Remedial Action(s), Site management or other measures to eliminate or minimize SVI at the Site.

(2) Once approved by the Department, Respondent agrees to implement the approved Work Plan on the schedule contained in the approved Work Plan.

IV. Site Access

The Department understands that the SVI and any subsequent remedial program will occur on property and in buildings not currently owned by Respondent. Respondent shall make all reasonable efforts to obtain access to the Site and the buildings so that the approved schedule can be met. If Respondent's efforts to obtain access to the Site and buildings are not successful, Respondent shall notify the Department and the Department will attempt to obtain said access. If the Department's attempt to obtain access is also unsuccessful, Respondent and the Department shall discuss how to conduct an alternative SVI without obtaining access to the Site and buildings.

V. Payment of State Costs

Respondent shall pay all state costs as set forth in Appendix "A". Invoices shall be sent to Respondent at the address stated below in ¶VI.A.2.

VI. Communications

A. All written communications required by this Consent Order shall be transmitted by United States Postal Service, by private courier service, by hand delivery, or by electronic mail.

1. Communication from Respondent shall be sent to:

Frank Sowers (1 hard copy (unbound for work plans) & 1 electronic copy)
Department of Environmental Conservation
Division of Environmental Remediation
6274 East Avon – Lima Road
Avon, NY 14414
frank.Sowers@dec.ny.gov

Krista Anders (electronic copy only)
New York State Department of Health
Empire State Plaza
Corning Tower Room 1787
Albany, NY 12237
krista.anders@health.ny.gov

2. Communication from the Department to Respondent shall be sent to:

Ms. Amy Butler and Mr. Frank Chiappone
Bausch + Lomb.
1400 N. Goodman Street
Rochester, NY 14609

B. The Department and Respondent reserve the right to designate additional or different addressees for communication on written notice to the other. Additionally, the Department reserves the right to request that the Respondent provide more than one paper copy of any work plan or report.

C. Each party shall notify the other within ninety (90) days after any change in the addresses listed in this paragraph or in Paragraph I.

VII. Miscellaneous

A. Appendix A – "Standard Clauses for All New York State Superfund Orders" is attached to and hereby made a part of this Order as if set forth fully herein.

B. In the event of a conflict between the terms of this Order (including any and all attachments thereto and amendments thereof) and the terms of Appendix A, the terms of this Order shall control.

C. The effective date of this Order is the 10th day after it is signed by the Commissioner or the Commissioner's designee.

DATED: February 14, 2017

BASIL SEGGOS,
COMMISSIONER
NEW YORK STATE DEPARTMENT OF
ENVIRONMENTAL CONSERVATION

By: Robert W. Schick, P.E., Director
Division of Environmental Remediation

CONSENT BY RESPONDENT

Respondent hereby consents to the issuing and entering of this Consent Order, waives Respondent's right to a hearing herein as provided by law, and agrees to be bound by this Consent Order.

BAUSCH + LOMB

By: Amy R. Butler

Title: V.P. Environment, Health, Safety + Sustainability

Date: 25 JAN '17

STATE OF NEW YORK)
) ss:
COUNTY OF)

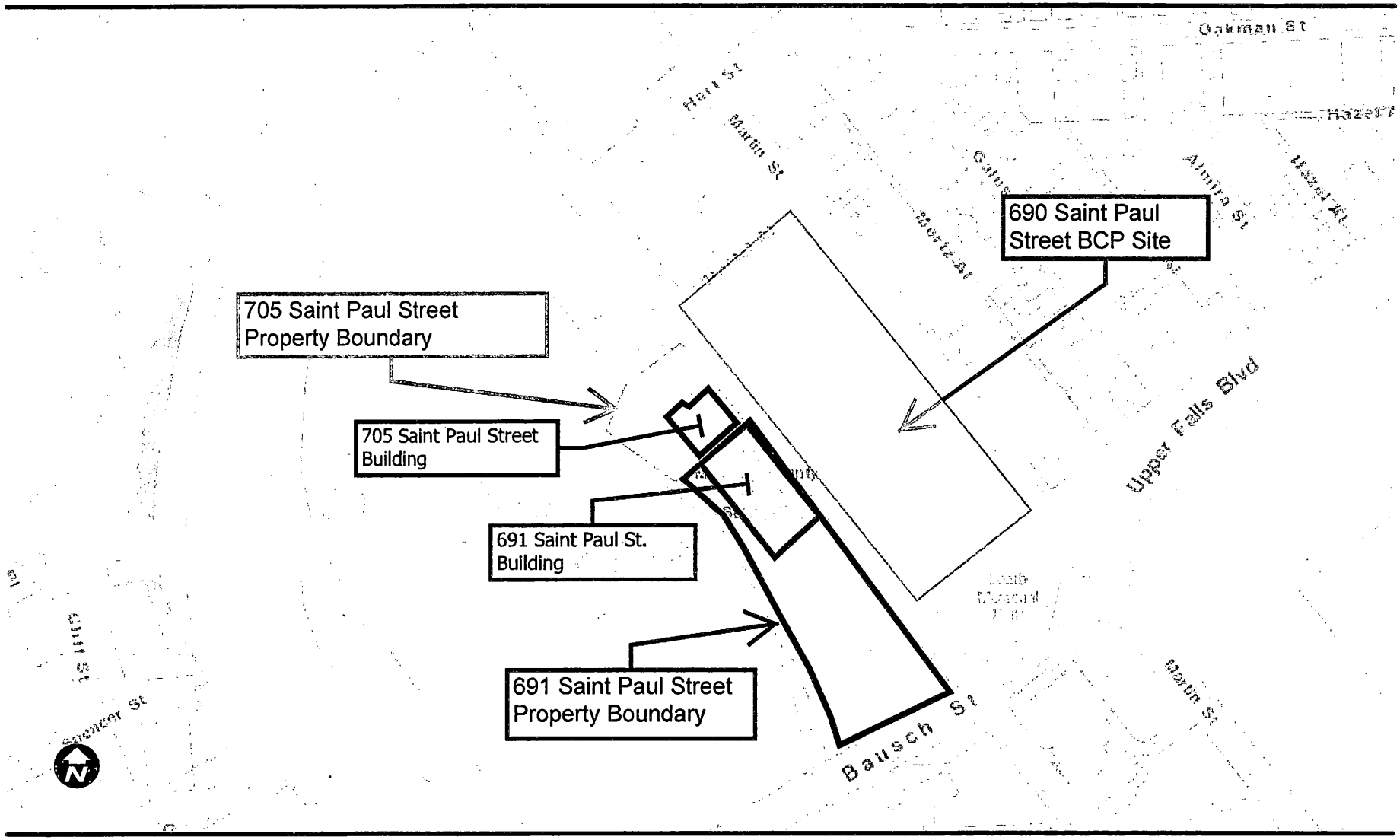
On the 25th day of January in the year 2017, before me, the undersigned, personally appeared Amy R. Butler *(full name)* personally known to me who, being duly sworn, did depose and say that he/she/they reside at 4789 Morrow Hill Rd., Canandaigua NY *(full mailing address)* and that he/she/they is (are) the Vice President *(president or other officer or director or attorney in fact duly appointed)* of the Bausch + Lomb *(full legal name of corporation)*, the corporation described in and which executed the above instrument; and that he/she/they signed his/her/their name(s) thereto by the authority of the board of directors of said corporation.

Jennifer R. Hatch
Notary Public, State of New York

JENNIFER R. HATCH
Notary Public - State of New York
No. 01HA6111879
Qualified in Wyoming County
My Commission Expires June 28, 2020

EXHIBIT "A"

Map



May 18, 2015

This map is intended for general reference only.

The City of Rochester makes no representation as to the accuracy or fitness of the data presented.

City of Rochester, NY

City of Rochester, NY
Lovely A. Warren, Mayor

EXHIBIT "B"

RECORDS SEARCH REPORT

1. Detail all environmental data and information within Respondent's or Respondent's agents' or consultants' possession or control regarding environmental conditions at or emanating from the Site.

2. A comprehensive list of all existing relevant reports with titles, authors, and subject matter, as well as a description of the results of all previous investigations of the Site and of areas immediately surrounding the Site which are or might be affected by contamination at the Site, including all available topographic and property surveys, engineering studies, and aerial photographs.

3. A concise summary of information held by Respondent and Respondent's attorneys and consultants with respect to:

(i) a history and description of the Site, including the nature of operations;

(ii) the types, quantities, physical state, locations, methods, and dates of disposal or release of hazardous waste at or emanating from the Site;(iii)a description of current Site security (i.e. fencing, posting, etc.); and

(iii) the names and addresses of all persons responsible for disposal of hazardous waste, including the dates of such disposal and any proof linking each such person responsible with the hazardous wastes identified.

APPENDIX "A"

STANDARD CLAUSES FOR ALL NEW YORK STATE STATE SUPERFUND ORDERS

STANDARD CLAUSES FOR ALL NEW YORK STATE SUPERFUND ADMINISTRATIVE ORDERS

The parties to the State Superfund Order (hereinafter "Order") agree to be bound by the following clauses which are hereby made a part of the Order. The word "Respondent" herein refers to any party to the Order, other than the New York State Department of Environmental Conservation (hereinafter "Department").

I. Citizen Participation Plan

Within twenty (20) days after the effective date of this Order, Respondent shall submit for review and approval a written citizen participation plan prepared in accordance with the requirements of ECL §27-1417 and 6 NYCRR sections 375-1.10 and 375-3.10. Upon approval, the Citizen Participation Plan shall be deemed to be incorporated into and made a part of this Order.

II. Initial Submittal

Within thirty (30) days after the effective date of this Order, Respondent shall submit to the Department a Records Search Report prepared in accordance with Exhibit "B" attached to the Order. The Records Search Report can be limited if the Department notifies Respondent that prior submissions satisfy specific items required for the Records Search Report.

III. Development, Performance, and Reporting of Work Plans

A. Work Plan Requirements

All activities at the Site that comprise any element of an Inactive Hazardous Waste Disposal Site Remedial Program shall be conducted pursuant to one or more Department-approved work plans ("Work Plan" or "Work Plans") and this Order and all activities shall be consistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 C.F.R. Part 300, as required under CERCLA, 42 U.S.C. § 9600 *et seq.* The Work Plan(s) under this Order shall address both on-Site and off-Site conditions and shall be developed and implemented in accordance with 6 NYCRR § 375-1.6(a), 375-3.6, and 375-6. Subject to Subparagraph III.E.3,. all Department-approved Work Plans shall be incorporated into and become enforceable parts of this Order. Upon approval of a Work Plan by the Department, Respondent shall implement such Work Plan in accordance with the schedule contained therein. Nothing in this Subparagraph shall mandate that any particular Work Plan be submitted.

The Work Plans shall be captioned as follows:

1. Site Characterization ("SC") Work Plan: a Work Plan which provides for the identification of the presence of any hazardous waste disposal at the Site;

2. Remedial Investigation/Feasibility Study ("RI/FS") Work Plan: a Work Plan which provides for the investigation of the nature and extent of contamination within the boundaries of the Site and emanating from such Site and a study of remedial alternatives to address such on-site and off-site contamination;

3. Remedial Design/Remedial Action ("RD/RA") Work Plan: a Work Plan which provides for the development and implementation of final plans and specifications for implementing the remedial alternative set forth in the ROD;

4. "IRM Work Plan" if the Work Plan provides for an interim remedial measure;

5. "Site Management Plan" if the Work Plan provides for the identification and implementation of institutional and/or engineering controls as well as any necessary monitoring and/or operation and maintenance of the remedy; or

6. "Supplemental" if additional work plans other than those set forth in II.A.1-5 are required to be prepared and implemented.

B. Submission/Implementation of Work Plans

1. Respondent may opt to propose one or more additional or supplemental Work Plans (including one or more IRM Work Plans) at any time, which the Department shall review for appropriateness and technical sufficiency.

2. Any proposed Work Plan shall be submitted for the Department's review and approval and shall include, at a minimum, a chronological description of the anticipated activities, a schedule for performance of those activities, and sufficient detail to allow the Department to evaluate that Work Plan.

i. The Department shall notify Respondent in writing if the Department determines that any element of a Department-approved Work Plan needs to be modified in order to achieve the objectives of the Work Plan as set forth in Subparagraph III.A or to ensure that the Remedial Program otherwise protects human health and the environment. Upon receipt of such notification, Respondent shall, subject to dispute resolution pursuant to Paragraph XV, modify the Work Plan.

ii. The Department may request, subject to dispute resolution pursuant to Paragraph XV, that Respondent submit additional or supplemental Work Plans for the Site to complete the current remedial phase within thirty (30) Days after the Department's written request.

3. A Site Management Plan, if necessary, shall be submitted in accordance with the schedule set forth in the IRM Work Plan or Remedial Work Plan.

4. During all field activities conducted under a Department-approved Work Plan, Respondent shall have on-Site a representative who is qualified to supervise the activities undertaken in accordance with the provisions of 6 NYCRR 375-1.6(a)(3).

5. A Professional Engineer must stamp and sign all Work Plans other than SC or RI/FS Work Plans.

C. Submission of Final Reports and Periodic Reports

1. In accordance with the schedule contained in a Work Plan, Respondent shall submit a final report as provided at 6 NYCRR 375-1.6(b) and a final engineering report as provided at 6 NYCRR 375-1.6(c).

2. Any final report or final engineering report that includes construction activities shall include "as built" drawings showing any changes made to the remedial design or the IRM.

3. In the event that the final engineering report for the Site requires Site management, Respondent shall submit an initial periodic report by in accordance with the schedule in the Site Management Plan and thereafter in accordance with a schedule determined by the Department. Such periodic report shall be signed by a Professional Engineer or by such other qualified environmental professional as the Department may find acceptable and shall contain a certification as provided at 6 NYCRR 375-1.8(h)(3). Respondent may petition the Department for a determination that the institutional and/or engineering controls may be terminated. Such petition must be supported by a statement by a Professional Engineer that such controls are no longer necessary for the protection of public health and the environment. The Department shall not unreasonably withhold its approval of such petition.

4. Within sixty (60) days of the Department's approval of a Final Report, Respondent shall submit such additional Work Plans as is required by the Department in its approval letter of such Final Report. Failure to submit any additional Work Plans within such period shall be a violation of this Order.

D. Review of Submittals

1. The Department shall make a good faith effort to review and respond in writing to each submittal Respondent makes pursuant to this Order within sixty (60) Days. The Department's response shall include, in accordance with 6 NYCRR 375-1.6(d), an approval, modification request, or disapproval of the submittal, in whole or in part.

i. Subject to Subparagraph III.E.3 and upon the Department's written approval of a Work Plan, such Department-approved Work Plan shall be deemed to be incorporated into and made a part of this Order and shall be implemented in accordance with the schedule contained therein.

ii. If the Department modifies or requests modifications to a submittal, it shall specify the reasons for such modification(s). Within fifteen (15) Days after the date of the Department's written

notice that Respondent's submittal has been disapproved, Respondent shall notify the Department of its election in accordance with 6 NYCRR 375-1.6(d)(3). If Respondent elects to modify or accept the Department's modifications to the submittal, Respondent shall make a revised submittal that incorporates all of the Department's modifications to the first submittal in accordance with the time period set forth in 6 NYCRR 375-1.6(d)(3). In the event that Respondent's revised submittal is disapproved, the Department shall set forth its reasons for such disapproval in writing and Respondent shall be in violation of this Order unless it invokes dispute resolution pursuant to Paragraph XV and its position prevails. Failure to make an election or failure to comply with the election is a violation of this Order.

iii. If the Department disapproves a submittal, it shall specify the reasons for its disapproval. Within fifteen (15) Days after the date of the Department's written notice that Respondent's submittal has been disapproved, Respondent shall notify the Department of its election in accordance with 6 NYCRR 375-1.6(d)(4). If Respondent elects to modify the submittal, Respondent shall make a revised submittal that addresses all of the Department's stated reasons for disapproving the first submittal in accordance with the time period set forth in 6 NYCRR 375-1.6(d)(4). In the event that Respondent's revised submittal is disapproved, the Department shall set forth its reasons for such disapproval in writing and Respondent shall be in violation of this Order unless it invokes dispute resolution pursuant to Paragraph XV and its position prevails. Failure to make an election or failure to comply with the election is a violation of this Order.

2. Within thirty (30) Days after the Department's approval of a final report, Respondent shall submit such final report, as well as all data gathered and drawings and submittals made pursuant to such Work Plan, in an electronic format acceptable to the Department. If any document cannot be converted into electronic format, Respondent shall submit such document in an alternative format acceptable to the Department.

E. Department's Issuance of a ROD

1. Respondent shall cooperate with the Department and provide reasonable assistance, consistent with the Citizen Participation Plan, in soliciting public comment on the proposed remedial action plan ("PRAP"), if any. After the close of the public comment period, the Department shall select a final remedial alternative for the Site in a ROD. Nothing in this Order shall be construed to abridge any rights of Respondent, as provided by law, to judicially challenge the Department's ROD.

2. Respondent shall have 60 days from the date of the Department's issuance of the ROD to notify the Department in writing whether it will implement the remedial activities required by such ROD. If the Respondent elects not to implement the required remedial activities, then this order shall terminate in accordance with Paragraph XIV.A. Failure to make an election or failure to comply with the election is a violation of this Order.

3. Nothing in this Order, in any submittal, or in any work plan(s) submitted pursuant to this Order shall modify, expand, reduce, or otherwise change the remedial activities (including site management) required by a ROD issued by the Department.

F. Institutional/Engineering Control Certification

In the event that the remedy for the Site, if any, or any Work Plan for the Site, requires institutional or engineering controls, Respondent shall submit a written certification in accordance with 6 NYCRR 375-1.8(h)(3) and 375-3.8(h)(2).

IV. Penalties

A. 1. Respondent's failure to comply with any term of this Order constitutes a violation of this Order, the ECL, and 6 NYCRR 375-2.11(a)(4). Nothing herein abridges Respondent's right to contest any allegation that it has failed to comply with this Order.

2. Payment of any penalties shall not in any way alter Respondent's obligations under this Order.

B. 1. Respondent shall not suffer any penalty or be subject to any proceeding or action in the event it cannot comply with any requirement of this Order as a result of any Force Majeure Event as provided at 6 NYCRR 375-1.5(b)(4). Respondent must use best efforts to anticipate the potential Force Majeure Event, best efforts to address any such event as it is

occurring, and best efforts following the Force Majeure Event to minimize delay to the greatest extent possible. "Force Majeure" does not include Respondent's economic inability to comply with any obligation, the failure of Respondent to make complete and timely application for any required approval or permit, and non-attainment of the goals, standards, and requirements of this Order.

2. Respondent shall notify the Department in writing within five (5) Days of the onset of any Force Majeure Event. Failure to give such notice within such five (5) Day period constitutes a waiver of any claim that a delay is not subject to penalties. Respondent shall be deemed to know of any circumstance which it, any entity controlled by it, or its contractors knew or should have known.

3. Respondent shall have the burden of proving by a preponderance of the evidence that (i) the delay or anticipated delay has been or will be caused by a Force Majeure Event; (ii) the duration of the delay or the extension sought is warranted under the circumstances; (iii) best efforts were exercised to avoid and mitigate the effects of the delay; and (iv) Respondent complied with the requirements of Subparagraph IV.B.2 regarding timely notification.

4. If the Department agrees that the delay or anticipated delay is attributable to a Force Majeure Event, the time for performance of the obligations that are affected by the Force Majeure Event shall be extended for a period of time equivalent to the time lost because of the Force majuere event, in accordance with 375-1.5(4).

5. If the Department rejects Respondent's assertion that an event provides a defense to non-compliance with this Order pursuant to Subparagraph IV.B, Respondent shall be in violation of this Order unless it invokes dispute resolution pursuant to Paragraph XV and Respondent's position prevails.

V. Entry upon Site

A. Respondent hereby consents, upon reasonable notice under the circumstances presented, to entry upon the Site (or areas in the vicinity of the Site which may be under the control of Respondent) by any duly designated officer or employee of the Department or any State agency having jurisdiction with respect to matters addressed pursuant to this Order, and by any agent, consultant, contractor, or other person so authorized by the Commissioner, all of whom shall abide by the health and safety rules in effect for the Site, for inspecting, sampling, copying records related to the contamination at the Site, testing, and any other activities necessary to ensure Respondent's compliance with this Order. Upon request, Respondent shall (i) provide the Department with suitable work space at the Site, including access to a telephone, to the extent available, and (ii) permit the Department full access to all non-privileged records relating to matters addressed by this Order. Raw data is not considered privileged and that portion of any privileged document containing raw data must be provided to the Department. In the event Respondent is unable to obtain any authorization from third-party property owners necessary to perform its obligations under this Order, the Department may, consistent with its legal authority, assist in obtaining such authorizations.

B. The Department shall have the right to take its own samples and scientific measurements and the Department and Respondent shall each have the right to obtain split samples, duplicate samples, or both, of all substances and materials sampled. The Department shall make the results of any such sampling and scientific measurements available to Respondent.

VI. Payment of State Costs

A. Within sixty (60) days after receipt of an itemized invoice from the Department, Respondent shall pay to the Department a sum of money which shall represent reimbursement for State Costs as provided by 6 NYCRR 375-1.5 (b)(3)(i). Failure to timely pay any invoice will be subject to late payment charge and interest at a rate of 9% from the date the payment is due until the date the payment is made.

B. Costs shall be documented as provided by 6 NYCRR 375-1.5(b)(3). The Department shall not be required to provide any other documentation of costs, provided however, that the Department's records shall be available consistent with, and in accordance with, Article 6 of the Public Officers Law.

C. Each such payment shall be made payable to the New York State Department of Environmental Conservation and shall be sent to:

Director, Bureau of Program Management

Division of Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway
Albany, New York 12233-7012

D. The Department shall provide written notification to the Respondent of any change in the foregoing addresses.

E. If Respondent objects to any invoiced costs under this Order, the provisions of 6 NYCRR 375-1.5 (b)(3)(v) and (vi) shall apply. Objections shall be sent to the Department as provided under subparagraph VI.C above.

F. In the event of non-payment of any invoice within the 45 days provided herein, the Department may seek enforcement of this provision pursuant to Paragraph IV or the Department may commence an enforcement action for non-compliance with ECL '27-1423 and ECL 71-4003.

VII. Release and Covenant Not to Sue

Upon the Department's issuance of a Certificate of Completion as provided at 6 NYCRR 375-1.9 and 375-2.9, Respondent shall obtain the benefits conferred by such provisions, subject to the terms and conditions described therein.

VIII. Reservation of Rights

A. Except as provided at 6 NYCRR 375-1.9 and 375-2.9, nothing contained in this Order shall be construed as barring, diminishing, adjudicating, or in any way affecting any of the Department's rights or authorities, including, but not limited to, the right to require performance of further investigations and/or response action(s), to recover natural resource damages, and/or to exercise any summary abatement powers with respect to any person, including Respondent.

B. Except as otherwise provided in this Order, Respondent specifically reserves all rights and defenses under applicable law respecting any Departmental assertion of remedial liability and/or natural resource damages against Respondent, and further reserves all rights respecting the enforcement of this Order, including the rights to notice, to be heard, to appeal, and to any other due process. The existence of this Order or Respondent's compliance with it shall not be construed as an admission of liability, fault, wrongdoing, or breach of standard of care by Respondent, and shall not give rise to any presumption of law or finding of fact, or create any rights, or grant any cause of action, which shall inure to the benefit of any third party. Further, Respondent reserves such rights as it may have to seek and obtain contribution, indemnification, and/or any other form of recovery from its insurers and from other potentially responsible parties or their insurers for past or future response and/or cleanup costs or such other costs or damages arising from the contamination at the Site as may be provided by law, including but not limited to rights of contribution under section 113(f)(3)(B) of CERCLA, 42 U.S.C. § 9613(f)(3)(B).

IX. Indemnification

Respondent shall indemnify and hold the Department, the State of New York, the Trustee of the State's natural resources, and their representatives and employees harmless as provided by 6 NYCRR 375-2.5(a)(3)(i).

X. Public Notice

A. Within thirty (30) Days after the effective date of this Order, Respondent shall provide notice as required by 6 NYCRR 375-1.5(a). Within sixty (60) Days of such filing, Respondent shall provide the Department with a copy of such instrument certified by the recording officer to be a true and faithful copy.

B. If Respondent proposes to transfer by sale or lease the whole or any part of Respondent's interest in the Site, or becomes aware of such transfer, Respondent shall, not fewer than forty-five (45) Days before the date of transfer, or within forty-five (45) Days after becoming aware of such conveyance, notify the Department in writing of the identity of the transferee and of the nature and proposed or actual date of the conveyance, and shall notify the transferee in writing, with a copy to the Department, of the applicability of this Order. However, such obligation shall not extend to a conveyance by means of a corporate reorganization or merger or the granting of any rights under any mortgage, deed, trust, assignment, judgment, lien, pledge, security agreement, lease, or any other right accruing to a person not affiliated with Respondent to secure the repayment of money or the performance of a duty or obligation.

XI. Change of Use

Applicant shall notify the Department at least sixty (60) days in advance of any change of use, as defined in 6 NYCRR 375-2.2(a), which is proposed for the Site, in accordance with the provisions of 6 NYCRR 375-1.11(d). In the event the Department determines that the proposed change of use is prohibited, the Department shall notify Applicant of such determination within forty-five (45) days of receipt of such notice.

XII. Environmental Easement

A. If a Record of Decision for the Site relies upon one or more institutional and/or engineering controls, Respondent (or the owner of the Site) shall submit to the Department for approval an Environmental Easement to run with the land in favor of the State which complies with the requirements of ECL Article 71, Title 36, and 6 NYCRR 375-1.8(h)(2). Upon acceptance of the Environmental Easement by the State, Respondent shall comply with the requirements of 6 NYCRR 375-1.8(h)(2).

B. If the ROD provides for no action other than implementation of one or more institutional controls, Respondent shall cause an environmental easement to be recorded under the provisions of Subparagraph XII.A.

C. If Respondent does not cause such environmental easement to be recorded in accordance with 6 NYCRR 375-1.8(h)(2), Respondent will not be entitled to the benefits conferred by 6 NYCRR 375-1.9 and 375-2.9 and the Department may file an Environmental Notice on the site.

XIII. Progress Reports

Respondent shall submit a written progress report of its actions under this Order to the parties identified in Subparagraph IV.A.1 of the Order by the 10th day of each month commencing with the month subsequent to the approval of the first Work Plan and ending with the Termination date as set forth in Paragraph XIV, unless a different frequency is set forth in a Work Plan. Such reports shall, at a minimum, include: all actions relative to the Site during the previous reporting period and those anticipated for the next reporting period; all approved activity modifications (changes of work scope and/or schedule); all results of sampling and tests and all other data received or generated by or on behalf of Respondent in connection with this Site, whether under this Order or otherwise, in the previous reporting period, including quality assurance/quality control information; information regarding percentage of completion; unresolved delays encountered or anticipated that may affect the future schedule and efforts made to mitigate such delays; and information regarding activities undertaken in support of the Citizen Participation Plan during the previous reporting period and those anticipated for the next reporting period.

XIV. Termination of Order

A. This Order will terminate upon the earlier of the following events:

1. Respondent's election in accordance with Paragraph III.E.2 not to implement the remedial activities required pursuant to the ROD. In the event of termination in accordance with this Subparagraph, this Order shall terminate effective the 5th Day after the Department's receipt of the written notification, provided, however, that if there are one or more Work Plan(s) for which a final report has not been approved at the time of Respondent's notification of its election not to implement the remedial activities in accordance with the ROD, Respondent shall complete the activities required by such previously approved Work Plan(s) consistent with the schedules contained therein. Thereafter, this Order shall terminate effective the 5th Day after the Department's approval of the final report for all previously approved Work Plans; or

2. The Department's written determination that Respondent has completed all phases of the Remedial Program (including Site Management), in which event the termination shall be effective on the 5th Day after the date of the Department's letter stating that all phases of the remedial program have been completed.

B. Notwithstanding the foregoing, the provisions contained in Paragraphs VI and IX shall survive the termination of this Order and any violation of such surviving Paragraphs shall be a violation of this Order, the ECL, and 6 NYCRR 375-2.11(a)(4), subjecting Respondent to penalties as provided under Paragraph IV so long as such

obligations accrued on or prior to the Termination Date.

C. If the Order is terminated pursuant to Subparagraph XIV.A.1, neither this Order nor its termination shall affect any liability of Respondent for remediation of the Site and/or for payment of State Costs, including implementation of removal and remedial actions, interest, enforcement, and any and all other response costs as defined under CERCLA, nor shall it affect any defenses to such liability that may be asserted by Respondent. Respondent shall also ensure that it does not leave the Site in a condition, from the perspective of human health and environmental protection, worse than that which existed before any activities under this Order were commenced. Further, the Department's efforts in obtaining and overseeing compliance with this Order shall constitute reasonable efforts under law to obtain a voluntary commitment from Respondent for any further activities to be undertaken as part of a Remedial Program for the Site.

XV. Dispute Resolution

A. In the event disputes arise under this Order, Respondent may, within fifteen (15) Days after Respondent knew or should have known of the facts which are the basis of the dispute, initiate dispute resolution in accordance with the provisions of 6 NYCRR 375-1.5(b)(2).

B. All cost incurred by the Department associated with dispute resolution are State costs subject to reimbursement pursuant to this Order.

C. Nothing contained in this Order shall be construed to authorize Respondent to invoke dispute resolution with respect to the remedy selected by the Department in the ROD or any element of such remedy, nor to impair any right of Respondent to seek judicial review of the Department's selection of any remedy.

XVI. Miscellaneous

A. Respondent agrees to comply with and be bound by the provisions of 6 NYCRR Subparts 375-1 and 375-2; the provisions of such Subparts that are referenced herein are referenced for clarity and convenience only and the failure of this Order to specifically reference any particular regulatory provision is not intended to imply that such provision is not applicable to activities performed under this Order.

B. The Department may exempt Respondent from the requirement to obtain any state or local permit or other authorization for any activity conducted pursuant to this Order in accordance with 6 NYCRR 375-1.12(b), (c), and (d).

C. 1. Respondent shall use best efforts to obtain all Site access, permits, easements, approvals, institutional controls, and/or authorizations necessary to perform Respondent's obligations under this Order, including all Department-approved Work Plans and the schedules contained therein. If, despite Respondent's best efforts, any access, permits, easements, approvals, institutional controls, or authorizations cannot be obtained, Respondent shall promptly notify the Department and include a summary of the steps taken. The Department may, as it deems appropriate and within its authority, assist Respondent in obtaining same.

2. If an interest in property is needed to implement an institutional control required by a Work Plan and such interest cannot be obtained, the Department may require Respondent to modify the Work Plan pursuant to 6 NYCRR 375-1.6(d)(3) to reflect changes necessitated by Respondent's inability to obtain such interest.

D. The paragraph headings set forth in this Order are included for convenience of reference only and shall be disregarded in the construction and interpretation of any provisions of this Order.

E. 1. The terms of this Order shall constitute the complete and entire agreement between the Department and Respondent concerning the implementation of the activities required by this Order. No term, condition, understanding, or agreement purporting to modify or vary any term of this Order shall be binding unless made in writing and subscribed by the party to be bound. No informal advice, guidance, suggestion, or comment by the Department shall be construed as relieving Respondent of Respondent's obligation to obtain such formal approvals as may be required by this Order. In the event of a conflict between the terms of this Order and any Work Plan submitted pursuant to this Order, the terms of this Order shall control over the terms of the Work Plan(s). Respondent consents to and agrees not to contest the authority and

jurisdiction of the Department to enter into or enforce this Order.

2. i. Except as set forth herein, if Respondent desires that any provision of this Order be changed, Respondent shall make timely written application to the Commissioner with copies to the parties listed in Subparagraph IV.A.1.

ii. If Respondent seeks to modify an approved Work Plan, a written request shall be made to the Department's project manager, with copies to the parties listed in Subparagraph IV.A.1.

iii. Requests for a change to a time frame set forth in this Order shall be made in writing to the Department's project attorney and project manager; such requests shall not be unreasonably denied and a written response to such requests shall be sent to Respondent promptly.

F. 1. If there are multiple parties signing this Order, the term "Respondent" shall be read in the plural, the obligations of each such party under this Order are joint and several, and the insolvency of or failure by any Respondent to implement any obligations under this Order shall not affect the obligations of the remaining Respondent(s) under this Order.

2. If Respondent is a partnership, the obligations of all general partners (including limited partners who act as general partners) under this Order are joint and several and the insolvency or failure of any general partner to implement any obligations under this Order shall not affect the obligations of the remaining partner(s) under this Order.

3. Notwithstanding the foregoing Subparagraphs XVI.F.1 and 2, if multiple parties sign this Order as Respondents but not all of the signing parties elect to implement a Work Plan, all Respondents are jointly and severally liable for each and every obligation under this Order through the completion of activities in such Work Plan that all such parties consented to; thereafter, only those Respondents electing to perform additional work shall be jointly and severally liable under this Order for the obligations and activities under such additional Work Plan(s). The parties electing not to implement the additional Work Plan(s) shall have no obligations under this Order relative to the activities set forth in such Work Plan(s). Further, only those Respondents electing to implement such additional Work Plan(s) shall be eligible to receive the release and covenant not to sue referenced in Paragraph VII.

G. Respondent shall be entitled to receive contribution protection and/or to seek contribution to the extent authorized by ECL 27-1421(6) and 6 NYCRR 375-1.5(b)(5).

H. Any time limitations set forth in Section 113(g)(1) of CERCLA, as amended, 42 U.S.C. § 9613(g)(1), Section 1012(h)(2) of the Oil Pollution Act, as amended, 33 U.S.C. § 2712(h)(2), the Federal Water Pollution Control Act, the New York Navigation Law, the New York Environmental Conservation Law, or any other federal or state statute or regulation with respect to potential claims for natural resource damages against Respondent or any other time limitations for the filing of potential natural resource damages claims against Respondent under any other applicable state or federal law are tolled in their entirety from the effective date of this Order until termination of this Order.

I. Unless otherwise expressly provided herein, terms used in this Order which are defined in ECL Article 27 or in regulations promulgated thereunder shall have the meaning assigned to them under said statute or regulations.

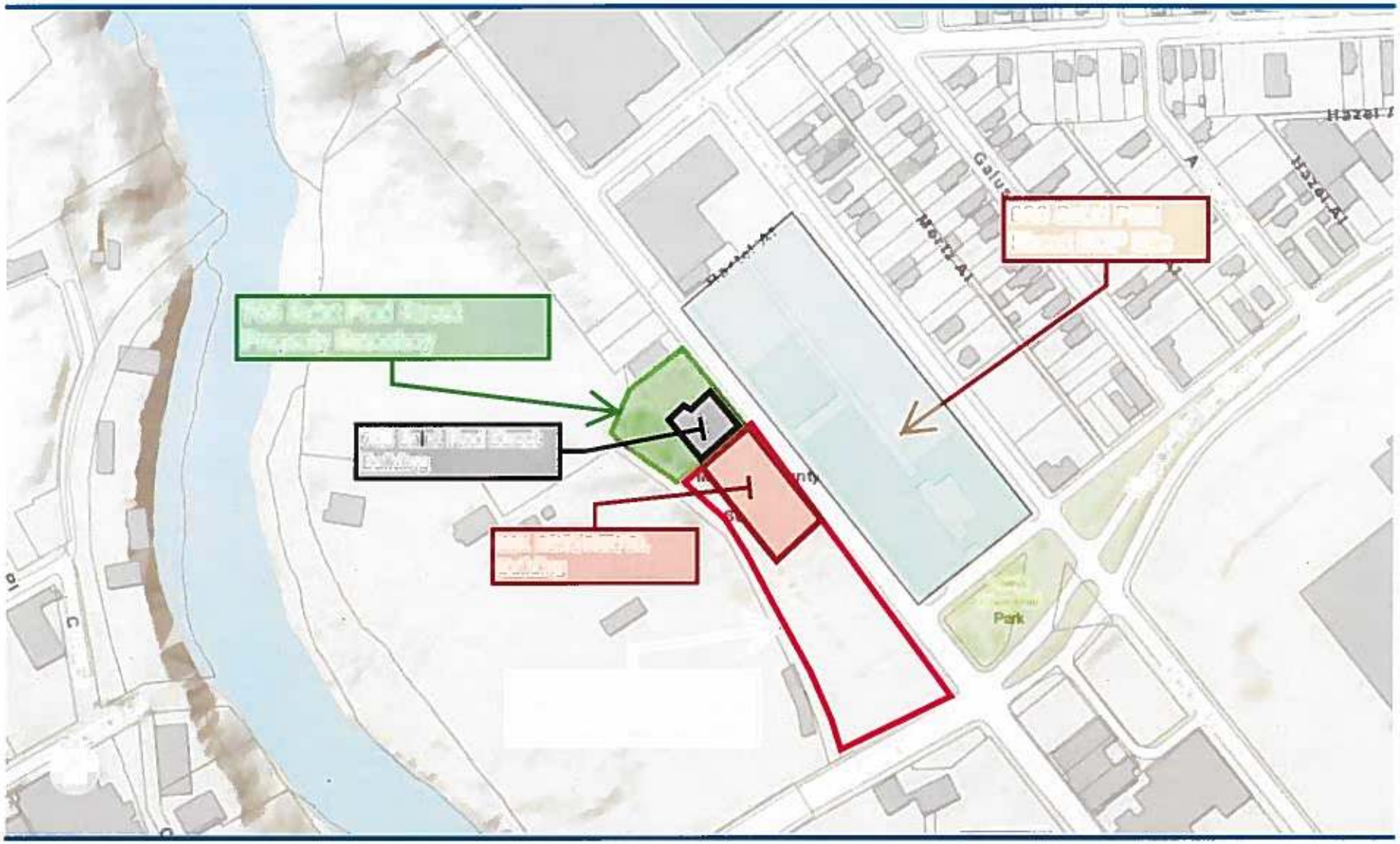
J. Respondent's obligations under this Order represent payment for or reimbursement of response costs, and shall not be deemed to constitute any type of fine or penalty.

K. Respondent and Respondent's successors and assigns shall be bound by this Order. Any change in ownership or corporate status of Respondent shall in no way alter Respondent's responsibilities under this Order.

L. This Order may be executed for the convenience of the parties hereto, individually or in combination, in one or more counterparts, each of which shall be deemed to have the status of an executed original and all of which shall together constitute one and the same.

4 y 3

Environment, Health, S


Park

APPENDIX 2

LIST OF SITE CONTACTS

APPENDIX 2 – LIST OF SITE CONTACTS

Name	Phone/Email Address
Site Owner – Dante Gullace (691 St. Paul Street LLC)	585-641-8566 / dante@gullacelaw.com
Remedial Party - Bausch & Lomb -Amy Butler -Frank Chiappone	 585-338-5699 / amy.butler@bausch.com 585-338-5087/ Frank.Chiappone@bausch.com
Professional Engineer (LaBella Associates, DPC)	585-295-6611 / dnoll@labellapc.com
NYSDEC DER Project Manager – Frank Sowers	585-226-5357 / frank.sowers@dec.ny.gov
NYSDEC Regional HW Engineer – Bernette Shilling	bernette.schilling@dec.ny.gov
NYSDEC Site Control – Kelly Lewandowski	518-402-8553 / Kelly.lewandowski@dec.ny.us

APPENDIX 3

OPERATIONS AND MAINTENANCE MANUAL

Operations and Maintenance Plan - Sub-Slab Depressurization System

Location:

NYSDEC Site #C828159A
691 Saint Paul Street
Rochester, New York

Prepared for:

Bausch & Lomb
1400 North Goodman Street
Rochester, New York 14609

LaBella Project No. 2170820

August 20, 2019

LaBella
Powered by partnership.

300 State Street, Suite 201 | Rochester, NY 14614 | p 585-454-6110 | f 585-454-3066

Table of Contents

FIGURES

APPENDICES

1.0 INTRODUCTION

This Operation and Maintenance (O&M) Plan is designed to assist the system operators in operating, maintaining and monitoring the Sub-Slab Depressurization System (SSDS) for the 691 St. Paul Street building. The SSDS is located at 691 St. Paul Street, City of Rochester, Monroe County, New York (see Figure 1). This plan was developed in accordance with the requirements of the Site Management Plan (SMP) Site No. C828159A which is administered by the New York State Department of Environmental Conservation (NYSDEC).

1.1 Systems Overview

The SSDS at the site was constructed and operated to address soil vapor intrusion concerns from groundwater contamination of chlorinated solvents in the shallow bedrock that is emanating from the NYSDEC Brownfield Cleanup Program (BCP) Site No. C828159 located at 690 St. Paul Street and east of the 691 St. Paul Street building. The SSDS is summarized below:

- **SSDS** – The SSDS depressurizes the sub-slab of the 691 St. Paul Street building, thus mitigating potential soil vapor intrusion issues within this building. In addition to the continual operation of the SSDS, monitoring of the effectiveness of the SSDS includes periodic checks of pressure field extension (PFE) monitoring points as well as monitoring and inspection of the system.
- **Lower Basement Wall Sealing** – Drylock® paint was applied to a portion of the lower basement's eastern interior wall to the extent practical to minimize potential soil vapor intrusion issues within this building and optimize the efficiency of the SSDS.

1.2 Plan Organization

The O&M Plan is divided into four sections:

- **Section 2** provides a general description of the remedial system;
- **Section 3** includes recommended preventative maintenance and checks; and
- **Section 4** includes a summary of operational monitoring of the remedial system.

Appendices for this O&M Plan are attached to this document and include the manufacture's product information sheets for the remedial systems, as applicable.

2.0 SSDS DESCRIPTION

The descriptions of each remedial system is described below:

2.1 Sub-Slab Depressurization System (SSDS)

The SSDS was installed in substantial accordance with the NYSDOH *Guidance for Evaluating Soil Vapor Intrusion in the State of New York* dated October 2006 (and associated amendments). The majority of the system was constructed of Schedule 40 polyvinyl chloride (PVC) piping and fittings.

The SSDS was designed to provide negative pressure beneath the sub slab of the 691 St. Paul Street building that effectively minimizes the potential for vapor intrusion for VOCs from sub slab soils to indoor air. The location of the system features are depicted on Figures 2A and 2B.

The SSDS consists of four separate systems, two systems are located on the upper basement and two systems are located at the lower basement. The performance of these systems can be monitored via PFE monitoring points. An audible alarm and manometer for each system is located on the west wall of the lower basement adjacent to the loading dock at the location shown on Figure 2A.

A sign is located on the wall adjacent to the alarms with contact information with who should be notified in the event an alarm is activated.

The audible alarms and fans are connected to separate circuits. The audible alarms are plugged into an outlet above the alarms. The fans are connected to the Low Voltage Panel ("LVP") #2 located in Room B17 at the upper basement. Fans for SSDS-1 and SSDS-2 that are associated with the upper basement are connected to Breaker #39. Fans for SSDS-3 and SSDS-4 that are associated with the lower basement are connected to Breaker #37. Also, there is an on and off switch for each fan on the roof of the loading dock building. Further details for the alarms and SSDS fans are included in Appendix A.

Two different types of fans are used for the systems. Systems SSDS-1, SSDS-2, and SSDS-3 utilizes a Festa Radon Technologies Model AMG Force fan. System SSDS-4 utilizes a Fantech Model FR250 fan. Specifications sheets for each fan are included in Appendix A.

2.2 Lower Basement Wall Sealing

White Drylock® paint was applied to a portion of the lower basement's eastern interior wall to the extent practical to minimize potential soil vapor intrusion issues within this building and to optimize the efficiency of the SSDS. The approximate location where the paint was applied is shown on Figure 2B. A copy of the manufacturer's specification sheet for the Drylock® paint is included as Appendix B.

3.0 PREVENTIVE MAINTENANCE

It is important that the systems be checked frequently so that any operating problems can be identified and corrected in a timely manner. Operational monitoring, discussed in Section 4.0 should also be performed as part of this inspection, when necessary.

3.1 SSDS Preventative Maintenance

Preventive maintenance of the SSDS will include checks to ensure the system is operating to the design requirements, and will include the following:

- Inspection of the area of concern, including all visible components of the venting systems;
- Monitoring of designated PFE monitoring points to ensure there are no potentially significant changes in pressure,
- Inspection of the blower/fan system and alarms to ensure all component parts are functioning;
- Checking and draining condensate traps as necessary;

- Monitoring of vent risers for flow rates to confirm that the venting systems are functioning as intended; and
- Other appropriate requirements such as routine maintenance, testing of functioning components of the venting systems in accordance with the manufacturers' schedule and recommendations, if appropriate.

Repairs and preventive maintenance will be performed as needed. The monitoring forms for the SSDS are included in Appendix C.

3.2 Lower Basement Interior Wall Sealant Preventative Maintenance

Preventative maintenance will include visually inspecting the wall where the Drylock® paint was applied for evidence of chips, flaking, and overall condition. Repairs will be made by applying additional Drylock® paint to areas that are significantly chipped, flaking, or appear to be in unsatisfactory condition. The monitoring form for the Drylock® paint sealant is included in Appendix C.

4.0 OPERATIONAL MONITORING

Operational monitoring allows for measuring the performance of the remedial system and identifies potential problems is the system operation.

4.1 SSDS Operation Monitoring

The monitoring of the SSDS will include the following:

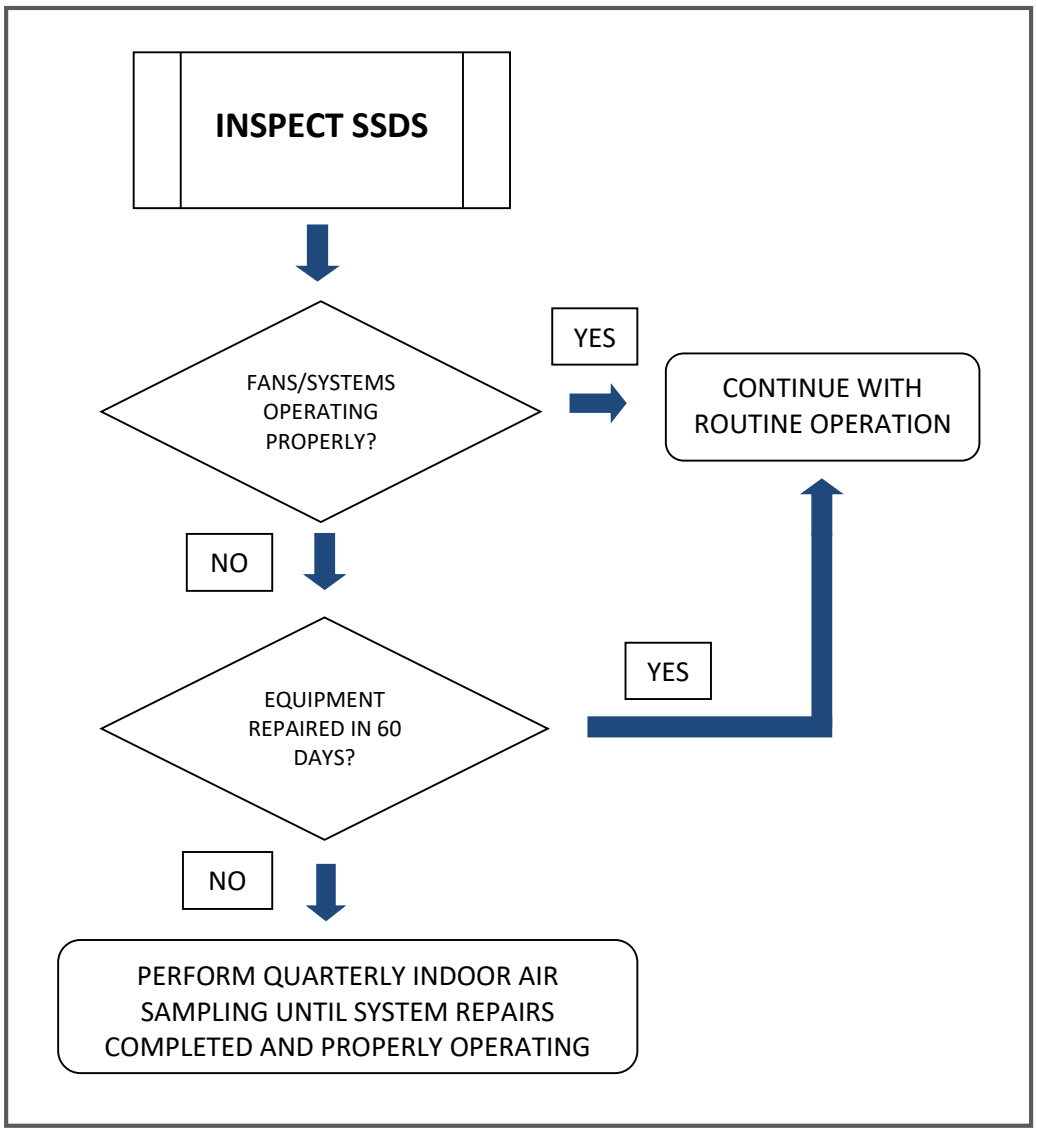
SSDS Monitoring

Remedial System Component	Monitoring Parameter	Operating Range	Monitoring Schedule
Fans	Pressure	Operation	Annually or as-needed
Fan Gauge/ Manometer	Should be within typical operating range	0 to 0.25 inches of water columns for all gauges and fans	Annually or as-needed
Fans	Pressure at PFE monitoring points (see Figures 2A and 2B)	0.004 inches of water column/negative pressure or similar to historical readings*	Annually or as-needed
Alarms and piping	Operational/condition	Minimum 0.25 inches of water column that triggers when there is a loss of power or failure to a fan	Annually or as-needed
Indoor Air Sampling	Collect indoor air samples	NYSDOH guidance values	As needed per contingency plan (see Section 4.1.1 below)

NYSDOH – New York State Department of Health
*Please note the PFE points along the lower basement west wall occasionally measure greater than 0.004 inches of water column or positive pressure during periods of high winds against the exposed western portion of the building foundation.

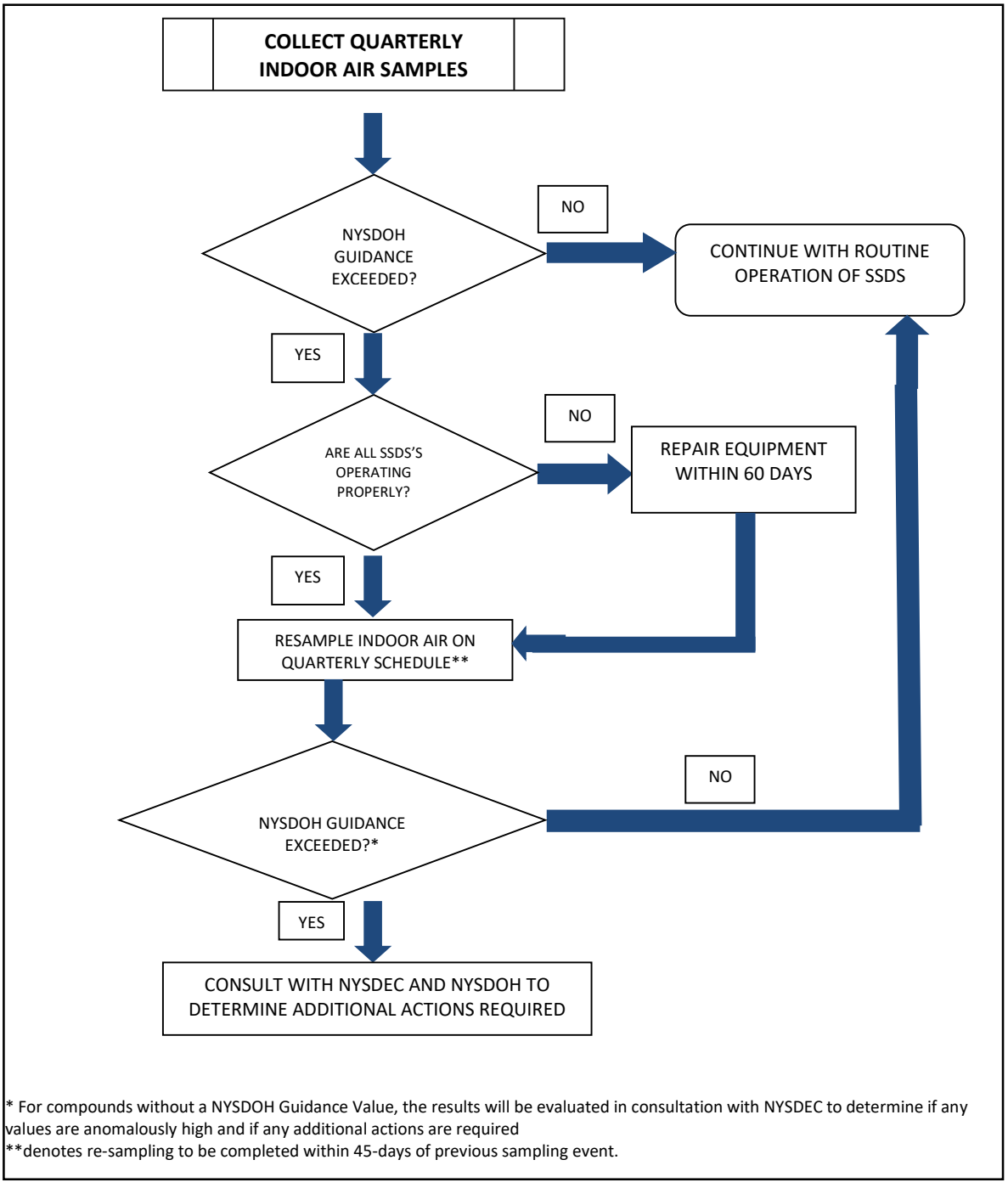
4.1.1 *Contingency Plan: SSDS Malfunction*

The four SSDS's are each connected to an alarm system. The alarms associated with each system are activated if differential pressure is lost in each respective system. In the event that an alarm is activated or a system is found to not be operating properly in any other way, the below plan will be put into action:



In addition to the above plan, the NYSDEC and NYSDOH will be notified in the event that any of the systems are not operating properly and updated as corrective actions are taken.

In the event that one or more targeted volatile organic compounds (VOCs) are identified at concentrations exceeding their respective NYSDOH Indoor Air Guidance value in one or more samples, the NYSDEC and NYSDOH will be alerted and the below plan may be put into action.



* For compounds without a NYSDOH Guidance Value, the results will be evaluated in consultation with NYSDEC to determine if any values are anomalously high and if any additional actions are required

**denotes re-sampling to be completed within 45-days of previous sampling event.

As part of this contingency plan, VOC concentrations will be compared to their respective NYSDOH Air Guideline established in Table 3.1 of the NYSDOH Guidance titled "Evaluating Soil Vapor Intrusion in the State of New York", October 2006. The comparison criteria for targeted VOCs are summarized in the table below.

Volatile Organic Compound	NYSDEC Air Guideline from Table 3.1 of NYSDOH "Evaluating Soil Vapor Intrusion in the State of New York"
Trichloroethene	2

It should be noted that the implementation of the contingency plan will be based on the concentrations and toxicities of any elevated VOCs and at the discretion of the NYSDEC and NYSDOH. The NYSDEC and NYSDOH will be notified of any exceedances within one week of the receipt of the sample data. However, validated data will be used for decision making purposes. In the event that corrective measures are required, the NYSDEC and NYSDOH will be updated as these measures are put into action.

Testing results will be included in the Periodic Review Report (PRR) as required in the SMP. Any reports associated with the implementation of the contingency plans will be prepared and submitted upon NYSDEC request.

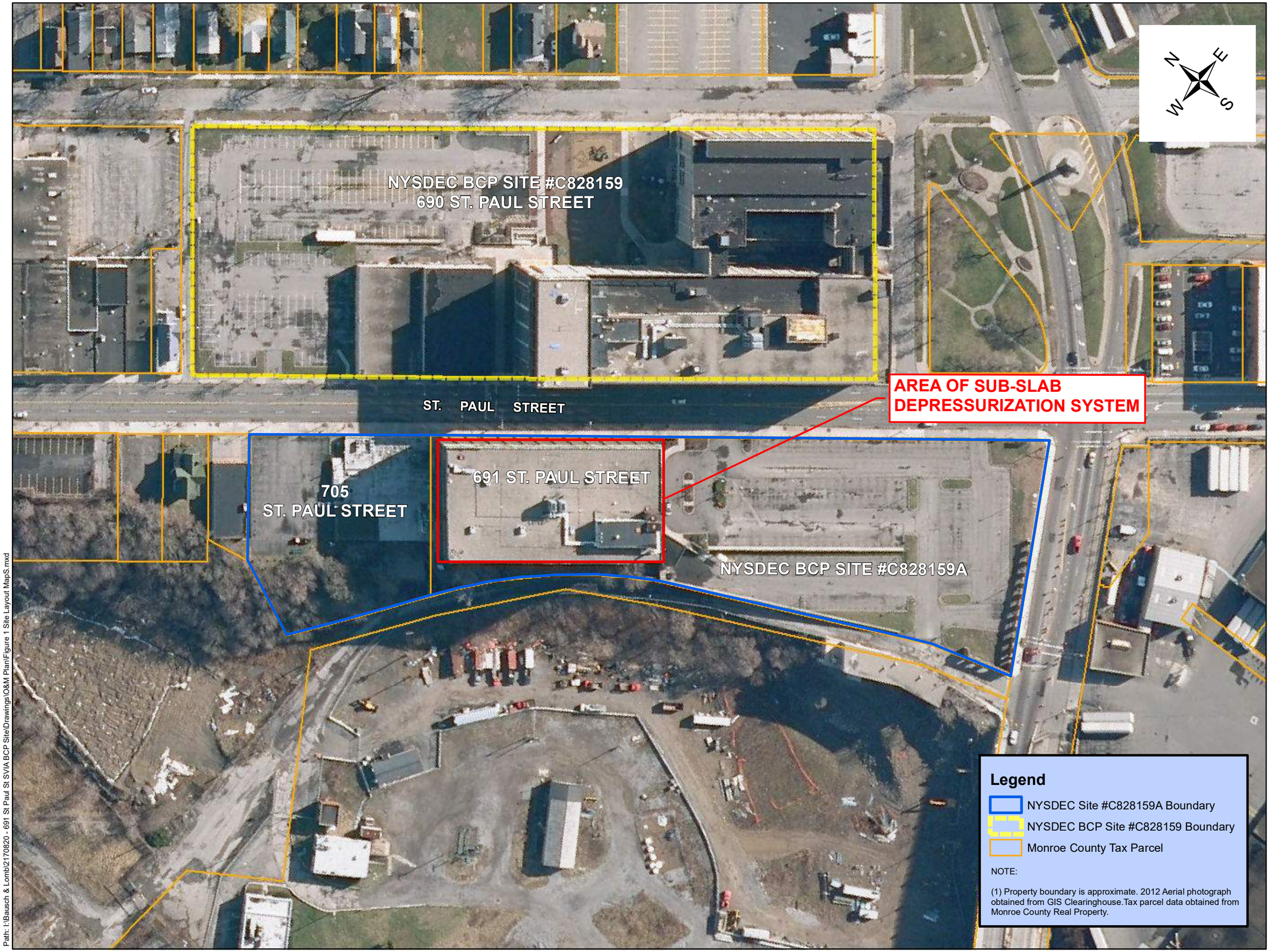
4.2 Lower Basement Sealant Operation Monitoring

Monitoring of the Drylock® paint applied to the portion of the lower basement interior eastern wall is summarized below:

Lower Basement Interior Wall Sealant Monitoring

Remedial System Component	Monitoring Parameter	Operating Range	Monitoring Schedule
Drylock® Paint Sealant	Visual Condition	Not Applicable	Annually or as-needed

FIGURES



Path: I:\Bausch & Lomb\2170820 - 691 St Paul St SVIA BCP Site\Drawings\O&M Plan\Figure 1 Site Layout Map5.mxd

LaBella
Powered by partnership.

TITLE
NYSDEC SITE NO. C828159A
SITE MAP

PROJECT
OPERATIONS AND
MAINTENANCE PLAN

NYSDEC SITE #C828159A
691 AND 705 SAINT PAUL ST
ROCHESTER, NEW YORK

CLIENT
BAUSCH AND LOMB

STATE OF NEW YORK
DANIEL P. NOLL
No. 081686
LICENSED PROFESSIONAL ENGINEER

0 25 50 100 Feet

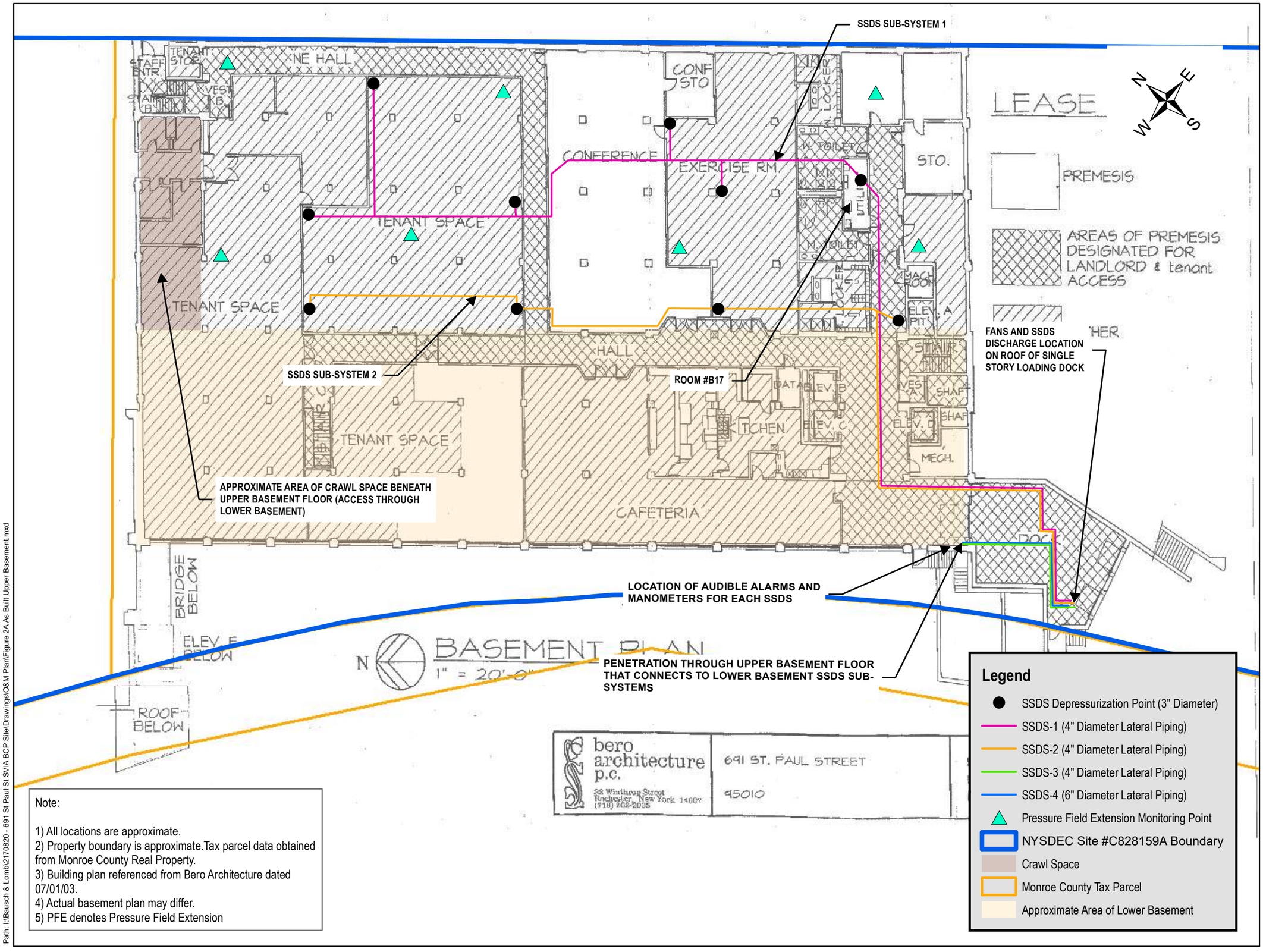
1 inch = 100 feet

Thursday, July 26, 2018

INTENDED TO PRINT 11"X17"

2170820

FIGURE 1



Note:

1) All locations are approximate.
2) Property boundary is approximate.Tax parcel data obtained from Monroe County Real Property.
3) Building plan referenced from Bero Architecture dated 07/01/03.
4) Actual basement plan may differ.
5) PFE denotes Pressure Field Extension

bero architecture p.c.
38 Winthrop Street
Rochester, New York 14607
(716) 262-2035

691 ST. PAUL STREET

95010

Legend

- SSDS Depressurization Point (3" Diameter)
- SSDS-1 (4" Diameter Lateral Piping)
- SSDS-2 (4" Diameter Lateral Piping)
- SSDS-3 (4" Diameter Lateral Piping)
- SSDS-4 (6" Diameter Lateral Piping)
- Pressure Field Extension Monitoring Point
- NYSDEC Site #C828159A Boundary
- Crawl Space
- Monroe County Tax Parcel
- Approximate Area of Lower Basement

LaBella
Powered by partnership.

TITLE
SUB-SLAB DEPRESSURIZATION AS BUILTS - UPPER BASEMENT

PROJECT
OPERATIONS AND MAINTENANCE PLAN

NYSDEC SITE #C828159A
691 AND 705 SAINT PAUL ST
ROCHESTER, NEW YORK

CLIENT
BAUSCH AND LOMB

STATE OF NEW YORK
DANIEL P. NOLL
No. 081898
LICENSED PROFESSIONAL ENGINEER

0 12.5 25 Feet

1 inch = 25 feet

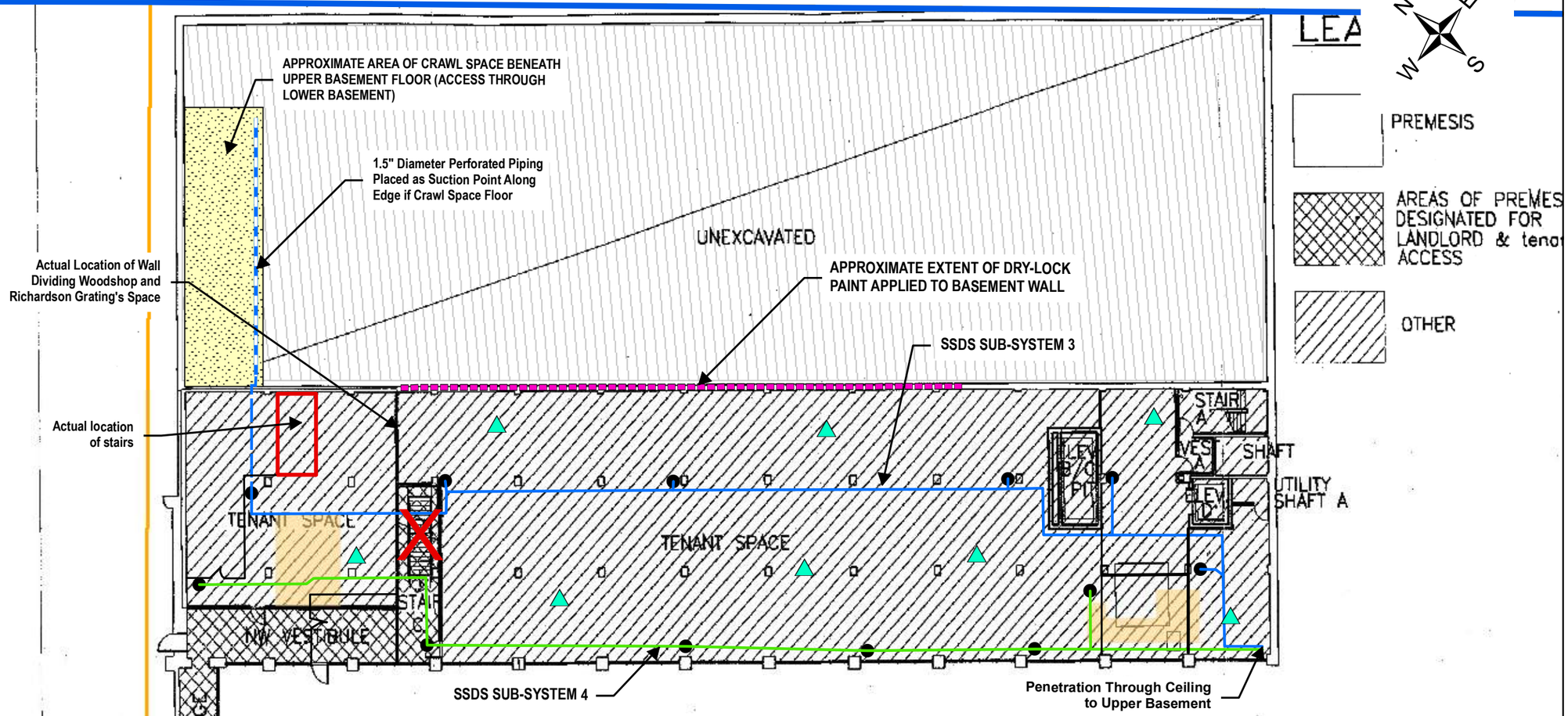
Saturday, August 18, 2018

INTENDED TO PRINT 11"X17"

2170820

FIGURE 2A

Path: I:\Bausch & Lomb\2170820 - 691 St Paul St SVIA BCP Site\Drawings\O&M Plan\Figure 2A As Built Upper Basement.mxd



Note:

1) All locations are approximate.
2) Property boundary is approximate.Tax parcel data obtained from Monroe County Real Property.
3) Building plan referenced from Bero Architecture dated 07/01/03.
4) Actual basement plan may differ.
5) PFE denotes Pressure Field Extension

bero architecture p.c.
82 Winthrop Street
Rochester, New York 14607
(716) 262-3035

691 ST. PAUL STREET

95010

Legend

- Pressure Field Exention Point
- Approxiamte Area of Drylock Paint
- SSDS-3 (4" Diameter Lateral Piping)
- SSDS-3 (1.5" Diameter Lateral Piping)
- SSDS-4 (6" Diameter Lateral Piping)
- Depressurization Point - 1.5" Diameter Perforated Piping
- Depressurization Point (3" Diameter)
- NYSDEC Site #C828159A Boundary
- Crawl Space
- Approximate Location of Subsurface Pit
- Approximate Extent of Upper Basement
- Monroe County Tax Parcel

LaBella
Powered by partnership.

TITLE
SUB-SLAB DEPRESSURIZATION AS BUILTS - LOWER BASEMENT

PROJECT
OPERATIONS AND MAINTENANCE PLAN

NYSDEC SITE #C828159A
691 AND 705 SAINT PAUL ST
ROCHESTER, NEW YORK

CLIENT
BAUSCH AND LOMB

STATE OF NEW YORK
DANIEL P. NOLL
No. 081696
LICENSED PROFESSIONAL ENGINEER

0 12.5 25 Feet

1 inch = 25 feet

Thursday, July 26, 2018

INTENDED TO PRINT 11"X17"

2170820

FIGURE 2B

Path: I:\Bausch & Lomb\2170820 - 691 St Paul St SVIA BCP Site\Drawings\O&M Plan\Figure 2B As Built Lower Basement.mxd

APPENDIX A

SSDS INFORMATION

ALARM DETAILS FOR SUB-SLAB MITIGATION SYSTEM

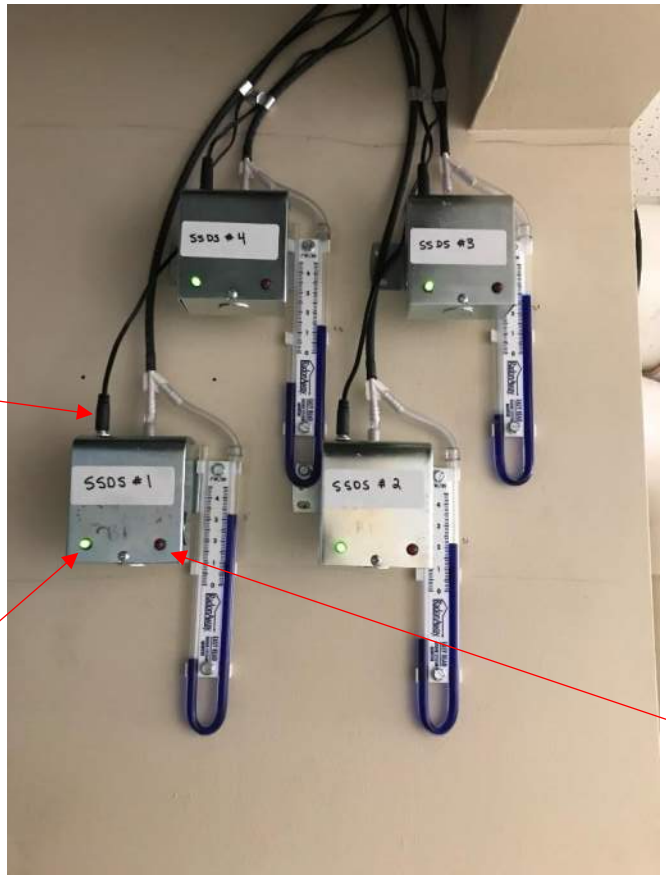
Alarms for **SSDS-1** and **SSDS-2** are associated with the **UPPER** basement. The fans for **SSDS-1** and **SSDS-2** are connected to **BREAKER #39** in Low Voltage Panel ("LVP") #2 in Room B17.

Alarms for **SSDS-3** and **SSDS-4** are associated with the **LOWER** basement. The fans for **SSDS-3** and **SSDS-4** are connected to **BREAKER #37** in Low Voltage Panel ("LVP") #2 in Room B17.

How to turn off Audible Alarms:

TO TURN OFF ALARM:
Remove Power Cord to Turn Off Audible Alarm & Reconnect Once Maintenance Has Been Completed

-Lit "Green" Light Indicates Alarm Is On and Working



-Lit "Red" Light and/or Audible Alarm Indicates Maintenance is Required. Call Contact Listed on "*NOTICE*" Sign

fantech®
a systemair company

FR Series
Inline Exhaust Fans

Fantech's versatile FR Series Inline Fans provide the ideal answer for a variety of air movement problems in residential and commercial applications. The fans feature a plastic housing constructed of UL-recognized, UV protected thermoplastic resin. This tough protective shell allows the fan to be mounted in outdoor and wet locations*. FR fans feature external rotor motors that have proven dependable year after year. Fan is fully caulked to prevent moisture from entering the housing.

Applications

FR fans can be used for multiple point exhaust applications, crawl space venting or make-up air supply, They are also widely used as booster fans to move air from one room or area to another.

Air-tight seam

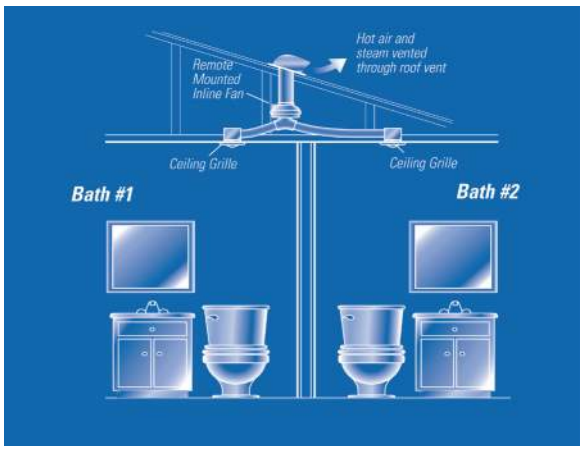
The FR series inline fans are joined via a vibration welding process. This welding process results in a fused, single-piece housing. The fused seam is inherently air tight, very strong and permanent. An air-tight fan ensures that efficiency is not lost and contaminants are not spilled due to leakage.

Features and Benefits

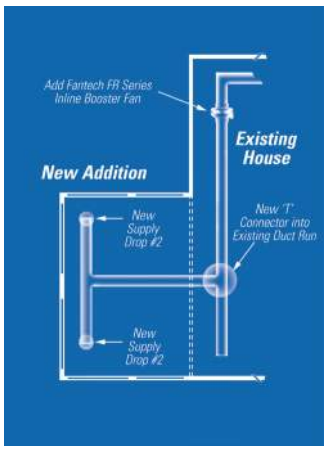
- 137 to 649 CFM
- 4" to 10" (102 to 254 mm) duct diameter
- Supplied with a mounting bracket for easy installation
- Approved for residential and commercial applications and for wet locations
- Suitable for airstream temperatures up to 140° F (60°C)
- Easy connection using external wiring box with waterproof gasket
- 100% speed controllable
- UL Listed
- 5 year warranty

Applications

Dual bath applications - commercial or residential



New addition



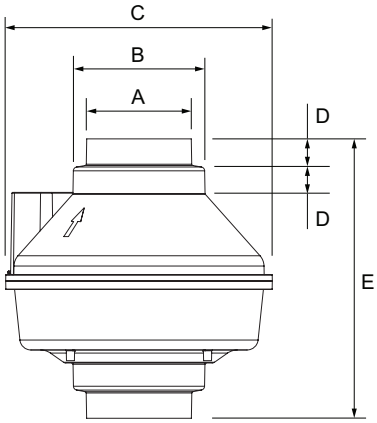
*The FR Series is not manufactured to operate with water running through the motor compartment, or to be used in applications where the fan would be buried underground. A UL-recognized waterproof conduit should be used for all outdoor applications to prevent moisture entry via knowckout in wiring.

Specification Data

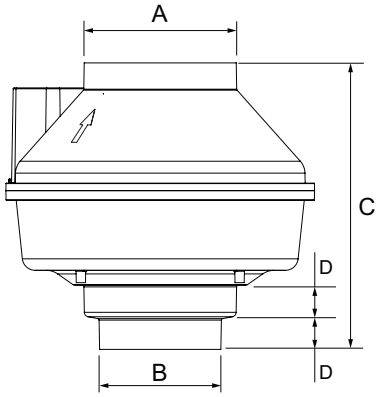
Model		Rated power	Voltage / phase	Max amps	0.0" P_s	0.2" P_s	0.4" P_s	0.6" P_s	0.8" P_s	1.0" P_s	1.5" P_s	Max P_s	Shipping weight	
		W	V / ~	A	cfm							in.wg	lbs	kg
FR100	•	19	120/1	0.17	150	122	93	62	17	-	-	0.9	6	3
FR110		80	120/1	0.72	187	167	147	128	111	87	50	2.0	7	3
FR125	•	19	120/1	0.17	171	137	96	60	-	-	-	0.85	6	3
FR140	•	61	120/1	0.53	214	190	162	132	99	46	-	1.15	8	4
FR150	•	68	120/1	0.59	323	286	243	199	160	122	38	1.7	8	4
FR160		116	120/1	0.99	341	295	249	198	160	130	76	2.0	8	4
FR200		122	120/1	1.11	408	360	308	259	213	173	72	2.14	10	5
FR225		137	120/1	1.35	429	400	366	332	297	260	168	2.48	11	5
FR250		241	120/1	2.40	649	600	553	506	454	403	297	2.58	13	6

Performance shown is for installation type D - Ducted inlet, Ducted outlet. Performance is based on actual speed of test. Performance ratings do not include the effects of appurtanances in the airstream.
• This products earned the ENERGY STAR® by meeting strict efficiency guidelines.

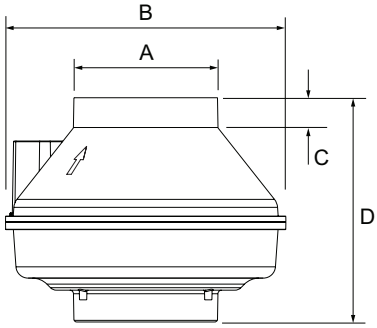
Dimensions



FR 100 / 110 / 200 / 225



FR 125



FR 140 / 150 / 160 / 250

Model	A	B	C	D	E
FR 100 / 110	3 31/32 (111)	4 31/32 (127)	10 (256)	1 (25)	10 9/16 (268)
FR 125	5 31/32 (152)	3 31/32 (101)	9 3/8 (238)	1 (25)	-
FR 200 / 225	8 (203)	10 (250)	13 1/4 (337)	1 1/2 (38)	12 1/4 (311)

Model	A	B	C	D
FR 140 / 150	5 7/8 (149)	11 1/2 (295)	1 1/4 (32)	9 1/4 (234)
FR 160	5 7/8 (149)	11 1/2 (295)	1 1/4 (32)	9 1/4 (234)
FR 250	10 (250)	13 1/4 (337)	1 1/2 (38)	9 1/4 (235)

All dimensions in inches (mm).

Accessories

FC
Mounting Clamps

FTD 7
7 Day Timer

FD 60EM
Electronic Timer

SCD
Speed Control

WC 15
Speed Control

FH 20
Dehumidistat

Systemair Inc. • January, 2017 • Art. 450399

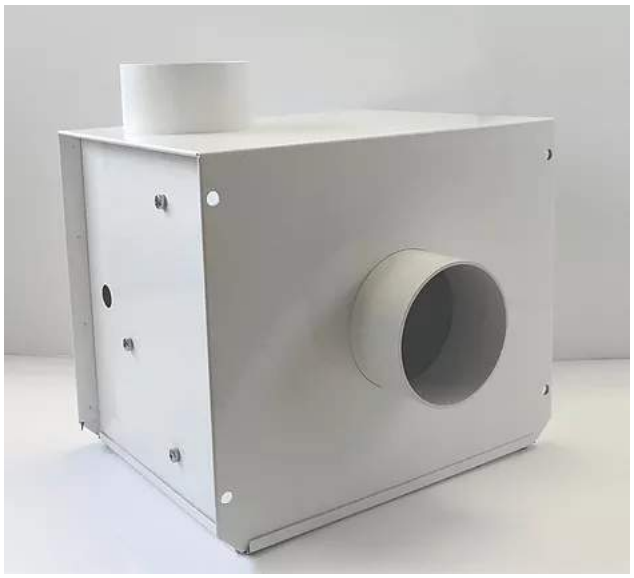
Customer Support:
Canada 800.565.3548 • CANADAsupport@fantech.net • www.fantech.net

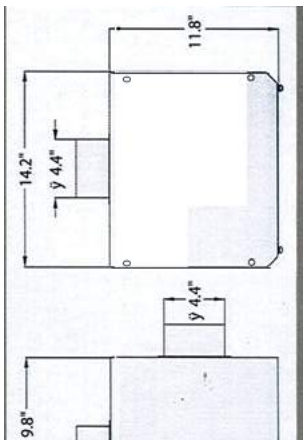
fantech®
a systemair company

Festa Radon Technologies Co.

Welcome to the home of the world's fastest growing fan manufacturer

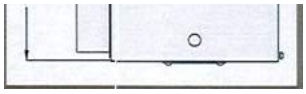
AMG Force





Performance shown is for installation type D - Ducted inlet, Ducted outlet.
Speed (rpm) shown is nominal. Performance is based on actual speed of test. Performance ratings do not include the effects of appurtenances in the air stream. The performance figures shown have been corrected to standard air density.

*We have brackets, too!



				CFM at STATIC PRESSURE in. w.g.										
Model	Volts	Watts	Max. Amps	0"	0.5"	1.0"	1.5"	2.0"	2.5"	3.0"	3.5"	4.0"	4.5"	5"

Tag your pictures of our products on social media using #Festafans and we will repost your picture!

Bringing Honesty, Integrity & Ethics to America's Radon Industry

Call Now: 1 (800) 806-7866

Festa Radon Technologies Co.

APPENDIX B

Drylock® Paint Information

Latex Base DRYLOK® Masonry Waterproofer

MANUFACTURER

UNITED GILSONITE LABORATORIES
MAILING: P.O. Box 70, Scranton, Pennsylvania, 18501
SHIPPING: 1396 Jefferson Avenue, Dunmore, Pennsylvania, 18509
TOLL FREE: 1-800-UGL-LABS (845-5227)
PHONE: 1-570-344-1202 • **FAX:** 1-570-969-7634
www.ugl.com

PRODUCT DESCRIPTION

Latex Base DRYLOK Masonry Waterproofer is the manageable way to solve water seepage problems. Reduces radon gas penetration by reducing vapor transfer.

- Guaranteed to stop water
- No pre-mixing or pre-wetting
- Resists 10 psi, equivalent to a wall of water 22 ft. high
- Fully transferable 10 year warranty
- White is tintable

BASIC USES

Formulated for waterproofing all interior, exterior, above or below grade masonry walls, cinder and concrete blocks, stucco and brick, retaining walls, fish ponds, birdbaths, basement walls and foundations.

LIMITATIONS

Latex DRYLOK may be applied over previous coatings in sound condition. but the warranty is void. **Not formulated for horizontal surfaces subject to foot traffic.**

TECHNICAL DATA

COMPOSITION:
Latex base

SHEEN:
Flat

% WEIGHT SOLIDS:
65-67%

% VOLUME SOLIDS:
48%-50%

DENSITY (LBS./US GAL.):
12.7-12.8

VISCOSITY:
120-130 KU @77°F

pH:
9.5-9.9

COLORS:
- White – ready mixed formula
- 3 ready mixed colors

DRY TIME:
- To touch: 30 minutes
- To recoat: 3 hours
- Top coat with latex paint: 24 hours

Note: Maximum cure and dry time will be prolonged when slightly humid and damp, cool conditions prevail.

CLEAN UP:
Soap and water

Dispose of contaminated absorbent, container and unused contents in accordance with local, state and federal regulations.

COVERAGE (SQ. FT./US GAL.):
- 75-100 sq. ft./gal.

Note: Actual coverage will vary depending upon application method, surface texture and porosity.

RECOMMENDED FILM THICKNESS/COAT:
- 13-21 wet mils/coat
- 6-10 dry mils/coat

FLASH POINT:
N/A

SHELF LIFE:
Four years

FREEZE/THAW:
Three cycles

CONTAINER SIZES:
One quart (US), one gallon (US), two gallon (US) and five gallon (US) containers

VOC

Does not exceed 100 g/L

TINTING

Tint to light shades with alkali-proof universal tinting colors. Do not use more than 2 fl. oz. of colorant per gallon.

SURFACE PREPARATION

Surface must be clean and free from dirt, dust, grease, oil, form release compound or paint. Patch all holes or cracks and the floor/wall joint with DRYLOK FAST PLUG® or a fast setting hydraulic cement, and smooth the patch evenly with the surface around it. Check the joint where the floor and wall meet and fill any breaks with DRYLOK FAST PLUG®.

EFFLORESCENCE, a white, powdery, crystal-like deposit visible on the masonry surface must be removed.

DRYLOK ETCH or muriatic acid, used according to manufacturer's directions, are effective efflorescence removal agents. All masonry surfaces are subject to occurrences of efflorescence.

Old paint in poor condition must be removed by wire-brushing, sand blasting or by using other suitable means

May be applied on slightly damp surfaces, but best results are obtained when applied over dry surfaces. For best waterproofing results, wait for a dry (rain-free) period.

WARNING

If you scrape, sand, or remove old paint, you may release lead dust. LEAD IS TOXIC. EXPOSURE TO LEAD DUST CAN CAUSE SERIOUS ILLNESS, SUCH AS BRAIN DAMAGE, ESPECIALLY IN CHILDREN. PREGNANT WOMEN SHOULD ALSO AVOID EXPOSURE. Wear a NIOSH-approved respirator to control lead exposure. Clean up carefully with a HEPA vacuum and a wet mop. Before you start,

DRY TIME:
30 Minutes
Recoat 3 Hours

CLEAN-UP:
Soap and Water

COVERAGE:
2 Coats Minimum

SPREAD RATE:
100 Sq. Ft./Gallon

OVER

find out how to protect yourself and your family by contacting the National Lead Information Hotline at 1-800-424-LEAD or log on to www.epa.gov/lead.

APPLICATION

STIR THOROUGHLY BEFORE AND DURING APPLICATION. DO NOT THIN. Paint only when air and surface temperatures are 50°F or higher. Apply Latex Base DRYLOK Masonry Waterproofer directly on bare masonry. Apply first coat with DRYLOK BRUSH or good quality nylon bristle brush working the WATERPROOFER into the pores of the masonry - avoid excessive brushing (see COVERAGE). APPLY TWO COATS. Allow to dry 3 hours between coats. The second coat may be applied by brush, roller or spray. For information on spray application, write UGL and ask for Spray Specification Sheet D-88 or visit www.ugl.com.

IMPORTANT

If leaking is still present after two coats, it indicates that pores or pin holes are still open. Paint these areas again. When painting the inside of concrete fish ponds and non-potable water tanks, allow Latex Base DRYLOK Masonry Waterproofer to dry at least one week, fill with water.

If desired, a high quality latex paint can be applied over DRYLOK after 24 hours for decorative purposes.

CAUTION

Contains Crystalline Silica which can cause cancer. (Risk of cancer depends on duration and level of exposure.)

Use only with adequate ventilation. Do not breathe dust, vapors or spray mist.

Vapor harmful. May affect the brain or nervous system causing dizziness, headache or nausea. Causes eye, nose and throat irritation. May be harmful if absorbed through skin. Harmful if swallowed.

NOTICE: Reports have associated repeated and prolonged occupational overexposure to solvents with permanent brain and nervous system damage. Intentional misuse by deliberately concentrating and inhaling the contents may be harmful or fatal. Ensure fresh air entry during application and drying. If you experience eye watering, headache or dizziness or if air monitoring demonstrates vapor/mist levels are above applicable limits, wear an appropriate, properly fitted respirator (NIOSH approved) during and after application. Avoid exposure to dust by wearing an appropriate (NIOSH approved) particulate respirator during sanding. Follow respirator manufacturer's directions for respirator use. Close container after each use. Do not get in eyes, on skin or clothing. Wash thoroughly after handling.

This product contains a chemical known to the State of California to cause cancer.

KEEP OUT OF REACH OF CHILDREN.
DO NOT TAKE INTERNALLY.
KEEP FROM FREEZING.

FIRST AID

EYES: Flush immediately with large amounts of water for at least 15 minutes. Consult a physician if irritation persists..
SKIN: Wash affected areas with soap and water. Consult a physician if irritation persists.
INGESTION: Give 1 or 2 glasses of water. If individual is drowsy or unconscious do not give anything by mouth. Consult a physician, medical facility or poison control center for advise about whether to induce vomiting.
INHALATION: Remove to fresh air.

For additional health and safety information please refer to the "Safety Data Sheet".

LIMITED WARRANTY

United Gilsonite Laboratories (UGL®) warrants DRYLOK® Latex Base Masonry Waterproofer, when applied according to directions on a properly prepared bare masonry surface, will provide a waterproof coating for ten (10) years from the date of application, warranty includes subsequent owners. There are no other warranties that extend beyond this warranty. This warranty shall not apply when the waterproofer fails due to improper product application, failure to follow label directions, inadequate surface preparation, cracked structural surfaces, reoccurring efflorescence or any conditions not foreseen by UGL. Two coats of DRYLOK Latex Base Waterproofer are required to assure warranted waterproofing. Label directions are as complete as possible, but cannot encompass all conditions, applications and/or surfaces. In the event that the coating fails, your remedy is limited to either replacement of the product purchased or refund of the purchase price. This is the exclusive remedy. For warranty fulfillment, return used product container and sales receipt to UGL, Technical Customer Service, 1396 Jefferson Ave., Dunmore, PA, 18509. **THIS LIMITED WARRANTY EXCLUDES ALL OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING THE WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE OR PURPOSE.** UGL will in no event be liable for any incidental or consequential damages. Some States do not allow limitations on how long an implied warranty lasts or the exclusion or limitations of incident or consequential damages, so the above limitations or exclusions may not apply to you. This warranty gives you specific legal rights, and you may also have other rights which vary from State to State.

SPECIFICATION

Latex Base DRYLOK has been tested to ASTM D-7088 Resistance to Hydrostatic Pressure and ASTM D-6904 Resistance to Wind Driven Rain.

Latex Base Waterproofer Ready Mixed Colors		White	Gray	Beige	Blue
1 QT.	4/Case	27512	n/a	n/a	n/a
1 GAL.	2/Case	27513	27613	27713	27813
2 GAL.	1/Case	27514	n/a	n/a	n/a
5 GAL.	1/Case	27515	27615	27715	27815

NOTE: COLOR SWATCHES ARE REPRESENTATIONAL ONLY.

SAFETY DATA SHEET

Issuing Date 25-Mar-2013 **Revision Date** 07-Jun-2018 **Revision Number** 2

1. IDENTIFICATION OF THE SUBSTANCE/PREPARATION AND OF THE COMPANY/UNDERTAKING

Product identifier **275, 276, 277, 278**

Product Name **Latex Base DRYLOK Masonry Waterproofer**

Other means of identification

Synonyms None

Recommended use of the chemical and restrictions on use

Recommended Use Waterproofing Sealers, Concrete/Masonry

Uses advised against No information available

Details of the supplier of the safety data sheet

Supplier Address
United Gilsonite Laboratories
1396 Jefferson Ave.
Dunmore
PA
18509
US
Phone:570-344-1202
Fax:570-969-7634
Email:sales@ugl.com
Contact Phone:570-344-1202

Emergency telephone number **(800) 424-9300 Chemtrec**

2. HAZARDS IDENTIFICATION

Classification

This chemical is considered hazardous by the 2012 OSHA Hazard Communication Standard (29 CFR 1910.1200).

Acute toxicity - Oral	Category 4
Acute toxicity - Inhalation (Vapors)	Category 4
Serious eye damage/eye irritation	Category 2
Carcinogenicity	Category 1A
Reproductive toxicity	Category 2
Specific target organ toxicity (repeated exposure)	Category 2

GHS Label elements, including precautionary statements

Emergency Overview

Signal word Danger

Hazard statements
Harmful if swallowed
Harmful if inhaled
Causes serious eye irritation
May cause cancer
Suspected of damaging fertility or the unborn child
May cause damage to organs through prolonged or repeated exposure

Appearance Color **Physical State** Liquid **Odor** Ammonia

Precautionary Statements - Prevention
Obtain special instructions before use
Do not handle until all safety precautions have been read and understood
Use personal protective equipment as required
Wash face, hands and any exposed skin thoroughly after handling
Do not eat, drink or smoke when using this product
Use only outdoors or in a well-ventilated area
Do not breathe dust/fume/gas/mist/vapors/spray

Precautionary Statements - Response
IF exposed or concerned: Get medical advice/attention

Inhalation
IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing

Ingestion
IF SWALLOWED: Call a POISON CENTER or doctor/physician if you feel unwell
Rinse mouth

Precautionary Statements - Storage
Store locked up

Precautionary Statements - Disposal
Dispose of contents/container to an approved waste disposal plant

Hazards not otherwise classified (HNOC)
Not Applicable

Other information
- Harmful to aquatic life with long lasting effects

Interactions with Other Chemicals No information available.

3. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical Name	CAS-No	Weight %	Trade Secret
Quartz	14808-60-7	15 - 40	*
Limestone	1317-65-3	15 - 40	*
Mica	12001-26-2	5 - 10	*
Diethylene glycol monomethyl ether	111-77-3	3 - 7	*
Titanium dioxide	13463-67-7	3 - 7	*

* The exact percentage (concentration) of composition has been withheld as a trade secret

4. FIRST AID MEASURES

First aid measures

General Advice Show this safety data sheet to the doctor in attendance. Immediate medical attention is required.

Eye Contact If symptoms persist, call a physician. Rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes. Remove contact lenses, if applicable, and continue flushing. Keep eye wide open while rinsing. Do not rub affected area.

Skin Contact Wash skin with soap and water. In the case of skin irritation or allergic reactions see a physician.

Inhalation Move to fresh air. If symptoms persist, call a physician. If breathing has stopped, contact emergency medical services immediately. If not breathing, give artificial respiration. Avoid breathing dust.

Ingestion Do NOT induce vomiting. Rinse mouth. Clean mouth with water and afterwards drink plenty of water. Never give anything by mouth to an unconscious person. Get medical attention.

Protection of First-aiders Avoid contact with skin, eyes and clothing. Use personal protective equipment. For personal protection see Section 8. Ensure that medical personnel are aware of the material(s) involved, and take precautions to protect themselves. Avoid breathing vapors or mists

Most important symptoms and effects, both acute and delayed

Most Important Symptoms/Effects Burning sensation. Coughing and/ or wheezing. Difficulty in breathing.

Indication of any immediate medical attention and special treatment needed

Notes to Physician Treat symptomatically.

5. FIRE-FIGHTING MEASURES

Suitable Extinguishing Media
Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.

Unsuitable Extinguishing Media
CAUTION: Use of water spray when fighting fire may be inefficient.

Specific Hazards Arising from the Chemical
No information available

Uniform Fire Code Irritant: Liquid
Toxic: Liquid

Hazardous Combustion Products
Carbon oxides.

Explosion Data
Sensitivity to Mechanical Impact No

Sensitivity to Static Discharge No

Protective Equipment and Precautions for Firefighters
As in any fire, wear self-contained breathing apparatus pressure-demand, MSHA/NIOSH (approved or equivalent) and full protective gear.

6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures

Personal Precautions Avoid contact with skin, eyes and clothing. Use personal protective equipment. Ensure adequate ventilation. Evacuate personnel to safe areas. Avoid breathing vapors or mists

Other Information Refer to protective measures listed in Sections 7 and 8.

Environmental precautions

Environmental Precautions Refer to protective measures listed in Sections 7 and 8.

Methods and material for containment and cleaning up

Methods for Containment Prevent further leakage or spillage if safe to do so.

Methods for Cleaning Up Dam up. Soak up with inert absorbent material. Pick up and transfer to properly labeled containers.

7. HANDLING AND STORAGE

Precautions for safe handling

Handling Handle in accordance with good industrial hygiene and safety practice. Avoid contact with skin, eyes and clothing. Do not eat, drink or smoke when using this product. Remove and wash contaminated clothing before re-use. Avoid breathing vapors or mists. Ensure adequate ventilation. In case of insufficient ventilation, wear suitable respiratory equipment.

Conditions for safe storage, including any incompatibilities

Storage Keep containers tightly closed in a dry, cool and well-ventilated place. Keep out of the reach of children. Store locked up.

Incompatible Products None known based on information supplied.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Control parameters

Exposure Guidelines

Chemical Name	ACGIH TLV	OSHA PEL	NIOSH IDLH
Quartz 14808-60-7	TWA: 0.025 mg/m^3 respirable fraction	TWA: 0.1 mg/m^3 (vacated)	IDLH: 50 mg/m^3 respirable dust TWA: 0.05 mg/m^3 respirable dust
Limestone 1317-65-3	-	TWA: 15 mg/m^3 TWA: 5 mg/m^3 (vacated) TWA: 15 mg/m^3 (vacated) TWA: 5 mg/m^3	TWA: 5 mg/m^3 respirable dust TWA: 10 mg/m^3 total dust
Mica 12001-26-2	TWA: 3 mg/m^3	TWA: 20 mppcf (<1% crystalline silica) 3 mg/m^3 (vacated)	IDLH: 1500 mg/m^3 containing <1% quartz TWA: 3 mg/m^3 respirable dust
Titanium dioxide 13463-67-7	TWA: 10 mg/m^3	TWA: 15 mg/m^3 total dust (vacated) TWA: 10 mg/m^3 total dust	IDLH: 5000 mg/m^3

ACGIH TLV: American Conference of Governmental Industrial Hygienists - Threshold Limit Value. OSHA PEL: Occupational Safety and Health Administration - Permissible Exposure Limits. NIOSH IDLH: Immediately Dangerous to Life or Health.

Other Exposure Guidelines Vacated limits revoked by the Court of Appeals decision in AFL-CIO v. OSHA, 965 F.2d 962 (11th Cir., 1992).

Appropriate engineering controls

Engineering Measures Showers
Eyewash stations
Ventilation systems

Individual protection measures, such as personal protective equipment

Eye/Face Protection If splashes are likely to occur, wear: Safety glasses with side-shields. None required for consumer use.

Skin and Body Protection Wear protective gloves/clothing.

Respiratory Protection No protective equipment is needed under normal use conditions. If exposure limits are exceeded or irritation is experienced, ventilation and evacuation may be required.

Hygiene Measures Handle in accordance with good industrial hygiene and safety practice. Do not eat, drink or smoke when using this product. Avoid contact with skin, eyes and clothing. Wear suitable gloves and eye/face protection. Wash hands before breaks and immediately after handling the product.

9. PHYSICAL AND CHEMICAL PROPERTIES

Physical and Chemical Properties

Physical State	Liquid		
Appearance	Color	**Odor**	Ammonia
Color	No information available	**Odor Threshold**	No information available

Property	**Values**	**Remarks/ Method**
pH	9.5	None known
Melting/freezing point	No data available	None known
Boiling Point/Range	100°C / 212°F	None known
Flash Point	5001C / 9034F	None known
Evaporation rate	No data available	None known
Flammability (solid, gas)	No data available	None known
Flammability Limits in Air		
Upper flammability limit	No data available	
Lower flammability limit	No data available	
Vapor pressure	No data available	None known
Vapor density	No data available	None known
Specific Gravity	No data available	None known
Water Solubility	Soluble in water.	None known
Solubility in other solvents	No data available	None known
Partition coefficient: n-octanol/water	No data available	None known
Autoignition temperature	No data available	None known
Decomposition temperature	No data available	None known
Kinematic viscosity	No data available	None known
Dynamic viscosity	No data available	None known
Explosive Properties	No data available	
Oxidizing Properties	No data available	

Other Information

Softening Point	No data available
VOC Content (%)	No data available

10. STABILITY AND REACTIVITY

Reactivity
No data available.

Chemical stability
Stable under recommended storage conditions.

Possibility of Hazardous Reactions
None under normal processing.

Hazardous Polymerization
Hazardous polymerization does not occur.

Conditions to avoid
Excessive heat.

Incompatible materials
None known based on information supplied.

Hazardous Decomposition Products
Carbon oxides.

11. TOXICOLOGICAL INFORMATION

11. TOXICOLOGICAL INFORMATION

Information on likely routes of exposure

Product Information

Inhalation There is no data available for this product. May cause irritation of respiratory tract. Harmful by inhalation. (based on components)

Eye Contact There is no data available for this product. Expected to be an irritant based on components. May cause redness, itching, and pain. May cause temporary eye irritation.

Skin Contact There is no data available for this product. May cause irritation. Prolonged contact may cause redness and irritation.

Ingestion There is no data available for this product. Ingestion may cause irritation to mucous membranes. Ingestion may cause gastrointestinal irritation, nausea, vomiting and diarrhea. Harmful if swallowed. (based on components). May be harmful if swallowed.

Chemical Name	LD50 Oral	LD50 Dermal	LC50 Inhalation
Quartz 14808-60-7	= 500 mg/kg (Rat)	-	-
Titanium dioxide 13463-67-7	> 10000 mg/kg (Rat)	-	-

Information on toxicological effects

Symptoms May cause redness and tearing of the eyes. Coughing and/ or wheezing.

Delayed and immediate effects as well as chronic effects from short and long-term exposure

Sensitization No information available.

Mutagenic Effects No information available.

Carcinogenicity The table below indicates whether each agency has listed any ingredient as a carcinogen.

Chemical Name	ACGIH	IARC	NTP	OSHA
Quartz 14808-60-7	A2	Group 1	Known	X
Titanium dioxide 13463-67-7		Group 2B		X

ACGIH: (American Conference of Governmental Industrial Hygienists)
A2 - Suspected Human Carcinogen
IARC: (International Agency for Research on Cancer)
Group 1 - Carcinogenic to Humans
Group 2B - Possibly Carcinogenic to Humans
Group 3 - Not Classifiable as to Carcinogenicity in Humans
NTP: (National Toxicity Program)
Known - Known Carcinogen
OSHA: (Occupational Safety & Health Administration)
X - Present

Reproductive Toxicity Contains a known or suspected reproductive toxin.
STOT - single exposure No information available.
STOT - repeated exposure Causes damage to organs through prolonged or repeated exposure. Based on classification criteria from the 2012 OSHA Hazard Communication Standard (29 CFR 1910.122), this product has been determined to cause systemic target organ toxicity from chronic or repeated exposure. (STOT RE). If this product is a mixture, the classification is not based on toxicology studies for this product, but is based solely on toxicology studies for ingredients found within this product. More detailed substance and/or ingredient information may be provided in the other sections of this SDS

Chronic Toxicity	No known effect based on information supplied. Contains a known or suspected carcinogen Contains a known or suspected reproductive toxin.. Possible risks of irreversible effects. Avoid repeated exposure. Prolonged exposure may cause chronic effects. Titanium dioxide has been classified by the International Agency for Research on Cancer (IARC) as possibly carcinogenic to humans (Group 2B) by inhalation. May cause adverse liver effects.
Target Organ Effects	Eyes. Respiratory system. Skin. Gastrointestinal tract (GI). Reproductive system. Lungs. Kidney. Liver.
Aspiration Hazard	No information available.

Numerical measures of toxicity Product Information

The following values are calculated based on chapter 3.1 of the GHS document
ATEmix (oral)
170.00 mg/kg
ATEmix (inhalation-vapor)
10.90ATEmix

12. ECOLOGICAL INFORMATION

Ecotoxicity

Harmful to aquatic life with long lasting effects.

Persistence and Degradability
No information available.

Bioaccumulation
No information available.

Other Adverse Effects
No information available.

13. DISPOSAL CONSIDERATIONS

Waste treatment methods

Waste Disposal Methods	This material, as supplied, is not a hazardous waste according to Federal regulations (40 CFR 261). This material could become a hazardous waste if it is mixed with or otherwise comes in contact with a hazardous waste, if chemical additions are made to this material, or if the material is processed or otherwise altered. Consult 40 CFR 261 to determine whether the altered material is a hazardous waste. Consult the appropriate state, regional, or local regulations for additional requirements.
Contaminated Packaging	Dispose of in accordance with local regulations.
California Hazardous Waste Codes	331

14. TRANSPORT INFORMATION

DOT	NOT REGULATED
Proper Shipping Name	NON REGULATED
Hazard Class	N/A
TDG	Not regulated

14. TRANSPORT INFORMATION

MEX Not regulated

ICAO Not regulated

IATA Not regulated
Proper Shipping Name NON REGULATED
Hazard Class N/A

IMDG/IMO Not regulated
Hazard Class N/A

RID Not regulated

ADR Not regulated

ADN Not regulated

15. REGULATORY INFORMATION

International Inventories

TSCA Complies
DSL All components are listed either on the DSL or NDSL.

TSCA - United States Toxic Substances Control Act Section 8(b) Inventory
DSL/NDSL - Canadian Domestic Substances List/Non-Domestic Substances List

U.S. Federal Regulations

SARA 313
Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product contains a chemical or chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372:

Chemical Name	CAS-No	Weight %	SARA 313 - Threshold Values %
Diethylene glycol monomethyl ether - 111-77-3	111-77-3	3 - 7	1.0

SARA 311/312 Hazard Categories

Acute Health Hazard	Yes
Chronic Health Hazard	Yes
Fire Hazard	No
Sudden Release of Pressure Hazard	No
Reactive Hazard	No

Clean Water Act
This product does not contain any substances regulated as pollutants pursuant to the Clean Water Act (40 CFR 122.21 and 40 CFR 122.42).

CERCLA
This material, as supplied, does not contain any substances regulated as hazardous substances under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (40 CFR 302) or the Superfund Amendments and Reauthorization Act (SARA) (40 CFR 355). There may be specific reporting requirements at the local, regional, or state level pertaining to releases of this material.

U.S. State Regulations

California Proposition 65
This product does not contain any Proposition 65 chemicals:

Chemical Name- N/A	California Prop. 65

U.S. State Right-to-Know Regulations

Chemical Name	New Jersey	Massachusetts	Pennsylvania
Mica 12001-26-2	X	X	X
Limestone 1317-65-3	X	X	X
Titanium dioxide 13463-67-7	X	X	X
Quartz 14808-60-7	X	X	X

International Regulations

Mexico - Grade Slight risk, Grade 1

Chemical Name	Carcinogen Status	Exposure Limits
Quartz		Mexico: TWA= 0.1 mg/m^3
Limestone		Mexico: TWA= 10 mg/m^3 Mexico: STEL= 20 mg/m^3
Mica		Mexico: TWA= 3 mg/m^3
Titanium dioxide		Mexico: TWA= 10 mg/m^3 Mexico: STEL= 20 mg/m^3

Canada

WHMIS Hazard Class

D2A Very toxic materials

16. OTHER INFORMATION

NFPA **Health Hazard** 3 **Flammability** 0 **Instability** 0 **Physical and Chemical Hazards** -

HMIS **Health Hazard** 3 * **Flammability** 0 **Physical Hazard** 0 **Personal Protection** X

Chronic Hazard Star Legend **Indicates a chronic health hazard.*

Prepared By

Product Stewardship
23 British American Blvd.
Latham, NY 12110
1-800-572-6501

Issuing Date 25-Mar-2013

Revision Date 07-Jun-2018

Revision Note No information available

General Disclaimer

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text

End of Safety Data Sheet

APPENDIX C

SSDS Monitoring Forms

PRESSURE FIELD EXTENSION MONITORING POINT INSPECTION FORM

PROJECT NAME: NYSDEC SITE NO. C828159A, 691 & 705 ST. PAUL STREET OFF-SITE

LOCATION: 691 ST. PAUL STREET, ROCHESTER, NEW YORK

LABELLA PROJECT #

LABELLA REP:

DATE:

WEATHER:

LOCTION	VACUUM READING (INCHES OF WATER)	NOTES
MP-1		
MP-2		
MP-3		
MP-4		
MP-5		
MP-6		
MP-7		
MP-8		
MP-9		
MP-10		
MP-11		
MP-12		
MP-13		
MP-14		
MP-15		

LaBella
Powered by partnership.

300 STATE STREET, SUITE 201

ROCHESTER, NEW YORK 14614

PHONE: (585) 454-6110

FAX: (585-454-3066

SUB SLAB DEPRESSURIZATION SYSTEM INSPECTION FORM

PROJECT NAME: NYSDEC SITE NO. C828159A, 691 & 705 ST. PAUL STREET OFF-SITE

LOCTION: 691 ST. PAUL STREET, ROCHESTER, NEW YORK

PROJECT NO.:

INSPECTED BY:

DATE:

WEATHER:

COMPONENT	FAN				COMMENTS
	SSDS FAN #1	SSDS FAN #2	SSDS FAN #3	SSDS FAN #4	
OPERATIONAL	YES / NO	YES / NO	YES / NO	YES / NO	
VACUUM GAUGE READING (IN. H20)					
OPEN BALL VALVE ON TRAP(S)/DRAIN WATER	YES / NO	Not Applicable	Not Applicable	Not Applicable	
ALARM CHECK	YES / NO	YES / NO	YES / NO	YES / NO	
SSDS PIPING CHECK	YES / NO	YES / NO	YES / NO	YES / NO	
SSDS FAN CHECK	YES / NO	YES / NO	YES / NO	YES / NO	
CONDENSATE WATER CHECK	YES / NO	YES / NO	YES / NO	YES / NO	
INDOOR AIR SAMPLES COLLECTED	YES / NO				
CONDITION OF DRYLOCK® PAINT	SATISFACTORY / UNSTISFACTORY				
SIGNIFICANT CHIPS OF DRYLOCK® PAINT	YES / NO				

SUB-SLAB DEPRESSURIZATION SYSTEM INSPECTION FORM

PROJECT NAME: NYSDEC SITE NO. C828159A, 691 & 705 ST. PAUL STREET OFF-SITE

LOCATION: 691 ST. PAUL STREET, ROCHESTER, NEW YORK

LABELLA PROJECT #

LABELLA REP:

DATE:

WEATHER:

LOCTION	OPERATIONAL	VACUUM READING (INCHES OF WATER)	ALARM WORKING
SSDS FAN #1	YES / NO		YES / NO
SSDS FAN #2	YES / NO		YES / NO
SSDS FAN #3	YES / NO		YES / NO
SSDS FAN #4	YES / NO		YES / NO

NOTES:

AIR SAMPLING FIELD REPORT

AIR SAMPLING POINT

Project: NYSDEC Site #C828159A
Site Location: 691 Saint Paul St., Rochester, NY
Client: _____

LaBella Project No.: _____
LaBella Representative: _____
Weather: _____

General Information

Sample Canister Location: _____

Sample Source: _____ Indoor Air _____ Sub-Slab _____ Exterior Ambient Air _____ Exterior Soil Gas

_____ Other

Shipping Date: _____ Laboratory: Centek

Canister Type: _____ 1.0 L Summa Canister _____ 6.0 L Summa Canister Other (specify): _____

Canister Serial No.: _____ Flow Controller Serial No.: _____

Time	Vacuum Reading (inHg)	Notes

Sampling Information

Sample Date: _____ Sampler: _____

Sample Height / Depth: _____

	Start	Stop
Canister Pressure Gauge Reading:		
Sample Time:		

Comments:

APPENDIX 4

QUALITY ASSURANCE PROJECT PLAN

Quality Assurance Project Plan

Location:

NYSDEC Site #C828159A
691 and 705 St. Paul Street
Rochester, New York

Prepared for:

Bausch & Lomb
1400 North Goodman Street
Rochester, New York 14609

LaBella Project No. 2170820

July 23, 2018

LaBella
Powered by partnership.

300 State Street, Suite 201 | Rochester, NY 14614 | p 585-454-6110 | f 585-454-3066

Table of Contents

TABLE OF CONTENTS

Continued

1.0 INTRODUCTION

LaBella's Assurance Project Plan (QAPP) is an integral part of its approach to environmental investigations. By maintaining a rigorous QC program, our firm is able to provide accurate and reliable data. QC also provides safe working conditions for all on-site workers.

The Quality Control program contains procedures, which provide for collected data to be properly evaluated, and which document that quality control procedures have been followed in the collection of samples. The quality control program represents the methodology and measurement procedures used in collecting quality field data. This methodology includes the proper use of equipment, documentation of sample collection, and sample handling practices.

Procedures used in the firm's Quality Control program are compatible with federal, state, and local regulations, as well as, appropriate professional and technical standards.

This QC program has been organized into the following areas:

- QC Objectives and Checks
- Field Equipment, Handling, and Calibration
- Sampling Techniques
- Sample Handling and Packaging

It should be noted that the Soil Gas Sampling Work Plan (SGS) Work Plan may have project specific details that will differ from the procedures in this QC program. In such cases, the SGS Work Plan should be followed (subsequent to regulatory approval).

2.0 QUALITY CONTROL OBJECTIVES

The United States Environmental Protection Agency (EPA) has identified five general levels of analytical data quality as being potentially applicable to site investigations conducted under CERCLA. These levels are summarized below:

- **Level I** - Field screening. This level is characterized by the use of portable instruments, which can provide real-time data to assist in the optimization of sampling point locations and for health and safety support. Data can be generated regarding the presence or absence of certain contaminants (especially volatiles) at sampling locations.
- **Level II** - Field analysis. This level is characterized by the use of portable analytical instruments, which can be used on site or in mobile laboratories stationed near a site (close-support labs). Depending upon the types of contaminants, sample matrix, and personnel skills, qualitative and quantitative data can be obtained.
-

- **Level III** - Laboratory analysis using methods other than the Contract Laboratory Program (CLP) Routine Analytical Services (RAS). This level is used primarily in support of engineering studies using standard EPA-approved procedures. Some procedures may be equivalent to CLP RAS, without the CLP requirements for documentation.

- **Level IV** - CLP Routine Analytical Services. This level is characterized by rigorous QC protocols and documentation and provides qualitative and quantitative analytical data. Some regions have obtained similar support via their own regional laboratories, university laboratories, or other commercial laboratories.
- **Level V** - Non-standard methods. Analyses, which may require method modification and/or development. CLP Special Analytical Services (SAS) are considered Level V.

Unless stated otherwise, all data will be generated in accordance with Level IV. When CLP methodology is not available, federal and state approved methods will be utilized. Level III will be utilized, as necessary, for non-CLP RAS work which may include ignitability, corrosivity, reactivity, EP toxicity, and other state approved parameters for characterization. Level I will be used throughout the SGS for health and safety monitoring activities.

All measurements will be made to provide that analytical results are representative of the media and conditions measured. Unless otherwise specified, all data will be calculated and reported in units consistent with other organizations reporting similar data to allow comparability of data bases among organizations. Data will be reported in µg/L and mg/L for aqueous samples, and µg/kg and mg/kg (dry weight) for soils, or otherwise as applicable.

The characteristics of major importance for the assessment of generated data are accuracy, precision, completeness, representativeness, and comparability. Application of these characteristics to specific projects is addressed later in this document. The characteristics are defined below.

2.1 Accuracy

Accuracy is the degree of agreement of a measurement or average of measurements with an accepted reference or "true" value and is a measure of bias in the system.

2.2 Precision

Precision is the degree of mutual agreement among individual measurements of a given parameter.

2.3 Completeness

Completeness is a measure of the amount of valid data obtained from a measurement system compared to the amount expected to be obtained under correct normal conditions.

2.4 Representativeness

Representativeness expresses the degree to which data accurately and precisely represents a characteristic of a population, parameter variations at a sampling point, a process condition, or an environmental condition.

Careful choice and use of appropriate methods in the field will ensure that samples are representative. This is relatively easy with water or air samples since these components are homogeneously dispersed. In soil and sediment, contaminants are unlikely to be evenly distributed, and thus it is important for the sampler and analyst to exercise good judgment when removing a sample.

2.5 Comparability

Comparability expresses the confidence with which one data set can be compared to another. The data sets may be inter- or intra- laboratory.

3.0 MEASUREMENT OF DATA QUALITY

3.1. Accuracy

Accuracy of a particular analysis is measured by assessing its performance with "known" samples. These "knowns" take the form of EPA standard reference materials, or laboratory prepared solutions of target analytes spiked into a pure water or sample matrix. In the case of GC or GC/MS analyses, solutions of surrogate compounds, which can be spiked into every sample and are designed to mimic the behavior of target analytes without interfering with their determination, are used.

In each case the recovery of the analyte is measured as a percentage, correcting for analytes known to be present in the original sample if necessary, as in the case of a matrix spike analysis. For EPA supplied known solutions, this recovery is compared to the published data that accompany the solution.

For the firm's prepared solutions, the recovery is compared to EPA-developed data or the firm's historical data as available. For surrogate compounds, recoveries are compared to EPA CLP acceptable recovery tables.

If recoveries do not meet required criteria, then the analytical data for the batch (or, in the case of surrogate compounds, for the individual sample) are considered potentially inaccurate. The analyst or his supervisor must initiate an investigation of the cause of the problem and take corrective action. This can include recalibration of the instrument, reanalysis of the QC sample, reanalysis of the samples in the batch, or flagging the data as suspect if the problems cannot be resolved. For highly contaminated samples, recovery of the matrix spike may depend on sample homogeneity. As a rule, analyses are not corrected for recovery of matrix spike or surrogate compounds.

3.2. Precision

Precision of a particular analysis is measured by assessing its performance with duplicate or replicate samples. Duplicate samples are pairs of samples taken in the field and transported to the laboratory as distinct samples. Their identity as duplicates is sometimes not known to ASC and usually not known to bench analysts, so their usefulness for monitoring analytical precision at bench level is limited. For most purposes, precision is determined by the analysis of replicate pairs (i.e., two samples prepared at the laboratory from one original sample). Often in replicate analysis the sample chosen for replication does not contain target analytes so that quantitation of precision is impossible.

For EPA CLP analyses, replicate pairs of spiked samples, known as matrix spike/matrix spike duplicate samples, are used for precision studies. This has the advantage that two real positive values for a target analyte can be compared.

Precision is calculated in terms of Relative Percent Difference (RPD).

- Where X_1 and X_2 represent the individual values found for the target analyte in the two replicate analyses or in the matrix spike/matrix spike duplicate analyses.
- RPDs must be compared to the method RPD for the analysis. The analyst or his supervisor must investigate the cause of RPDs outside stated acceptance limits. This may include a visual inspection of the sample for non homogeneity, analysis of check samples, etc. Follow-up action may include sample reanalysis or flagging of the data as suspect if problems cannot be resolved.
- During the data review and validation process (see Section 9), field duplicate RPDs are assessed as a measure of the total variability of both field sampling and laboratory analysis.

3.3. Completeness

Completeness for each parameter is calculated as follows:

- The firm's target value for completeness for all parameters is 100%. A completeness value of 95% will be considered acceptable. Incomplete results will be reported to the site managers. In planning the field sample collection, the site manager will plan to collect field duplicates from identified critical areas. This procedure should assure 100% completeness for these areas.

3.4. Representativeness

The characteristic of representativeness is not quantifiable. Subjective factors to be taken into account are as follows:

- The degree of homogeneity of a site;
- The degree of homogeneity of a sample taken from one point in a site; and
- The available information on which a sampling plan is based.

To maximize representativeness of results, sampling techniques and sample locations will be carefully chosen so that they provide laboratory samples representative of the site and the specific area. Within the laboratory, precautions are taken to extract from the sample bottle an aliquot representative of the whole sample. This includes premixing the sample and discarding pebbles from soil samples.

4.0 QC TARGETS

Target values for detection limit, percent spike recovery and percent "true" value of known check standards, and RPD of duplicates/replicates are included in the QAPP, Analytical Procedures. Note that tabulated values are not always attainable. Instances may arise where high sample concentrations, non homogeneity of samples, or matrix interferences preclude achievement of target detection limits or other quality control criteria. In such instances, the firm will report reasons for deviations from these detection limits or noncompliance with quality control criteria.

5.0 SAMPLING PROCEDURES

5.1 Ambient Air Sampling

This section describes the sampling procedures to be utilized for each environmental medium that will be collected and analyzed in accordance with appropriate state and federal requirements. All procedures described are consistent with EPA sampling procedures as described in SW-846, Update V, dated August
2015 and New York State Department of Health's *Guidance for Evaluating Soil Vapor Intrusion in the State of New York dated October 2006*.

To obtain representative samples and to minimize possible discrepancies, air samples should be collected in the following manner at all locations:

- The protective brass plug from each canister will be removed and the pre-calibrated flow controller will be connected to the canister. The canister will be connected to the soil gas sampling probe via inert tubing (e.g., polyethylene, stainless steel, or Teflon®).
- The identification numbers for the canisters and flow controllers will be recorded along with the. initial canister pressures on the vacuum gauge. Canisters with a significantly different pressure than originally recorded by the testing laboratory should not be used for sampling.
- The flow controller valve will be completely opened and the time that the valve was opened (beginning of sampling) will be recorded.
- Sample collection will be stopped after the scheduled duration of sample collection (approximately 8 hours) and care will be taken to make sure that the canister still has a minimum amount of vacuum remaining. If there is no vacuum remaining, the sample will be rejected and should be collected again in a new canister.
- The final vacuum pressure will be recorded and the flow controller valve will be closed completely. The date and time sample collection was stopped will be recorded.
- The flow controller from the canister will be removed and the protective brass plugs will be replaced.
- Labels/tags (sample name, time/date of sampling, etc.) will be attached to the canisters as directed by the laboratory and placed in the packaging provided by the laboratory.
- The information required for each sample will be entered on the chain of custody form. Copies of the chain-of-custody form will be included in the shipping packaging, as directed by the laboratory. The field manager will retain a copy of the chain of custody for the project file.
- The samples will be shipped to the laboratory within one business day of sample collection via overnight delivery.

- In addition to the indoor air samples, one exterior ambient air sample will also be collected from the apparent upwind location. The ambient air sample will be collected from about 3 to 5ft above the ground using a Summa Canister over the same approximate sampling period.

In some cases, weather conditions may present certain limitations for the sampling. When soil vapor samples are collected, the following actions will be taken to document local conditions during sampling that may influence interpretation of the results:

- Weather conditions (e.g., precipitation and outdoor temperature) should be noted for the past 24 to 48 hours; and
- Any pertinent observations should be recorded, such as odors and readings from field instrumentation.

6.0 SURVEYING

Coordinates and elevations will be established for each soil gas sampling point. Elevations to the closest 0.01 foot shall be used for the survey. These elevations shall be referenced to a regional, local, or project-specific datum. USGS benchmarks will be used whenever available. The location, identification, coordinates, and elevations of the wells will be plotted on maps with a scale large enough to show their location with reference to other structures at each site. Interior locations will be located via tape measure and elevations based on tape measure from exterior grade, to the extent practicable.

7.0 GEOLOGIC LOGGING AND SAMPLING

At each investigative location, the boring will be advanced through overburden using either a drill rig and hollow-stem auger or direct push technology; soils will be visually inspected for stains and monitored with a PID to help determine potential for vertical migration of contaminants. Soil samples will be collected continuously. The sampling device will be decontaminated according to procedures outlined in the Decontamination section of this document. Recovered soil will be screened in the field for volatile organic vapors using a PID, classified in accordance with Unified Soil Classification System (USCS) specifications, and logged.

All samples will be screened with a PID during collection. The headspace of all samples taken in the field will be screened using USEPA method 3810.

8.0 MANAGEMENT OF INVESTIGATIVE DERIVED WASTE

Purpose:

The purposes of these guidelines are to ensure the proper holding, storage, transportation, and disposal of materials that may contain hazardous wastes. Investigation-derived waste (IDW) included the following:

- Drill cuttings, discarded soil samples, drilling mud solids, and used sample containers;
- Soiled disposable personal protective equipment (PPE);
- Used disposable sampling equipment;
- Used plastic sheeting and aluminum foil;

- Other equipment or materials that either contain or have been in contact with potentially-impacted environmental media.
- Because these materials may contain regulated chemical constituents, they must be managed as a solid waste. This management may be terminated id characterization analytical results indicate the absence of these constituents.

Procedure:

1. Contain all investigation-derived wastes in Department of Transpiration (DOT)-approved 55-gallon drums, roll-off boxes, or other containers suitable for the wastes.
2. Contain wastes from separate borings or wells in separate containers (i.e. do not combine wastes from several borings/wells in a single container, unless it is a container used specifically for transfer purposes, or unless specific permission to do so has been provided by the LaBella Project Manager. Unused samples from surface sample locations within a given area may be combined.

3. To the extent practicable, separate solids from drilling muds, decontamination waters, and similar liquids. Place solids within separate containers.
4. Transfer all waste containers to a staging area. Access to this area will be controlled. Waste containers must be transferred to the staging area as soon as practicable after the generating activity is complete.
5. Pending transfer, all containers will be covered and secured when not immediately attended,
6. Label all containers with regard to contents, origin, and date of generation. Use indelible ink for all labeling.
7. Collect samples for waste characterization purposes, use boring/well sample analytical data for characterization.
8. For wastes determined to be hazardous in character, be aware on accumulation time limitations. Coordinate the disposal of these wastes with the Owner and NYSDEC.
9. Dispose of investigation-derived wastes as follows;
    - Soil, water, and other environmental media for which analysis does not detect organic constituents, and for which inorganic constituents are at levels consistent with background, may be spread on-site or otherwise treated as a non0-waste material.
    - Soils, water, and other environmental media in which organic compounds are detected or metals are present above background will be disposed as industrial waste. Alternate disposition must be consistent with applicable State and Federal laws.
    - Personal protective equipment, disposable bailers, and similar equipment may be disposed as municipal waste, unless waste characterization results mandate disposal as industrial wastes

9.0 DECONTAMINATION

Sampling methods and equipment have been chosen to minimize decontamination requirements and to prevent the possibility of cross-contamination. Decontamination of equipment will be performed between discrete sampling locations. Equipment used to collect samples between composite sample locations will not require decontamination between collection of samples. All drilling equipment will be decontaminated prior to drilling, after drilling each monitoring well, and after the completion of all drilling. Special attention will be given to the drilling assembly, augers, and PVC casing and screens.

Drilling decontamination will consist of:

- Steam cleaning;
- Scrubbing with brushes, if soil remains on equipment; and
- Steam rinse.

Split spoons and other non-disposable equipment will be decontaminated between each sampling event. The sampler will be cleaned prior to each use, by one of the following procedures:

- Initially cleaned of all foreign matter;

- Sanitized with a steam cleaner;

OR

- Initially cleaned of all foreign matter;
- Scrubbed with brushes in trisodium phosphate or alconox solution;
- Rinsed with deionized water;
- Rinsed with pesticide grade methanol;
- Triple rinsed with deionized water; and
- Allowed to air dry.

10.0 SAMPLE CONTAINERS

The volumes and containers required for the sampling activities are included in pre-washed sample containers will be ordered directly from a firm, which prepares the containers in accordance with EPA bottle washing procedures.

TABLE 1
Air Samples

Type of Analysis	Type and Size of Container	Number of Containers and Sample Volume (per sample)	Preservation	Maximum Holding Time
Volatile Organics via USEPA Method TO-15	Summa Canister, 1 to 6 Liter	One (1), fill as regulator allows	Keep away from sunlight	30 days

* Holding time is based on the times from verified time of sample receipt at the laboratory.

11.0 SAMPLE CUSTODY

This section describes standard operating procedures for sample identification and chain-of-custody to be utilized for all Phase II field activities. The purpose of these procedures is to ensure that the quality of the samples is maintained during their collection, transportation, and storage through analysis. All chain-of-custody requirements comply with standard operating procedures indicated in EPA sample handling protocol.

Sample identification documents must be carefully prepared so that sample identification and chain-of-custody can be maintained and sample disposition controlled. Sample identification documents include:

- Field notebooks,
- Sample label,
- Custody seals, and
- Chain-of-custody records.

12.0 CHAIN OF CUSTODY

The primary objective of the chain-of-custody procedures is to provide an accurate written or computerized record that can be used to trace the possession and handling of a sample from collection to completion of all required analyses. A sample is in custody if it is:

- In someone's physical possession;
- In someone's view;
- Locked up; or
- Kept in a secured area that is restricted to authorized personnel.

12.1 Field Custody Procedures

- As few persons as possible should handle samples.
- Sample bottles will be obtained precleaned from a source such as I-Chem. Coolers or boxes containing cleaned bottles should be sealed with a custody tape seal during transport to the field or while in storage prior to use.
- The sample collector is personally responsible for the care and custody of samples collected until they are transferred to another person or dispatched properly under chain-of-custody rules.
- The sample collector will record sample data in the notebook.
- The site manager will determine whether proper custody procedures were followed during the fieldwork and decide if additional samples are required.

12.2 Sample Tags

Sample tags attached to or affixed around the sample container must be used to properly identify all samples collected in the field. The sample tags are to be placed on the bottles so as not to obscure any QC lot numbers on the bottles; sample information must be printed in a legible manner using waterproof ink. Field identification must be sufficient to enable cross-reference with the logbook. For chain-of-custody purposes, all QC samples are subject to exactly the same custodial procedures and documentation as "real" samples.

12.3 Transfer of Custody and Shipment

- The coolers in which the samples are packed must be accompanied by a chain-of-custody record. When transferring samples, the individuals relinquishing and receiving them must sign, date, and note the time on the chain-of-custody record. This record documents sample custody transfer
- Shipping containers must be sealed with custody seals for shipment to the laboratory. The method of shipment, name of courier, and other pertinent information are entered in the "Remarks" section of the chain-of-custody record and traffic reports.
- All shipments must be accompanied by the chain-of-custody record identifying their contents. The original record accompanies the shipment. The other copies are distributed appropriately to the site manage.
- If sent by mail, the package is registered with return receipt requested. If sent by common carrier, a bill of lading is used. Freight bills, Postal Service receipts, and bill of lading are retained as part of the permanent documentation.

12.4 Chain-of-Custody Record

The chain-of-custody record must be fully completed in duplicate, using black carbon paper where possible, by the field technician who has been designated by the project manager as responsible for sample shipment to the appropriate laboratory for analysis. In addition, if samples are known to require rapid turnaround in the laboratory because of project time constraints or analytical concerns (e.g., extraction time or sample retention period limitations, etc.), the person completing the chain-of-custody record should note these constraints in the "Remarks" section of the record.

12.5 Laboratory Custody Procedures

A designated sample custodian accepts custody of the shipped samples and verifies that the sample identification number matches that on the chain-of-custody record and traffic reports, if required. Pertinent information as to shipment, pickup, and courier is entered in the "Remarks" section.

12.6 Custody Seals

Custody seals are preprinted adhesive-backed seals with security slots designed to break if the seals are disturbed. Sample shipping containers (coolers, cardboard boxes, etc., as appropriate) are sealed in as many places as necessary to ensure security. Seals must be signed and dated before use. On receipt at the laboratory, the custodian must check (and certify, by completing the package receipt log and LABMIS entries) that seals on boxes and bottles are intact. Strapping tape should be placed over the seals to ensure that seals are not accidentally broken during shipment.

13.0 DOCUMENTATION

13.1 Sample Identification

All containers of samples collected from the project will be identified using the following format on a label or tag fixed to the sample container (labels are to be covered with Mylar tape):

XX-YY-O/D

- XX This set of initials indicates the specific Phase II sampling project
- YY These initials identify the sample location. Actual sample locations will be

recorded in the task log.

- O/D An "O" designates an original sample; "D" identifies it as a duplicate.

Each sample will be labeled, chemically preserved, if required and sealed immediately after collection. To minimize handling of sample containers, labels will be filled out prior to sample collection. The sample label will be filled out using waterproof ink and will be firmly affixed to the sample containers and protected with Mylar tape. The sample label will give the following information:

- Name of sampler,
- Date and time of collection,
- Sample number,
- Analysis required,
- pH, and
- Preservation.

13.2 Daily Logs

Daily logs and data forms are necessary to provide sufficient data and observations to enable participants to reconstruct event that occurred during the project and to refresh the memory of the field personnel if called upon to give testimony during legal proceedings. All daily logs will be kept in a bound waterproof notebook containing numbered pages. All entries will be made in waterproof ink, dated, and signed. No pages will be removed for any reason. Corrections will be made according to the procedures given at the end of this section. The daily logs will include a site log and task log.

The site log is the responsibility of the site manager and will include a complete summary of the day's activity at the site.

The **Task Log** will include:

- Name of person making entry (signature).
- Names of team members on-site.
- Levels of personnel protection:
  - Level of protection originally used;
  - Changes in protection, if required; and
  - Reasons for changes.
- Time spent collecting samples.
- Documentation on samples taken, including:
  - Sampling location and depth station numbers;
  - Sampling date and time, sampling personnel;
  - Type of sample (grab, composite, etc.); and
  - Sample matrix.
- On-site measurement data.
- Field observations and remarks.
- Weather conditions, wind direction, etc.
- Unusual circumstances or difficulties.
- Initials of person recording the information.

14.0 CORRECTIONS TO DOCUMENTATION

14.1 Notebook

As with any data logbooks, no pages will be removed for any reason. If corrections are necessary, these must be made by drawing a single line through the original entry (so that the original entry can still be read) and writing the corrected entry alongside. The correction must be initialed and dated. Most corrected errors will require a footnote explaining the correction.

14.2 Sampling Forms

As previously stated, all sample identification tags, chain-of-custody records, and other forms must be written in waterproof ink. None of these documents are to be destroyed or thrown away, even if they are illegible or contain inaccuracies that require a replacement document.

If an error is made on a document assigned to one individual, that individual may make corrections simply by crossing a line through the error and entering the corrected information. The incorrect information should not be obliterated. Any subsequent error discovered on a document should be corrected by the person who made the entry. All corrections must be initialed and dated.

14.3 Photographs

Photographs will be taken as directed by the site manager. Documentation of a photograph is crucial to its validity as a representation of an existing situation. The following information will be noted in the task log concerning photographs:

- Date, time, location photograph was taken;
- Photographer (signature);
- Weather conditions;
- Description of photograph taken;
- Reasons why photograph was taken;
- Sequential number of the photograph and the film roll number; and
- Camera lens system used.

After the photographs have been developed, the information recorded in the field notebook should be transferred to the back of the photographs

15.0 SAMPLE HANDLING, PACKAGING, AND SHIPPING

The transportation and handling of samples must be accomplished in a manner that not only protects the integrity of the sample, but also prevents any detrimental effects due to the possible hazardous nature of samples. Regulations for packaging, marking, labeling, and shipping hazardous materials are promulgated by the United States Department of Transportation (DOT) in the Code of Federal Regulation, 49 CFR 171 through 177. All samples will be delivered to the laboratory with 24 to 48 hours from the day of collection.

All chain-of-custody requirements must comply with standard operating procedures in the EPA sample handling protocol. All sample control and chain-of-custody procedures applicable to the Consultant are presented in the Field Personnel Chain-of-Custody Documentation and Quality Control Procedures Manual, January 1992.

15.1 Sample Packaging

Samples must be packaged carefully to avoid breakage or contamination and must be shipped to the laboratory at proper temperatures. The following sample packaging requirements will be followed:

- Sample bottle lids must never be mixed. All sample lids must stay with the original containers.
- The sample volume level can be marked by placing the top of the label at the appropriate sample height, or with a grease pencil. This procedure will help the laboratory to determine if any leakage occurred during shipment. The label should not cover any bottle preparation QC lot numbers.
- All sample bottles are placed in a plastic bag to minimize the potential for vermiculite contamination.
- Shipping coolers must be partially filled with packing materials and ice when required, to prevent the bottles from moving during shipment.
- The sample bottles must be placed in the cooler in such a way as to ensure that they do not touch one another.
- The environmental samples are to be cooled. The use of "blue ice" or some other artificial icing material is preferred. If necessary, ice may be used, provided that it is placed in plastic bags. Ice is not to be used as a substitute for packing materials.
- Any remaining space in the cooler should be filled with inert packing material. Under no circumstances should material such as sawdust, sand, etc., be used.
- A duplicate custody record and traffic reports, if required must be placed in a plastic bag and taped to the bottom of the cooler lid. Custody seals are affixed to the sample cooler.

15.2 Shipping Containers

Shipping containers are to be custody-sealed for shipment as appropriate. The container custody seal will consist of filament tape wrapped around the package at least twice and custody seals affixed in such a way that access to the container can be gained only by cutting the filament tape and breaking a seal.

Field personnel will make arrangements for transportation of samples to the lab. When custody is relinquished to a shipper, field personnel will telephone the lab custodian to inform him of the expected time of arrival of the sample shipment and to advise him of any time constraints on sample analysis. The lab must be notified as early in the week as possible, and in no case later than 3 p.m. (EST) on Thursday, regarding samples intended for Saturday delivery.

15.3 Marking and Labeling

- Use abbreviations only where specified.
- The words "This End Up" or "This Side Up" must be clearly printed on the top of the outer package. Upward pointing arrows should be placed on the sides of the package. The words "Laboratory Samples" should also be printed on the top of the package.
- After a sample container has been sealed, two chain-of-custody seals are placed on the container, one on the front and one on the back. The seals are protected from accidental damage by placing strapping tape over then.
- If samples are designated as medium or high hazard, they must be sealed in metal paint cans, placed in the cooler with vermiculite and labeled and placarded in accordance with DOT regulations.
- In addition, the coolers must also be labeled and placarded in accordance with DOT regulations if shipping medium and high hazard samples.

16.0 CALIBRATION PROCEDURES AND FREQUENCY

All instruments and equipment used during sampling and analysis will be operated, calibrated, and maintained according to the manufacturer's guidelines and recommendations as well as criteria set forth in the applicable analytical methodology references. Operation, calibration, and maintenance will be performed by personnel properly trained in these procedures. Documentation of all routine and special maintenance and calibration information will be maintained in an appropriate logbook or reference file, and will be available on request. Table 7-1 lists the major instruments to be used for sampling and analysis. Brief descriptions of calibration procedures for major field and laboratory instruments follow.

17.0 FIELD INSTRUMENTATION

17.1 Photovac/MiniRae Photoionization Detector (PID)

Standard operating procedures for the PID require that routine maintenance and calibration be performed every six months. Field calibration will be performed on a daily basis. The packages used for calibration are non-toxic analyzed gas mixtures available in pressurized containers.

17.2 Internal Quality Control Checks

QC data are necessary to determine precision and accuracy and to demonstrate the absence of

interferences and/or contamination of field equipment. Field-based QC will comprise at least 10% of each data set generated and will consist of standards, replicates, spikes, and blanks. Field duplicates and field blanks will be analyzed by the laboratory as samples and will not necessarily be identified to the laboratory as duplicates or blanks. For each matrix, field duplicates will be provided at a rate of one per 10 samples collected or one per shipment, whichever is greater. Field blanks which consist of trip, routine field, and rinsate blanks will be provided at a rate of one per 20 samples collected for each parameter group, or one per shipment, whichever is greater.

Calculations will be performed for recoveries and standard deviations along with review of retention times, response factors, chromatograms, calibration, tuning, and all other QC information generated. All QC data, including split samples, will be documented in the site logbook. QC records will be retained and results reported with sample data.

17.3 Blank Samples

Blank samples are analyzed in order to assess possible contamination from the field and/or laboratory so that corrective measures may be taken, if necessary. Field samples are discussed in the following subsection:

17.4 Field Blanks

Various types of blanks are used to check the cleanliness of field handling methods. The following types of blanks may be used: the trip blank, the routine field blank, and the field equipment blank. They are analyzed in the laboratory as samples, and their purpose is to assess the sampling and transport procedures as possible sources of sample contamination. Field staff may add blanks if field circumstances are such that they consider normal procedures are not sufficient to prevent or control sample contamination, or at the direction of the project manager. Rigorous documentation of all blanks in the site logbooks is mandatory.

- Routine Field Blanks or bottle blanks are blank samples prepared in the field to access ambient field conditions. They will be prepared by filling empty sample containers with deionized water and any necessary preservatives. They will be handled like a sample and shipped to the laboratory for analysis.
- Trip Blanks are similar to routine field blanks with the exception that they are not exposed to field conditions. Their analytical results give the overall level of contamination from everything except ambient field conditions. For the SGS, one trip blank will be collected with every batch of water samples for volatile organic analysis. Each trip blank will be prepared by filling a 40-ml vial with deionized water prior to the sampling trip, transported to the site, handled like a sample, and returned to the laboratory for analysis without being opened in the field.

- **Field Equipment Blanks** are blank samples (sometimes called transfer blanks or rinsate blanks) designed to demonstrate that sampling equipment has been properly prepared and cleaned before field use, and that cleaning procedures between samples are sufficient to minimize cross contamination. If a sampling team is familiar with a particular site, they may be able to predict which areas or samples are likely to have the highest concentration of contaminants. Unless other constraints apply, these samples should be taken last to avoid excessive contamination of sampling equipment.

17.5 Field Duplicates

Field duplicate samples consist of a set of two samples collected independently at a sampling location during a single sampling event. In some instances the field duplicate can be a blind duplicate, i.e., indistinguishable from other analytical samples so that personnel performing the analyses are not able to determine which samples are field duplicates. Field duplicates are designed to assess the consistency of the overall sampling and analytical system.

17.6 Quality Control Check Samples

Inorganic and organic control check samples are available from EPA free of charge and are used as a means of evaluating analytical techniques of the analyst. Control check samples are subjected to the entire sample procedure, including extraction, digestion, etc., as appropriate for the analytical method utilized.

APPENDIX 5

SITE MANAGEMENT FORMS

PRESSURE FIELD EXTENSION MONITORING POINT INSPECTION FORM

PROJECT NAME: NYSDEC SITE NO. C828159A, 691 & 705 ST. PAUL STREET OFF-SITE

LOCATION: 691 ST. PAUL STREET, ROCHESTER, NEW YORK

LABELLA PROJECT #

LABELLA REP:

DATE:

WEATHER:

LOCTION	VACUUM READING (INCHES OF WATER)	NOTES
MP-1		
MP-2		
MP-3		
MP-4		
MP-5		
MP-6		
MP-7		
MP-8		
MP-9		
MP-10		
MP-11		
MP-12		
MP-13		
MP-14		
MP-15		

LaBella
Powered by partnership.

300 STATE STREET, SUITE 201

ROCHESTER, NEW YORK 14614

PHONE: (585) 454-6110

FAX: (585-454-3066

SUB SLAB DEPRESSURIZATION SYSTEM INSPECTION FORM

PROJECT NAME: NYSDEC SITE NO. C828159A, 691 & 705 ST. PAUL STREET OFF-SITE

LOCTION: 691 ST. PAUL STREET, ROCHESTER, NEW YORK

PROJECT NO.:

INSPECTED BY:

DATE:

WEATHER:

COMPONENT	FAN				COMMENTS
	SSDS FAN #1	SSDS FAN #2	SSDS FAN #3	SSDS FAN #4	
OPERATIONAL	YES / NO	YES / NO	YES / NO	YES / NO	
VACUUM GAUGE READING (IN. H20)					
OPEN BALL VALVE ON TRAP(S)/DRAIN WATER	YES / NO	Not Applicable	Not Applicable	Not Applicable	
ALARM CHECK	YES / NO	YES / NO	YES / NO	YES / NO	
SSDS PIPING CHECK	YES / NO	YES / NO	YES / NO	YES / NO	
SSDS FAN CHECK	YES / NO	YES / NO	YES / NO	YES / NO	
CONDENSATE WATER CHECK	YES / NO	YES / NO	YES / NO	YES / NO	
INDOOR AIR SAMPLES COLLECTED	YES / NO				
CONDITION OF DRYLOCK® PAINT	SATISFACTORY / UNSTISFACTORY				
SIGNIFICANT CHIPS OF DRYLOCK® PAINT	YES / NO				

SUB-SLAB DEPRESSURIZATION SYSTEM INSPECTION FORM

PROJECT NAME: NYSDEC SITE NO. C828159A, 691 & 705 ST. PAUL STREET OFF-SITE

LOCATION: 691 ST. PAUL STREET, ROCHESTER, NEW YORK

LABELLA PROJECT #

LABELLA REP:

DATE:

WEATHER:

LOCTION	OPERATIONAL	VACUUM READING (INCHES OF WATER)	ALARM WORKING
SSDS FAN #1	YES / NO		YES / NO
SSDS FAN #2	YES / NO		YES / NO
SSDS FAN #3	YES / NO		YES / NO
SSDS FAN #4	YES / NO		YES / NO

NOTES:

AIR SAMPLING FIELD REPORT

AIR SAMPLING POINT

Project: NYSDEC Site #C828159A
Site Location: 691 Saint Paul St., Rochester, NY
Client: _____

LaBella Project No.: _____
LaBella Representative: _____
Weather: _____

General Information

Sample Canister Location: _____

Sample Source: _____ Indoor Air _____ Sub-Slab _____ Exterior Ambient Air _____ Exterior Soil Gas

_____ Other

Shipping Date: _____ Laboratory: Centek

Canister Type: _____ 1.0 L Summa Canister _____ 6.0 L Summa Canister Other (specify): _____

Canister Serial No.: _____ Flow Controller Serial No.: _____

Time	Vacuum Reading (inHg)	Notes

Sampling Information

Sample Date: _____ Sampler: _____

Sample Height / Depth: _____

	Start	Stop
Canister Pressure Gauge Reading:		
Sample Time:		

Comments:

APPENDIX 6

REMEDIAL SITE OPTIMIZATION TABLE OF CONTENTS

REMEDIAL SYSTEM OPTIMIZATION FOR 691 St. Paul Street, Rochester. NY

TABLE OF CONTENTS

APPENDIX 7

RESPONSIBILITIES OF OWNER AND REMEDIAL PARTY

Responsibilities

The responsibilities for implementing the Site Management Plan ("SMP") for the 691 St. Paul Street (the "site"), number C282159A, are divided between the site owner(s) and a Remedial Party, as defined below. The owners are currently listed as:

- 691 St. Paul Street LLC, 160 Despatch Drive, East Rochester, New York (691 St. Paul Street) (the "owner")

Solely for the purposes of this document and based upon the facts related to a particular site and the remedial program being carried out, the term Remedial Party ("RP") refers to any of the following: certificate of completion holder, volunteer, applicant, responsible party, and, in the event the New York State Department of Environmental Conservation ("NYSDEC") is carrying out remediation or site management, the NYSDEC and/or an agent acting on its behalf. The RP is:

- Bausch & Lomb, Mr. Frank Chiappone or Ms. Amy Butler, 1400 North Goodman Street, Rochester, New York.

Nothing on this page shall supersede the provisions of a Consent Order, Consent Decree, agreement, or other legally binding document that affects rights and obligations relating to the site.

Site Owner's Responsibilities:

1) The owner shall grant access to the site to the RP and the NYSDEC and its agents for the purposes of performing activities required under the SMP and assuring compliance with the SMP.

2) The owner is responsible for assuring the security of the remedial components located on its property to the best of its ability. In the event that damage to the remedial components or vandalism is evident, the owner shall notify the site's RP and the NYSDEC in accordance with the timeframes indicated in Section 1.3 -Notifications.

3) In the event some action or inaction by the owner adversely impacts the site, the owner must notify the site's RP and the NYSDEC in accordance with the time frame indicated in Section 1.3 - Notifications and (ii) coordinate the performance of necessary corrective actions with the RP.

4) Until such time as the NYSDEC deems the vapor mitigation system unnecessary, the owner shall operate the system, pay for the utilities for the system's operation, and report any maintenance issues to the RP and the NYSDEC.

5) In accordance with the tenant notification law, within 15 days of receipt, the owner must supply a copy of any vapor intrusion data, that is produced with respect to structures and that exceeds NYSDOH or OSHA guidelines on the site, whether produced by the NYSDEC, RP, or owner,

to the tenants on the property. The owner must otherwise comply with the tenant and occupant notification provisions of Environmental Conservation Law Article 27, Title 24.

Remedial Party Responsibilities

1) The RP must follow the SMP provisions regarding any construction it undertakes at the site.

2) The RP shall report to the NYSDEC all activities required for remediation, operation, maintenance, monitoring, and reporting. Such reporting includes, but is not limited to, periodic review reports and certifications, electronic data deliverables, corrective action work plans and reports, and updated SMPs.

3) Before accessing the site property to undertake a specific activity, the RP shall provide the owner advance notification that shall include an explanation of the work expected to be completed. The RP shall provide to (i) the owner, upon the owner's request, (ii) the NYSDEC, and (iii) other entities, if required by the SMP, a copy of any data generated during the site visit and/or any final report produced.

4) If the NYSDEC determines that an update of the SMP is necessary, the RP shall update the SMP and obtain final approval from the NYSDEC. Within 5 business days after NYSDEC approval, the RP shall submit a copy of the approved SMP to the owner(s).

5) The RP shall notify the NYSDEC and the owner of any changes in RP ownership and/or control and of any changes in the party/entity responsible for the operation, maintenance, and monitoring of and reporting with respect to any remedial system (Engineering Controls). The RP shall provide contact information for the new party/entity. Such activity constitutes a Change of Use pursuant to 375-1.11(d) and requires 60-days prior notice to the NYSDEC. A 60-Day Advance Notification Form and Instructions are found at http://www.dec.ny.gov/chemical/76250.html .

6) The RP shall notify the NYSDEC of any damage to or modification of the systems as required under Section 1.3 - Notifications of the SMP.

7) The RP is responsible for the proper maintenance of any installed vapor intrusion mitigation systems associated with the site, as required in Section 5.0 or Appendix 3 (Operation, Monitoring and Maintenance Manual) of the SMP.

8) Prior to a change in use that impacts the remedial system or requirements and/or responsibilities for implementing the SMP, the RP shall submit to the NYSDEC for approval an amended SMP.

9) Any change in use, change in ownership, change in site classification (*e.g.*, delisting), reduction or expansion of remediation, and other significant changes related to the site may result in a change in responsibilities and, therefore, necessitate an update to the SMP and/or updated legal documents. The RP shall contact the Department to discuss the need to update such documents.

Change in RP ownership and/or control and/or site ownership does not affect the RP's obligations with respect to the site unless a legally binding document executed by the NYSDEC releases the RP of its obligations.

Future site owners and RPs and their successors and assigns are required to carry out the activities set forth above.

APPENDIX 8

HEALTH AND SAFETY AND COMMUNITY AIR MONITORING PLANS

Appendix 1A
New York State Department of Health
Generic Community Air Monitoring Plan

Overview

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 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 DEC/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, particularly if wind direction changes. 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.

1. 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.

2. 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.

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

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

1. 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.

2. 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.

3. All readings must be recorded and be available for State (DEC and NYSDOH) and County Health personnel to review.

December 2009

Health and Safety Plan
NYSDEC Site #C828159A

Location:

691 and 705 St. Paul Street
Rochester, New York

Prepared for:

Bausch & Lomb
1400 North Goodman Street
Rochester, New York 14609

LaBella Project No. 2170820

July 11, 2018

LaBella
Powered by partnership.

300 State Street, Suite 201 | Rochester, NY 14614 | p 585-454-6110 | f 585-454-3066

Table of Contents

Page

SITE HEALTH AND SAFETY PLAN

Project Title:	691 and 705 Saint Paul Street RAWP
Project Number:	2170436
Project Location (Site):	691 and 705 Saint Paul Street, Rochester, New York 14605-1742
Environmental Director:	Gregory Senecal, CHMM
Project Manager:	Dan Noll, P.E.
Plan Review Date:	_____
Plan Approval Date:	_____
Plan Approved By:	_____ Mr. Richard Rote, CIH
Site Safety Supervisor:	To Be Determined
Site Contact:	To Be Determined
Safety Director:	Rick Rote, CIH
Proposed Date(s) of Field Activities:	To Be Determined
Site Conditions:	Slightly sloping, encompassing approximately 3.74 acres
Site Environmental Information Provided By:	Interim SMP for 690 St. Paul (NYSDEC Site Code #: C828159) prepared by LaBella Associates, D.P.C., dated March 2013
Air Monitoring Provided By:	LaBella Associates, D.P.C.
Site Control Provided By:	Contractor(s)

EMERGENCY CONTACTS

	Name	Phone Number
Ambulance:	As Per Emergency Service	911
Hospital Emergency:	Rochester General Hospital	585-922-4000
Poison Control Center:	Finger Lakes Poison Control	585-273-4621
Police (local, state):	Monroe County Sheriff	911
Fire Department:	Rochester Fire Department	911
Site Contact:	Frank Chiappone	
Agency Contact:	NYSDEC – Frank Sowers, P.E. NYSDOH – Justin Deming Finger Lakes Poison Control MCDOH – Jeff Kosmala	585-226-5357 518-402-7860 1-800-222-1222 585-753-5904
Environmental Director:	Greg Senecal, CHMM	Direct: 585-295-6243 Cell: 585-752-6480 Home: 585-323-2142
Project Manager:	Dan Noll, P.E.	Direct: 585-295-6611 Cell: 585-301-8458
Site Safety Supervisor:	To Be Determined	
Safety Director	Rick Rote, CIH	Direct: 704-941-2123

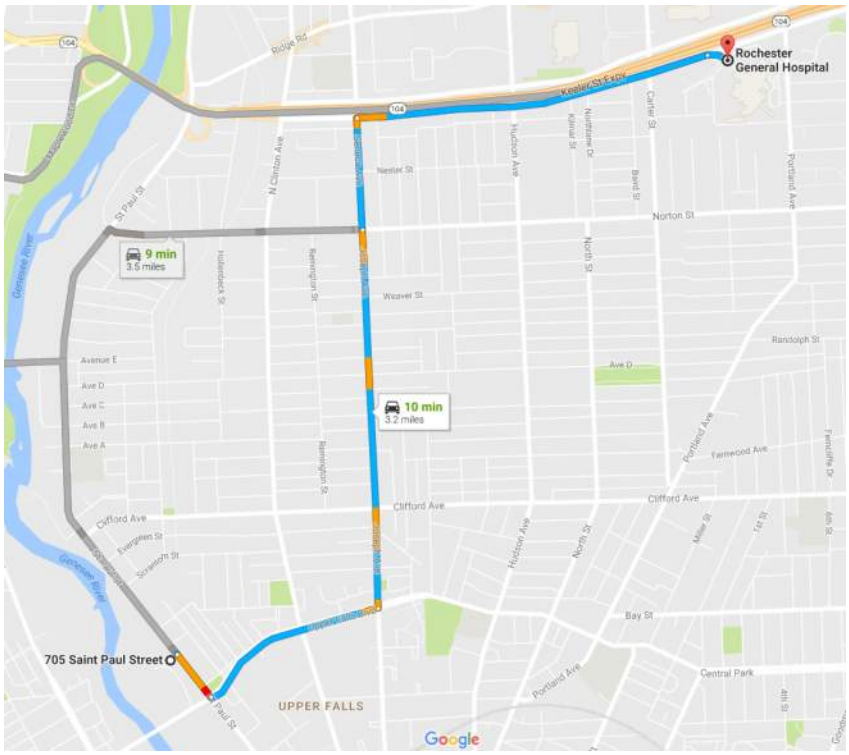
MAP AND DIRECTIONS TO THE MEDICAL FACILITY - ROCHESTER GENERAL HOSPITAL

Total Time: 10 minutes
Total Distance: 3.20 miles

Start: 691 Saint Paul St, Rochester, NY 14605-1742

START	1: Start out going SOUTHEAST on ST PAUL ST toward LOWELL ST.	0.1 mi
	2: Turn LEFT onto UPPER FALLS BLVD.	0.6 mi
	3: Turn LEFT onto JOSEPH AVE.	1.1 mi
	4: JOSEPH AVE becomes SENECA AVE.	0.3 mi
	5: Turn RIGHT onto RT-104.	1.2 mi
	6: Turn RIGHT onto PORTLAND AVE/CR-114.	0.2 mi
END	7: End at 1425 Portland Ave Rochester, NY 14621-3001	

End: 1425 Portland Ave, Rochester, NY 14621-3001



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 work associated with the operations and maintenance of the sub-slab depressurization system (SSDS) activities at the Site located at 691 and 705 Saint Paul Street in the City of Rochester, Monroe County, New York. This HASP only reflects the policies of LaBella Associates D.P.C. The requirements of this HASP are applicable to all approved LaBella personnel at the work site. This document's project specifications 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 were developed in general accordance with 29 CFR 1910 and 29 CFR 1926 and do not replace or supersede any regulatory requirements of the USEPA, NYSDEC, OSHA or and other regulatory body.

2.0 Responsibilities

This HASP presents guidelines to minimize the risk of injury to project personnel, and to provide rapid response in the event of injury. The HASP is applicable only to activities of approved LaBella personnel and their authorized visitors. The Project Manager shall implement the provisions of this HASP for the duration of the project. It is the responsibility of LaBella 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:

- ❑ Management of environmental investigation and remediation activities
- ❑ Environmental Monitoring
- ❑ Collection of samples
- ❑ Management of excavated soil and fill.

4.0 Work Area Access and Site Control

The contractor(s) will have primary responsibility for work area access and site control. However, a minimum requirement for work area designation and control will consist of:

- Drilling (Geoprobe/Rotary) – Orange cones to establish at least a 10-foot by 10-foot work area
- Test Pitting – Orange cones and orange temporary fencing to establish at least 10-feet of distance between test pit and fencing.

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 approved 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 hard hat, safety glasses and steel toe shoes are required.

5.2 Excavation Hazards

Potential Hazard:
Excavations and trenches can collapse, causing injury or death. Edges of excavations can be unstable and collapse. Toxic and asphyxiant gases can accumulate in confined spaces and trenches. Excavations that require working within the excavation will require air monitoring in the breathing zone (refer to Section 9.0).

Excavations left open create a fall hazard which can cause injury or death.

Protective Action:
Personnel must receive approval from the Project Manager to enter an excavation for any reason. Subsequently, approved personnel are to receive authorization for entry from the Site Safety Officer. Approved personnel are not to enter excavations over 4 feet in depth unless excavations are adequately sloped. Additional personal protective equipment may be required based on the air monitoring.

Personnel should exercise caution near all excavations at the site as it is expected that excavation sidewalls will be unstable. All excavations will be backfilled by the end of each day. Additionally, no test pit will be left unattended during the day.

Fencing and/or barriers accompanied by "no trespassing" signs should be placed around all excavations when left open for any period of time when work is not being conducted.

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 Project Manager is responsible for making First Aid supplies available at the work site to treat minor injuries. 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 Project Manager. Serious injuries are to be reported immediately to the Site Safety Officer

5.4 Injury Due to Exposure of Chemical Hazards

Potential Hazards:
Volatile organic vapors from petroleum products, chlorinated solvents or other chemicals may be encountered during excavation activities at the project work site. Inhalation of high concentrations of organic vapors 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. Approved employees will not work in environments where hazardous concentrations of organic vapors are present. Air monitoring (refer to Section 9.0 and to the Modified CAMP in Appendix 7) of the work area will be performed at least every 60 minutes or more often using a Photoionization Detector (PID). Personnel are to leave the work area whenever PID measurements of ambient air exceed 25 ppm consistently for a 5 minute period. In the event that sustained total volatile organic compound (VOC) readings of 25 ppm is encountered personnel should upgrade personal protective equipment to Level C (refer to Section 8.0) and an Exclusion Zone should be established around the work area to limit and monitor access to this area (refer to Section 6.0).

5.5 Injuries Due to Extreme Hot or Cold Weather Conditions

Potential Hazards:
Extreme hot weather conditions can cause heat exhaustion, heat stress and heat stroke or extreme cold weather conditions can cause hypothermia.

Protective Action:
Precaution measures should be taken such as dress appropriately for the weather conditions and drink plenty of fluid. If personnel should suffer from any of the above conditions, proper techniques should be taken to cool down or heat up the body and taken to the nearest hospital if needed.

5.6 Potential Exposure to Asbestos

Potential Hazards:
During ground intrusive activities (e.g., test pitting or drilling) soil containing asbestos may be encountered. Asbestos is friable when dry and can be inhaled when exposed to air.

Protective Action:
The presence of asbestos can be identified through visual observation of a white magnesium silicate material. If encountered, work should be halted and a sample of the suspected asbestos should be collected and placed in a plastic sealable bag. This sample should be sent to the asbestos laboratory at LaBella Associates for analysis.

6.0 Work Zones

In the event that conditions warrant establishing various work zones (i.e., based on hazards - Section 5.4), the following work zones should be established:

Exclusion Zone (EZ):
The EZ will be established in the immediate vicinity and adjacent downwind direction of site activities that elevate breathing zone VOC concentrations to unacceptable levels based on field screening. These site activities include contaminated soil excavation and soil sampling activities. If access to the site is required to accommodate non-project related personnel then an EZ will be established by constructing a barrier around the work area (yellow caution tape and/or construction fencing). The EZ barrier shall encompass the work area and any equipment staging/soil staging areas necessary to perform the associated work. The contractor(s) will be responsible for establishing the EZ and limiting access to approved personnel. Depending on the condition for establishing the EZ, access to the EZ may require adequate PPE (e.g., Level C).

Contaminant Reduction Zone (CRZ):
The CRZ will be the area where personnel entering the EZ will don proper PPE prior to entering the EZ and the area where PPE may be removed. The CRZ will also be the area where decontamination of equipment and personnel will be conducted as necessary.

7.0 Decontamination Procedures

Upon leaving the work area, approved 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. Personnel assigned to this project should be prepared with a change of clothing whenever on site.

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

8.0 Personal Protective Equipment

Generally, site conditions at this work site require level of protection of Level D or modified Level D. However, air monitoring will be conducted to determine if up-grading to Level C PPE is required (refer to Section 9.0). Descriptions of the typical safety equipment associated with Level D and Level C are provided below:

Level D:
Hard hat, safety glasses, rubber nitrile sampling gloves, steel toe construction grade boots, etc.

Level C:
Level D PPE and full or ½-face respirator and tyvek suit (if necessary). [*Note: Organic vapor cartridges are to be changed after each 8-hours of use or more frequently.*]

9.0 Air Monitoring

According to 29 CFR 1910.120(h), air monitoring shall be used to identify and quantify airborne levels of hazardous substances and health hazards in order to determine the appropriate level of employee protection required for personnel working onsite. Air monitoring identified in this HASP is only intended to monitor air for workers involved with the RI. Please refer to the Site Specific CAMP for further details on air monitoring at the Site required for protection of the Site occupants and neighboring properties.

The Air Monitor will utilize a photoionization Detector (PID) to screen the ambient air in the work areas for total Volatile Organic Compounds (VOCs), a DustTrak tm Model 8520 aerosol monitor or equivalent for measuring particulates. [*Note: Radiation monitoring requirements are identified in 5.7 above.*] Air monitoring of the work areas will be performed at least every 15 minutes or more often using a PID, and the DustTrak meter.

If sustained PID readings of greater than 10 ppm are recorded in the breathing zone, then either personnel are to leave the work area until satisfactory readings are obtained or approved personnel may re-enter the work areas wearing at a minimum a ½ face respirator with organic vapor cartridges for an 8-hour duration (i.e., upgrade to Level C PPE). Organic vapor cartridges are to be changed after each 8-hours of use or more frequently, if necessary. If PID readings are sustained, in the work area, at levels above 10 ppm for a 5 minute average, work will be stopped immediately until safe levels of VOCs are encountered or additional PPE will be required (i.e., Level B).

If dust concentrations exceed the upwind concentration by 150 µg/m^3 (0.15 mg/m^3) consistently for a 10 minute period within the work area or at the downwind location, then LaBella personnel may not re-enter the work area until dust concentrations in the work area decrease below 150 µg/m^3 (0.15 mg/m^3), which may be accomplished by the construction manager implementing dust control or suppression measures.

10.0 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.

Employees are not authorized or trained to provide rescue and medical efforts. Rescue and medical efforts will be provided by local authorities.

11.0 Medical Surveillance

Medical surveillance will be provided to all employees who are injured due to overexposure from an emergency incident involving hazardous substances at this site.

12.0 Employee Training

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

Individuals involved with the remedial investigation must be 40-hour OSHA HAZWOPER trained with current 8-hour refresher certification.

I:\Bausch & Lomb\2170820 - 691 St Paul St SVIA BCP Site\Reports\RAWP SSDS\Appendices\Appendix D - HASP\HASP_8.18.2017.DOC

Table 1
Exposure Limits and Recognition Qualities

Compound	PEL-TWA (ppm)(b)(d)	TLV-TWA (ppm)(c)(d)	STEL	LEL (%)(e)	UEL (%)(f)	IDLH (ppm)(g)(d)	Odor	Odor Threshold (ppm)	Ionization Potential	^{232}Thorium Action Level
Acetone	750	500	NA	2.15	13.2	20,000	Sweet	4.58	9.69	NA
Anthracene	0.2	0.2	NA	NA	NA	NA	Faint aromatic	NA	NA	NA
Benzene	1	0.5	5	1.3	7.9	3000	Pleasant	8.65	9.24	NA
Benzo (a) pyrene (coal tar pitch volatiles)	0.2	0.1	NA	NA	NA	700	NA	NA	NA	NA
Benzo (a)anthracene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo (b) Fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo (g,h,i)perylene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo (k) Fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Bromodichloromethane	NA	NA	NA	NA	NA	NA	NA	NA	10.88	NA
Carbon Disulfide	20	1	NA	1.3	50	500	Odorless or strong garlic type	0.096	10.07	NA
Chlorobenzene	75	10	NA	1.3	9.6	2,400	Faint almond	0.741	9.07	NA
Chloroform	50	2	NA	NA	NA	1,000	ethereal odor	11.7	11.42	NA
Chrysene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichloroethylene	200	200	NA	9.7	12.8	400	Acrid	NA	9.65	NA
1,2-Dichlorobenzene	50	25	NA	2.2	9.2		Pleasant		9.07	NA
Ethylbenzene	100	100	NA	1	6.7	2,000	Ether	2.3	8.76	NA
Fluoranthene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fluorene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Methylene Chloride	500	50	NA	12	23	5,000	Chloroform-like	10.2	11.35	NA
Naphthalene	10, Skin	10	NA	0.9	5.9	250	Moth Balls	0.3	8.12	NA
n-propylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Phenanthrene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pyrene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
p-Isopropylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
sec-Butylbenzene	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Tetrachloroethane	NA	NA	NA	NA	NA	NA	Sweet	NA	NA	NA
Toluene	100	100	NA	0.9	9.5	2,000	Sweet	2.1	8.82	NA
Trichloroethylene	100	50	NA	8	12.5	1,000	Chloroform	1.36	9.45	NA
1,2,4-Trimethylbenzene	NA	25	NA	0.9	6.4	NA	Distinct	2.4	NA	NA
1,3,5-Trimethylbenzene	NA	25	NA	NA	NA	NA	Distinct	2.4	NA	NA
Vinyl Chloride	1	1	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes (o,m,p)	100	100	NA	1	7	1,000	Sweet	1.1	8.56	NA
Metals										
Arsenic	0.01	0.2	NA	NA	NA	100, Ca	Almond	NA	NA	NA
Cadmium	0.2	0.5	NA	NA	NA	NA	NA	NA	NA	NA
Chromium	1	0.5	NA	NA	NA	NA	NA	NA	NA	NA
Lead	0.05	0.15	NA	NA	NA	700	NA	NA	NA	NA
Mercury	0.05	0.05	NA	NA	NA	28	Odorless	NA	NA	NA
Selenium	0.2	0.02	NA	NA	NA	Unknown	NA	NA	NA	NA
Other										
Asbestos	0.1 (f/cc)	NA	1.0 (f/cc)	NA	NA	NA	NA	NA	NA	NA

(a) Skin = Skin Absorption
(b) OSHA-PEL Permissible Exposure Limit (flame weighted average, 8-hour): NIOSH Guide, June 1990
(c) ACGIH – 8 hour time weighted average from Threshold Limit Values and Biological Exposure Indices for 2003.
(d) Metal compounds in mg/m3
(e) Lower Exposure Limit (%)
(f) Upper Exposure Limit (%)
(g) 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.