December 3, 2019

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

Re: Off-Site Soil Vapor Intrusion Sampling Work Plan
Eldre Corporation
1500 Jefferson Road & 55 Hofstra Road
Henrietta, New York
NYSDEC BCP Site C828182
LaBella Project No. 212721.02

Dear Ms. Theobald,

LaBella Associates, D.P.C. (LaBella) is submitting this letter work plan detailing proposed off-Site soil vapor intrusion (SVI) testing associated with the above referenced New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP) Site (BCP ID No. C828182) located at 1500 Jefferson Road and 55 Hofstra Road in the Town of Henrietta, New York, herein after referred to as "the Site." It is understood an inquiry was made to the New York State Department of Health (NYSDOH) by the New York State Department of Transportation (NYSDOT) which occupies the eastern adjacent building addressed as 1530 Jefferson Road. NYSDEC and NYSDOH have required that SVI be evaluated at this adjacent building to determine if a SVI condition in excess of NYSDOH standards exists.

Site Background

A Remedial Investigation (RI) has been completed at the Site and was initially submitted to NYSDEC and NYSDOH in February 2015. The RI identified volatile organic compounds (VOCs), specifically trichloroethene (TCE) and associated breakdown compounds, at elevated concentrations in the subsurface. The most significant impacts are present beneath the northern portion of the 1500 Jefferson Road building and extend towards the north. This area is downgradient/cross gradient of the NYSDOT office building. A sub-slab depressurization system (SSDS) was installed in the northern portion of the 1500 Jefferson Road building in 2018 to mitigate SVI within the Site Building. An electrical resistance heating (ERH) system is currently being installed in accordance with the Interim Remedial Measures Work Plan dated September 2019 to treat the source of VOCs at the Site.

Soil Vapor Intrusion Sampling Plan

Three (3) collocated sub-slab and indoor air samples and one (1) outdoor air sample will be collected during the heating season from the 1530 Jefferson Road building (refer to Figure 1). SVI sampling will be conducted subject to NYSDOT owner consent to access the NYSDOT office building and property. SVI sampling will be conducted in accordance with the *New York State Department of Health (NYSDOH) Guidance for Evaluating Soil Vapor Intrusion in the State of New York* dated 2006 and subsequent updates ("NYSDOH Guidance"). The following sampling procedures are planned:

- A building walkthrough will be completed with the property owner and/or tenant to select testing locations. This letter provides tentative testing locations; however, the locations are subject to change based on the walkthrough. If any of the locations change based on the walkthrough, a revised figure will be provided to NYSDEC and NYSDOH prior to sampling.
- Samples will be collected using Summa® canisters over an approximate six (6) hour timeframe. Three (3) sub-slab sampling points will be installed in the floor slab by drilling an approximate 1.5-inch diameter hole through the floor and installing a 5/8-inch diameter metal sampling point. The sub-slab points will be installed in the lowest level of the building. Refer to Figure 1 for proposed testing locations. The locations are subject to change following a Site visit. At least one (1) sample location will be biased towards the western side of the building (i.e., closest to the Eldre Corporation Site) and at least one (1) sample location will be biased towards any laboratories within the building, if applicable.
- After installation of the sub-slab sample points, one (1) to three (3) volumes of air will be purged prior to collecting the samples to ensure samples collected are representative of sub-slab soil vapor. Flow rates for purging will not exceed 0.2 liters per minute to minimize the ambient air infiltration during sampling.
- A tracer gas evaluation will also be conducted using helium to verify the integrity of the sub-slab soil vapor probe seal. An enclosure will be constructed around the soil gas sampling point and sealed around the sample point casing. Subsequently, the enclosure will be enriched with the tracer gas. The purged soil gas will then be tested for the tracer gas by an appropriate meter (i.e., a meter capable of measuring helium at a concentration of 10% or greater). If greater than 10% helium is detected in the sub-slab, efforts will be made to strengthen the seal between the sampling point and the floor slab.
- Summa Canisters® will be connected to the sub-slab soil vapor sampling point via inert tubing for sample collection. In addition to the sub-slab vapor samples, collocated indoor air samples will be collected within the same vicinity (i.e., within 15-feet) from approximately 3-5-feet above the floor. An outdoor air sample will also be collected from an upwind location to assess background conditions.
- All samples will be collected using one (1) liter Summa Canisters® equipped with pre-calibrated laboratory supplied flow regulators set for a sampling time of six (6) hours. The Summa Canisters® will be certified clean by the laboratory.
- Following sample collection, the samples will be sent under chain of custody procedures to a NYSDOH Environmental Laboratory Accreditation Program (ELAP)-certified laboratory for VOCs using USEPA Method TO-15. An ASP Category B data package and electronic data deliverables (EDDs) will be provided by the laboratory.
- In accordance with the NYSDOH Guidance, a product inventory will be completed during sample collection across the lowest level of the building to document products used within the building that could be potential sources for indoor air contamination.

LaBella's Health and Safety Plan and Quality Control Plan included in the Interim Remedial Measures Work Plan dated September 2016 will be implemented for this work. Following receipt of analytical results, a letter report will be completed documenting the sampling procedures and analytical results. Results will be compared to the NYSDOH Air Guideline values, NYSDOH Decision Matrices, and the USEPA Building Assessment and Survey Evaluation (BASE) Database (90th Percentile) included in the NYSDOH Guidance.

If you have any questions, or require additional information, please do not hesitate to contact me at (585) 295-6611.

Respectfully submitted,

LABELLA ASSOCIATES, D.P.C.

Daniel P. Noll, PE
Project Manager

ATTACHMENTS:
Figure 1

I:\ELDRE CORPORATION\212721.01 - BCP REMOVAL PHASE\REPORTS\SVI STUDY\OFF-SITE SVI\DRAFT C828182 ELDRE CORPORATION OFF-SITE SVI SAMPLING WORK PLANV2.DOC

Notes:
1) Property boundaries obtained from Monroe County and are approxiamte.
2) Aerial image obtained from Monroe County GIS dated 2009 and may not represent current conditions.
3) Proposed testing locations are approximate and subject to change based on site conditions.
4) Outdoor air sample location to be determined based on prevailing wind direction during sampling.

Legend

- Proposed Off-Site SVI Testing Locations (Sub-Slab and Indoor Air)
- BCP Site
- Surrounding Parcel Boundaries

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ELDRE CORPORATION
BCP SITE C828182

1500 JEFFERSON ROAD
AND 55 HOFSTRA ROAD

OFF-SITE SOIL VAPOR
INTRUSION TESTING
LOCATIONS

N
W E
S

0 50 100 Feet

1 inch = 100 feet

212721.02

FIGURE 1

Path: I:\Eldre Corporation\212721.01 - BCP Removal Phase\Drawings\Off-Site SVI\Figure 1 Work Plan.mxd