NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8
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Via Regular Mail and Email

July 13, 2017

Mr. Lewis Norry
3750 Monroe Avenue Associates, LLC
c/o Norry Management Corporation
1465 Monroe Avenue
Rochester, New York 14618

Dear Mr. Norry:

Subject: **3750 Monroe Avenue, Site #C828187**
Remedial Investigation Work Plan Amendment: Concrete Sampling
April 20, 2017
Town of Pittsford, Monroe County

The New York State Department of Environmental Conservation ("NYSDEC") and the New York State Department of Health (collectively, the "State") have completed their review of the document titled *"Remedial Investigation Work Plan Amendment: Concrete Sampling"* ("Work Plan Amendment"), dated April 20, 2017, and prepared by LaBella Associates, D.P.C. for the above-referenced site. In accordance with 6 NYCRR Subpart 375-1.6, the State has determined that the Work Plan Amendment includes sufficient new information to justify modifying the approved Remedial Investigation Work Plan and substantially addresses the requirements of the Brownfield Cleanup Agreement. Specifically, the Work Plan Amendment modifies comment I.3 of NYSDEC's letter dated October 27, 2016 approving the Remedial Investigation Work Plan. The Work Plan Amendment is hereby approved.

Please contact me at (585) 226-5357 if you have questions or concerns on this matter.

Sincerely,

Frank Sowers

Frank Sowers, P.E.
Environmental Engineer 2

ec:

Dudley Loew	Rachel Rosen
Bernette Schilling	Dan O'Brien
Dan Noll	Wade Silkworth
Jennifer Gillen	Bridget Boyd
Kyle Miller	Justin Deming

LABELLA Associates, D.P.C.
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April 20, 2017

Frank Sowers, P.E.
Division of Environmental Remediation
New York State Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414

RE: Remedial Investigation Work Plan Amendment: Concrete Sampling
Brownfield Cleanup Program Site #C828187
3750 Monroe Avenue, Pittsford (T), New York
LaBella Project No. 213131

Dear Mr. Sowers:

LaBella Associates, D.P.C. ("LaBella") is submitting this letter on behalf of 3750 Monroe Avenue, LLC (c/o Norry Management Corp.) to the New York State Department of Environmental Conservation (NYSDEC) to propose an amendment to the approved Remedial Investigation Work Plan (RIWP) dated March 2016 for the 3750 Monroe Avenue NYSDEC Brownfield Cleanup Program (BCP) Site #C828187 (hereinafter referred to as "the Site").

The work addressed by this amendment consists of sampling the concrete floor slab adjacent to existing and apparent former electrical transformer locations. This work is intended to evaluate the potential presence of polychlorinated biphenyls (PCBs) that may have been released from the Site building's electrical transformers onto the underlying and/or adjacent concrete floor slab. The findings of this work will be summarized in the Remedial Investigation Report and be used to determine whether additional subsurface investigation or remediation may be warranted in these areas. The following amendment is proposed to the RIWP.

Sampling of Concrete Floor Slab

Sampling of the concrete floor slab will be performed in the two (2) existing electrical transformer rooms, located in the following areas of the Site building (refer to Figure 1):

- at the rear of Concentrix's Production Area (i.e., the "Northeastern Electrical Transformer Room"); and
- at the "elbow" of the L-shaped hallway that serves as entrances to the Town Senior Center, MAXIMUS, and Concentrix tenant spaces (i.e., the "Southern Electrical Transformer Room").

It should be noted that a third area of the Site building once reportedly housed electrical transformers on a mezzanine. This area (i.e., the "Northern Former Electrical Transformer Mezzanine") was reportedly located in the northern corner of the current Concentrix loading dock. It is understood that at the time this area contained electrical transformers, the current elevated floor of the loading dock did not exist. The mezzanine was reportedly removed and the lower level of this space was raised to construct the loading dock. Based upon discussions at the Site with the NYSDEC on January 26, 2017, no concrete sampling is proposed for the Northern Former Electrical Transformer Mezzanine area.

Sampling of concrete will be performed following the protocols for sampling hard porous surfaces outlined in the United States Environmental Protection Agency's (USEPA's) *Standard Operating Procedure For Sampling Porous Surfaces for PCBs*, dated May 2011 (included as Attachment A), as summarized below.

- Samples will be collected from three (3) discrete areas in the Northeastern Electrical Transformer Room and from three (3) discrete areas in the Southern Electrical Transformer Room.
- Sampling activities will include the collection of a sample duplicate and a matrix spike/matrix spike duplicate (MS/MSD) sample.
- Sampling locations will be biased toward areas that appear to have historically contained electrical equipment or toward areas of visible surface staining.
- Samples will be collected from depths of 0 to approximately 0.5 inches below finished floor (BFF).
- Samples will be collected using a 1.5-inch diameter (or similar size) carbide tip drill bit attached to an electric rotary impact hammer-drill.
- The concrete dust created by the drill bit will be collected using stainless steel or plastic sampling spoons and containerized in laboratory provided soil sampling jars.
- Sampling equipment, including the drill bit, will be decontaminated prior to use and between sampling locations using an Alconox and potable water wash, followed by a potable water rinse.
- The samples will be shipped under standard chain of custody protocols to a New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP) certified laboratory for analysis of PCBs using USEPA Method 8082. In addition, a NYSDEC Analytical Services Protocol (ASP) Category B data deliverable will be generated by the laboratory and a data usability summary report (DUSR) will subsequently be developed.

Health and Safety Plan

Fieldwork will be completed in accordance with the previously approved Health and Safety Plan (HASP), as detailed in the NYSDEC-approved RIWP.

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

Sincerely,

LABELLA ASSOCIATES, P.C.

Daniel P. Noll, P.E.
Project Manager

DPN/krm

Attachments:
Figure 1: Current and Former Electrical Transformer Areas
Attachment A - USEPA's May 2011 *Standard Operating Procedure For Sampling Porous Surfaces for PCBs*

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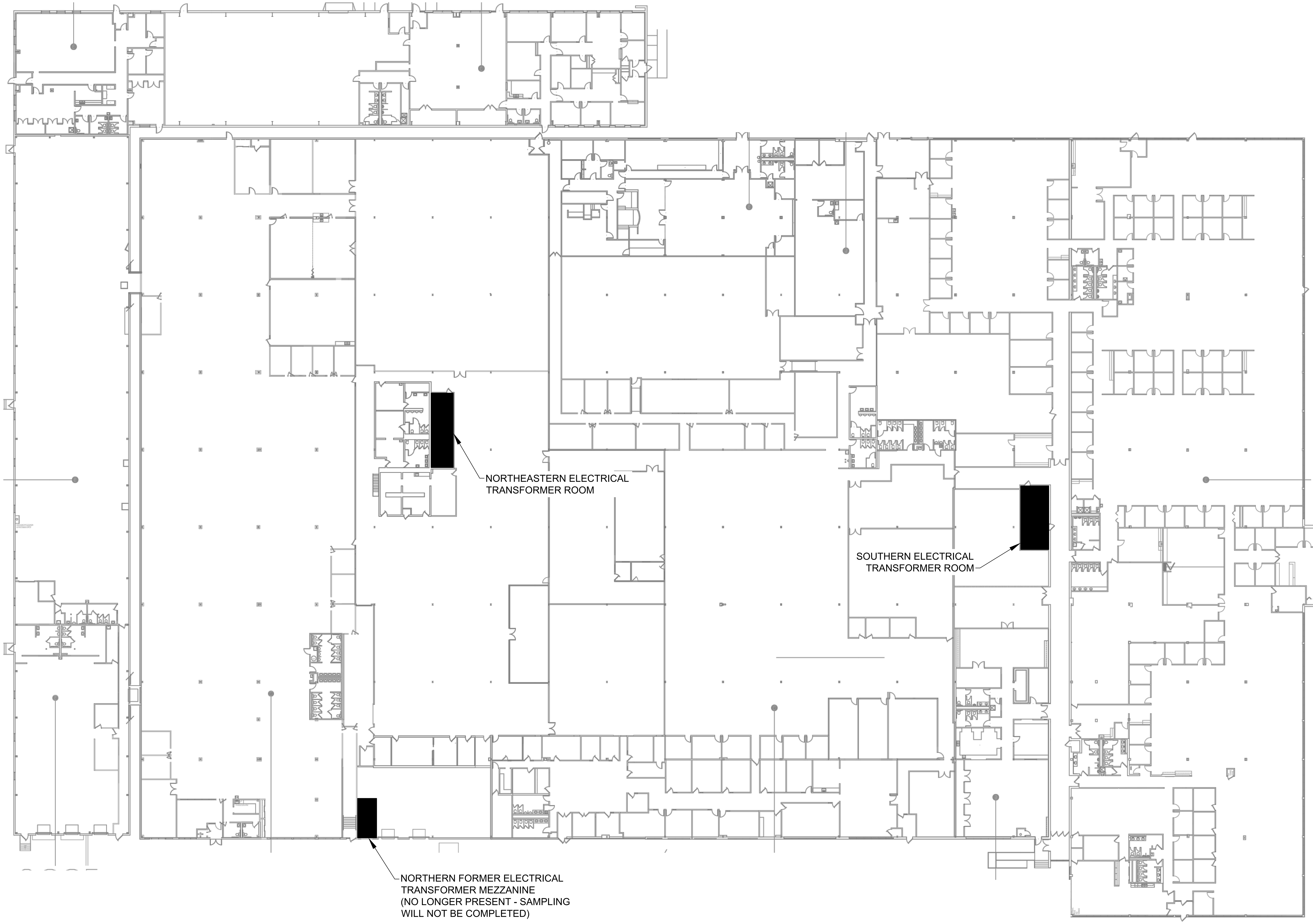

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DANIEL P. NOLL
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PROJECT/CLIENT

RIWP AMENDMENT

3750 MONROE AVE
PITTSFORD, NEW YORK
NYSDEC BCP SITE #C828187

DRAWING TITLE

CURRENT AND FORMER ELECTRICAL TRANSFORMER AREAS

ISSUED FOR

AS-BUILT

DATE: SEPTEMBER, 2016

DESIGNED BY: DPN
DRAWN BY: DRP
REVIEWED BY: DPN

J:\Norry Management Corp\213131 - BCP Application 3750 Monroe Ave\Drawings\CCR SSDS\Figure 3.dwg

PROJECT/DRAWING NUMBER

213131

FIGURE 1

LABELLA Associates, D.P.C. | Engineering Architecture Environmental Planning

ATTACHMENT A

USEPA's May 2011 *Standard Operating Procedure For Sampling Porous Surfaces for PCBs*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

STANDARD OPERATING PROCEDURE FOR SAMPLING POROUS SURFACES FOR POLYCHLORINATED BIPHENYLS (PCBs)

May 2011

STANDARD OPERATING PROCEDURE FOR SAMPLING POROUS SURFACES FOR POLYCHLORINATED BIPHENYLS (PCBs)

The Office of Environmental Measurement and Evaluation
EPA New England – Region 1
11 Technology Dr.
North Chelmsford, MA 01863

Prepared by: Dan Granz, Environmental Engineer — Date: 5/5/11

Reviewed by: Kim Tisa, TSCA PCB Coordinator — Date: 5/5/11

Reviewed by: Jerry Keefe – EIA Team Leader — Date: 05/23/11

Approved by: Dan Boudreau, EIA Chemistry Team Leader — Date: 5/23/11

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Revision Page

Date	Rev#	Summary of Changes	Sections
12/97	1	Initial Approval, draft	
3/20/08	2	Major update, only for PCBs, added TSCA sampling	All sections
7/17/08	3	Disposal of dust filter and decon of vac hose	11.0 and 14.0
5/04/11	4	Vacuum Trap Design and Clean-out	9.4

Table of Contents

1.0 Scope and Application

1.1 This Standard Operating Procedure (SOP) is suitable for collection of a porous matrix sample for analysis of Polychlorinated Biphenyls (PCBs).

1.2 This SOP describes sampling techniques for both hard and soft porous surfaces.

1.2.1 Hard surfaces, and most soft surfaces, can be sampled using an impact hammer drill to generate a uniform, finely ground, powder to be extracted and analyzed for PCBs. This procedure is primarily geared at providing enough sample quantity for two analyses. Hard porous surfaces include concrete, brick, asphalt, cement, sandstone, limestone, unglazed ceramics, and other possible PCB suspected material. This procedure may also be used on other softer porous surfaces, such as wood.

1.2.2 Soft surfaces can be sampled using a chisel or sharp knife to generate a representative sample to be extracted and analyzed for PCBs. Soft porous surfaces include wood, wall plasterboard, low density plastics, rubber, caulking, and other PCB suspected material.

1.3 This SOP provides for collection of surface samples (0 – 0.5 inches) and delineation of PCB contamination throughout the core of the porous surface. The procedure can be used to sample the porous surface at distinctly different depth zones.

2.0 Method Summary

A one-inch or other sized diameter carbide drill bit is used in a rotary impact hammer drill to generate a fine powder, or other representative sample, suitable for extraction and analysis of PCBs from porous surfaces. This method also allows the use of chisels or knives for the collection of samples from soft porous surfaces for PCB analysis.

3.0 Definitions

3.1 Field/Bottle Blank: A sample container of the same lot as the containers used for the environmental samples. This evaluates PCB contamination introduced from the sample container(s) from a common lot.

3.2 Equipment/Rinse/Rinsate Blanks: A sample that is collected by pouring hexane over the sample collection equipment after decontamination and before sample collection. The sample is collected in the appropriate sample container identical to the sample containers. This represents background contamination resulting from the field equipment, sampling procedure, sample container, and shipment.

3.3 Field Replicates/Duplicates: Two or more samples collected at the same sampling location. Field replicates should be samples collected side by side. Field replicates represent the precision of the whole method, site heterogeneity, field sampling, and the laboratory analysis.

3.4 Field Split Samples: Two or more representative subsamples taken from one environmental sample in the field. Prior to splitting, the environmental sample is homogenized to correct for sample heterogeneity that would adversely impact data comparability. Field split samples are usually analyzed by different laboratories (interlaboratory comparison) or by the same laboratory (intralaboratory comparison). Field splits are used to assess sample handling procedures from field to laboratory and laboratory comparability.

3.5 Laboratory Quality Samples: Additional samples that will be collected for the laboratory's quality control program: matrix spike, matrix spike duplicate, laboratory duplicates, etc.

3.6 Proficiency Testing (PT)/Performance Evaluation (PE) Sample: A sample, the composition of which is unknown to the laboratory or analyst, provided to the analyst or laboratory to assess the capability to produce results within acceptable criteria. This is optional depending on the data quality objectives. If possible, it is recommended that the PE sample be of similar matrix as the porous surface(s) being sampled.

3.7 Porous Surface: Any surface that allows PCBs to penetrate or pass into itself including, but not limited to, paint or coating on metal; corroded metal; fibrous glass or glass wool; unglazed ceramics; ceramics with porous glaze; porous building stone such as sandstone, travertine, limestone, or coral rock; low density plastics such as Styrofoam and low density polyethylene; coated (varnished or painted) or uncoated wood; painted or unpainted concrete or cement; plaster; plasterboard; wallboard; rubber; caulking; fiberboard; chipboard; asphalt; or tar paper.

3.8 Shipping Container Temperature Blank: A water sample that is transported to the laboratory to measure the temperature of the samples in the cooler.

4.0 Health and Safety

4.1 Eye, respiratory, and hearing protection are required at all times during sample drilling. A properly fitted respirator is required for hard porous surface sampling. A respirator is recommended whenever there is a risk of inhalation of either particulate or volatilized PCBs during sampling.

4.2 All proper personal protection clothing and equipment must be worn.

4.3 When working with potentially hazardous materials or situations, follow EPA, OSHA, and specific health or safety procedures.

4.4 Care must be exercised when using an electrical drill and sharp cutting objects.

5.0 Interferences and Potential Problems

5.1 This sampling technique produces a finely ground uniform powder, which minimizes the physical matrix effects from variations in the sample consistency (i.e., particle size, uniformity, homogeneity, and surface condition). Matrix spike analysis of a sample is highly recommended to monitor for any matrix related interferences.

5.2 Nitrile gloves are recommended. Latex gloves must not be used due to possible phthalate contamination.

5.3 Interferences may result from using contaminated equipment, solvents, reagents, sample containers, or sampling in a disturbed area. The drill bit must be decontaminated between samples. (see Section 11.0.)

5.4 Cross contamination problems can be eliminated or minimized through the use of dedicated sampling equipment.

6.0 Personnel Qualifications

6.1 All field samplers working at hazardous materials/waste sites are required to take a 40 hour health and safety training course prior to engaging in any field activities. Subsequently, an 8 hour refresher health and safety course is required annually.

6.2 The field sampler should be trained by an experienced sampler before initiating this procedure.

6.3 All personnel shall be responsible for complying with all quality assurance/quality control requirements that pertain to their organizational/technical function.

7.0 Equipment and Supplies

7.1 This list varies with the matrix and if depth profiling is required

Rotary impact hammer variable speed drill
1-inch or other suitable (1/2, 3/4, etc.) diameter carbide tip drill bits
Steel chisel or sharp cutting knife, and hammer
Brush and cloths to clean area
Stainless steel scoopulas

Aluminum foil to collect the powder sample
1 quart Cubitainer with the top cut out to collect the powder sample
Aluminum weighing pans to collect the powder sample
Cleaned glass container (2 oz or 40 mL) with Teflon lined cap
Decontamination supplies: hexane, two small buckets, a scrub brush, detergent, deionized water, hexane squirt bottle, and paper towels
Dedicated vacuum cleaner with a disposable filter or a vacuum pump with a dust filter
Polyethylene tubing and Pasteur pipettes
Sample tags/labels, custody seals, and Chain-of-Custody form

8.0 Sampling Design

8.1 A sufficient number of samples must be collected to meet the data quality objectives of the project. If the source of the PCB contamination is regulated under the federal TSCA PCB Regulations at 40 CFR Part 761, the sampler should insure that the sampling design is sufficient to meet any investigation or verification sampling requirements. At a minimum, the following is recommended:

8.1.1 Suspected stained area (s) should be sampled.

8.1.2 At each separate location, collect at least 3 samples of each type of porous surface, regardless of the amount of each type of porous surface present.

8.1.3 In areas where PCB equipment was used or where PCBs were stored, samples should be collected at a frequency of 1 sample/100 square feet (ft^2).

9.0 Sample Collection

9.1 Hard Porous Surfaces

9.1.1 Lock a 1-inch or another size diameter carbide drill bit into the impact hammer drill and plug the drill into an appropriate power source. For easy identification, sample locations may be pre-marked using a marker or paint. (Note: the actual drilling point must not be marked.) Remove any debris with a clean brush or cloth prior to drilling. All sampling decisions of this nature should be noted in the sampling logbook.

9.1.2 Use a Cubitainer with the top cut off or aluminum foil to contain the powdered sample. Begin drilling in the designated location. Apply steady even pressure and let the drill do the work. Applying too much pressure will generate excessive heat and dull the drill bit prematurely. The drill will provide a finely ground powder that can be easily collected.

9.1.3 Samples should be collected at ½-inch depth intervals. Thus, the initial surface sample should be collected from 0 – 0.5 inches. A ½-inch deep hole generates about 10 grams (20 mL) of powder. Multiple holes located closely adjacent to each other, may be needed to generate sufficient sample volumes for a PCB determination. It is strongly recommended that the analytical laboratory be consulted on the minimum sample size needed for PCB extraction and analysis.

9.1.4 Wall and Ceiling Sampling: A team of two samplers will be required for wall and ceiling sampling. The second person will hold a clean catch surface (e.g. an aluminum pan) below the drill to collect the falling powder. Alternatively, use the chuck-end of the drill bit and punch a hole through the center of the collection pan. The drill bit is then mounted through the pan and into the drill. For ceilings, the drill may be held at an angle to collect the powder. Thus the driller can be drilling at an angle while the assistant steadies the pan to catch the falling powder. As a precaution, it may be advantageous to tape a piece of plastic around the drill, just below the chuck, to avoid dust contaminating the body of the drill and entering the drill's cooling vents. Caution must be taken to prevent obstruction of the drill's cooling vents.

9.2 Soft Porous Surfaces

9.2.1 The procedure for the hard porous surface may be used for certain soft porous surfaces, such as wood.

9.2.2 Samples should be collected at no more than ½-inch depth intervals using a metal chisel or sharp cutting knife. Thus, the initial surface sample should be collected from 0 – 0.5 inches. It is important to collect at least 10 grams for analysis.

9.2.3 For soft porous surfaces, such as caulking and rubber, a representative sample can be collected using a metal chisel or sharp cutting knife.

9.3 Multiple Depth Sampling

9.3.1 Multiple Depth Sampling may not be applicable to certain porous surfaces, such as caulking.

9.3.2 Collect the surface sample as outlined in Section 9.1 or 9.2.

9.3.3 Use the vacuum pump or cleaner to clean out the hole.

9.3.4 To collect multiple depths there are two options.

9.3.4.1 Option one: drill sequentially ½-inch increments with the 1 inch drill.

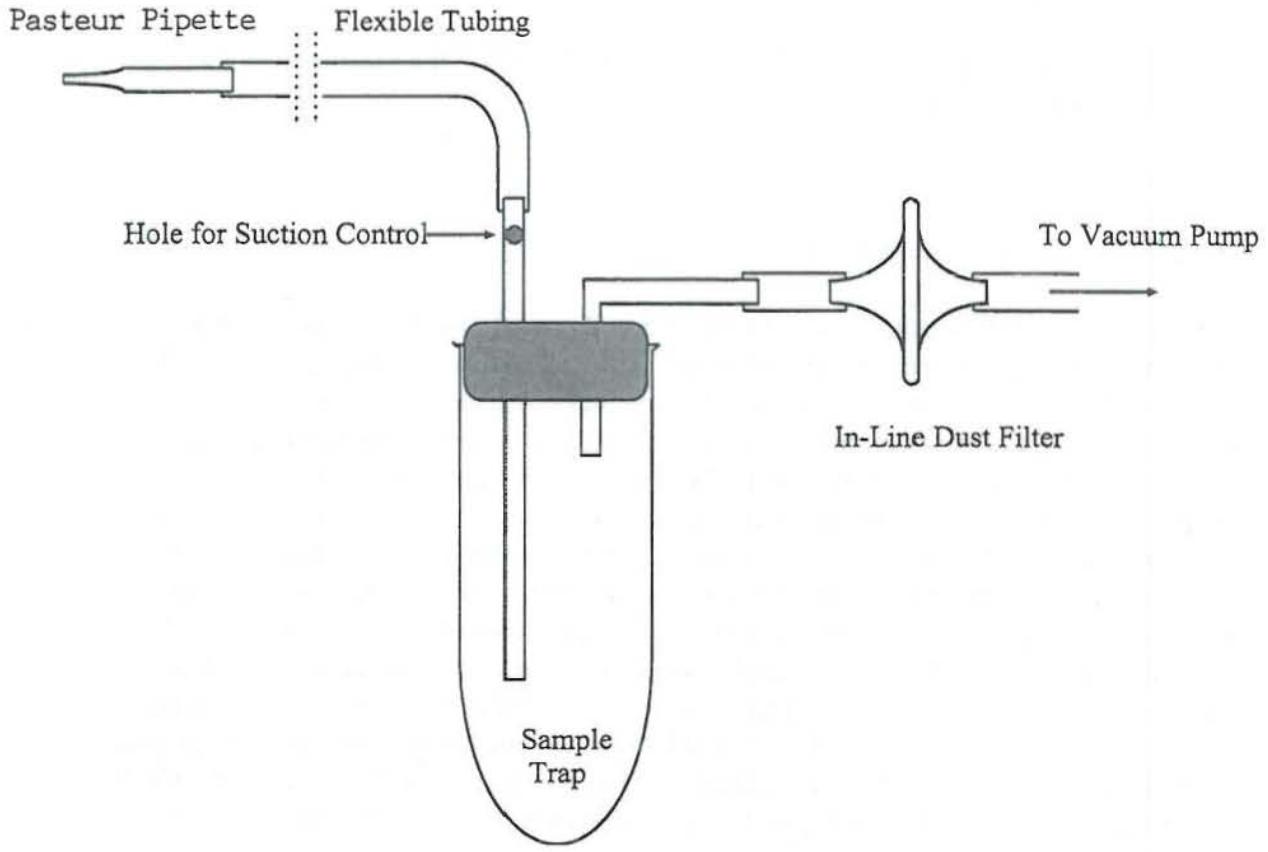
9.3.4.2 Option two: drill with the 1 inch bit and either make the hole larger or use a smaller bit to take the next ½- inch sample.

9.3.5 A stainless steel scoopula will make it easier to collect the sample from the bottom of the hole.

9.4 Vacuum Trap Design and Clean-out

The trap presented in Figure 1 is a convenient and thorough way for collecting and removing concrete powder from drilled holes. The trap system is designed to allow for control of the suction from the vacuum pump and easy trap clean-out between samples. Note, by placing a hole in the inlet tube (see Figure 1), a finger on the hand holding the trap can be used to control the suction at the sampling tip. Thus, when this hole is left completely open, there will be no suction, and the sampler can have complete control over where and what to sample. To change-out between samples the following steps should be taken: 1) the Pasteur pipette and piece of polyethylene tubing at the sample inlet should be replaced with new materials, 2) the portion of the rubber stopper and glass tubing that was in the trap should be wiped down with a clean damp paper towel (wetted with deionized water) and then dried with a fresh paper towel, 3) a clean pipe cleaner should be drawn through the glass inlet tube to remove any concrete dust present, and 4) the glass tube or flask used to collect the sample should swapped out with a clean decontaminated sample trap. Having several clean tubes or flasks on hand will facilitate change-out between samples.

Figure 1



Note: the holes should be vacuumed thoroughly to minimize any cross-contamination between sample depths and the bits should be decontaminated between samples. (See Section 11.0)

10.0 Sample Handling, Preservation, and Storage

10.1 Samples must be collected in glass containers for PCB analyses. In general, a 2-ounce sample container with a Teflon-lined cap (wide-mouth jars are preferred) will hold sufficient mass for most analyses. A 2-ounce jar can hold roughly 90 grams of sample.

10.2 Samples are to be shipped refrigerated and maintained at $\leq 6°C$ until the time of extraction and analysis.

10.3 The suggested holding time for PCB samples is 14 days to extraction.

11.0 Decontamination

11.1 Assemble two decontamination buckets. The first bucket contains a detergent and potable water solution, and the second bucket is for rinsate. Place all used drill bits, hose for the vacuum cleaner, and utensils in the detergent and water bucket. Scrub each piece thoroughly using the scrub brush. Note, the powder does cling to the metal surfaces, so care should be taken during this step, especially with the twists and curves of the drill bits. Next, rinse each piece with water and hexane. Place the rinsed pieces on clean paper towels and individually dry and inspect each piece. Note: all pieces should be dry prior to reuse.

11.2 Lightly contaminated drill bits and utensils may be wiped with a hexane soaked cloth and hexane rinsed for decontamination.

12.0 Data and Record Management

12.1 All data and information collection should follow a Field Data Management SOP or Quality Assurance Project Plan (QAPP).

12.2 Follow the chain of custody procedures to release the samples to the laboratory. A copy is kept with the sampling records.

12.3 The field data is stored for at least 3 years.

13.0 Quality Control and Quality Assurance

13.1 Representative samples are required. The sampler will evaluate the site specific conditions to assure the sample will be representative.

13.2 All sampling equipment must be decontaminated prior to use and between each discrete sample.

13.3 All field Quality Control (QC) sample requirements in a Sample and Analysis Plan (SAP) or QAPP must be followed. The SAP or QAPP may involve field blanks, equipment blanks, field duplicates and/or the collection of extra samples for the laboratory's quality control program.

13.4 Field duplicates should be collected at a minimum frequency of 1 per 20 samples or 1 per non-related porous matrix, whichever is greater.

14.0 Waste Management and Pollution Prevention

14.1 During field sampling events there may be PCB and/or hazardous waste produced from the sample collection. The waste must be handled and disposed of in accordance with federal, state, and local regulations. The dust filter, and tubing if a vacuum pump is used, is disposed after each site investigation. This waste will be treated as PCB waste if the samples are positive for PCBs. It may be possible to manage or dispose of the waste produced at the site where the work was performed. If the site does not meet regulatory requirements for these types of activities, the waste must be transported to a facility permitted to manage and/or dispose of the waste.

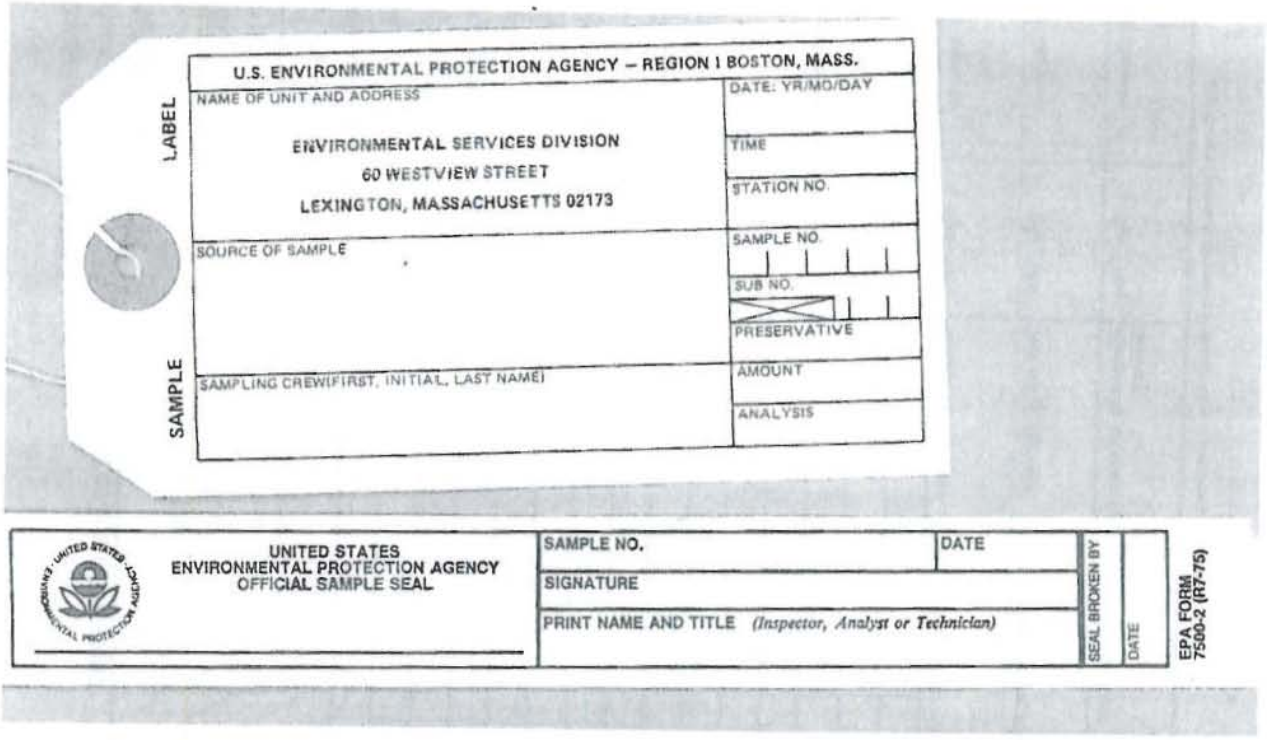
15.0 References

1. Guidance for the Preparation of Standard Operating Procedures for Quality-Related Operations, QA/G-6, EPA/600/R-96/027, November 1995.

2. 40 CFR Part 761 – Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution In Commerce, and Use Prohibitions

3. Sample Container and Holding Time: RCRA SW 846, Chapter 4, Table 4.1, Revision 4, February, 2007.

Example of Sample Label and Custody Seal



LABEL

U.S. ENVIRONMENTAL PROTECTION AGENCY – REGION I BOSTON, MASS.

NAME OF UNIT AND ADDRESS

ENVIRONMENTAL SERVICES DIVISION
60 WESTVIEW STREET
LEXINGTON, MASSACHUSETTS 02173

DATE: YR/MO/DAY

TIME

STATION NO.

SAMPLE

SOURCE OF SAMPLE

SAMPLE NO.

SUB NO.

PRESERVATIVE

SAMPLING CREW(FIRST, INITIAL, LAST NAME)

AMOUNT

ANALYSIS

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
OFFICIAL SAMPLE SEAL

SAMPLE NO.

DATE

SIGNATURE

PRINT NAME AND TITLE *(Inspector, Analyst or Technician)*

SEAL BROKEN BY

DATE

EPA FORM
7500-2 (R7-75)

Example of Chain of Custody Form

ENVIRONMENTAL PROTECTION AGENCY

REGION 1

CHAIN OF CUSTODY RECORD

PROJ. NO.	PROJECT NAME					NO. OF CON-TAINERS							REMARKS
SAMPLERS: *(Signature)*													
STA. NO.	DATE	TIME	COMP	GRAB	STATION LOCATION								

Relinquished by: *(Signature)*	Date / Time	Received by: *(Signature)*	Relinquished by: *(Signature)*	Date / Time	Received by: *(Signature)*
Relinquished by: *(Signature)*	Date / Time	Received by: *(Signature)*	Relinquished by: *(Signature)*	Date / Time	Received by: *(Signature)*
Relinquished by: *(Signature)*	Date / Time	Received for Laboratory by: *(Signature)*	Date / Time	Remarks	

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