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Streamlined Site Characterization & Closure

October 31, 2005

Mr. Gregory B. MacLean, P.E.
Environmental Engineer II
New York State Department of Environmental Conservation
Division of Environmental Remediation - Region 8
6274 East Avon-Lima Road
Avon, New York 14414

RE: Supplemental Remedial Investigation Activities at Carlson Park in Rochester, NY. (NYSDEC VCP Number V00514-8)

Dear Greg:

This letter is intended to outline a variety of supplemental Remedial Investigation (RI) activities which 100 Carlson Road, LLC proposes to conduct at the Carlson Park site this Autumn. These activities represent a follow-up to the RI activities conducted this past summer in accordance with the Voluntary Cleanup Program Remedial Investigation Work Plan for Carlson Park, dated October 2004. Unless otherwise noted herein, the subject field tasks will be conducted in accordance with the methodologies and procedures outlined in the subject Work Plan. Accordingly, we request that this letter be considered an addendum to that Work Plan. The remainder of this letter contains a summary and brief description of the various activities currently being proposed.

Summary of Proposed Supplemental RI Activities:

- Additional Adaptive Groundwater Sampling in the vicinity of CR-12;
- Subsurface Sludge delineation in the vicinity of CR-4;
- Ash Fill delineation in the southwest portion of the Site;
- Subsurface Oil delineation in the vicinity of SB-201; and
- Additional Pesticide delineation in surface soil near SS-202, 203, and 204.

Brief Description of Proposed Supplemental RI Activities:

<u>Additional Adaptive Groundwater Sampling in the vicinity of CR-12.</u>

Elevated concentrations of dissolved TCE were previously identified in groundwater at location CR-12. It is believed that such concentrations may be indicative of a potential subsurface chlorinated solvent source zone in this area. Additional adaptive groundwater sampling activities will be conducted in order to help determine if such a source zone is present, and to help pinpoint its precise location and configuration.

A majority of the proposed groundwater grab sampling will be conducted beneath an indoor loading dock area where rig access is available. In addition, limited supplemental groundwater sampling will also be conducted at exterior locations in close proximity to previous sampling points. This higher sampling density should result in better plume resolution and assist in potential source area delineation. The subject adaptive groundwater sampling activities will be conducted in a similar manner as that conducted in June 2005, and as described in the Voluntary Cleanup Program Remedial Investigation Work Plan. As such, all of these depth-discrete groundwater grab samples will be analyzed on-site in a mobile laboratory.

Subsurface Sludge delineation in the vicinity of CR-4.

A thin subsurface black sludge layer was found to be present within several feet of ground surface at location CR-4. Analytical results obtained from a sample of this sludge indicated elevated concentrations of SVOCs, as well as some VOCs. As part of these supplemental activities, shallow soil borings will be advanced radially out from location CR-4 in order to visually define the lateral and vertical extent of this sludge layer. Given the obvious visual characteristics of this material, no additional analytical testing of this sludge is currently proposed.

Ash Fill delineation in the southwest portion of the Site.

A majority of the Fill Area evaluation activities presented in the Voluntary Cleanup Program Remedial Investigation Work Plan were completed in June 2005. Additional activities being proposed at this time are specifically aimed at obtaining a more thorough delineation of the Ash Fill material found to be present within the larger fill area.

In order to accomplish this delineation in the most efficient manner, an attempt will be made to utilize direct-push electrical conductivity measurements to supplement soil sampling and analysis. Initially, conductivity pushes will be conducted adjacent to at least two locations where soil borings have already been advanced and boring logs prepared. Information from these pushes will be used to calibrate the electrical conductivity responses to actual stratigraphic conditions, and to verify that the ash layer and underlying native soil represent distinct conductivity signatures. If successful, then additional conductivity pushes will be advanced to identify the location, depth, and thickness of the ash layer, along with defining the depth of native soils over a larger area.

Once this has been accomplished, approximately 6 to 10 representative locations will be selected to undergo soil sampling. At such locations, soil borings will be advanced to at least native soil. At a minimum, samples will be collected from the ash layer and from the underlying native soil. If there are more than several feet of vertical thickness between the base of the ash and the native soil surface, then additional soil samples may be collected from within this zone. All samples collected in this manner will be dried and homogenized into a powder and then screened for metals on site with the use of X-ray fluorescence (XRF). The metals to be included in this screening will consist of RCRA metals plus magnesium and zinc. Based upon the results of this screening, a limited number of these samples will then be selected to undergo more formal metals analysis at a NY-certified off-site lab. The same suite of metals will be analyzed off-site as those screened for on-site.

As requested by NYDEC, limited surface soil sampling will also be conducted in the vicinity of SB-201 and SB-204. This sampling was requested to help evaluate potential impacts from the former incinerator stacks that used to be active in this area. Consequently, these samples will be subject to the same on-site metals screening as discussed above for the ash delineation.

Subsurface Oil delineation in the vicinity of SB-201.

During previous sampling activities conducted in the vicinity of SB-201 in June 2005, a layer of oil was visually observed to be present in the subsurface. As part of upcoming supplemental activities, an attempt will be made to delineate both the lateral and vertical extent of this subsurface oil zone. Given the plethora of underground utilities and manmade obstructions in this area, together with a wide variety of surface features, sampling access will be quite limited. Subsurface oil delineation will be accomplished through visual observations made of soil samples collected from soil borings. No additional analytical testing of this oil is currently proposed.

Additional Pesticide delineation in surface soil near SS-202, 203, and 204.

Analytical results of soil samples collected in June 2005 indicated elevated concentrations of selected pesticides in surface soils at certain locations. Such concentrations appeared to be limited to surface soils, with virtually little to no downward migration. Consequently, additional surface soil sampling is proposed in the vicinity of locations SS-202, SS-203, and SS-204 to determine if observed pesticide findings at these locations are localized or more widespread.

In order to accomplish this pesticide delineation, a total of two or three additional surface soil samples will be collected from each of the subject locations. These samples will be collected at distances of about 25 feet away from the original sampling locations. Sampling and analysis procedures will be similar to those described in the Voluntary Cleanup Program Remedial Investigation Work Plan. All such samples will undergo pesticide analysis at a NY-certified lab.

This concludes the description of supplemental RI activities proposed to be conducted at the Carlson Park Site this autumn. Any additional field activities which may potentially be required at the Site in the future, will be determined once the results from these activities have been reviewed in concert with the results previously obtained in June 2005 and in 2000.

We currently plan to begin the subject supplemental RI activities sometime between November 9th and 14th, and complete them by Thanksgiving. Please contact me at (908) 253-3200 ext.11 if you have any questions or comments concerning this matter, or if you require any additional information.

Sincerely,

Steven B. Gelb
Project Manager