S_2C_2 inc.
Streamlined Site Characterization & Closure

August 11, 2011

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 Overburden Remedial Investigation Work Plan Letter Addendum #2 at Carlson Park in Rochester, NY. (NYSDEC VCP Number V00514-8)

Dear Greg:

This letter is intended to provide a summary of supplemental shallow overburden Remedial Investigation (RI) activities that 100 Carlson Road, LLC proposes to conduct as part of ongoing RI activities being implemented at the Carlson Park Site (the Site). The proposed supplemental overburden RI activities addressed herein have been verbally discussed with you in the past, and are being presented at this time based upon the results of a Ground Penetrating Radar (GPR) survey that was completed in late July, as described in more detail below. These activities represent an expansion of the Scope of Work outlined in the Supplemental Work Plan for Initial Bedrock Evaluation Activities dated February 28, 2010 (Supplemental Work Plan), and a subsequent RI Work Plan Letter Addendum dated September 15, 2010. The Supplemental Work Plan, and associated Addendum Letter were both addendums to the original Voluntary Cleanup Program Remedial Investigation Work Plan for Carlson Park, dated October 2004 (RI Work Plan). Accordingly, we request that this Supplemental Overburden RI Work Plan Addendum Letter #2 be considered as an additional attachment to the Supplemental Work Plan. The remainder of this letter contains a summary and brief description of the additional supplemental RI activities currently being proposed.

Summary of Proposed Supplemental RI Activities:

- Overburden Groundwater Evaluation in the vicinity of a former underground pipe suspected to be present beneath a parking area in the southeast portion of the Site; and

- Expanded Overburden Groundwater and Shallow Soil Evaluation in the vicinity of location BR-3 (including selected nearby residential properties along Hampden Road).

Brief Description of Proposed Supplemental RI Activities:

Please note that both of the currently proposed supplemental RI activities will be conducted in a similar manner as those previously conducted as part of the original RI Work Plan and/or Supplemental Work Plan activities. The approximate locations of all currently proposed supplemental RI activities are presented on the attached Figure. As both of these activities will involve some component of adaptive sampling, the actual final sampling locations will be determined in the field, and based upon results obtained from previous locations. Adaptive sampling will involve the collection of depth-discrete groundwater grab samples and/or soil samples to be analyzed for Volatile Organic Compounds (VOCs) within an on-site mobile laboratory in accordance with USEPA SW-846 GC/MS Method 8260B-modified.

Overburden Groundwater Evaluation in the Vicinity of a Former Underground Pipe Suspected to be Present Beneath a Parking Area in the Southeast Portion of the Site.

Shortly after the presence of DNAPL was identified in shallow bedrock at location BR-6, an old facility drawing was found which indicated the possible presence of an "Injection Pit Line"that may have been installed beneath a parking area east of Building 2, and extending south and east towards a sanitary sewer line on Blossom Road. The placement of this unknown line/pipe, as depicted on the old facility drawing, is shown on the attached figure. As also indicated on the figure, the location of the bedrock groundwater monitoring well installed at location BR-6 appears to be close to the unknown pipe.

In order to help determine if the unknown pipe is actually present, a Ground Penetrating Radar (GPR) survey was conducted in this area in late July 2011. Results from the GPR survey indicated the presence of a subsurface linear anomaly which matched the location and shape of the unknown pipe depicted on the old facility drawing. Based upon those results, we presume that a subsurface pipe is actually present at the location shown. Additionally, observations made during the GPR survey suggest that this pipe is situated in unsaturated soils beneath a paved parking area.

In order to help evaluate whether or not possible former leakage from this pipe (or from bedding material around the pipe), may have contributed to environmental quality impacts, it is proposed that overburden groundwater evaluation activities be conducted near this pipe. Initial groundwater evaluation activities will focus on presumed downgradient (i.e. north northeast) locations where bends in the pipe are present (as shown on the attached figure). Actual groundwater grab sampling locations will be determined in the field and based upon the results obtained from previous sampling locations. If overburden groundwater quality impacts are found to be present along this pipe, an attempt will be made to delineate the on-site extent of such impacts within saturated overburden. Depending upon the results of the groundwater grab sampling activities, selected locations may also be chosen to conduct limited soil sampling.

It should be noted that previous overburden groundwater grab sampling was not required or conducted in this particular area as part of extensive adaptive sampling activities associated with the delineation of previously identified nearby impacted areas.

Expanded Overburden Groundwater and Shallow Soil Evaluation in the Vicinity of Location BR-3.

Elevated concentrations of dissolved TCE were previously identified in shallow overburden groundwater at location BR-3 situated along the eastern property boundary of the Site. Results from a subsequent extensive on-site adaptive overburden groundwater sampling program conducted beneath the parking lot surrounding that area, together with the results from an off-site adaptive overburden groundwater sampling program conducted east of this area along Hamden Road, continue to suggest the possibility of a localized shallow source zone in the general vicinity of BR-3. Identification of a localized shallow source of TCE, if present, is important for addressing potential on-going groundwater quality impacts in that specific area.

Given the placement of this location at the property boundary, it is currently unknown whether a localized source of these impacts is from an on-site or off-site location. The additional supplemental RI activities proposed herein are intended to provide information that can be used to better identify the specific shallow subsurface configuration of a possible on-going source of dissolved TCE which may be present in this vicinity. Initially, supplemental overburden groundwater grab sampling will be conducted both on-site and off-site in the immediate vicinity of BR-3, as approximately shown on the attached figure. These samples will be analyzed for VOCs. Based upon the results of these VOC analysis, the locations exhibiting the highest dissolved TCE concentrations in overburden groundwater will also be selected to undergo unsaturated soil sampling and analysis.

In addition to the adaptive sampling activities described above, a single piezometer will be installed just west (behind) each of two residential properties situated in this area. Information obtained from the piezometers will be utilized to evaluate and monitor conditions relative to soil vapor considerations.

Water Level Monitoring.

In addition to the two tasks described above, while on-site to conduct the proposed supplemental RI activities, a complete round of water levels will be measured from all existing on-site groundwater monitoring wells and/or piezometers, as well as the additional off-site piezometers to be installed as part of this program.

As mentioned above, all supplemental RI activities proposed in this Work Plan attachment will be completed in a similar manner as previously conducted as part of the ongoing RI activities being completed at the Site, and will be consistent with the methodologies presented in the prior Work Plans as previously approved by NYSDEC for this Site.

This concludes the description of additional supplemental overburden RI activities currently being proposed to be conducted at the Carlson Park Site at this time. Any additional field activities which may be required at the Site in the future, including additional overburden evaluation activities, and on-site bedrock groundwater evaluation activities, will be determined once the results from these activities have been evaluated together with information previously obtained.

We currently anticipate conducting these supplemental RI activities during the week of August 15th. This schedule will be contingent upon coordinating access to the applicable residential properties, and obtaining your approval to proceed.

Please feel free to 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,
S2C2 Inc.

Steven B. Gelb
Project Manager

Proposed Supplemental Overburden Groundwater Delineation Areas

Carlson Park, Rochester, NY

S_2C_2 inc.

DRAWN BY	SCALE	DATE	DWG. NO.	FIGURE
TCK	1:1,500	8/8/2011		1