



672 Frey Road, Macedon N.Y. 14502
Tel: (315) 986-4751 • Fax: (315) 986-8274
www.soilairwater.com

REMEDIAL INVESTGATION WORK PLAN

Former Labelon Corporation Facility
10 Chapin Street
City of Canandaigua
Ontario County, New York
Site # C835016

Prepared For:

Canandaigua Crossroads, LLC
620 Park Avenue
Suite 185
Rochester, New York 14607

Prepared By:

SAW Environmental Services, Inc.
672 Frey Road
Macedon, NY 14502
(315) 986-4751

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TABLE OF CONTENTS

Section

1.0	INTRODUCTION.....	1
1.1	Purpose.....	1
1.2	Site Description & History.....	1
1.3	Prior Investigations	1
2.0	SCOPE OF WORK	4
2.1	Floor Drain/Sump Inspection.....	4
2.2	Geophysical Survey	4
2.3	Potential Dry Well Evaluation	4
2.4	Passive Soil Gas Survey.....	4
2.5	Direct Push Soil Borings	5
2.6	Groundwater Monitoring Wells	6
2.6.1	Survey	7
2.6.2	Hydraulic Conductivity Testing	7
2.6.3	Groundwater Sampling	7
2.7	Laboratory Analysis	7
2.8	Management of Investigation Derived Waste	8
2.9	Qualitative Exposure Assessment.....	8
2.10	Additional Investigation/Interim Remedial Measures.....	8
2.11	Remedial Investigation Report.....	8
3.0	QUALITY ASSURANCE PROJECT PLAN	9
3.1	Sampling Objectives	9
3.2	Project Organization.....	9
3.3	Sampling Procedures.....	9
3.4	Decontamination Procedures.....	10
3.5	QA/QC Samples.....	11
3.6	Data Validation	11
4.0	HEALTH & SAFETY	11
5.0	PROJECT PERSONNEL	11
6.0	SCHEDULE	11
7.0	CITIZEN PARTICIPATION	12

TABLE OF CONTENTS (Continued)

Tables

Table 1 – Analytical Sampling Program Summary

Figures

Figure 1 – Site Location Map

Figure 2 – Site Map

Figure 3 – Proposed Sample Location Map

Appendices

Appendix A: Health & Safety Plan

Appendix B: Project Personnel Resumes

Appendix C: Citizen Participation Plan

References

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1.0 INTRODUCTION

1.1 Purpose

The purpose of this Remedial Investigation Work Plan (RIWP) is to describe proposed site activities associated with a Brownfield Remedial Investigation (RI) at the Former Labelon Corporation Facility (Site # C835016), located at 10 Chapin Street in the City of Canandaigua, New York. This RIWP has been prepared on behalf of Canandaigua Crossroads, LLC and addresses required elements of the New York State Department of Environmental Conservation (NYSDEC) Program Policy DER-10 – *Technical Guide for Site Investigation and Remediation*, May 2010.

The objectives of the RI are as follows:

- Delineate the aerial and vertical extent of contaminants in all media at or emanating from the site
- Determine the surface and subsurface characteristics of the site, including topography, geology, and hydrogeology
- Identify the sources of contamination, the migration pathways and actual or potential receptors
- Collect sufficient data to develop remedial alternatives
- Collect sufficient data to provide to NYSDEC personnel/contractors to direct off-site investigations

1.2 Site Description & History

The site is located at 10 Chapin Street in the City of Canandaigua, Ontario County, New York and encompasses 1.63 acres. A Site Location Map is attached as Figure 1. The site is bordered to the east and south by commercial properties. Canandaigua City Hall and residential neighborhoods border the site to the north and a residential neighborhood borders the site to the west. An approximately 80,000 square foot, 4-story vacant manufacturing building is located at the site.

Historical site usage has included a coal yard (circa 1880s to 1910s), a corset factory (circa 1920s to 1940s) and a bicycle factory (circa 1940s to 1950s). Labelon Corporation, a manufacturer of transparency films and pressure sensitive labels, occupied the site from approximately 1960 to 2002.

Based on the findings of prior investigations native soils at the site consist primarily of fine sand with varying quantities of silt and fine gravel. The site overlies the Middle Devonian Skaneateles Formation, which consists of shale and limestone. Bedrock was encountered in prior investigations at a depth of approximately 20 feet below ground surface (bgs). Prior groundwater monitoring has indicated that groundwater flow at the site is to the southwest.

1.3 Prior Investigations

[Note: Information from investigations performed at the site prior to 2009 were obtained during a document review associated with a Phase I Environmental Site Assessment performed at the site by SAW in June 2009 on behalf of a prospective purchaser. The documents were reviewed in the Region 8 office of the NYSDEC in response to a Freedom of Information request]

Underground Storage Tank Removal – 1990. Fifteen (15) underground storage tanks (USTs) were removed from the site in September 1990 by Entech Management Services Corp. of Buffalo, New York. According to reports for the tank removal three soil piles were reportedly generated. Two of the piles were disposed of as hazardous waste. According to the report the third pile was determined to be non-hazardous and was used as backfill.

Haley and Aldrich of New York (H&A) was retained to perform additional sampling and investigation at the site. A Well Installation Work Plan submitted to the NYSDEC by H&A indicates that soil samples were collected from the base of the excavations. The document indicates that one soil sample (i.e., SS-14,

proximate to the overhead door on the northwest portion of the site building) contained elevated concentrations of acetone (39.5 mg/kg), methyl ethyl ketone (MEK, 60.8 mg/kg) and toluene (128 mg/kg). These concentrations exceed current 6 NYCRR Part 375-6.8(a) unrestricted use and protection of groundwater soil cleanup objectives (SCOs) but are below §375.6-8(b) restricted use commercial SCOs.

Hydrogeologic Investigation – 1992. In March 1992 H&A installed two groundwater monitoring wells at the site in the vicinity of the former tank location. The findings of a Hydrogeologic Investigations report indicate that compounds detected in the analysis of post-excavation soil samples in 1990 were not detected in groundwater samples collected from the wells. However, the sampling revealed the presence of low concentrations of trichloroethene (TCE, 29.0 µg/L) and 1,2-dichloroethene (DCE, 7 µg/L) in the groundwater samples.

Environmental Investigation – 2001. In August 2001 H&A conducted an investigation at the site that included the advancement of 11 soil borings with a Geoprobe® and conversion of 8 borings to 1-inch groundwater monitoring wells. In addition, six soil vapor samples were collected in tedlar® bags from beneath the building concrete floor and were analyzed by H&A's in-house gas chromatograph. Soil samples from these locations were submitted to a laboratory for analysis of total petroleum hydrocarbons and metals as well.

The findings of the report indicate that TCE and DCE were detected in four monitoring well samples at concentrations ranging from 23.2 µg/L to 54 µg/L. In addition, acetone was detected in two samples with a maximum concentration of 3,700 µg/L. These concentrations exceed applicable NYSDEC ambient water quality standards.

Silver was detected in soil samples from soil vapor borings at concentrations ranging between 1.2 and 51.6 mg/kg. Other metals detected were within site background levels or unrestricted use SCOs. Analysis of soil samples from two of the soil vapor borings indicated total petroleum hydrocarbon (TPH) concentrations of 24.9 and 61.6 mg/kg. While there is no standard for TPH in soil, elevated concentrations of TPH may be indicative of further petroleum impacts at the site (petroleum impacts at the site are discussed further below).

PCE (23.7 µg/kg), TCE (1890 µg/kg), cis-DCE (503 µg/kg) and trans-DCE (23.4 µg/kg) were detected in soil samples collected from a soil boring (GP-104A) advanced adjacent to the western property line. Only TCE was detected in a groundwater sample collected from a temporary monitoring well installed in the boring at a concentration of 874 µg/L.

The findings of sub-slab vapor sampling indicate that TCE was detected in all six samples at concentrations ranging from 1.59 to 10.58 mg/m³ [Note: Sub-slab sampling was conducted prior to issuance of NYSDEC/DOH 2006 guidance for vapor intrusion assessment. Samples were collected in tedlar® bags and analyzed on H&A's in-house gas chromatograph].

Phase I Environmental Site Assessment – 2009. In June 2009 SAW conducted a Phase I Environmental Site Assessment at the site on behalf of a potential purchaser. The Phase I identified the following recognized environmental conditions (RECs):

1. Observations of gasoline tanks on Sanborn® maps and lack of documentation relative to their removal.
2. Lack of documentation relative to the removal or potential presence of a 4,000-gallon fuel UST northeast of the site building.
3. The presence and unknown extent of VOC impacts in site soils.
4. The presence and unknown extent of TCE and DCE in site groundwater.
5. The presence and unknown extent of silver and petroleum hydrocarbons in site soils.
6. The potential for a vapor intrusion concern at the subject site from sub-slab TCE vapors.

7. The unknown discharge location of sumps observed in the site building.
8. The likely presence and unknown condition of a fuel oil UST at the site.

Phase II Environmental Investigation – 2009. SAW performed a Phase II Environmental Investigation at the site to address the RECs identified during the Phase I. The investigation included the advancement of sixteen (16) soil borings, installation and sampling of four (4) groundwater monitoring wells, sampling of five (5) existing monitoring wells and collection of soil and sub-slab vapor samples.

During advancement of soil borings petroleum odors and elevated PID readings were encountered adjacent to the site building on the southwestern portion of the property. As per the reporting requirements of 6 NYCRR Part 613.8, SAW personnel notified the NYSDEC Bureau of Spill Prevention and Response by telephone of evidence of a release from a petroleum bulk storage facility. The NYSDEC assigned the site spill #0903206.

Laboratory reports indicated that SVOCs were not detected in soil samples. Petroleum related VOCs were present in soil adjacent to the 20,000-gallon fuel oil UST outside the boiler room and south and west of the western stairwell (approximate location of a gas tank observed on Sanborn® maps); however concentrations detected were well below Part 375-6.8(a) unrestricted use SCOs (TAGM #4046 RSCOs at the time of the investigation). Low concentrations of heavy metals were detected at concentrations below unrestricted use SCOs. No evidence of impact was encountered in the vicinity of the former tank pits (i.e., northwest of the site building) or the gas tank observed on Sanborn® maps north of the original site building, therefore these areas were no longer considered of concern. It is likely that the 20,000-gallon fuel oil UST registered at the site has been filled in place and may be located partially under the site building.

Laboratory analysis of groundwater samples collected during the investigation indicated that silver was not detected in site groundwater. Trichloroethene (TCE) was detected in four monitoring wells at the site. High concentrations of TCE (3,140 µg/L) was detected in monitoring wells installed adjacent to the western property line. Also detected were the cis and trans isomers of 1,2-DCE and vinyl chloride. Groundwater flow at the site was calculated to be to the south-southwest, towards the adjacent residential properties and Chapin Street. Given the high concentrations of these compounds in groundwater in close proximity to the property line it is likely that these compounds have been transported off site.

Laboratory analysis of sub-slab vapor samples indicated that chlorinated VOCs and BTEX compounds were present in all 8 sample locations under the building slab. Concentrations of TCE detected in sub-slab vapor at the site exceed the NYSDOH Vapor Intrusion Guidance mitigation criteria with a maximum concentration of 3,790 µg/m³. Soil vapor samples collected from adjacent to the western property line contained chlorinated VOCs and BTEX compounds. These samples were collected from an approximate depth of one foot below grade in topsoil. It is likely that concentrations would be much higher if an impervious surface, such as a basement slab, were present. The potential exists that a soil vapor plume extends from the site to the adjacent residential properties.

During setup of the sub-slab sampling equipment an apparent former floor drain was discovered. Approximately ½ of the length of the drain was observed to be filled with concrete and the remainder was covered with a steel plate. No pipes were observed coming into or out of the apparent drain. A sample of sediment from the drain was collected. Laboratory reports indicate that TCE was detected in analysis of the sediment at a concentration of 36.2 µg/kg. It is likely that a pipe is connected to the drain in the section filled in with concrete. It is not known if the drain was utilized by Labelon during their operation of the site or by the bicycle manufacturer who operated the site prior to 1960. Given that the sediment in the floor drain was dry and exposed to the air for an extended period of time (i.e., at least since Labelon ceased operations at the site in the early 2000s) it has likely volatilized considerably. It is conceivable that the original concentration was significantly higher. It is possible that the floor drain is connected to a dry well or, if connected to the sanitary sewer, the pipe connecting it has leaked. The floor drain was identified as a potential contributor to TCE impacts to groundwater at the site.

Based on the findings of the Phase II Environmental Investigation the potential purchaser declined to proceed with the purchase of the property.

2.0 SCOPE OF WORK

Prior to initiation of intrusive site work Dig Safely New York will be notified to locate public utilities.

2.1 Floor Drain/Sump Inspection

Trenches and sumps observed during prior site visits are detailed on Figure 2. Efforts will be made to determine the discharge location of the apparent floor drains in the main site building. The concrete partially filling each trench will be jackhammered and removed to determine if a pipe is connected to the drain. If a pipe is present, pipe location equipment will be utilized to trace the location of the pipe and a pipe inspection camera will be utilized to visually inspect the pipe for breaks, leaks and discharge locations. The findings of the pipe trace/inspection will be utilized to focus soil boring/monitoring well locations.

Sump water and sediment (if present) will be sampled as detailed in the Analytical Sampling Program Summary, which is attached as Table 1.

2.2 Geophysical Survey

A geophysical survey will be performed using ground penetrating radar (GPR) or underground imaging detection to determine the presence of any underground storage tanks (USTs) and associated plumbing, utilities, and any other subsurface anomalies to support subsequent site investigation and potential future remedial activities. All equipment will be calibrated and maintained manufacturer's specifications. The geophysical survey will be focused on proposed boring, dry well, and floor drain locations.

The findings of geophysical survey will be utilized to focus soil boring/monitoring well locations. In the event that geophysical survey indicates the potential or likely presence of a UST at the site the UST will be addressed as an Interim Remedial Measure (IRM) (See Section 2.10 below).

2.3 Potential Drywell Evaluation

An unknown structure (potential drywell) is present at the site along the western property boundary. The purpose of this structure is not known. An approximately 12 inch pipe is connected to the structure and appears to head in a northeasterly direction, towards the railroad bridge abutment and the Canandaigua City Hall. Pipe inspection equipment will be utilized to determine the terminus of the pipe connected to the structure. The findings of the pipe trace/inspection will be utilized to focus soil boring/monitoring well locations.

It is not known if the structure has a solid bottom, however sediment was observed in the bottom of the structure. The structure will be probed in several locations for a solid bottom. If sediment depth is greater than 6 inches at least three hand-driven core samples will be collected. Sediment samples will be screened with a photo-ionization detector (PID). A minimum of one sediment sample will be collected from the base of the structure and submitted for laboratory analysis as detailed in Table 1. Additional samples may be collected based on sediment thickness and degree of apparent impact.

2.4 Passive Soil Gas Survey

A passive soil gas survey will be performed to identify potential source areas of VOC impacts at the site. Sorbent tubes will be provided and analyzed by Beacon Environmental Services, Inc. by Modified EPA Method 8260C (modified for the introduction of samples by thermal desorption). Target analytes will include halogenated, non-halogenated and aromatic VOCs, TPH C5-C9 and TPH C10-C15 straight chain alkanes. Sorbent tubes will be installed and retrieved per the manufacturer's instructions and will be

deployed in a grid pattern with a maximum spacing of 50 feet between sample locations. Approximate passive soil gas sample locations are detailed on Figure 3.

Sampling procedures are further described in Section 3.3.1 below. It is anticipated that approximately 72 sorbent tubes will be deployed during the passive soil gas survey. Sorbent tubes will be retrieved after a period of approximately 2 weeks and submitted for analysis. The results of laboratory analysis of the passive soil gas sampling will be presented on color isopleth maps. The findings of the passive soil gas survey will be utilized to determine final placement of soil borings and groundwater monitoring wells.

2.5 Direct Push Soil Borings

A truck or track mounted direct push drill rig will be utilized to advance soil borings through overburden soils at the site. Soil samples will be collected continuously utilizing Macro-Core[®] sampling equipment or similar device. Borings will be advanced to equipment refusal. A field geologist will observe soil borings and create a field log for each boring. Soil samples will be collected at 2 foot intervals and will be visually examined to characterize soil type and physical properties such as color, moisture content and visual evidence of contamination (e.g., staining, product or sheen).

Soil samples will be screened in the field for volatile organic vapors with a photoionization detector (PID) equipped with a 10.6 eV lamp. The PID will be calibrated in the field daily prior to use to a 100 ppm isobutylene reference standard.

Sampling procedures are further described in Section 3.3.2 below. Samples collected for laboratory analysis of VOCs will be biased on evidence of impact (e.g. staining, odors or elevated PID readings). In general, samples will not be submitted for VOC analysis from borings where no evidence of impact is observed, however a minimum of two samples with no evidence of impact will be analyzed from soils near the water table. The proposed type and number of samples from soil borings submitted for laboratory analysis are detailed in the Analytical Sampling Program Summary, which is attached as Table 1.

Proposed soil boring locations are detailed on Figure 2. The actual number and placement of soil borings and laboratory samples will be dependent on the following:

- The location of underground utilities at the site.
- The findings of the floor drain and potential drywell pipe location/inspection.
- The findings of the passive soil gas survey.
- Field observations of evidence of impact, such as staining, odors or elevated PID readings.
- The experience and judgment of the field geologist overseeing the soil borings.
- Input from DER personnel.

Soil borings are proposed for the following areas:

Former UST Area

Soil borings will be advanced in the vicinity of the former USTs northwest of the site building to determine the presence and extent of VOCs, SVOCs and metals. A minimum of four borings will be advanced in this area. The actual number and placement of borings will be based on field observations of evidence of impact. Borings will be advanced to equipment refusal.

Solvent Mixing Room

Soil borings will be advanced in the solvent mixing room in the north portion of the site building and vicinity to determine if VOC impacts are present in this area that may be contributing to groundwater and sub slab vapor impacts. A minimum of four borings will be advanced in this area. The actual number and placement of borings will be based on field observations of evidence of impact. Borings will be advanced to equipment refusal or 2 feet into groundwater, whichever is encountered first.

Silver Mixing Rooms

One soil boring will be advanced in each of the silver mixing rooms (total of 4) in the eastern portion of the site building to determine the presence of metals in subsurface soils in this area. Given the lack of silver detected in previous groundwater sampling at the site these borings will be advanced to an approximate depth of 8 feet bgs.

West of Site Building

Soil borings will be advanced west of the site building to determine the presence of a source area contributing to groundwater contamination. Of particular interest in this area is the vicinity of the unknown structure and boring GP-104A from H&A's 2001 investigation. This boring was located approximately 10 feet north of SAW boring/well B4 and contained elevated concentrations of chlorinated VOCs in soil and groundwater. Borings west of the site building will also provide additional data relative to the low level petroleum impacts in the vicinity of the boiler room and west of the stairwell.

Approximately 15 borings are proposed west of the site building. The actual number and placement of borings will be based on field observations of evidence of impact. Borings will be advanced to equipment refusal.

Main Site Building Interior

Soil borings will be advanced through the concrete floor in the main site building in an effort to determine the source of VOC vapors detected in sub slab air samples. Approximately 15 borings are proposed for the interior of the site building. Initial borings will be placed in the vicinity of prior sub slab air sampling locations. The actual number and placement of borings will be based on field observations of evidence of impact. Borings will be advanced to equipment refusal or 2 feet into groundwater, whichever is encountered first.

Additional Boring Locations

Additional boring locations will be selected as appropriate based on field observations of impact and the findings of the floor drain and potential drywell pipe location/inspection.

2.6 Groundwater Monitoring Wells

A total of 10 groundwater monitoring wells are initially proposed at the subject site (i.e., 6 exterior wells and 4 interior wells). Proposed well locations are detailed on Figure 2. Final well locations will be selected based on the findings of the floor drain and potential drywell pipe location/inspections, passive soil gas survey, observations from soil borings and input from DER personnel.

Exterior monitoring wells will be installed with a rotary drill rig and 4 ¼ inch inner diameter hollow stem augers. Augers will be advanced through the overburden to bedrock refusal, anticipated at approximately 20 feet bgs. Air or drilling fluids will not be used. Soils will be sampled continuously in advance of the augers utilizing standard split spoon samplers or Macro-Core[®] sampling equipment. A field geologist will observe and log each boring in a fashion similar to that describe in Section 2.3 above. Select soil samples will be collected for laboratory analysis to supplement data from the direct push soil borings; however the focus of the monitoring well installation will be on collection of groundwater samples.

Due to overhead clearance issues installation of monitoring wells inside the building with a drill rig will not be feasible. Interior wells will be installed in open direct push soil borings.

Exterior monitoring wells will be constructed of 2 inch Sch 40 flush joint PVC screen and riser. Interior wells will be constructed of 1 inch PVC. Based on soils encountered in previous investigations it is anticipated that 0.010 inch slotted screens will be installed with a sandpack consisting of #0 Morie sand. It is anticipated that each well will be equipped with 10 feet of screen to facilitate discreet sampling at multiple depths. The sandpack will extend approximately 1 foot above the top of the well screen. A 1 foot layer of choke (fine) sand will be placed above the sand pack to inhibit bentonite/grout intrusion. A 2 foot thick bentonite pellet seal will be placed above the sandpack and the remainder of the boring will

be grouted to the surface with a 5% bentonite grout. It is anticipated that monitoring wells will be completed at the surface with flush-mount protective casings set in a concrete collar. Each well will be equipped with a locking J-plug and padlock.

The wells will be developed after a minimum period of 48 hours. Wells will be developed by surging and pumping to remove fine particles from the well and sandpack. Development water will be managed as described in Section 2.6 below.

2.6.1 Survey

Subsequent to installation all new wells will be surveyed to existing site datum to facilitate groundwater flow and gradient calculations.

2.6.2 Hydraulic Conductivity Testing

Rising and falling head well tests will be performed on a representative selection of monitoring wells to determine hydraulic conductivity at the site. It is anticipated that conductivity testing will be performed on four wells.

2.6.3 Groundwater Sampling

Prior to sampling, all wells at the site will be gauged with an oil-water interface probe to determine depth to groundwater and the presence of non aqueous phase liquid (NAPL). Data will be utilized in conjunction with surveyed casing elevations to calculate groundwater flow and gradient. Given that prior groundwater sampling has indicated that contaminants of concern were not detected in monitoring wells located north or east of the site building, it is anticipated that only one upgradient well will be sampled. Given the lack of metals or SVOCs detected in prior sampling at the site the focus of groundwater sampling will be VOCs.

Groundwater samples will be collected from all newly installed wells and select wells installed during prior investigations. It is anticipated that existing wells B3 and B4 (installed by SAW in 2009) and B-105A and B-106 OW (installed by H&A in 2001) will be sampled along with the newly installed wells; however the final decision on which wells will be sampled will be determined based on the findings of the passive soil gas survey, the final well locations and consultation with DER personnel. Groundwater samples will be collected from each well using low-flow sampling techniques with a variable speed peristaltic pump, flow through cell and disposable polyethylene tubing. A water quality meter will be utilized to measure groundwater chemistry parameters including pH, conductivity, temperature, dissolved oxygen, ORP and turbidity and measurements will be recorded on low flow sample logs. Groundwater samples will not be altered (i.e., filtered). The proposed type and number of groundwater samples submitted for laboratory analysis are detailed in the Analytical Sampling Program Summary, which is attached as Table 1.

Per DER-10 a second round of groundwater samples will be collected. Based on the results of laboratory analysis the second round of sampling may be modified to eliminate non-critical wells and/or eliminate specific parameters. DER approval will be obtained prior to any modification of analytical testing prior to the second round of sampling. Where feasible the sampling events will coincide with seasonably high and low water.

2.7 Laboratory Analysis

Laboratory Analysis will be performed by a NYSDOH Environmental Laboratory Accreditation Program (ELAP) accredited laboratory. Samples will be analyzed by methods included in the July 2005 NYSDEC Analytical Services Protocol (ASP) and results will be reported with Category B deliverables to facilitate data validation (see Section 3.6 below).

The proposed type and number of samples to be submitted for laboratory analysis are detailed in the Analytical Sampling Program Summary, which is attached as Table 1.

2.8 Management of Investigation Derived Waste (IDW)

Consistent with DER-10, drill cuttings and other spoil from soil borings will be returned to the boring from which they were generated with the following exceptions:

- Gross contamination, NAPL or free product is present
- The borehole will be used for installation of a monitoring well
- The borehole has penetrated an aquitard, aquiclude or other confining layer
- The borehole has extended into bedrock
- Backfilling the borehole with cuttings will create a significant path for vertical movement of contaminants
- The soil cannot fit into the borehole

Soils meeting these criteria will be containerized in 55 gallon drums and secured within the site building pending waste characterization and disposal.

Development, purge and decontamination water will be containerized in 55 gallon drums and secured within the site building pending waste characterization and disposal.

2.9 Qualitative Exposure Assessment

A Qualitative Exposure Assessment (QEA) will be performed to assess potential site impacts to human health. The QEA will be consistent with the NYSDOH guidance contained in Appendix 3B of DER-10. The QEA will contain a determination of reasonably anticipated future land and groundwater use, an evaluation of exposure settings, identification of potential exposure pathways and an evaluation of contaminant fate and transport. Given that the remedial party is a volunteer in the BCP, the QEA will not include a delineation of the nature and extent of off-site impacts.

Given the urban nature of the site and surrounding area and lack of significant fish and wildlife habitats a fish and wildlife resource impact analysis will not be performed.

2.10 Additional Investigation/Interim Remedial Measures

The necessity for additional investigation will be determined based on the findings of investigation activities described in this RIWP. Additional investigation activities may include installation of additional monitoring wells (potentially including bedrock monitoring wells), additional soil borings or test pits. Further, based on the findings of the RI the necessity for removal, treatment, containment or other interim remedial measures (IRMs) will be evaluated.

In the event that the geophysical survey reveals the likely presence of a UST at the site the presence of the UST will be confirmed with test pits. Any UST discovered will be evaluated for size and the contents will be characterized. Abandoned USTs will be closed/removed as an IRM in conformance with DER-10.

If additional investigation or IRMs are deemed necessary a proposed scope of work will be presented to DER personnel for approval prior to initiation of additional field activities.

2.11 Remedial Investigation Report

Subsequent to completion of all RI activities a Remedial Investigation Report (RIR) will be completed consistent with the requirements of DER-10. The RIR will contain the following information:

- A technical overview of the findings of the RI and description and documentation of work performed.
- Identification and characterization of the source(s) of contamination.
- Description of the location, nature and extent and other significant characteristics of the contamination present.

- Define hydrogeologic factors as needed.
- Identify routes of exposure and human populations at risk.

3.0 QUALITY ASSURANCE PROJECT PLAN

3.1 Sampling Objectives

The objective of field sampling at the site is to collect representative samples of environmental media in order to:

1. Fully characterize the nature and extent of contaminants at the site.
2. Identify, to the extent possible, sources of contamination at the site.
3. Collect data necessary to evaluate the actual or potential threats to human health and the environment.
4. Collect data necessary to evaluate remedial alternatives.

A Sample Analysis Plan detailing the number and method of laboratory analysis for various site media is attached as Table 1. Proposed sampling locations are detailed on Figure 2.

3.2 Project Organization

David Engert of SAW will provide project oversight on behalf of Canandaigua Crossroads, LLC. The RI will be implemented by a US Environmental Protection Agency (EPA) retained contractor under EPA's Targeting Brownfield Assistance program. The selected contractor will provide a list of project personnel upon approval of the RIWP.

3.3 Sampling Procedures

General procedures for the collection of soil and groundwater samples are described in Sections 2.3 and 2.4.2, respectively.

3.3.1 Passive Soil Gas Sample Collection

Passive Soil Gas samples will be collected using Beacon Environmental Services, Inc. BESURE™ samplers following manufacturer's installation and retrieval instructions. In general, a 3/4 inch metal stake (provided with samplers) and hammer will be used to create a hole approximately six inches to 1 foot in depth. The sample tube will be placed in the hole and the hole will be plugged with aluminum foil and soil. After a period of approximately 2 weeks the samples will be retrieved and sent to the laboratory. Dates and times of installation and retrieval will be recorded on Field Deployment Records provided by the manufacturer with the samplers.

3.3.2 Soil Sample Collection

Soil samples for laboratory analysis will be collected from split-spoon and Macro-Core® samplers based on PID screening. Soil samples for SVOC, metals and PCBs will be placed directly into laboratory supplied glass jars of proper type and size as detailed in Section 3.3.3 below.

Soil samples for VOC analysis will be collected using EPA Method 5035 sample collection procedures. Samples will be collected directly from split-spoon or Macro-Core® samplers using 5 oz. EnCore® samplers. Two EnCore® samples will be collected for each soil sample collected for analysis. Samples will be delivered to the laboratory within 48 hours to ensure proper preservation.

3.3.3 Groundwater Sample Collection

Groundwater samples will be collected via low flow sampling techniques using polyethylene tubing dedicated to each well and a variable speed peristaltic pump equipped with a flow through cell. Subsequent to liquid level gauging the polyethylene tubing will be placed in the well such that the end of

the tubing is placed at the required sampling depth. The pump will then be turned on and the flow rate will be adjusted to a rate less than or equal to the recovery rate of the well. The flow rate should be no greater than 0.5 L/min. Groundwater quality parameters will be monitoring and recorded on low flow sample logs at 3 minute intervals until equilibrium is achieved. Equilibrium is defined as within +/- 10 % for DO and turbidity, +/- 3% for conductivity, +/- 10 mV for ORP and +/- 0.1 for pH. Where possible wells will be purged until turbidity is decreased to less than 10 NTUs. After equilibrium is achieved groundwater samples will be collected in containers of proper type and size as detailed in Section 3.3.3 below.

3.3.4 Sample Management

With the exception of EnCore® samplers, all sample containers will be provided by the laboratory. The Project Manager will coordinate with the laboratory to acquire the appropriate number and type of sample containers and ensure appropriate preservatives are added to containers prior to transport to the site.

Subsequent to sample collection all samples will be labeled with the date and time of sample, sample ID, project information and analytical parameters to be tested for. Sample containers will immediately be placed in a laboratory supplied cooler on ice pending transportation to the laboratory. A chain of custody record will be completed for all samples and will accompany samples at all times. Samples will be maintained at a temperature of 4° C until delivery to laboratory. Sampled will be delivered to laboratory as soon as is practical, but no more than 48 hours from time of collection.

Laboratory methods, preservation, containers and holding times are summarized as follows:

Parameter	Analysis Method	Matrix	Container	Preservative	Holding Time*
VOCs	EPA 8620 TCL	Soil**	5 oz. EnCore® x 2	Methanol**	10 days
	EPA 8620 TCL	Groundwater	40 mL Glass x 2	NA	7 days
	EPA 8260C	Soil Vapor	BESURE™	NA	28 days
SVOCs	EPA 8270 TCL	Soil	4 oz. Glass	NA	5 days
	EPA 8270 TCL	Groundwater	1 L Glass	NA	5 days
Metals	EPA 6010 TAL	Soil	4 oz. Glass	NA	180 days
	EPA 6010 TAL	Groundwater	250 mL Plastic	HNO ₃	180 days
Mercury	EPA 7470	Soil	4 oz. Glass	NA	26 days
	EPA 7470	Groundwater	250 mL Plastic	HNO ₃	26 days
PCBs	EPA 8082	Soil	4 oz. Glass	NA	5 days
	EPA 8082	Groundwater	1 L Glass	NA	5 days

*From verified time of sample receipt at laboratory.

** Samples will be collected in EnCore samplers and delivered to laboratory within 48 hours of collection. Where analysis will not be conducted within 48 hours of sample collection samples will be preserved by weighing and placing in a glass jar with methanol upon receipt at laboratory.

Project quantitation limits for soil and groundwater are detailed in Table 2.

3.4 Decontamination Procedures

All sampling equipment will be decontaminated prior to reuse to prevent cross contamination of samples. All drill rigs, direct push rigs or other heavy equipment will be cleaned prior to entering the site.

A temporary decontamination pad will be constructed for decontamination of drill augers and sampling equipment. Two layers of 6-mil polyethylene sheeting will be placed on the ground surface and will be bermed on all sides to contain decontamination fluids and will be equipped with a sump. Drill augers will be steam cleaned between each boring.

All reusable sampling equipment, including split spoon and MacroCore® samplers, interface probes, and flow through cells, will be scrubbed with a biodegradable, phosphate free detergent (e.g.alconox®) followed by a potable water rinse. The equipment will be rinsed again with deionized water and allowed to air dry.

All decontamination fluids will be containerized and secured in the site building pending waste characterization and disposal.

3.5 QA/QC Samples

The following describes the number and types of quality assurance/quality control samples to be collected during the project.

Duplicate Samples. Duplicate samples will be collected at a frequency of 1 duplicate per every 20 samples collected for each sample matrix. Duplicate samples will *not* be identified as such on the chain of custody.

Matrix Spike. Matrix Spike (MS) samples will be collected at a frequency of 1 per every 20 samples collected for each sample matrix. MS samples will be designated with “MS” after the sample ID on the chain of custody.

Matrix Spike Duplicate. Matrix Spike Duplicate (MSD) samples will be collected at a frequency of 1 per every 20 samples collected for each sample matrix. MSD samples will be designated with “MSD” after the sample ID on the chain of custody.

Trip Blanks. Trip blanks will be prepared by the laboratory and carried to the site on each day of sampling. Trip blanks will be placed in each cooler containing aqueous samples for VOC analysis.

3.6 Data Validation

ASP Category B data deliverables will be provided to an independent data validator for preparation of a Data Usability Summary Report (DUSR). The DUSR will be consistent with the requirements of Appendix 2B of DER-10.

4.0 HEALTH & SAFETY

A site specific Health & Safety Plan (HASP) is attached in Appendix A. Given the close proximity to residential areas to the site continuous air monitoring for particulate matter and VOCs will be conducted. A Generic Community Air Monitoring Plan (CAMP) is included in the HASP.

5.0 PROJECT PERSONNEL

The RI will be implemented by a US Environmental Protection Agency (EPA) retained contractor under EPA’s Targeting Brownfield Assistance program. The selected contractor will provide a list of project personnel upon approval of the RIWP.

6.0 SCHEDULE

The following schedule is anticipated for the project:

Task	Start Date	End Date
Submission of revised RIWP	11/03/11	NA
NYSDEC Review of RIWP	11/03/11	11/18/11
NYSDEC Approval of RIWP, begin public comment period	11/18/11	01/04/12
Project preparation, contractor scheduling, utility stakeouts, etc.	01/04/12	01/31/12
Geophysical survey, Pipe/trench/sump inspection/trace	02/01/12	02/10/12
Passive soil gas survey	02/13/12	02/29/12
Soil borings, well installation & sampling	03/12/12	04/30/12
RI Report Preparation, client/attorney review	05/01/12	05/31/12
Draft RI Report Submission to NYSDEC	06/01/12	NA

7.0 CITIZEN PARTICIPATION

A Citizen Participation (CP) Plan is attached in Appendix C. The CP Plan contains information such as project contacts, location of document repositories and CP activities.

James Craft - RE: FW: Labelon - Canandaigua Phase II Scope and Schedule Update

From: James Craft
To: Devine.Alison@epamail.epa.gov; Koberle, Melissa; MacDonald, Brendan; ...
Subject: RE: FW: Labelon - Canandaigua Phase II Scope and Schedule Update
CC: Putzig, Bart; kjc05@health.state.ny.us

Melissa,

With the comments, clarifications, and understandings below, we can consider the November 2011 RIWP final and approved. I added this series of emails as an addendum to the November 2011 RIWP (attached).

Thank you,

- Jim

>>> "Koberle, Melissa" <KoberleMA@cdmsmith.com> 2/6/2012 3:21 PM >>>
[Hi Jim,](#)

CDM Smith is in the process of finalizing the schedule with subcontractors and project staff. I will send along the schedule to the project team once its finalized.

Thanks.

Melissa Koberle
Environmental Scientist
CDM Smith
110 Fieldcrest Avenue, #8
6th Floor
Edison, NJ 08837
Phone: (732) 590-4616
Work Cell: (917) 575-1543
Fax: (732) 225-7851
koberlema@cdmsmith.com

From: James Craft [mailto:jhcraft@gw.dec.state.ny.us]
Sent: Thursday, February 02, 2012 9:41 AM
To: Devine.Alison@epamail.epa.gov; Koberle, Melissa; MacDonald, Brendan; adriscoll@dhdventures.com; dengert@soilairwater.com; dkanyuck@nyenvlaw.com
Cc: Putzig, Bart; kjc05@health.state.ny.us
Subject: RE: FW: Labelon - Canandaigua Phase II Scope and Schedule Update

Hi folks, Has a field investigation start date been established yet?

Thanks, - Jim

(sorry for the resend; some addresses were corrupted in my system).

>>> "Koberle, Melissa" <KoberleMA@cdmsmith.com> 1/4/2012 7:42 AM >>>
[Jim,](#)

Thank you for the prompt response. The CLP Method SOM01.2 is a closed system, and any preservative or surrogates are added through the septa cap, the vial is never opened. For sampling CDM Smith will follow Option 1 of *Appendix B: CLP Sample Collection Guidelines for VOAs in Soil by SW-846 Method 5035A*. Five grams of soil will be collected in three pre-weighed (dry) 40-ml VOA vials with a spin bar. In addition one 2-oz jar will be collected and filled without any headspace. The vials will not be preserved in the field, as indicated in Option 1, rather iced or frozen in the field.

CDM Smith will keep the referenced method as SOM01.2 to remain consistent with the CLP and to avoid potential confusion during the laboratory booking process. However, it will be noted on the worksheet that sample collection will be conducted according to Option 1 of *Appendix B: CLP Sample Collection Guidelines for VOAs in Soil by SW-846 Method 5035A*.

Please call or e-mail with any concerns. Thank you.

Melissa Koberle
 Environmental Scientist
 110 Fieldcrest Avenue, #8
 6th Floor
 Edison, NJ 08837
 Phone: (732) 590-4616
 Work Cell: (917) 575-1543
 Fax: (732) 225-7851
koberlema@cdmsmith.com



From: James Craft [<mailto:jhcraft@gw.dec.state.ny.us>]
Sent: Tuesday, January 03, 2012 7:30 PM
To: Devine.Alison@; Koberle, Melissa; adriscoll@; areichhart@; dengert@
Cc: Putzig, Bart
Subject: RE: FW: Labelon - Canandaigua Phase II Scope and Schedule Update

Hi Melissa,

Thanks for the update. The methods you cite appear to be versatile and clear improvements. However, I'm still concerned about preservation steps for VOC soil samples. It's important that a "closed system" sampling/analysis technique be used or we run the risk of significant VOC loss. Certainly methanol would raise detection limits (although 0.25 mg/kg is achievable for most chloroethenes) but adding water (not a preservative anyway) at the laboratory should not be allowed since opening the vials would likely lead to VOC loss.

We suggest use of Options 1-3 (Option 1 appears to be the least onerous) in Appendix B of the Contract Laboratory Program Guidance for Field Samplers (<http://www.epa.gov/superfund/programs/clp/download/sampler/CLPSamp-01-2011.pdf>). Freezing at the lab within 48 hours of sample collection extends holding times to 14 days.

"Appendix B: CLP Sample Collection Guidelines for VOAs in Soil by SW-846 Method 5035A

A. Preferred Options for the Contract Laboratory Program (CLP) are Options 1, 2, and 3: This method employs sample vials that are filled and weighed in the field and never opened during the analytical process. As a result, sampling personnel should be equipped with a portable balance capable of weighing to 0.01g. Soil samples must be placed on their sides prior to being frozen or placed on ice. Dry ice or field freezers are the only options.

Option 1.

Closed-system Vials:

Container - tared or preweighed 40 mL VOA vial containing a magnetic stir bar.

Collect 5 g of soil per vial (iced or frozen in the field). Check the pre-tared weight of the (dry) VOA vials prior to departure for the sampling event under controlled conditions. Weigh vials and soil samples to the nearest 0.01 g. This check is to ensure that the original weight was properly recorded.

Regular Samples

3 Vials - Dry (5 g soil per vial)

1 Vial - Dry (filled with soil, no headspace)

4 Total Vials

Regular Samples Requiring QC Analysis

9 Vials - Dry (5 g soil per vial)

1 Vial - Dry (filled with soil, no headspace)

10 Total Vials"

Let us know which option you intend to use.

Thanks, - Jim

P.S. Note that NYS still allows Option 6 (actually the default sampling method) which undoubtedly yields biased data. When one considers the time, effort, and money to gather, analyze, and validate data that is compromised from the start and which are then used for decision-making, it's quite unsettling. Perhaps the above guidance will help us move forward.

Option 6.

Glass Containers filled with sample - No Headspace:

Container - 4 oz Glass Jars.

Glass container filled with soil with no headspace and iced.

Caution: This is NOT a preferred option for the CLP because: Samples collected in this manner lose most of their volatile analytes prior to analysis when the sample containers are opened and sub-sampled in the laboratory.

James H. Craft

Engineering Geologist

New York State Department of Environmental Conservation

Division of Environmental Remediation - Region 8

6274 East Avon - Lima Road

Avon, NY 14414-9519

e-mail: jhcraft@gw.dec.state.ny.us

phone: (585) 226-5352

fax: (585) 226-8139

>>> "Koberle, Melissa" <KoberleMA@cdmsmith.com> 1/3/2012 11:56 AM >>>

Jim,

Thank you for your feedback on the Canandaigua Phase II Scope update. To close the loop on the action items below, the following will be incorporated into CDM's Sampling Analysis Plan:

1. Soil samples will not be preserved in the field as per SOM01.2. The samples will be collected in 40 ml vials with a spin bar and sent to the laboratory within 24 hours. A request will be submitted to the laboratory indicating that sodium bisulfite will not be used for sample preservation. Upon arrival

to the laboratory, the soil samples will most likely be preserved with water and frozen immediately.

Methanol preservation (estimated detection limit of 5 mg/kg) will not be used onsite in an effort to achieve NYSDEC Unrestricted use Soil Cleanup Objectives for site related contaminants (e.g., TCE [0.47 mg/kg] and DCE [.330 mg/kg]). Also, the CLP method for TAL metals has recently been updated from ILM04.3 to ISM01.3; the updated CLP method will be used for this investigation.

2. Based on a December 20th scoping meeting with SAW, CDM planned to evaluate soils with respect to NYSDEC Subpart 375 Unrestricted Use Soil Cleanup Objectives. The link provided by NYSDEC references the CP-51 Soil Cleanup Guidance (which replaces TAGM and STARS criteria), which will be used in conjunction with Subpart 375 Unrestricted Use standards.

Soil gas samples will be used for qualitative assessment.

3. Cyanide will be included as a target analyte.
4. NA
5. CDM is required to procure a subcontract laboratory for services associated with the passive soil gas survey. As a result, specific laboratory QC procedures are currently unknown yet will be submitted to the project team upon receipt. The modified SW-856 8270C and laboratory QC samples summarized in the Beacon Environmental SOP is being used as a guidance to prepare the laboratory SOW for procurement.
6. CDM is not currently planning to bag soil samples for PID screening from each 4-foot interval. Soil cores will be initially screened upon extraction using the PID. If the initial PID screening of the soil core and visual observations suggest impacted soils, laboratory containers and ziploc bags will be filled from the interval. If an interval of obvious contamination is not initially identified, a laboratory and PID (ziploc) sample will be collected immediately above the water table. PID samples will be brought to room temperature and screened with a PID at the end of each day. Since not every sample for each boring will be submitted for analysis, at the end of the day the project team will decide which samples will be submitted based on field screening/characterization results. In general, samples will not be submitted for VOC analysis from borings where no evidence of impact is observed, however a minimum of two samples with no evidence of impact will be analyzed from soils near the water table.

7. NA

Regarding the proposed additional 'rows' of soil gas sampling, Dave Engert (SAW) informed CDM that NYSDEC is requesting the inclusion of 8 to 10 passive soil gas samples on the two residential properties to the west, and early during the investigation such that NYSDEC can determine if additional off-site investigation is required. SAW will provide an updated sample location figure (including the number of additional samples) to CDM; CDM will incorporate an additional 10 passive soil gas survey locations into the sampling analysis plan.

If you have any questions or concerns feel free to call or e-mail anytime, Thank you.

Melissa Koberle
Environmental Scientist



110 Fieldcrest Avenue, #8

6th Floor
 Edison, NJ 08837
 Phone: (732) 590-4616
 Work Cell: (917) 575-1543
 Fax: (732) 225-7851
koberlema@cdmsmith.com

From: James Craft [<mailto:jhcrafft@gw.dec.state.ny.us>]
Sent: Friday, December 23, 2011 4:35 PM
To: Koberle, Melissa; adriscoll@dhdventures.com; Devine.Alison@epamail.epa.gov; areichhart@nyenvlaw.com; dengert@soilairwater.com
Cc: Bart Putzig
Subject: Re: FW: Labelon - Canandaigua Phase II Scope and Schedule Update

Sorry, I've been out of the loop. If a field schedule exists, please let us know.

We received a comment letter from a downgradient neighbor who is very concerned about contamination and he noted that he and another neighbor have cancer. Of course, any site connection is unclear but the homes are close and VI concerns are significant. As a first step, it is hoped the passive soil gas survey will help direct offsite work. If possible, the State would appreciate placement of another two rows of PSG probes in each of the closest two residential properties. For a small additional cost, it would help resolve the most pressing site-related issue.

With regard to the questions below, our responses follow each below:

1. CDM will be using CLP for analytical services. CDM proposes use of SOM01.2 and ILM04.3 methods for analysis in lieu of the methodology stated in the workplan (EPA Method SW-846 8260, 8270, 6010, 8082). CDM will collect VOC samples in 40 ml vials with a spin bar as per SOM01.2 instead of the EnCore® sampler as per EPA Method 5035.

Agree but please specify the field preservation steps. We would be concerned with the use of sodium bisulfite and possible reaction (VOC loss) with calcareous soils. Methanol is preferable if adequate detection limits can be achieved.

2. Have screening criteria for soil and soil gas samples been established?

SCOs can be found at: http://www.dec.ny.gov/docs/remediation_hudson_pdf/cpsoil.pdf

Soil gas results are reported as mass (nanograms); relative differences help discern possible source areas and plumes and optimize further characterization.

3. Please confirm cyanide is not intended to be included in metals analyses.

Please include cyanide.

4. CDM proposes to use disposable equipment, such as aluminum foil pans and disposal scoopers. CDM will collect one field blank per lot of pans and scoopers resulting in less aqueous equipment blanks for analysis.

Ok.

5. CDM understands that no duplicate is to be collected for soil gas samples. Has this been explicitly discussed with NYSDEC?

We understand that Beacon can run dupes; would 5-10% be adequate?

(page 1 in attached: "Trip blanks are analyzed with each batch of samples and because two sets of hydrophobic adsorbent cartridges are provided in each Sampler, duplicate or confirmatory analyses can be performed for any of the sample locations.")

6. The Work Plan states that samples will be submitted for fixed-base analyses based on visual observations, odors, and/or elevated PID readings. Per the work plan CDM will also collect at least two samples with no evidence of impact from soils near the water table. For AOCs where there are more borings than samples what methodology has been discussed with NYSDEC to choose borings submitted for analysis? Will baseline readings be determined? Or will potential samples be containerized until the end of the day?

Given cold weather work, we suggest that field PID screening be supplemented by taking collocated samples (lab and ziplock bags); preserve the potential lab samples but bring baggies to room temp., then sneak the PID tip into the bag, record readings, and prioritize samples.

7. CDM assumes that SAW will be responsible for implementing the Community Air Monitoring Program (CAMP) during all drilling activities.

Agree.

I'm available to discuss the above and other issues.

Sincerely,

- Jim

James H. Craft
Engineering Geologist
New York State Department of Environmental Conservation
Division of Environmental Remediation - Region 8
6274 East Avon - Lima Road
Avon, NY 14414-9519
e-mail: jhcrafft@gw.dec.state.ny.us
phone: (585) 226-5352
fax: (585) 226-8696

>>> "Dave Engert" 12/19/11 9:34 AM >>>

Jim,

We are having a conference call tomorrow with EPA's contractor (CDM) to discuss implementing the work plan for Chapin St. and assigning tasks. Please see the e-mail below. If you could provide insight on some of their questions or directly answer the ones relative to Department approval I would appreciate it. Give me a call with any questions. I will be in and out all day, so e-mail or cell phone is the best way to get a hold of me.

Thanks ? Dave

David K. Engert
Geologist/Project Manager
S.A.W. Environmental Services, Inc.
672 Frey Road
Macedon, New York 14502
(315) 986-4751 - phone
(315) 986-8274 - fax
(585) 746-2986 - mobile

dengert@soilairwater.com

From: Koberle, Melissa [<mailto:KoberleMA@cdm.com>]

Sent: Friday, December 16, 2011 3:54 PM

To: Koberle, Melissa; 'Adam Driscoll'; 'Dave Engert'; 'Amy Reichhart'; Devine.Alison@epamail.epa.gov; MacDonald, Brendan

Subject: RE: Canandaigua Phase II Scope and Schedule Update

Good Afternoon,

I put together a list of questions/action items CDM would like to discuss during Tuesday's meeting. Feel free to send along any questions you may have.

1. CDM will be using CLP for analytical services. CDM proposes use of SOM01.2 and ILM04.3 methods for analysis in lieu of the methodology stated in the workplan (EPA Method SW-846 8260, 8270, 6010, 8082). CDM will collect VOC samples in 40 ml vials with a spin bar as per SOM01.2 instead of the EnCore® sampler as per EPA Method 5035.
2. Have screening criteria for soil and soil gas samples been established?
3. Please confirm cyanide is not intended to be included in metals analyses.
4. CDM proposes to use disposable equipment, such as aluminum foil pans and disposal scoopers. CDM will collect one field blank per lot of pans and scoopers resulting in less aqueous equipment blanks for analysis.
5. CDM understands that no duplicate is to be collected for soil gas samples. Has this been explicitly discussed with NYSDEC?
6. The Work Plan states that samples will be submitted for fixed-base analyses based on visual observations, odors, and/or elevated PID readings. Per the work plan CDM will also collect at least two samples with no evidence of impact from soils near the water table. For AOCs where there are more borings than samples what methodology has been discussed with NYSDEC to choose borings submitted for analysis? Will baseline readings be determined? Or will potential samples be containerized until the end of the day?
7. CDM assumes that SAW will be responsible for implementing the Community Air Monitoring Program (CAMP) during all drilling activities.

Thanks. Melissa Koberle

-----Original Appointment-----

From: Koberle, Melissa

Sent: Thursday, December 15, 2011 10:22 AM

To: Adam Driscoll; 'Dave Engert'; 'Amy Reichhart'; Devine.Alison@epamail.epa.gov; MacDonald, Brendan

Subject: Canandaigua Phase II Scope and Schedule Update

When: Tuesday, December 20, 2011 9:30 AM-10:30 AM (GMT-05:00) Eastern Time (US & Canada).

Where: Conference Line: 866-692-4541; passcode 936-1958-#

All,

The meeting on Tuesday will discuss elements of the work plan CDM/EPA will be performing, confirm scope, and put together a schedule for upcoming field work. The meeting will be held as a conference call at 9:30 am.

Conference Call Information:

Conference Line: 866-692-4541; passcode 936-1958-#

Thanks, Melissa Koberle, CDM

TABLES

Table 1
Analytical Sampling Program Summary
Former Labelon Corporation Facility
Canadiagua, New York

Location	Matrix	Proposed # of Samples				Field Analysis	Sample Depth
		TCL VOCs + 10 TICs	TCL SVOCs + 20 TICs	TAL Metals	TAL PCBs		
Soil Borings							
Former UST Area	Soil	4	4	2	1	PID/Visual	Based on Field Observations
Solvent Mixing Room	Soil	2	1	1	1		
Silver Mixing Rooms	Soil	1	1	4	1		
West of Site Building	Soil	8	4	1	1		
Main Site Building Interior	Soil	6	1	1	1		
Duplicate	Soil	1	1	1	1	NA	
Matrix Spike (QC)	Soil	1	1	1	1		
Matrix Spike Duplicate (QC)	Soil	1	1	1	1		
Monitoring Wells							
Soil Samples	Soil	4	1	0	0	PID/Visual	Based on Field Observations
Groundwater Samples	Water	10	1	1	1	Temp., ORP, DO, Cond., pH	
Matrix Spike (QC)	Water	1	1	1	1	NA	
Matrix Spike Duplicate (QC)	Water	1	1	1	1		
Duplicate	Water	1	1	1	1		
Trip Blank	Water	1	0	0	0		
Misc. Sampling							
Unknown Structure	Sediment	1	1	1	1	PID/Visual	Based on Field Observations
Pipe	Sediment	3	1	3	1		
Sumps	Water	3	1	3	1	NA	
Trip Blank	Water	1	0	0	0	NA	

Table 2
Project Quantitation Limits
Former Labelon Corporation Facility
Canandaigua, New York

Analysis/Compound	CAS No.	Method	Quantitation Limits	
			Water (ug/L)	Soil (ug/kg)
Volatile Organics				
1,1,1-Trichloroethane	71-55-6	SW8260B	5	5
1,1,2,2-Tetrachloroethane	79-34-5	SW8260B	5	5
1,1,2-Trichloroethane	79-00-5	SW8260B	5	5
1,1,2-Trichlorotrifluoroethane	76-13-1	SW8260B	5	5
1,1-Dichloroethane	75-34-3	SW8260B	5	5
1,1-Dichloroethene	75-35-4	SW8260B	5	5
1,2,4-Trichlorobenzene	120-82-1	SW8260B	5	5
1,2-Dibromo-3-Chloropropane	96-12-8	SW8260B	5	5
1,2-Dibromoethane	106-93-4	SW8260B	5	5
1,2-Dichlorobenzene	95-50-1	SW8260B	5	5
1,2-Dichloroethane	107-06-2	SW8260B	5	5
1,2-Dichloropropane	78-87-5	SW8260B	5	5
1,3-Dichlorobenzene	541-73-1	SW8260B	5	5
1,4-Dichlorobenzene	106-46-7	SW8260B	5	5
2-Butanone	78-93-3	SW8260B	25	25
2-Hexanone	591-78-6	SW8260B	25	25
4-Methyl-2-Pentanone	108-10-1	SW8260B	25	25
Acetone	67-64-1	SW8260B	25	25
Benzene	71-43-2	SW8260B	5	5
Bromodichloromethane	75-27-4	SW8260B	5	5
Bromoform	75-25-2	SW8260B	5	5
Bromomethane	74-83-9	SW8260B	5	5
Carbon Disulfide	75-15-0	SW8260B	5	5
Carbon Tetrachloride	56-23-5	SW8260B	5	5
Chlorobenzene	108-90-7	SW8260B	5	5
Chloroethane	75-00-3	SW8260B	5	5
Chloroform	67-66-3	SW8260B	5	5
Chloromethane	74-87-3	SW8260B	5	5
cis-1,2-Dichloroethene	156-59-2	SW8260B	5	5
cis-1,3-Dichloropropene	10061-01-5	SW8260B	5	5
Cyclohexane	110-82-7	SW8260B	5	5
Dibromochloromethane	124-48-1	SW8260B	5	5
Dichlorodifluoromethane	75-71-8	SW8260B	5	5
Ethyl Benzene	100-41-4	SW8260B	5	5
Isopropylbenzene	98-82-8	SW8260B	5	5
Methyl Acetate	79-20-9	SW8260B	5	5
Methyl tert-butyl Ether	1634-04-4	SW8260B	5	5
Methylcyclohexane	108-87-2	SW8260B	5	5
Methylene Chloride	75-09-2	SW8260B	5	5
Styrene	100-42-5	SW8260B	5	5
t-1,3-Dichloropropene	10061-02-6	SW8260B	5	5
Tetrachloroethene	127-18-4	SW8260B	5	5
Toluene	108-88-3	SW8260B	5	5
trans-1,2-Dichloroethene	156-60-5	SW8260B	5	5

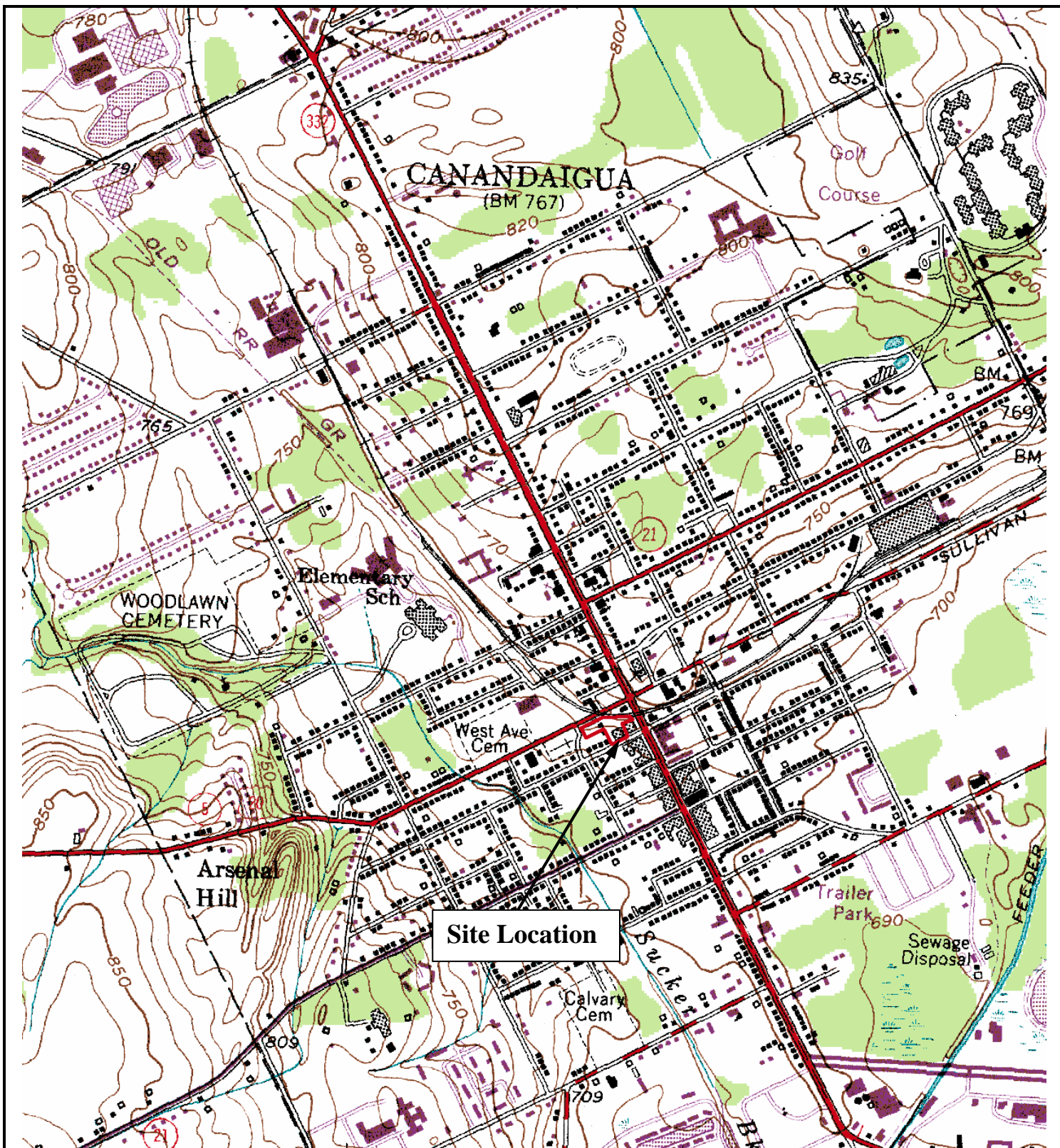
Analysis/Compound	CAS No.	Method	Quantitation Limits	
			Water (ug/L)	Soil (ug/kg)
Volatile Organics (Continued)				
Trichloroethene	79-01-6	SW8260B	5	5
Trichlorofluoromethane	75-69-4	SW8260B	5	5
Vinyl Chloride	75-01-4	SW8260B	5	5
m/p-Xylenes	136777-61-2	SW8260B	10	10
o-Xylene	95-47-6	SW8260B	5	5
Semivolatile Organics				
1',1-Biphenyl	92-52-4	SW8270C	10	330
2,2'-oxybis(1-Chloropropane)	108-60-1	SW8270C	10	330
2,4,5-Trichlorophenol	95-95-4	SW8270C	10	330
2,4,6-Trichlorophenol	88-06-2	SW8270C	10	330
2,4-Dichlorophenol	120-83-2	SW8270C	10	330
2,4-Dimethylphenol	105-67-9	SW8270C	10	330
2,4-Dinitrophenol	51-28-5	SW8270C	10	330
2,4-Dinitrotoluene	121-14-2	SW8270C	10	330
2,6-Dinitrotoluene	606-20-2	SW8270C	10	330
2-Chloronaphthalene	91-58-7	SW8270C	10	330
2-Chlorophenol	95-57-8	SW8270C	10	330
2-Methylnaphthalene	91-57-6	SW8270C	10	330
2-Methylphenol	95-48-7	SW8270C	10	330
2-Nitroaniline	88-74-4	SW8270C	10	330
2-Nitrophenol	88-75-5	SW8270C	10	330
3,3'-Dichlorobenzidine	91-94-1	SW8270C	10	330
3+4-Methylphenols	65794-96-9	SW8270C	10	330
3-Nitroaniline	99-09-2	SW8270C	10	330
4,6-Dinitro-2-methylphenol	534-52-1	SW8270C	10	330
4-Bromophenyl-phenyl ether	101-55-3	SW8270C	10	330
4-Chloro-3-methylphenol	59-50-7	SW8270C	10	330
4-Chloroaniline	106-47-8	SW8270C	10	330
4-Chlorophenyl-phenyl ether	7005-72-3	SW8270C	10	330
4-Nitroaniline	100-01-6	SW8270C	10	330
4-Nitrophenol	100-02-7	SW8270C	10	330
Acenaphthene	83-32-9	SW8270C	10	330
Acenaphthylene	208-96-8	SW8270C	10	330
Acetophenone	98-86-2	SW8270C	10	330
Anthracene	120-12-7	SW8270C	10	330
Atrazine	1912-24-9	SW8270C	10	330
Benzo(a)anthracene	56-55-3	SW8270C	10	330
Benzo(a)pyrene	50-32-8	SW8270C	10	330
Benzo(b)fluoranthene	205-99-2	SW8270C	10	330
Benzo(g,h,i)perylene	191-24-2	SW8270C	10	330
Benzo(k)fluoranthene	207-08-9	SW8270C	10	330
Benzaldehyde	100-52-7	SW8270C	10	330
bis(2-Chloroethoxy)methane	111-91-1	SW8270C	10	330
bis(2-Chloroethyl)ether	111-44-4	SW8270C	10	330
bis(2-Ethylhexyl)phthalate	117-81-7	SW8270C	10	330
Butylbenzylphthalate	85-68-7	SW8270C	10	330
Caprolactam	105-60-2	SW8270C	10	330
Carbazole	86-74-8	SW8270C	10	330
Chrysene	218-01-9	SW8270C	10	330

Analysis/Compound	CAS No.	Method	Quantitation Limits	
			Water (ug/L)	Soil (ug/kg)
Semivolatile Organics (Continued)				
Dibenzo(a,h)anthracene	53-70-3	SW8270C	10	330
Dibenzofuran	132-64-9	SW8270C	10	330
Diethylphthalate	84-66-2	SW8270C	10	330
Dimethylphthalate	131-11-3	SW8270C	10	330
Di-n-butylphthalate	84-74-2	SW8270C	10	330
Di-n-octyl phthalate	117-84-0	SW8270C	10	330
Fluoranthene	206-44-0	SW8270C	10	330
Fluorene	86-73-7	SW8270C	10	330
Hexachlorobenzene	118-74-1	SW8270C	10	330
Hexachlorobutadiene	87-68-3	SW8270C	10	330
Hexachlorocyclopentadiene	77-47-4	SW8270C	10	330
Hexachloroethane	67-72-1	SW8270C	10	330
Indeno(1,2,3-cd)pyrene	193-39-5	SW8270C	10	330
Isophorone	78-59-1	SW8270C	10	330
Naphthalene	91-20-3	SW8270C	10	330
Nitrobenzene	98-95-3	SW8270C	10	330
N-Nitroso-di-n-propylamine	621-64-7	SW8270C	10	330
N-Nitrosodiphenylamine	86-30-6	SW8270C	10	330
Pentachlorophenol	87-86-5	SW8270C	10	330
Phenanthrene	85-01-8	SW8270C	10	330
Phenol	108-95-2	SW8270C	10	330
Pyrene	129-00-0	SW8270C	10	330
Metals				
Aluminum	7429-90-5	6010B	50	5000
Antimony	7440-36-0	6010B	25	2500
Arsenic	7440-38-2	6010B	10	1000
Barium	7440-39-3	6010B	50	5000
Beryllium	7440-41-7	6010B	3	300
Cadmium	7440-43-9	6010B	3	300
Calcium	7440-70-2	6010B	1000	100000
Chromium	7440-47-3	6010B	5	500
Cobalt	7440-48-4	6010B	15	1500
Copper	7440-50-8	6010B	10	1000
Iron	7439-89-6	6010B	50	5000
Lead	7439-92-1	6010B	6	600
Magnesium	7439-95-4	6010B	1000	100000
Manganese	7439-96-5	6010B	10	1000
Nickel	7440-02-0	6010B	20	2000
Potassium	7440-09-7	6010B	1000	100000
Selenium	7782-49-2	6010B	10	1000
Silver	7440-22-4	6010B	5	500
Sodium	7440-23-5	6010B	1000	100000
Thallium	7440-28-0	6010B	20	2000
Vanadium	7440-62-2	6010B	20	2000
Zinc	7440-66-6	6010B	20	2000
Mercury	7439-97-6	7471A	0.2	10

Analysis/Compound	CAS No.	Method	Quantitation Limits	
			Water (ug/L)	Soil (ug/kg)
PCB's				
Aroclor-1016	12674-11-2	8082	0.5	17
Aroclor-1221	11104-28-2	8082	0.5	17
Aroclor-1232	11141-16-5	8082	0.5	17
Aroclor-1242	53469-21-9	8082	0.5	17
Aroclor-1248	12672-29-6	8082	0.5	17
Aroclor-1254	11097-69-1	8082	0.5	17
Aroclor-1260	11096-82-5	8082	0.5	17
Aroclor-1262	37324-23-5	8082	0.5	17
Aroclor-1268	11100-14-4	8082	0.5	17

Beacon Environmental Services, Inc., manufacturer of the BESHURE passive soil gas sampler, indicates a reporting quantitation level for each compound is 25 nanograms (ng)

FIGURES



Legend

= Approximate Brownfield Property Boundary

S.A.W. Environmental Services, Inc.

672 Frey Road
Macedon, New York 14502
www.soilairwater.com



Title: Site Location Map

Project: Former Labelon Corp. Facility
10 Chapin Street
Canandaigua, New York

Date: 02/24/11

Project #: 210037

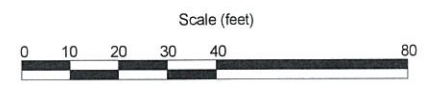
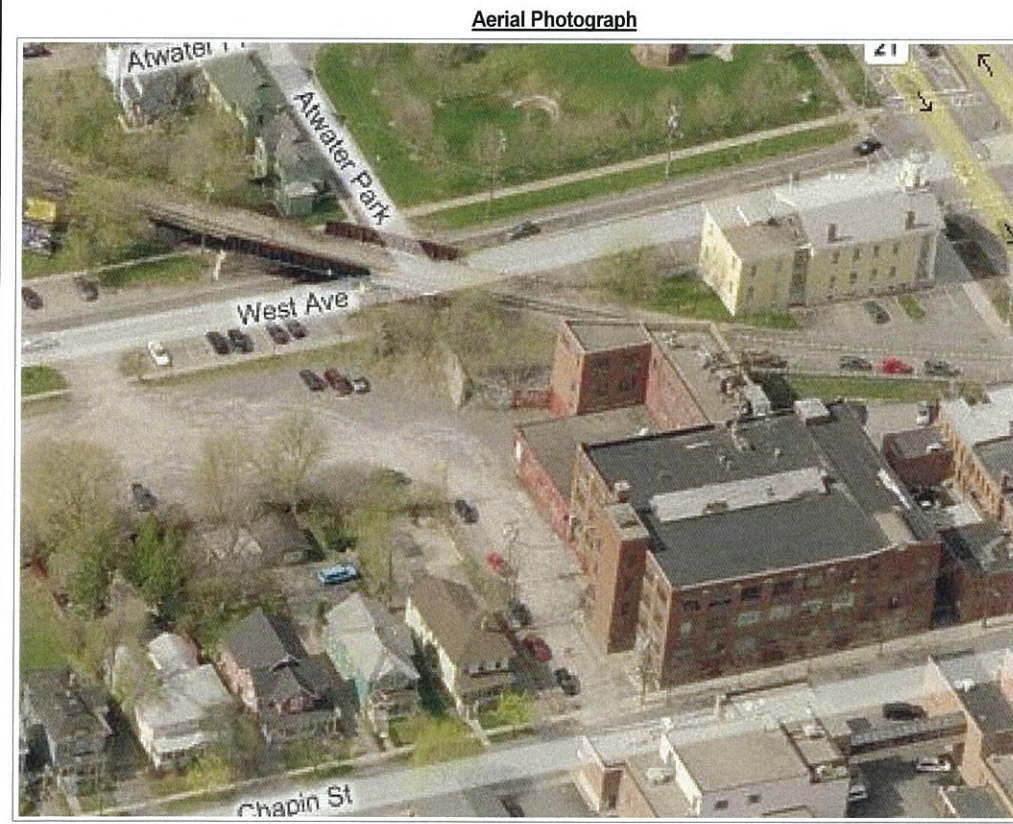
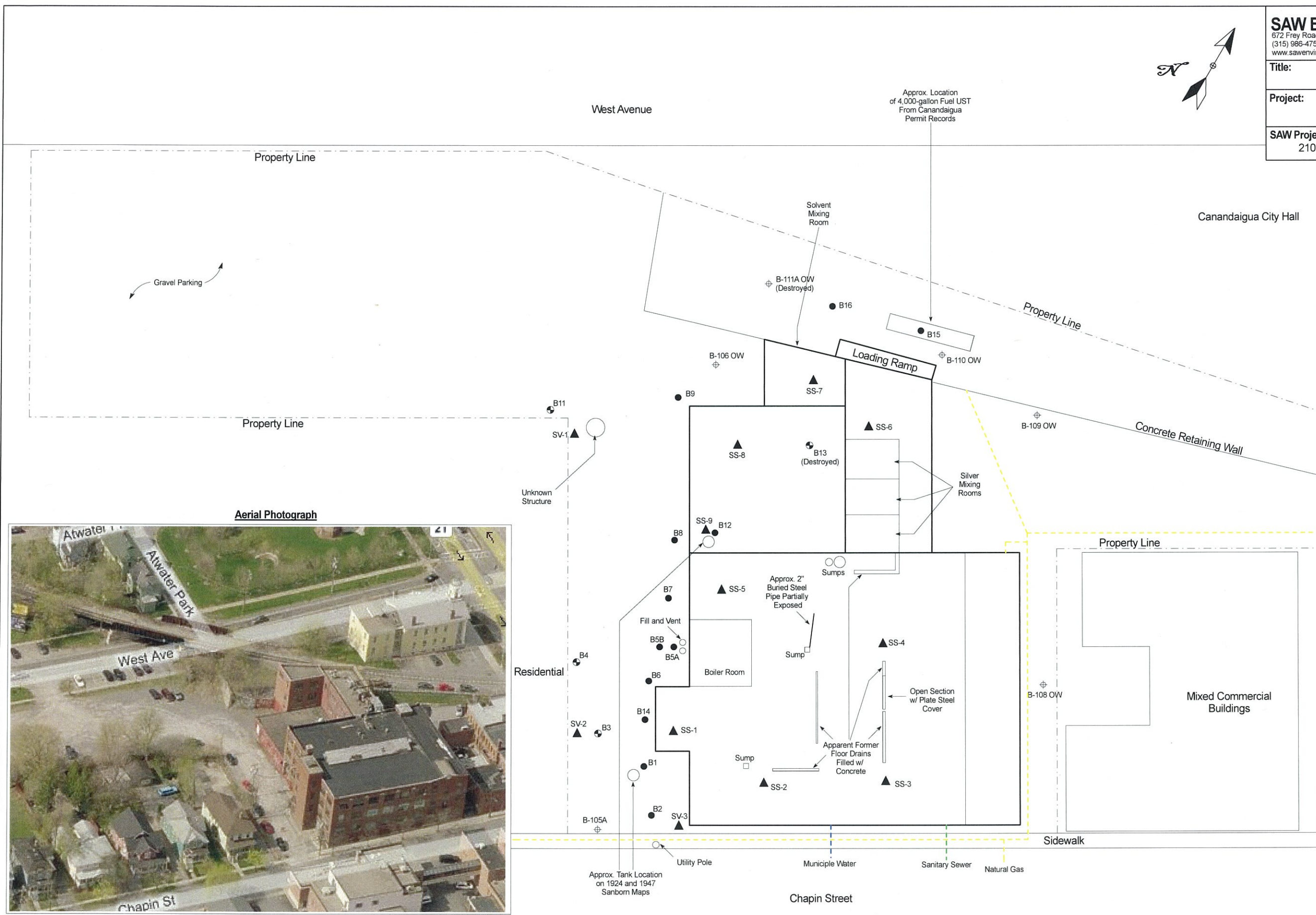
Scale: Not to Scale


Drawn by: DKE

Source: U.S. Geologic Survey. Canandaigua, N.Y. Quadrangle [Map].
1:24,000. 7.5 Minute Series. Reston, VA: USGS, 1978.

Title: Figure 2 - Site Map		
Project: Former Labelon Corp. Facility 10 Chapin Street Canandaigua, NY	Date: 04/29/11	
SAW Project #: 210037	Scale: 1" = 40'	Drawn by: DKE

- = Soil Boring - SAW 2009 Phase II
- ⊕ = Soil Boring Converted to 1" Monitoring Well - SAW 2009 Phase II
- ⊕ = Monitoring Well From H&A 2001 Investigation
- ▲ = Sub-Slab/Soil Vapor Sampling Location
- SS = Sub-Slab, SV = Soil Vapor - SAW 2009 Phase II

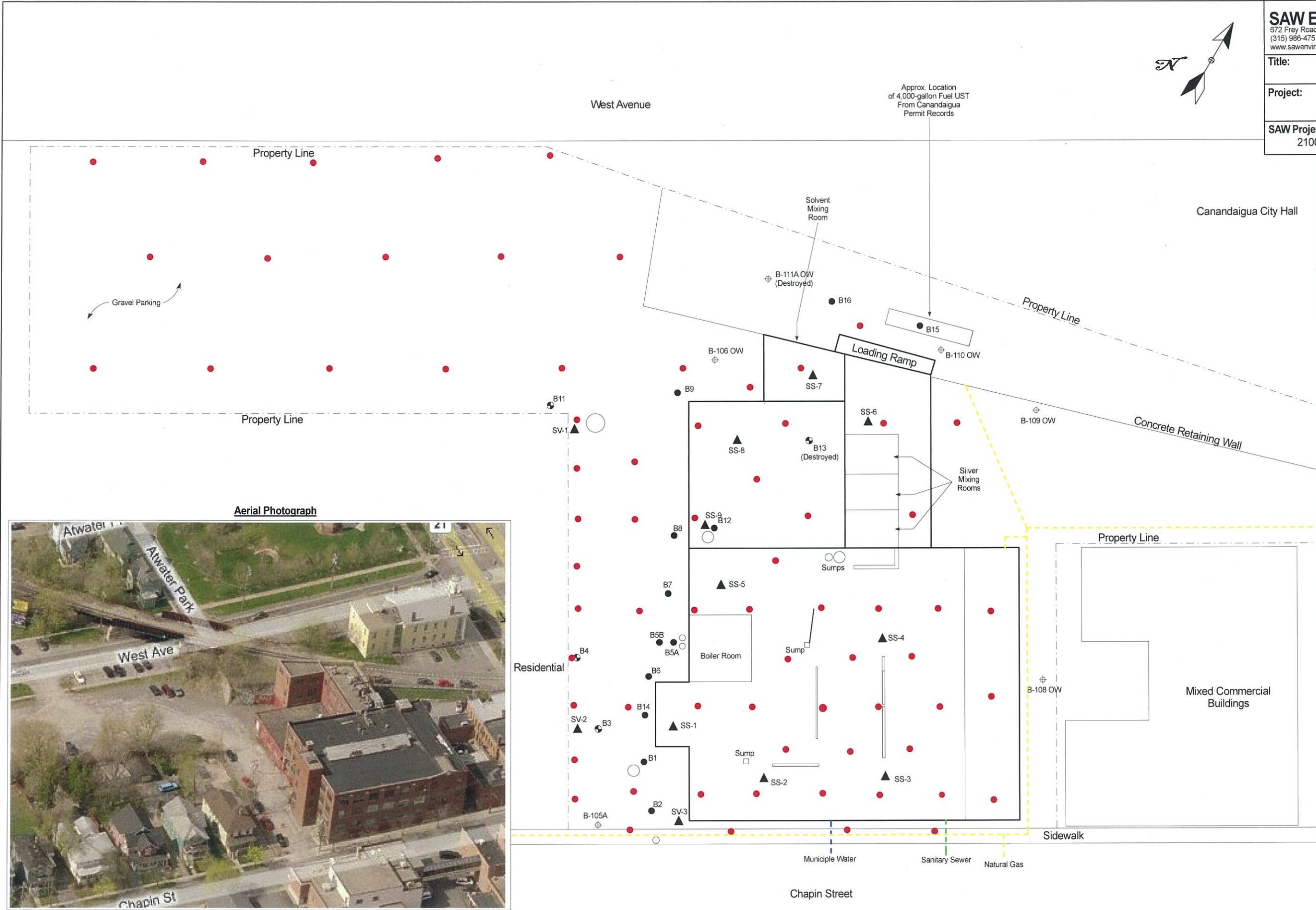




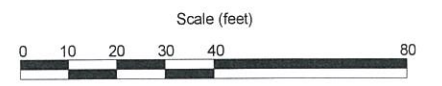
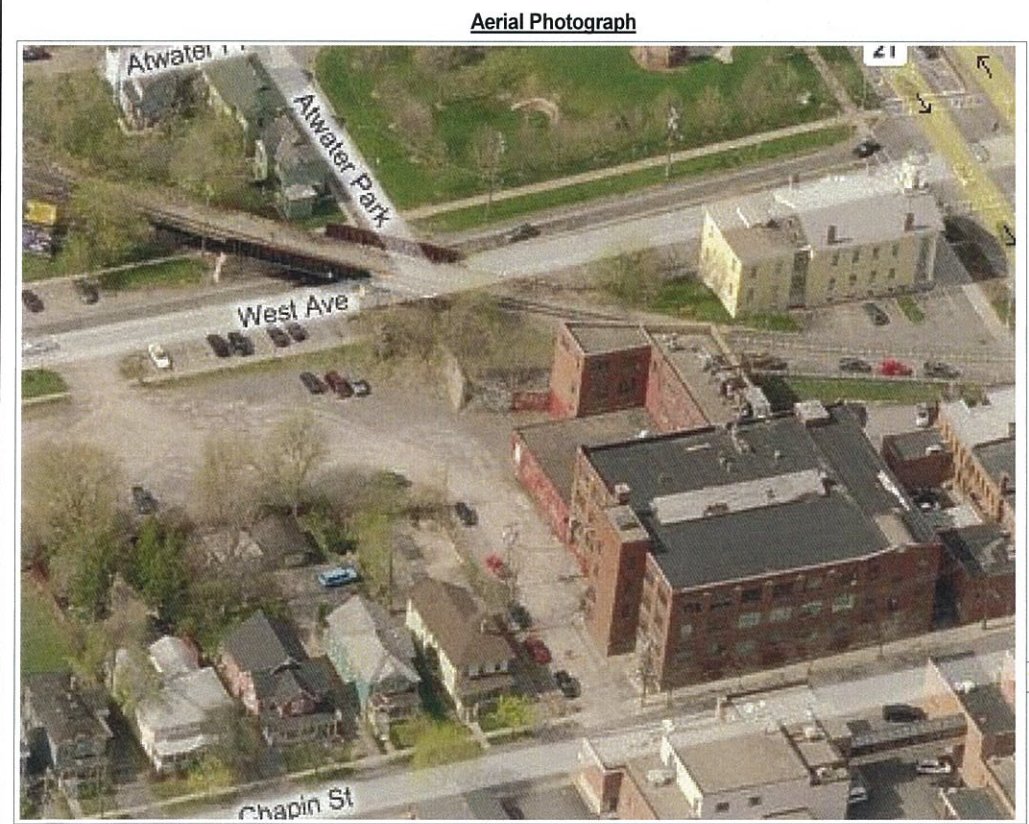
SAW Environmental Services, Inc.
 672 Frey Road • Macedon, NY 14502
 (315) 986-4751 Phone • (315) 986-8274 Fax
 www.sawenvironmental.com

Title: Figure 3 - Passive Soil Gas Survey Sample Locations

Project: Former Labelon Corp. Facility 10 Chapin Street Canandaigua, NY	Date: 11/03/11
SAW Project #: 210037	Scale: 1" = 40'
Drawn by: DKE	

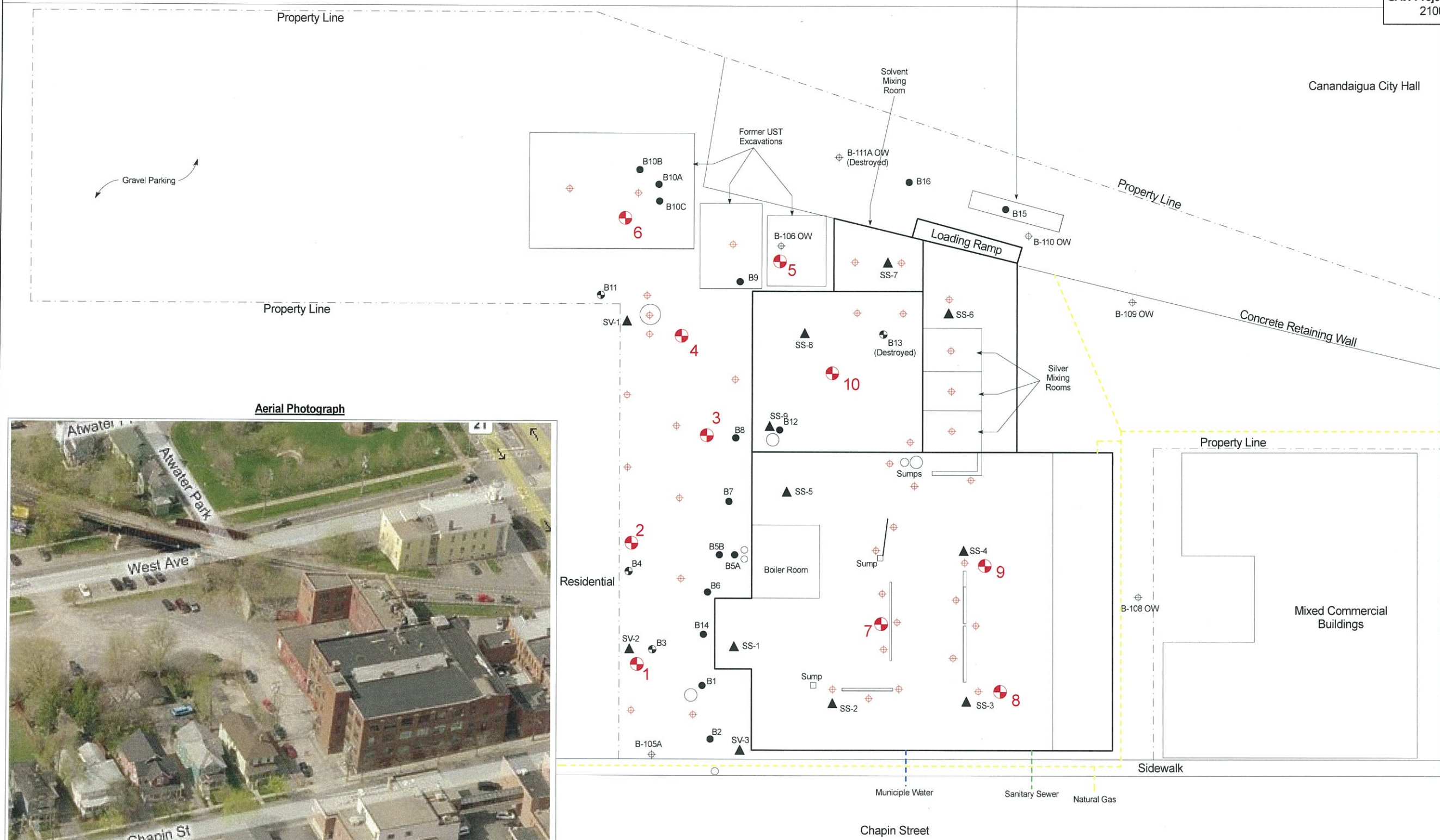


- = Soil Boring - SAW 2009 Phase II
- ⊕ = Soil Boring Converted to 1" Monitoring Well - SAW 2009 Phase II
- ⊕ = Monitoring Well From H&A 2001 Investigation
- ▲ = Sub-Slab/Soil Vapor Sampling Location
- SS = Sub-Slab, SV = Soil Vapor - SAW 2009 Phase II
- = Proposed Passive Soil Gas Sample Location

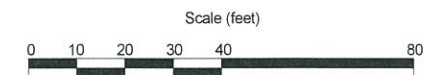
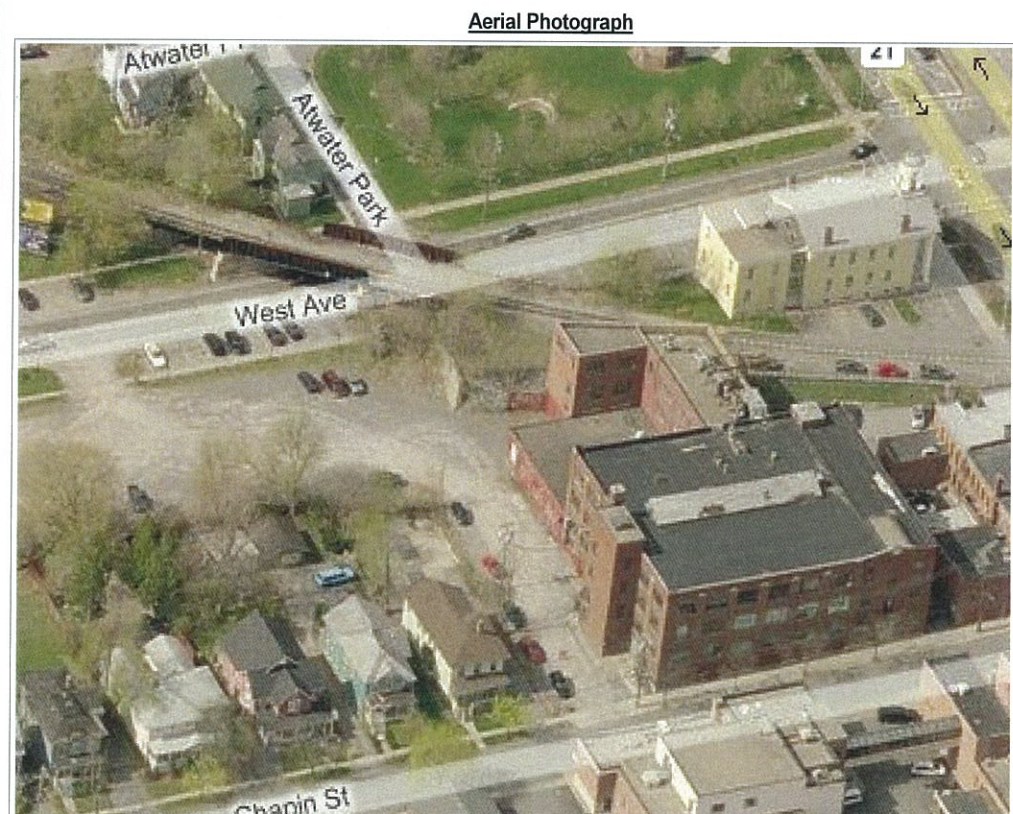




Title: Figure 4 - Soil Boring and Monitoring Well Locations		
Project: Former Labelon Corp. Facility 10 Chapin Street Canandaigua, NY	Date: 05/02/11	
SAW Project #: 210037	Scale: 1" = 40'	Drawn by: DKE



- = Soil Boring - SAW 2009 Phase II
 - ⊕ = Soil Boring Converted to 1" Monitoring Well - SAW 2009 Phase II
 - ⊕ = Monitoring Well From H&A 2001 Investigation
 - ▲ = Sub-Slab/Soil Vapor Sampling Location
SS = Sub-Slab, SV = Soil Vapor - SAW 2009 Phase II
 - ⊕ = Proposed Direct Push Soil Boring Location*
 - ⊕ = Proposed Monitoring Well Location*
- * Final Locations to be based on findings of pipe trace and passive soil gas survey



APPENDIX A

Health & Safety Plan



672 Frey Road, Macedon N.Y. 14502
Tel: (315) 986-4751 • Fax: (315) 986-8274
www.soilairwater.com

HEALTH AND SAFETY PLAN

Project:

Brownfield Remedial Investigation
Former Labelon Corp. Facility
10 Chapin Street
City of Canandaigua
Ontario County, New York
Site # C835016

Prepared By:

SAW Environmental Services Inc.
672 Frey Road
Macedon, NY 14502
(315) 986-4751

March 2011

HEALTH & SAFETY PLAN

Former Labelon Corp. Facility
10 Chapin Street
Canandaigua, New York
Site # C835016

TABLE OF CONTENTS

Section

1.0 Introduction.....	1
1.1 Project Location.....	1
1.2 Intent	1
1.3 Scope of Work	1
1.4 Hazard Overview	2
2.0 Project Personnel	2
3.0 Hazard Assessment	3
4.0 Personal Protective Equipment & Monitoring Procedures.....	3
4.1 General.....	3
4.2 Monitoring Procedures.....	4
4.3 Action Levels	4
5.0 Decontamination Procedures.....	4
6.0 Medical Monitoring	4
7.0 Personnel Training	5
8.0 Emergency Response	5
8.1 Notification of Site Emergencies	5
8.2 Responsibilities	6
8.3 Accidents & Injuries	6
8.4 Site Communications	7
8.5 Site Security & Control.....	7

TABLE OF CONTENTS (Continued)

8.6	Emergency Response	7
8.7	Medical/First Aid Response.....	8
8.8	Fire Fighting Procedures.....	8
8.9	Emergency Decontamination Procedure.....	8
8.10	Emergency Equipment.....	8
9.0	Special Precautions	9
9.1	Heat Stress/Cold Injury Prevention Program.....	9
9.2	Heavy Machinery/Equipment	9
9.3	Construction Materials & Site Refuse	9
9.4	Additional Safety Practices.....	9
10.0	Community Health & Safety	10
10.1	Community Relations	10
10.2	Community Air Monitoring Plan.....	10

Appendices

Appendix A: Site Location Map

Appendix B: NIOSH Pocket Guides to Chemical Hazards

Appendix C: Directions to Hospital

Appendix D: NYSDOH Generic Community Air Monitoring Plan

Appendix E: Tailgate Safety Meetings

1.0 INTRODUCTION

Soil Air Water Environmental Services, Inc. (SAW) has developed this Health and Safety Plan (HASP) in preparation for activities associated with a Remedial Investigation at the Former Labelon Corp. Facility in Canandaigua, New York.

This HASP is intended to assist the user in making appropriate decisions regarding the health and safety of site workers within the project limits. The HASP is designed as a flexible document to accommodate possible changes in site conditions.

This HASP was prepared by David Engert, Geologist/Project Manager for SAW.

1.1 PROJECT LOCATION

The site is located at 10 Chapin Street in an urban setting in the City of Canandaigua, Ontario County, New York. A site location map is included in Appendix A. The site consists of one 1.63-acre parcel with a vacant four story manufacturing building. The site is bordered by commercial properties to the north, south and east. A residential neighborhood borders the site to the west.

1.2 INTENT

The intent of this plan is to provide the appropriate safety requirements and general procedures to be met by SAW personnel, drillers and visitors. All personnel will follow applicable state and federal rules and health and safety regulations. In the event of conflicting procedures, personnel will follow those that afford the highest level of protection.

1.3 SCOPE OF WORK

This project involves the advancement of soil borings with rotary and direct-push drill rigs, installation of groundwater monitoring wells and collection of soil and groundwater samples potentially contaminated with volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), heavy metals and PCBs. Specific work activities covered by this HASP include:

1. Advancement of soil borings by hollow stem augering and direct-push methods
2. Collection of split spoon and MacroCore soil samples
3. Installation of groundwater monitoring wells
4. Placement of drill cuttings in 55-gallon drums
5. Development and sampling of monitoring wells and placement of development water in 55-gallon drums
6. Surveying of monitoring wells
7. Loading, transporting and disposing of waste drums

1.4 HAZARD OVERVIEW

The possible physical hazards associated with the work activities outlined in Section 1.3 are slip, trip and fall accidents, falling objects, injury caused by heavy equipment and accidents involving motor vehicles.

Possible chemical hazards associated with the work activities include exposure volatile organic compounds in drill cuttings and soil and groundwater samples. Prior site investigations have identified the presence of elevated concentrations of the chlorinated VOCs trichloroethene (TCE), cis and trans-1,2 dichloroethene (DCE) and vinyl chloride and petroleum related VOCs such as toluene and xylenes. Other chemicals of concern potentially present at the site include SVOCs, heavy metals and PCBs.

Potential routes of exposure include ingestion, inhalation and skin contact.

2.0 PROJECT PERSONNEL

The key project personnel are as follows:

Project Safety Manager, SAW Environmental – David Engert
(315) 986-4751 (Day)
(585) 746-2986 (Cell, 24 hours)

Health and Safety Manager, SAW Environmental – Jon Heerkens
(315) 986-4751 (Day)
(585) 734-0735 (Cell, 24 hours)

Project Safety Manager or designee is responsible for SAW employees and subcontractors on the work site unless otherwise specified in the HASP. He will review project plans and revisions to plans to assure health and safety procedures are incorporated through all of the work phases. Specifically, the Project Safety Manager responsibilities include:

1. Assuring that a complete copy of the HASP is at the site prior to the start of work activities and that all workers are familiar with it;
2. Conducting on-site health and safety training and briefing sessions on an as-needed basis;
3. Assuring the availability, use and proper maintenance of personal protective, decontamination and other safety or health equipment;
4. Maintaining a high level of safety awareness among workers and communicating pertinent safety and health matters promptly;
5. Assuring that all activities are performed in a manner consistent with SAW's company policy and the HASP;
6. Monitoring for dangerous conditions during field activities;
7. Coordinating with emergency response personnel and medical support facilities

8. Initiating immediate corrective actions in the event of an emergency or unsafe condition;
9. Promptly notifying all workers in the event of any emergency, unsafe condition, problem, or need in exception to this HASP;
10. Conducting safety and health performance audits and system audits.

The Project Safety Manager has the authority to:

1. Suspend activities or otherwise limit exposures if the health or safety of any person appears to be in danger;
2. Direct workers to alter practices that do not properly protect their health or the environment; and
3. Suspend an individual from work for violating the requirements outlined in this HASP.

3.0 HAZARD ASSESSMENT

The site work is being performed to determine the nature and extent of soil and groundwater impacts from historical chemical releases at the site. Based on the findings of prior investigations TCE, DCE, vinyl chloride and several petroleum (i.e., fuel oil) related VOCs are present at the site. Given known chemical use at the site and high concentrations of toluene in sub slab vapor samples the potential exists for exposure to toluene.

The primary routes of exposure for known and suspected site chemicals include inhalation and skin absorption. NIOSH Pocket Guides for TCE, DCE, vinyl chloride, fuel oil and toluene are included in Appendix B.

Possible additional hazards expected on site include, but are not limited to, slip, trip and fall accidents, falling objects, injury caused by heavy equipment and accidents involving motor vehicles.

4.0 PERSONAL PROTECTIVE EQUIPMENT & MONITORING PROCEDURES

4.1 GENERAL

All work will be completed under modified Level D personal protective equipment (PPE). Level D PPE will consist of a hard hat, safety glasses with side shields, hearing protection, DOT compliant high visibility apparel, steel toe leatherwork boots, and leather gloves. Modifications to the Level D PPE include Tyvek suits and chemical resistant (e.g., PVC or nitrile rubber) gloves when handling soil and groundwater samples or drill cuttings.

PPE will be upgraded to Level C if determined necessary by the Project Safety Manager based on monitoring conditions detailed below. Level C PPE will consist of Level D PPE with the addition of a Tyvek suit, chemical resistant gloves and an air purifying respirator equipped with organic vapor cartridges.

The requirements for personnel training are referenced in Section 7.0 of this HASP.

4.2 MONITORING PROCEDURES

Monitoring will be conducted by the Project Safety Manager or site geologist during investigation activities. A photo-ionization detector (PID) will be utilized to monitor for VOCs within the breathing zone and soil samples once retrieved. Drill cuttings will be monitored for the presence of VOCs as well.

4.3 ACTION LEVELS

In the event that PID readings of 10 ppm are sustained in the breathing zone for a period of more than fifteen minutes the Project Safety Manager shall be notified and PPE will be upgraded to Level C.

5.0 DECONTAMINATION PROCEDURES

All drill augers, sampling equipment and other downhole equipment utilized during investigation activities will be pressure washed in a designated decontamination area. The decontamination area will be bermed and lined with polyethylene sheeting prior to equipment washing. The Project Safety Manager will see that decontamination fluids will be disposed of in an appropriate manner.

In the event the Project Safety Manager ascertains that personnel and equipment leaving the work or exclusion zones must be thoroughly decontaminated, decontamination of personnel will be done by scrubbing with a soap/water mixture followed by clean water rinses. The Project Safety Manager will see that water used in the decontamination procedure will be disposed of in an appropriate manner.

6.0 MEDICAL MONITORING

Medical monitoring will be required for those employees required to wear respirators and required to wear hearing protection. Employees who wear or may wear respiratory protection must be provided respirators in accordance with the guidelines of 29 CFR 1910.134. The regulation requires that an individual's ability to wear respiratory protection be medically certified before he/she performs designated duties. Employees who wear or may wear hearing protection devices must be provided to them in accordance with the guidelines of 29 CFR 1910.95. This regulation requires that an individual's hearing level be medically evaluated. Medical monitoring shall only apply to qualified personnel approved to work in sensitive environmental areas or where excessive noise is prevalent.

7.0 PERSONNEL TRAINING

All site personnel must have completed an off-site training course of at least 40 hours meeting the requirements of 29 CFR 1910.120 on Hazardous Waste Site Operations and Emergency Response. If the course was taken more than 12 months prior to the work date, an 8-hour refresher course is also required within the last 12 months.

All personnel entering a permit required confined space or attending or supervising an entry shall have had training meeting the requirements of 29CFR 1910.146.

Site Specific Training: Site specific training shall be provided to each employee during the tailgate safety meeting or prior to setting up of the exclusion zone. Personnel will be briefed by the Project Safety Manager as to the potential hazards to be encountered.

Topics will include:

- Availability of this HASP
- General site hazards and specific hazards in the work areas including those attributable to the chemicals present
- Selection, use, testing and care of the body, eye, ear, hand, foot, and respiratory protective equipment to be worn, with the limitations of each
- Decontamination procedures for personnel, their personal protective equipment and other equipment used on the site
- Emergency response procedures and requirements
- Emergency alarm systems and other forms of notification and evacuation routes to be followed
- Methods to obtain emergency assistance and medical attention

8.0 EMERGENCY RESPONSE

8.1 NOTIFICATION OF SITE EMERGENCIES

In the event of an emergency, site personnel will signal distress with three blasts from an appropriate horn (vehicle horn, air horn, etc.). This sound signal must be loud enough to be clearly heard above other noise present. Appropriate authorities will then be immediately notified of the nature and extent of the emergency.

The table below shows Emergency Response Telephone Numbers. This table will be maintained at the work site by the Project Safety Manager. The location of the nearest telephone will be determined prior to the initiation of on-site activities.

Emergency Response Telephone Numbers

Fire Department	911
Police Department	911
Ambulance	911
Hospital	911
Poison Control Center	911
Chemical Emergency Advice	800-424-9300
NYSDEC Spills Unit	585-226-5433
SAW Safety Coordinator	585-746-2986
SAW Main Office	315-986-4751

Should someone be transported to a hospital or doctor, a copy of this Health and Safety Plan must accompany them. A map with directions to the nearest hospital is included in Appendix C.

8.2 RESPONSIBILITIES

The Project Safety Manager (or designee) will be responsible for responding to all emergencies. The Project Safety Manager will: 1) Notify appropriate individuals, authorities and/or health care facilities of the potentially hazardous activities and potential wastes that may develop as a result of the investigation; 2) Have working knowledge of safety equipment available at the site; and 3) Ensure that a map which details the most direct route to the nearest hospital is prominently posted with the emergency telephone numbers.

Employees who will respond to emergency situations involving hazardous materials shall be trained on how to respond to such emergencies. The project supervisor will ensure that the following safety equipment is available at the site: eyewash bottles, first aid supplies, and fire extinguisher. The emergency response plan will be reviewed daily to ensure its applicability for the planned day's operations.

8.3 ACCIDENTS AND INJURIES

In the event of a safety or health emergency at the site, appropriate emergency measures will immediately be taken to assist those who have been injured or exposed and to protect others from hazards.

Personnel trained in first aid procedure should be present during site activities to provide appropriate treatment of injuries or illnesses occurring during site operations.

In the event of safety or health emergency at the site, the Project Safety Manager must be immediately notified. Upon notifications of an exposure incident, the Project Safety Manager will contact the appropriate emergency personnel, who will, according to the seriousness of the accident, provide recommended medical diagnosis and, if necessary, treatment.

The Project Safety Manager will investigate facility/site conditions to determine whether,

and at what levels, exposure actually occurred, the cause of such exposure and the means to be taken to prevent the incident from reoccurring.

The Project Safety Manager and the exposed individual will complete an exposure-incident reporting form. The form will be filed with the employee's medical and safety records to serve as documentation of the incident and the actions taken.

8.4 SITE COMMUNICATIONS

Hand signals will be utilized where phones are impractical. If possible, mobile telephones will be present during site activities for emergency response and office communications. The locations of public telephones will be identified prior to the start of activities. These will provide back up for the mobile telephones and serve as the primary off-site communication network. Daily tailgate safety meetings will be used to communicate any new hazards to all site personnel and to reinforce adherence to work practices. A copy of a tailgate safety-meeting log is available in Appendix E.

8.5 SITE SECURITY AND CONTROL

The Project Safety Manager and/or his designee shall maintain site security and control. Their duties include limiting access to the site to authorized personnel, oversight of project equipment and materials, and general oversight of site activities, as appropriate.

8.6 EMERGENCY RESPONSE

In case of emergency, site personnel should evacuate to the identified safe refuge location, both for their own personal safety and to prevent hampering response/rescue efforts. Unless changed by the Project Manager, the command center will be used as the safe refuge. In the case of an evacuation, the Project Safety Manager will account for all personnel.

In the event of an emergency, the Project Safety Manager will direct all notification, response and follow-up actions with the concurrence of the Project Manager. Contact with any outside response personnel (ambulance, fire department, etc.) will be done at the direction of the Project Safety Manager, again with the individuals trained in first aid procedures. If an individual is transported to a hospital or a doctor, a copy of this HASP must accompany the individual.

Follow-up activities must be completed before on-site work is resumed following an emergency. All used emergency equipment must be recharged, refilled or replaced. Government agencies must be notified as appropriate. An investigation of the incident must be conducted as soon as possible. The resulting report must be accurate, objective, complete and authenticated (signed and dated).

8.7 MEDICAL/FIRST AID RESPONSE

Only trained personnel competent in such matters will provide on-site medical and/or first aid response to an injury or illness. The Project Safety Manager is responsible for directing the actions and contacting the appropriate off-site response personnel (paramedics, etc.).

8.8 FIRE FIGHTING PROCEDURES

A fire extinguisher, intended for small fires, will be available at the work site during all site activities. When the fire cannot be controlled with the extinguisher, the area should be evacuated immediately. The Project Safety Manager (or designee) will determine the time to contact fire department response personnel.

8.9 EMERGENCY DECONTAMINATION PROCEDURE

The extent of emergency decontamination depends on the severity of the injury or illness and the nature of the contamination. Minimum decontamination will consist of detergent washing and rinsing and removal of contaminated outer clothing and equipment. If the emergency is such that there is insufficient time to complete all of the actions, it is acceptable to remove the contaminated clothing without washing it. If the situation is such that the contaminated clothing cannot be removed, the person should be given required first aid treatment, and then wrapped in plastic or a blanket prior to transportation to medical care.

8.10 EMERGENCY EQUIPMENT

Equipment for safety and emergency response shall be maintained on-site, as follows:

- Fire extinguisher
- First aid kit
- Eye wash bottles
- Detergent
- Rinse Water
- Blanket
- Extra copy of the Health and Safety Plan

9.0 SPECIAL PRECAUTIONS

9.1 HEAT STRESS/COLD INJURY PROTECTION PROGRAM

Training in prevention of heat and/or cold injuries will be provided as part of the site-specific training. Informal review of these techniques will be made as part of daily pre-work briefings. Any person who experiences signs of heat or cold related distress would be instructed to stop work immediately. Medical attention will be sought if there is any doubt that prompt and full recovery will not occur without it.

9.2 HEAVY MACHINERY/EQUIPMENT

Site employees must remain aware of those site activities that involve the use of heavy equipment and machinery. Appropriate PPE will be determined by site conditions.

9.3 CONSTRUCTION MATERIALS AND SITE REFUSE

All construction materials and site refuse will be contained in appropriate areas or facilities. Site personnel should make certain that soil spoils, cuttings, etc. are not scattered throughout the area of activity and that trash and scrap materials are immediately and properly disposed of.

9.4 ADDITIONAL SAFETY PRACTICES

The following are important safety precautions, which will be enforced during this work:

- Eating drinking, chewing gum or tobacco, smoking, or any practice that increases the probability of hand-to-mouth transfer and ingestion of material is prohibited in the exclusion and decontamination zones. Smoking is prohibited anywhere in the work area.
- Hands and face must be thoroughly washed upon leaving the work area and before eating, drinking, or any other activity.
- Contact with potential contaminated surfaces should be avoided whenever possible. One should not walk through puddles, mud, or other discolored surfaces; kneel on ground, lean, sit or place equipment on drums, containers, vehicles, or the ground.
- Medicine and alcohol can intensify, as well as mask the effect from exposure to certain compounds. Personnel involved in the project must not consume controlled substances and alcoholic beverages. Consumption of prescribed drugs must be at the direction of a physician familiar with the person's work.
- Activities in the exclusion zone will be conducted using the "Buddy System". The Buddy is another worker fully dressed in the appropriate PPE, who can perform the following activities:
 - Provide his/her partner with assistance
 - Observe his/her partner for signs of chemical or heat exposure
 - Periodically check the integrity of his/her partner's PPE; and
 - Notify others if emergency help is needed

- Work areas for various operational activities should be established.
- Personnel and equipment in the work areas should be minimized, consistent with effective site operations.
- Procedures for leaving the work area must be planned and implemented prior to going to the site. Work areas and decontamination procedures and locations must be established on the basis of prevailing site conditions.
- Unsafe equipment left unattended will be identified by a "DANGER, DO NOT OPERATE", tag.

10.0 COMMUNITY HEALTH & SAFETY

10.1 COMMUNITY RELATIONS

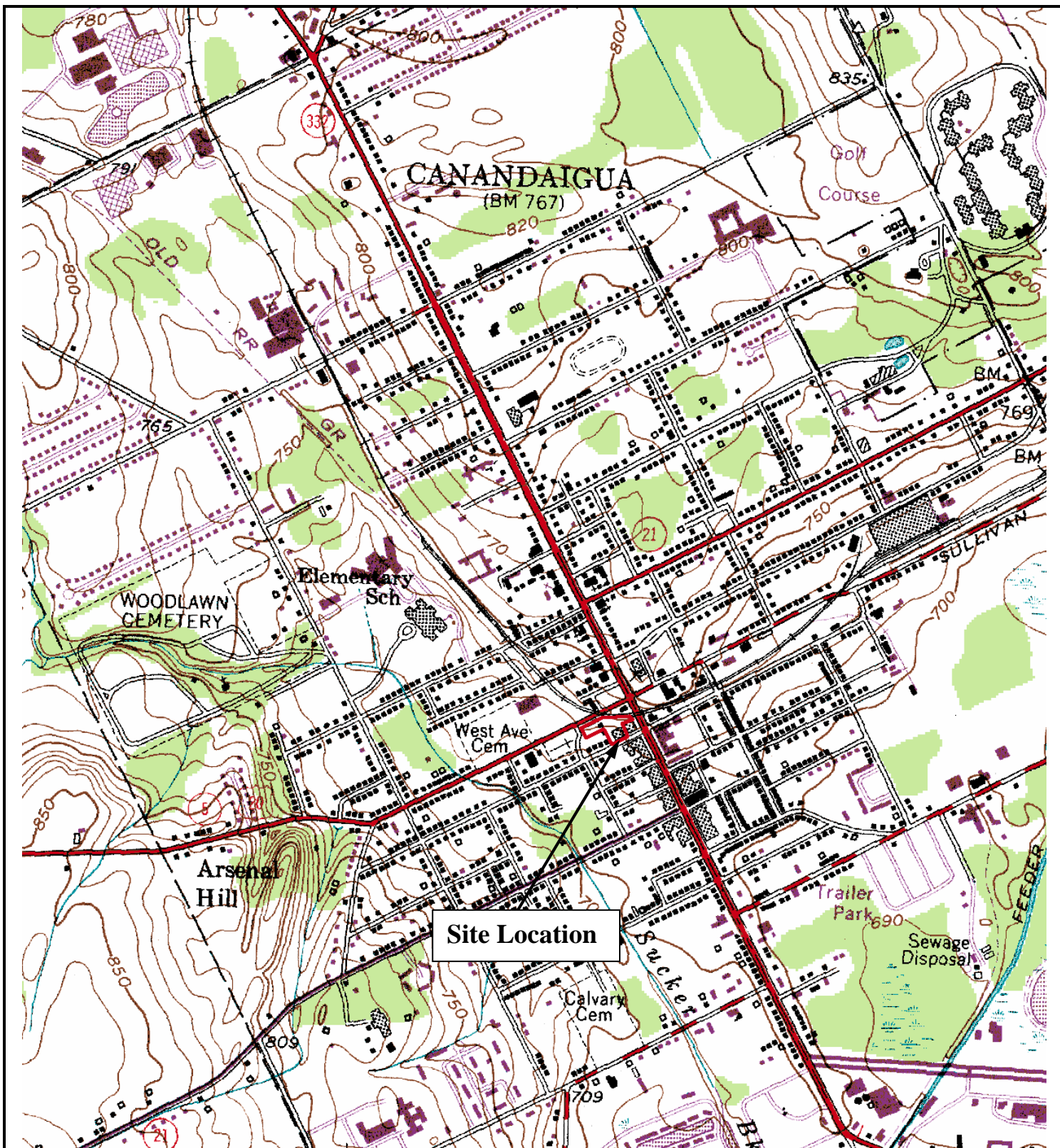
Given the proximity to residential neighborhoods community relations may be a sensitive issue. All SAW employees and subcontractors will limit all discussions with community members not directly involved with site activities. All questions relative to site activities are to be directed to representatives of the Brownfield participant (Canandaigua Crossroads, LLC) or the New York State Department of Environmental Conservation.

10.2 COMMUNITY AIR MONITORING PLAN

Efforts will be made during site activities to minimize the creation of airborne vapors, dust or particulates. Work areas may be wetted if necessary to control dust during dry periods. Given the direction of prevailing winds, airborne impacts to residential areas are not anticipated. Periodic monitoring will be performed during intrusive site activities as outlined in the NYSDOH Generic Community Air Monitoring Plan (CAMP). A copy of the NYSDOH Generic CAMP is attached in Appendix D.

Appendix A

Site Location Map



Legend

= Approximate Brownfield Property Boundary

S.A.W. Environmental Services, Inc.

672 Frey Road
Macedon, New York 14502
www.soilairwater.com



Title: Site Location Map

Project: Former Labelon Corp. Facility
10 Chapin Street
Canandaigua, New York

Date: 02/24/11

Project #: 210037

Scale: Not to Scale

Drawn by: DKE

Source: U.S. Geologic Survey. Canandaigua, N.Y. Quadrangle [Map].
1:24,000. 7.5 Minute Series. Reston, VA: USGS, 1978.

Appendix B

**NIOSH Pocket Guides
to Chemical Hazards**

Trichloroethylene

Synonyms & Trade Names

Ethylene trichloride, TCE, Trichloroethene, Trilene


CAS No.

79-01-6

RTECS No.

[KX4550000](#)

DOT ID & Guide

1710 [160](#)

Formula

ClCH=CCl_2

Conversion

1 ppm = 5.37 mg/m³

IDLH

Ca [1000 ppm]

See: [79016](#)

Exposure Limits

NIOSH REL

: Ca [See Appendix A](#) [See Appendix C](#)


OSHA PEL

†: TWA 100 ppm C 200 ppm 300 ppm (5-minute maximum peak in any 2 hours)

Measurement Methods

NIOSH [1022](#)  ,
[3800](#)  ;

OSHA [1001](#) 

See: [NMAM](#) or [OSHA Methods](#)

Physical Description

Colorless liquid (unless dyed blue) with a chloroform-like odor.

MW:

131.4

BP:

189°F

FRZ:

-99°F

Sol:

0.1%

VP:

58 mmHg

IP:

9.45 eV

Sp.Gr:

1.46

FLP:

?

UEL(77°F): 10.5%

LEL(77°F): 8%

Combustible Liquid, but burns with difficulty.

Incompatibilities & Reactivities

Strong caustics & alkalis; chemically-active metals (such as barium, lithium, sodium, magnesium, titanium & beryllium)

Exposure Routes

inhalation, skin absorption, ingestion, skin and/or eye contact

Symptoms

irritation eyes, skin; headache, visual disturbance, lassitude (weakness, exhaustion), dizziness, tremor, drowsiness, nausea, vomiting; dermatitis; cardiac arrhythmias, paresthesia; liver injury; [potential occupational carcinogen]

Target Organs

Eyes, skin, respiratory system, heart, liver, kidneys, central nervous system

Cancer Site

[in animals: liver & kidney cancer]

Personal Protection/Sanitation

([See protection codes](#))

First Aid

([See procedures](#))

Skin: Prevent skin contact
Eyes: Prevent eye contact
Wash skin: When contaminated
Remove: When wet or contaminated
Change: No recommendation
Provide: Eyewash, Quick drench

Eye: Irrigate immediately
Skin: Soap wash promptly
Breathing: Respiratory support
Swallow: Medical attention immediately

Respirator Recommendations

NIOSH

At concentrations above the NIOSH REL, or where there is no REL, at any detectable concentration:

(APF = 10,000) Any self-contained breathing apparatus that has a full facepiece and is operated in a pressure-demand or other positive-pressure mode

(APF = 10,000) Any supplied-air respirator that has a full facepiece and is operated in a pressure-demand or other positive-pressure mode in combination with an auxiliary self-contained positive-pressure breathing apparatus

Escape:

(APF = 50) Any air-purifying, full-facepiece respirator (gas mask) with a chin-style, front- or back-mounted organic vapor canister

Any appropriate escape-type, self-contained breathing apparatus

[Important additional information about respirator selection](#)

See also: [INTRODUCTION](#) See ICSC CARD: [0081](#) See MEDICAL TESTS: [0236](#)

Vinylidene chloride

Synonyms & Trade Names

1,1-**DCE**; 1,1-**Dichloroethene**; 1,1-Dichloroethylene; VDC; Vinylidene chloride monomer; Vinylidene dichloride

CAS No.

75-35-4

RTECS No.

[KV9275000](#)

DOT ID & Guide

1303 [130P](#) (inhibited)

Formula

$\text{CH}_2=\text{CCl}_2$

Conversion

IDLH

Ca [N.D.]

See: [IDLH INDEX](#)

Exposure Limits

NIOSH REL

: Ca [See Appendix A](#)

OSHA PEL

†: none

Measurement Methods

NIOSH [1015](#) ;

OSHA [19](#) 

See: [NMAM](#) or [OSHA Methods](#) 

Physical Description

Colorless liquid or gas (above 89°F) with a mild, sweet, chloroform-like odor.

MW:

96.9

BP:

89°F

FRZ:

-189°F

Sol:

0.04%

VP:

500 mmHg

IP:

10.00 eV

Sp.Gr:

1.21

FLP:

-2°F

UEL:

15.5%

LEL:

6.5%

Class IA Flammable Liquid: Fl.P. below 73°F and BP below 100°F.

Incompatibilities & Reactivities

Aluminum, sunlight, air, copper, heat [Note: Polymerization may occur if exposed to oxidizers, chlorosulfonic acid, nitric acid, or oleum. Inhibitors such as the monomethyl ether of hydroquinone are added to prevent polymerization.]

Exposure Routes

inhalation, skin absorption, ingestion, skin and/or eye contact

Symptoms

irritation eyes, skin, throat; dizziness, headache, nausea, dyspnea (breathing difficulty); liver, kidney disturbance; pneumonitis; [potential occupational carcinogen]

Target Organs

Eyes, skin, respiratory system, central nervous system, liver, kidneys

Cancer Site

[in animals: liver & kidney tumors]

Personal Protection/Sanitation

([See protection codes](#))

First Aid

([See procedures](#))

Skin: Prevent skin contact
Eyes: Prevent eye contact
Wash skin: When contaminated
Remove: When wet (flammable)
Change: No recommendation
Provide: Eyewash, Quick drench

Eye: Irrigate immediately
Skin: Soap flush immediately
Breathing: Respiratory support
Swallow: Medical attention immediately

Respirator Recommendations

NIOSH

At concentrations above the NIOSH REL, or where there is no REL, at any detectable concentration:

(APF = 10,000) Any self-contained breathing apparatus that has a full facepiece and is operated in a pressure-demand or other positive-pressure mode

(APF = 10,000) Any supplied-air respirator that has a full facepiece and is operated in a pressure-demand or other positive-pressure mode in combination with an auxiliary self-contained positive-pressure breathing apparatus

Escape:

(APF = 50) Any air-purifying, full-facepiece respirator (gas mask) with a chin-style, front- or back-mounted organic vapor canister

Any appropriate escape-type, self-contained breathing apparatus

[Important additional information about respirator selection](#)

See also: [INTRODUCTION](#) See ICSC CARD: [0083](#)

Vinyl chloride

Synonyms & Trade Names

Chloroethene, Chloroethylene, Ethylene monochloride, Monochloroethene, Monochloroethylene, VC, Vinyl chloride monomer (VCM)

CAS No.

75-01-4

RTECS No.

[KU9625000](#)

DOT ID & Guide

1086 [116P](#) (inhibited)

Formula

$\text{CH}_2=\text{CHCl}$

Conversion

1 ppm = 2.56 mg/m³

IDLH

Ca [N.D.]

See: [IDLH INDEX](#)

Exposure Limits

NIOSH REL

: Ca [See Appendix A](#)

OSHA PEL

: [1910.1017] TWA 1 ppm C 5 ppm [15-minute]

Measurement Methods

NIOSH [1007](#) ;

OSHA [4](#) , [75](#) 

See: [NMAM](#) or [OSHA Methods](#) 

Physical Description

Colorless gas or liquid (below 7°F) with a pleasant odor at high concentrations. [Note: Shipped as a liquefied compressed gas.]

MW:

62.5

BP:

7°F

FRZ:

-256°F

Sol(77°F): 0.1%

VP:

3.3 atm

IP:

9.99 eV

FLP:

NA (Gas)

UEL:

33.0%

LEL:

3.6%

RGasD:

2.21

Flammable Gas

Incompatibilities & Reactivities

Copper, oxidizers, aluminum, peroxides, iron, steel [Note: Polymerizes in air, sunlight, or heat unless stabilized by inhibitors such as phenol. Attacks iron & steel in presence of moisture.]

Exposure Routes

inhalation, skin and/or eye contact (liquid)

Symptoms

lassitude (weakness, exhaustion); abdominal pain, gastrointestinal bleeding; enlarged liver; pallor or cyanosis of extremities; liquid: frostbite; [potential occupational carcinogen]

Target Organs

Liver, central nervous system, blood, respiratory system, lymphatic system

Cancer Site

[liver cancer]

Personal Protection/Sanitation

([See protection codes](#))

Skin: Frostbite

Eyes: Frostbite

Wash skin: No recommendation

Remove: When wet (flammable)

Change: No recommendation

Provide: Frostbite wash

First Aid

([See procedures](#))

Eye: Frostbite

Skin: Frostbite

Breathing: Respiratory support

Respirator Recommendations

([See Appendix E](#))

NIOSH

At concentrations above the NIOSH REL, or where there is no REL, at any detectable concentration:

(APF = 10,000) Any self-contained breathing apparatus that has a full facepiece and is operated in a pressure-demand or other positive-pressure mode

(APF = 10,000) Any supplied-air respirator that has a full facepiece and is operated in a pressure-demand or other positive-pressure mode in combination with an auxiliary self-contained positive-pressure breathing apparatus

Escape:

(APF = 50) Any air-purifying, full-facepiece respirator (gas mask) with a chin-style, front- or back-mounted canister providing protection against the compound of concern
Any appropriate escape-type, self-contained breathing apparatus

[Important additional information about respirator selection](#)

See also: [INTRODUCTION](#) See ICSC CARD: [0082](#) See MEDICAL TESTS: [0241](#)

Toluene

Synonyms & Trade Names

Methyl benzene, Methyl benzol, Phenyl methane, Toluol

CAS No.

108-88-3

RTECS No.

[XS5250000](#)

DOT ID & Guide

1294 [130](#)

Formula

$C_6H_5CH_3$

Conversion

1 ppm = 3.77 mg/m³

IDLH

500 ppm

See: [108883](#)

Exposure Limits

NIOSH REL

: TWA 100 ppm (375 mg/m³) ST 150 ppm (560 mg/m³)

OSHA PEL

†: TWA 200 ppm C 300 ppm 500 ppm (10-minute maximum peak)

Measurement Methods

NIOSH [1500](#) , [1501](#) ,
[3800](#) , [4000](#) 

OSHA [111](#) 

See: [NMAM](#) or [OSHA Methods](#) 

Physical Description

Colorless liquid with a sweet, pungent, benzene-like odor.

MW:

92.1

BP:

232°F

FRZ:

-139°F

Sol(74°F): 0.07%

VP:

21 mmHg

IP:

8.82 eV

Sp.Gr:

0.87

Fl.P:

40°F

UEL:

7.1%

LEL:

1.1%

Class IB Flammable Liquid: Fl.P. below 73°F and BP at or above 100°F.

Incompatibilities & Reactivities

Strong oxidizers

Exposure Routes

inhalation, skin absorption, ingestion, skin and/or eye contact

Symptoms

irritation eyes, nose; lassitude (weakness, exhaustion), confusion, euphoria, dizziness, headache; dilated pupils, lacrimation (discharge of tears); anxiety, muscle fatigue, insomnia; paresthesia; dermatitis; liver, kidney damage

Target Organs

Eyes, skin, respiratory system, central nervous system, liver, kidneys

Personal Protection/Sanitation

([See protection codes](#))

Skin: Prevent skin contact

Eyes: Prevent eye contact

Wash skin: When contaminated

Remove: When wet (flammable)

First Aid

([See procedures](#))

Eye: Irrigate immediately

Skin: Soap wash promptly

Breathing: Respiratory support

Change: No recommendation

Swallow: Medical attention immediately

Respirator Recommendations

NIOSH

Up to 500 ppm:

(APF = 10) Any chemical cartridge respirator with organic vapor cartridge(s)*

(APF = 25) Any powered, air-purifying respirator with organic vapor cartridge(s)*

(APF = 50) Any air-purifying, full-facepiece respirator (gas mask) with a chin-style, front- or back-mounted organic vapor canister

(APF = 10) Any supplied-air respirator*

(APF = 50) Any self-contained breathing apparatus with a full facepiece

Emergency or planned entry into unknown concentrations or IDLH conditions:

(APF = 10,000) Any self-contained breathing apparatus that has a full facepiece and is operated in a pressure-demand or other positive-pressure mode

(APF = 10,000) Any supplied-air respirator that has a full facepiece and is operated in a pressure-demand or other positive-pressure mode in combination with an auxiliary self-contained positive-pressure breathing apparatus

Escape:

(APF = 50) Any air-purifying, full-facepiece respirator (gas mask) with a chin-style, front- or back-mounted organic vapor canister

Any appropriate escape-type, self-contained breathing apparatus

[Important additional information about respirator selection](#)

See also: [INTRODUCTION](#) See ICSC CARD: [0078](#) See MEDICAL TESTS: [0232](#)

Kerosene

Synonyms & Trade Names

Fuel Oil No. 1, Range oil [Note: A refined petroleum solvent (predominantly C₉-C₁₆), which typically is 25% normal paraffins, 11% branched paraffins, 30% monocycloparaffins, 12% dicycloparaffins, 1% tricycloparaffins, 16% mononuclear aromatics & 5% dinuclear aromatics.]


CAS No.

8008-20-6

RTECS No.

[OA5500000](#)

DOT ID & Guide

1223 [128](#)

Conversion

IDLH

N.D.

See: [IDLH INDEX](#)

Exposure Limits

NIOSH REL

: TWA 100 mg/m³

OSHA PEL

: none

Measurement Methods

NIOSH 1550 

See: [NMAM](#) or [OSHA Methods](#)

Physical Description

Colorless to yellowish, oily liquid with a strong, characteristic odor.

MW:

170 (approx)

BP:

347-617°F

FRZ:

-50°F

Sol:

Insoluble

VP(100°F): 5 mmHg

IP:

?

Sp.Gr:

0.81

FLP:

100-162°F

UEL:

5%

LEL:

0.7%

Class II Combustible Liquid: Fl.P. at or above 100°F and below 140°F.

Incompatibilities & Reactivities

Strong oxidizers

Exposure Routes

inhalation, ingestion, skin and/or eye contact

Symptoms

irritation eyes, skin, nose, throat; burning sensation in chest; headache, nausea, lassitude (weakness, exhaustion), restlessness, incoordination, confusion, drowsiness; vomiting, diarrhea; dermatitis; chemical pneumonitis (aspiration liquid)

Target Organs

Eyes, skin, respiratory system, central nervous system

Personal Protection/Sanitation

([See protection codes](#))

Skin: Prevent skin contact

Eyes: Prevent eye contact

Wash skin: When contaminated

First Aid

([See procedures](#))

Eye: Irrigate immediately

Skin: Soap flush immediately

Breathing: Respiratory

Remove: When wet or contaminated

Change: No recommendation

Provide: Quick drench

support

Swallow: Medical attention immediately

Respirator Recommendations

NIOSH

Up to 1000 mg/m³:

(APF = 10) Any chemical cartridge respirator with organic vapor cartridge(s)

(APF = 10) Any supplied-air respirator

Up to 2500 mg/m³:

(APF = 25) Any supplied-air respirator operated in a continuous-flow mode

(APF = 25) Any powered, air-purifying respirator with organic vapor cartridge(s)

Up to 5000 mg/m³:

(APF = 50) Any chemical cartridge respirator with a full facepiece and organic vapor cartridge(s)

(APF = 50) Any air-purifying, full-facepiece respirator (gas mask) with a chin-style, front- or back-mounted organic vapor canister

(APF = 50) Any powered, air-purifying respirator with a tight-fitting facepiece and organic vapor cartridge(s)

(APF = 50) Any self-contained breathing apparatus with a full facepiece

(APF = 50) Any supplied-air respirator with a full facepiece

Emergency or planned entry into unknown concentrations or IDLH conditions:

(APF = 10,000) Any self-contained breathing apparatus that has a full facepiece and is operated in a pressure-demand or other positive-pressure mode

(APF = 10,000) Any supplied-air respirator that has a full facepiece and is operated in a pressure-demand or other positive-pressure mode in combination with an auxiliary self-contained positive-pressure breathing apparatus

Escape:

(APF = 50) Any air-purifying, full-facepiece respirator (gas mask) with a chin-style, front- or back-mounted organic vapor canister

Any appropriate escape-type, self-contained breathing apparatus

[Important additional information about respirator selection](#)

See also: [INTRODUCTION](#) See ICSC CARD: [0663](#)

Appendix C

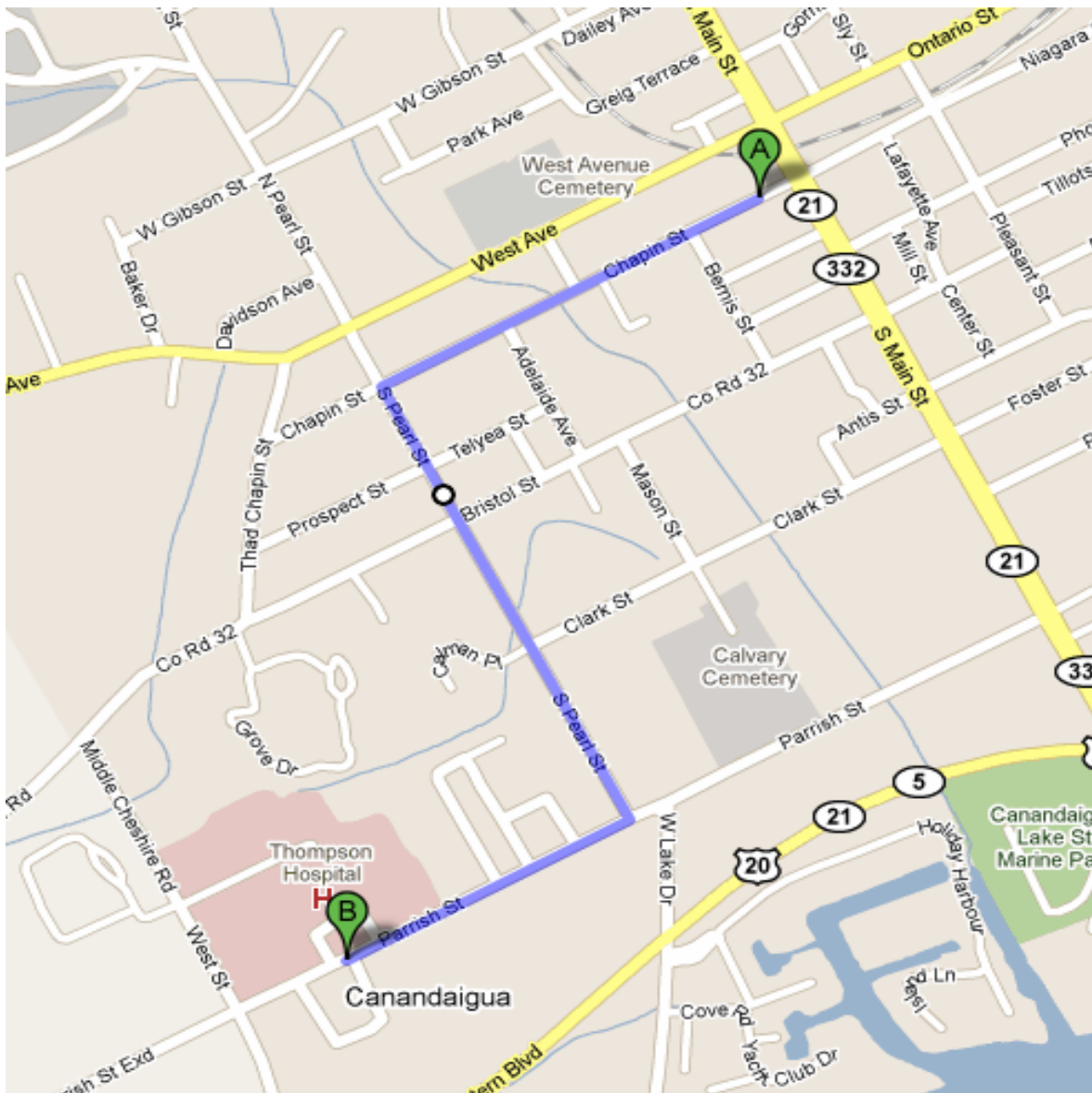
Directions to Hospital

From:
10 Chapin Street
Canandaigua, NY

To:
F.F. Thompson Hospital
350 Parish Street
Canandaigua, NY

1. Head **southwest** on **Chapin St** toward **Bemis St**
About 1 min
go 0.4 mi
total 0.4 mi
2. Turn left at **S Pearl St**
About 2 mins
go 0.5 mi
total 0.9 mi
3. Turn right at **Parrish St**
Destination will be on the right
About 1 min
go 0.3 mi
total 1.3 mi

Total - 1.3 mi – about 4 mins



Appendix D

NYSDOH Generic CAMP

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 $150 \text{ mcg}/\text{m}^3$ 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 $150 \text{ mcg}/\text{m}^3$ 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 $150 \text{ mcg}/\text{m}^3$ 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

Appendix 1B

Fugitive Dust and Particulate Monitoring

A program for suppressing fugitive dust and particulate matter monitoring at hazardous waste sites is a responsibility on the remedial party performing the work. These procedures must be incorporated into appropriate intrusive work plans. The following fugitive dust suppression and particulate monitoring program should be employed at sites during construction and other intrusive activities which warrant its use:

1. Reasonable fugitive dust suppression techniques must be employed during all site activities which may generate fugitive dust.
2. Particulate monitoring must be employed during the handling of waste or contaminated soil or when activities on site may generate fugitive dust from exposed waste or contaminated soil. Remedial activities may also include the excavation, grading, or placement of clean fill. These control measures should not be considered necessary for these activities.
3. Particulate monitoring must be performed using real-time particulate monitors and shall monitor particulate matter less than ten microns (PM₁₀) with the following minimum performance standards:
 - (a) Objects to be measured: Dust, mists or aerosols;
 - (b) Measurement Ranges: 0.001 to 400 mg/m³ (1 to 400,000 :ug/m³);
 - (c) Precision (2-sigma) at constant temperature: +/- 10 :g/m³ for one second averaging; and +/- 1.5 g/m³ for sixty second averaging;
 - (d) Accuracy: +/- 5% of reading +/- precision (Referred to gravimetric calibration with SAE fine test dust (mmd= 2 to 3 :m, g= 2.5, as aerosolized);
 - (e) Resolution: 0.1% of reading or 1g/m³, whichever is larger;
 - (f) Particle Size Range of Maximum Response: 0.1-10;
 - (g) Total Number of Data Points in Memory: 10,000;
 - (h) Logged Data: Each data point with average concentration, time/date and data point number
 - (i) Run Summary: overall average, maximum concentrations, time/date of maximum, total number of logged points, start time/date, total elapsed time (run duration), STEL concentration and time/date occurrence, averaging (logging) period, calibration factor, and tag number;
 - (j) Alarm Averaging Time (user selectable): real-time (1-60 seconds) or STEL (15 minutes), alarms required;
 - (k) Operating Time: 48 hours (fully charged NiCd battery); continuously with charger;
 - (l) Operating Temperature: -10 to 50° C (14 to 122° F);
 - (m) Particulate levels will be monitored upwind and immediately downwind at the working site and integrated over a period not to exceed 15 minutes.
4. In order to ensure the validity of the fugitive dust measurements performed, there must be appropriate Quality Assurance/Quality Control (QA/QC). It is the responsibility of the remedial party to adequately supplement QA/QC Plans to include the following critical features: periodic instrument calibration, operator training, daily instrument performance (span) checks, and a record keeping plan.
5. The action level will be established at 150 ug/m³ (15 minutes average). While conservative,

this short-term interval will provide a real-time assessment of on-site air quality to assure both health and safety. If particulate levels are detected in excess of 150 ug/m³, the upwind background level must be confirmed immediately. If the working site particulate measurement is greater than 100 ug/m³ above the background level, additional dust suppression techniques must be implemented to reduce the generation of fugitive dust and corrective action taken to protect site personnel and reduce the potential for contaminant migration. Corrective measures may include increasing the level of personal protection for on-site personnel and implementing additional dust suppression techniques (see paragraph 7). Should the action level of 150 ug/m³ continue to be exceeded work must stop and DER must be notified as provided in the site design or remedial work plan. The notification shall include a description of the control measures implemented to prevent further exceedances.

6. It must be recognized that the generation of dust from waste or contaminated soil that migrates off-site, has the potential for transporting contaminants off-site. There may be situations when dust is being generated and leaving the site and the monitoring equipment does not measure PM₁₀ at or above the action level. Since this situation has the potential to allow for the migration of contaminants off-site, it is unacceptable. While it is not practical to quantify total suspended particulates on a real-time basis, it is appropriate to rely on visual observation. If dust is observed leaving the working site, additional dust suppression techniques must be employed. Activities that have a high dusting potential--such as solidification and treatment involving materials like kiln dust and lime--will require the need for special measures to be considered.

7. The following techniques have been shown to be effective for the controlling of the generation and migration of dust during construction activities:

- (a) Applying water on haul roads;
- (b) Wetting equipment and excavation faces;
- (c) Spraying water on buckets during excavation and dumping;
- (d) Hauling materials in properly tarped or watertight containers;
- (e) Restricting vehicle speeds to 10 mph;
- (f) Covering excavated areas and material after excavation activity ceases; and
- (g) Reducing the excavation size and/or number of excavations.

Experience has shown that the chance of exceeding the 150ug/m³ action level is remote when the above-mentioned techniques are used. When techniques involving water application are used, care must be taken not to use excess water, which can result in unacceptably wet conditions. Using atomizing sprays will prevent overly wet conditions, conserve water, and provide an effective means of suppressing the fugitive dust.

8. The evaluation of weather conditions is necessary for proper fugitive dust control. When extreme wind conditions make dust control ineffective, as a last resort remedial actions may need to be suspended. There may be situations that require fugitive dust suppression and particulate monitoring requirements with action levels more stringent than those provided above. Under some circumstances, the contaminant concentration and/or toxicity may require additional monitoring to protect site personnel and the public. Additional integrated sampling and chemical analysis of the dust may also be in order. This must be evaluated when a health and safety plan is developed and when appropriate suppression and monitoring requirements are established for protection of health and the environment.

Appendix E

Tailgate Safety Meetings

APPENDIX B

Project Personnel Resumes

APPENDIX C

Citizen Participation Plan



New York State Department of Environmental Conservation

Brownfield Cleanup Program

Citizen Participation Plan



Former Labelon Corp. Facility

**10 Chapin Street
Canandaigua, New York**

March 2011

Contents

<u>Section</u>	<u>Page Number</u>
1. What is New York's Brownfield Cleanup Program?	3
2. Citizen Participation Activities.....	3
3. Major Issues of Public Concern	8
4. Site Information	8
5. Investigation and Cleanup Process	9
Appendix A – Project Contacts and Locations of Reports and Information	12
Appendix B – Site Contact List	14
Appendix C – Site Location Map	15
Appendix D – Brownfield Cleanup Program Process	16

* * * * *

Note: The information presented in this Citizen Participation Plan was current as of the date of its approval by the New York State Department of Environmental Conservation. Portions of this Citizen Participation Plan may be revised during the site's investigation and cleanup process.

Applicant: **Canandaigua Crossroads, LLC ("Applicant")**
Site Name: **Former Labelon Corp. Facility ("Site")**
Site Address: **10 Chapin Street, Canandaigua, New York**
Site County: **Ontario**
Site Number: **C835016**

1. What is New York's Brownfield Cleanup Program?

New York's Brownfield Cleanup Program (BCP) works with private developers to encourage the voluntary cleanup of contaminated properties known as "brownfields" so that they can be reused and developed. These uses include recreation, housing, and business.

A brownfield is any real property that is difficult to reuse or redevelop because of the presence or potential presence of contamination. A brownfield typically is a former industrial or commercial property where operations may have resulted in environmental contamination. A brownfield can pose environmental, legal, and financial burdens on a community. If a brownfield is not addressed, it can reduce property values in the area and affect economic development of nearby properties.

The BCP is administered by the New York State Department of Environmental Conservation (NYSDEC) which oversees Applicants that conduct brownfield site investigation and cleanup activities. An Applicant is a person who has requested to participate in the BCP and has been accepted by NYSDEC. The BCP contains investigation and cleanup requirements, ensuring that cleanups protect public health and the environment. When NYSDEC certifies that these requirements have been met, the property can be reused or redeveloped for the intended use.

For more information about the BCP, go online at: <http://www.dec.ny.gov/chemical/8450.html> .

2. Citizen Participation Activities

Why NYSDEC Involves the Public and Why It Is Important

NYSDEC involves the public to improve the process of investigating and cleaning up contaminated sites, and to enable citizens to participate more fully in decisions that affect their health, environment, and social well being. NYSDEC provides opportunities for citizen involvement and encourages early two-way communication with citizens before decision makers form or adopt final positions.

Involving citizens affected and interest in site investigation and cleanup programs is important for many reasons. These include:

- Promoting the development of timely, effective site investigation and cleanup programs that protect public health and the environment

- Improving public access to, and understanding of, issues and information related to a particular site and that site's investigation and cleanup process
- Providing citizens with early and continuing opportunities to participate in NYSDEC's site investigation and cleanup process
- Ensuring that NYSDEC makes site investigation and cleanup decisions that benefit from input that reflects the interests and perspectives found within the affected community
- Encouraging dialogue to promote the exchange of information among the affected/interested public, State agencies, and other interested parties that strengthens trust among the parties, increases understanding of site and community issues and concerns, and improves decision making.

This Citizen Participation (CP) Plan provides information about how NYSDEC will inform and involve the public during the investigation and cleanup of the site identified above. The public information and involvement program will be carried out with assistance, as appropriate, from the Applicant.

Project Contacts

Appendix A identifies NYSDEC project contact(s) to whom the public should address questions or request information about the site's investigation and cleanup program. The public's suggestions about this CP Plan and the CP program for the site are always welcome. Interested people are encouraged to share their ideas and suggestions with the project contacts at any time.

Locations of Reports and Information

The locations of the reports and information related to the site's investigation and cleanup program also are identified in Appendix A. These locations provide convenient access to important project documents for public review and comment. Some documents may be placed on the NYSDEC web site. If this occurs, NYSDEC will inform the public in fact sheets distributed about the site and by other means, as appropriate.

Site Contact List

Appendix B contains the site contact list. This list has been developed to keep the community informed about, and involved in, the site's investigation and cleanup process. The site contact list will be used periodically to distribute fact sheets that provide updates about the status of the project. These will include notifications of upcoming activities at the site (such as fieldwork), as well as availability of project documents and announcements about public comment periods.

The site contact list includes, at a minimum:

- chief executive officer and planning board chairperson of each county, city, town and village in which the site is located;
- residents, owners, and occupants of the site and properties adjacent to the site;
- the public water supplier which services the area in which the site is located;
- any person who has requested to be placed on the site contact list;
- the administrator of any school or day care facility located on or near the site for purposes of posting and/or dissemination of information at the facility;
- location(s) of reports and information.

The site contact list will be reviewed periodically and updated as appropriate. Individuals and organizations will be added to the site contact list upon request. Such requests should be submitted to the NYSDEC project contact(s) identified in Appendix A. Other additions to the site contact list may be made at the discretion of the NYSDEC project manager, in consultation with other NYSDEC staff as appropriate.

Receive Site Information by Email

Have site information such as fact sheet sent right to your email inbox.

NYSDEC invites you to sign up at the following web page:
www.dec.ny.gov/chemical/61092.html



It's quick, free, and confidential and it will help keep you better informed.

As a listserv member, you will periodically receive site-related information/announcements for all contaminated sites in the county(ies) you select.

You may continue also to receive paper copies of site information for a time after you sign up with a county listserv, until the transition to electronic distribution is complete.

CP Activities

The table at the end of this section identifies the CP activities, at a minimum, that have been and will be conducted during the site's investigation and cleanup program. The flowchart in Appendix D shows how these CP activities integrate with the site investigation and cleanup process. The public is informed about these CP activities through fact sheets and notices distributed at significant points during the program. Elements of the investigation and cleanup process that match up with the CP activities are explained briefly in Section 5.

- **Notices and fact sheets** help the interested and affected public to understand contamination issues related to a site, and the nature and progress of efforts to investigate and clean up a site.

(Please note the free and confidential email delivery option above; a transition to all electronic distribution is planned for the near future).

- **Public forums, comment periods and contact with project managers** provide opportunities for the public to contribute information, opinions and perspectives that have potential to influence decisions about a site's investigation and cleanup.

The public is encouraged to contact project staff at any time during the site's investigation and cleanup process with questions, comments, or requests for information.

This CP Plan may be revised due to changes in major issues of public concern identified in Section 3 or in the nature and scope of investigation and cleanup activities. Modifications may include additions to the site contact list and changes in planned citizen participation activities.

Technical Assistance Grant

NYSDEC must determine if the site poses a significant threat to public health or the environment. This determination generally is made using information developed during the investigation of the site, as described in Section 5.

If the site is determined to be a significant threat, a qualifying community group may apply for a Technical Assistance Grant (TAG). The purpose of a TAG is to provide funds to the qualifying group to obtain independent technical assistance. This assistance helps the TAG recipient to interpret and understand existing environmental information about the nature and extent of contamination related to the site and the development/implementation of a remedy.

An eligible community group must certify that its membership represents the interests of the community affected by the site, and that its members' health, economic well-being or enjoyment of the environment may be affected by a release or threatened release of contamination at the site. For more information about TAGs, go online at <http://www.dec.ny.gov/regulations/2590.html>.

The following table summarizes citizen participation activities related to the site's investigation and cleanup program:

Citizen Participation Requirements (Activities)	Timing of CP Activity(ies)				
<p align="center">Application Process:</p> <table border="1"> <tr> <td data-bbox="212 323 824 407"> <ul style="list-style-type: none"> • Prepare site contact list • Establish document repositories </td><td data-bbox="824 323 1435 407">At time of preparation of application to participate in the BCP.</td></tr> <tr> <td data-bbox="212 407 824 642"> <ul style="list-style-type: none"> • Publish notice in Environmental Notice Bulletin (ENB) announcing receipt of application and 30-day public comment period • Publish above ENB content in local newspaper • Mail above ENB content to site contact list • Conduct 30-day public comment period </td><td data-bbox="824 407 1435 642">When NYSDEC determines that BCP application is complete. The 30-day public comment period begins on date of publication of notice in ENB. End date of public comment period is as stated in ENB notice. Therefore, ENB notice, newspaper notice, and notice to the site contact list should be provided to the public at the same time.</td></tr> </table>		<ul style="list-style-type: none"> • Prepare site contact list • Establish document repositories 	At time of preparation of application to participate in the BCP.	<ul style="list-style-type: none"> • Publish notice in Environmental Notice Bulletin (ENB) announcing receipt of application and 30-day public comment period • Publish above ENB content in local newspaper • Mail above ENB content to site contact list • Conduct 30-day public comment period 	When NYSDEC determines that BCP application is complete. The 30-day public comment period begins on date of publication of notice in ENB. End date of public comment period is as stated in ENB notice. Therefore, ENB notice, newspaper notice, and notice to the site contact list should be provided to the public at the same time.
<ul style="list-style-type: none"> • Prepare site contact list • Establish document repositories 	At time of preparation of application to participate in the BCP.				
<ul style="list-style-type: none"> • Publish notice in Environmental Notice Bulletin (ENB) announcing receipt of application and 30-day public comment period • Publish above ENB content in local newspaper • Mail above ENB content to site contact list • Conduct 30-day public comment period 	When NYSDEC determines that BCP application is complete. The 30-day public comment period begins on date of publication of notice in ENB. End date of public comment period is as stated in ENB notice. Therefore, ENB notice, newspaper notice, and notice to the site contact list should be provided to the public at the same time.				
<p align="center">After Execution of Brownfield Site Cleanup Agreement:</p> <table border="1"> <tr> <td data-bbox="212 693 824 743"> <ul style="list-style-type: none"> • Prepare Citizen Participation (CP) Plan </td><td data-bbox="824 693 1435 743">Before start of Remedial Investigation</td></tr> </table>		<ul style="list-style-type: none"> • Prepare Citizen Participation (CP) Plan 	Before start of Remedial Investigation		
<ul style="list-style-type: none"> • Prepare Citizen Participation (CP) Plan 	Before start of Remedial Investigation				
<p align="center">Before NYSDEC Approves Remedial Investigation (RI) Work Plan:</p> <table border="1"> <tr> <td data-bbox="212 798 824 957"> <ul style="list-style-type: none"> • Distribute fact sheet to site contact list about proposed RI activities and announcing 30-day public comment period about draft RI Work Plan • Conduct 30-day public comment period </td><td data-bbox="824 798 1435 957">Before NYSDEC approves RI Work Plan. If RI Work Plan is submitted with application, public comment periods will be combined and public notice will include fact sheet. Thirty-day public comment period begins/ends as per dates identified in fact sheet.</td></tr> </table>		<ul style="list-style-type: none"> • Distribute fact sheet to site contact list about proposed RI activities and announcing 30-day public comment period about draft RI Work Plan • Conduct 30-day public comment period 	Before NYSDEC approves RI Work Plan. If RI Work Plan is submitted with application, public comment periods will be combined and public notice will include fact sheet. Thirty-day public comment period begins/ends as per dates identified in fact sheet.		
<ul style="list-style-type: none"> • Distribute fact sheet to site contact list about proposed RI activities and announcing 30-day public comment period about draft RI Work Plan • Conduct 30-day public comment period 	Before NYSDEC approves RI Work Plan. If RI Work Plan is submitted with application, public comment periods will be combined and public notice will include fact sheet. Thirty-day public comment period begins/ends as per dates identified in fact sheet.				
<p align="center">After Applicant Completes Remedial Investigation:</p> <table border="1"> <tr> <td data-bbox="212 1012 824 1087"> <ul style="list-style-type: none"> • Distribute fact sheet to site contact list that describes RI results </td><td data-bbox="824 1012 1435 1087">Before NYSDEC approves RI Report</td></tr> </table>		<ul style="list-style-type: none"> • Distribute fact sheet to site contact list that describes RI results 	Before NYSDEC approves RI Report		
<ul style="list-style-type: none"> • Distribute fact sheet to site contact list that describes RI results 	Before NYSDEC approves RI Report				
<p align="center">Before NYSDEC Approves Remedial Work Plan (RWP):</p> <table border="1"> <tr> <td data-bbox="212 1142 824 1381"> <ul style="list-style-type: none"> • Distribute fact sheet to site contact list about proposed RWP and announcing 45-day public comment period • Public meeting by NYSDEC about proposed RWP (if requested by affected community or at discretion of NYSDEC project manager) • Conduct 45-day public comment period </td><td data-bbox="824 1142 1435 1381">Before NYSDEC approves RWP. Forty-five day public comment period begins/ends as per dates identified in fact sheet. Public meeting would be held within the 45-day public comment period.</td></tr> </table>		<ul style="list-style-type: none"> • Distribute fact sheet to site contact list about proposed RWP and announcing 45-day public comment period • Public meeting by NYSDEC about proposed RWP (if requested by affected community or at discretion of NYSDEC project manager) • Conduct 45-day public comment period 	Before NYSDEC approves RWP. Forty-five day public comment period begins/ends as per dates identified in fact sheet. Public meeting would be held within the 45-day public comment period.		
<ul style="list-style-type: none"> • Distribute fact sheet to site contact list about proposed RWP and announcing 45-day public comment period • Public meeting by NYSDEC about proposed RWP (if requested by affected community or at discretion of NYSDEC project manager) • Conduct 45-day public comment period 	Before NYSDEC approves RWP. Forty-five day public comment period begins/ends as per dates identified in fact sheet. Public meeting would be held within the 45-day public comment period.				
<p align="center">Before Applicant Starts Cleanup Action:</p> <table border="1"> <tr> <td data-bbox="212 1436 824 1512"> <ul style="list-style-type: none"> • Distribute fact sheet to site contact list that describes upcoming cleanup action </td><td data-bbox="824 1436 1435 1512">Before the start of cleanup action.</td></tr> </table>		<ul style="list-style-type: none"> • Distribute fact sheet to site contact list that describes upcoming cleanup action 	Before the start of cleanup action.		
<ul style="list-style-type: none"> • Distribute fact sheet to site contact list that describes upcoming cleanup action 	Before the start of cleanup action.				
<p align="center">After Applicant Completes Cleanup Action:</p> <table border="1"> <tr> <td data-bbox="212 1566 824 1736"> <ul style="list-style-type: none"> • Distribute fact sheet to site contact list that announces that cleanup action has been completed and that summarizes the Final Engineering Report • Distribute fact sheet to site contact list announcing issuance of Certificate of Completion (COC) </td><td data-bbox="824 1566 1435 1736">At the time NYSDEC approves Final Engineering Report. These two fact sheets are combined if possible if there is not a delay in issuing the COC.</td></tr> </table>		<ul style="list-style-type: none"> • Distribute fact sheet to site contact list that announces that cleanup action has been completed and that summarizes the Final Engineering Report • Distribute fact sheet to site contact list announcing issuance of Certificate of Completion (COC) 	At the time NYSDEC approves Final Engineering Report. These two fact sheets are combined if possible if there is not a delay in issuing the COC.		
<ul style="list-style-type: none"> • Distribute fact sheet to site contact list that announces that cleanup action has been completed and that summarizes the Final Engineering Report • Distribute fact sheet to site contact list announcing issuance of Certificate of Completion (COC) 	At the time NYSDEC approves Final Engineering Report. These two fact sheets are combined if possible if there is not a delay in issuing the COC.				

3. Major Issues of Public Concern

This section of the CP Plan identifies major issues of public concern that relate to the site. Additional major issues of public concern may be identified during the course of the site's investigation and cleanup process.

Preliminary sampling indicates the presence of volatile organic compounds (primarily trichloroethene or TCE) in groundwater on the Site (and likely migrating off-Site) resulting from the historic industrial operations at the Site. Contamination has been documented above the relevant groundwater cleanup standards directly adjacent to a residential neighborhood. Therefore, while the full nature and extent of contamination has not been fully delineated, exceedances have been found above applicable state and federal standards as discussed further below.

4. Site Information

The Site consists of 1.63 acres located at 10 Chapin Street in the City of Canandaigua. The Site is an irregularly shaped parcel which abuts West Avenue, Chapin Street, and North Main Street. It is located within the City of Canandaigua, and is surrounded by residential, municipal and commercial uses. The Site contains one four-story masonry and brick building constructed in 1921 with a total gross floor area of about 80,000 square feet. The remainder of the property is gravel and asphalt parking areas and driveways. The Site is serviced by electricity, natural gas, public water supply and public sewers.

Appendix C contains a map identifying the location of the site.

Site Description

- **location – 10 Chapin Street, City of Canandaigua, New York, Ontario County**
- **setting – urban**
- **site size – 1.63 acres**
- **adjacent properties – residential, municipal, and commercial**

History of Site Use, Investigation, and Cleanup

Over 100 years of industrial use has included a coal yard, a corset factory, and a bicycle factory. Most recently, Labelon, a manufacturer of transparency films and pressure sensitive labels, operated at the site from about 1960 to 2002. It has been vacant since although the parking areas are used on a daily basis.

In 1990, Labelon removed an underground tank farm (15 tanks) and testing revealed residual contamination with solvents (mainly toluene, ketones, xylene, and trichloroethene). Negotiations with NYSDEC for further investigation were protracted and unsuccessful and Labelon declared bankruptcy in 2002. However, during 2001, Labelon conducted an independent investigation which revealed more elevated levels of chlorinated solvents in soil and groundwater at the site perimeter along with trichloroethene (TCE) vapors and petroleum

beneath the building slab. This investigation occurred without the knowledge or involvement of NYSDEC and it was not reported until further work was conducted in 2009 by a prospective buyer of the property. The 2009 investigation properly reported a petroleum release and the data of greatest concern showed over 3000 parts per billion (groundwater quality standard = 5 ppb) of TCE in groundwater and elevated TCE in soil vapor at the site property line. A residential neighborhood is located downgradient (in the direction of groundwater flow) on Chapin Street; offsite migration of TCE-contaminated groundwater appears likely.

Direct contact with contaminated groundwater and soil is unlikely but volatile organic compounds (such as TCE) in the groundwater may move into the soil vapor (air between soil particles), which in turn may move into overlying buildings and affect the indoor air quality. This process, which is similar to the movement of radon gas from the subsurface into the indoor air of buildings, is referred to as soil vapor intrusion. The potential exists for the inhalation of site contaminants due to soil vapor intrusion for any future on-site redevelopment and occupancy. In addition, the potential exists for vapor intrusion into nearby offsite structures where TCE contaminated groundwater has moved offsite. Definition of offsite contamination will be a separate task of the overall investigation.

5. Investigation and Cleanup Process

Application

The Applicant has applied for and been accepted into New York's Brownfield Cleanup Program as a Volunteer. This means that the Applicant was not responsible for the disposal or discharge of the contaminants or whose ownership or operation of the site took place after the discharge or disposal of contaminants. The Volunteer must fully characterize the nature and extent of contamination onsite, and must conduct a "qualitative exposure assessment," a process that characterizes the actual or potential exposures of people, fish and wildlife to contaminants on the site and to contamination that has migrated from the site.

The Applicant in its Application proposes that the site will be used for restricted purposes.

To achieve this goal, the Applicant will conduct investigation and cleanup activities at the site with oversight provided by NYSDEC. The Brownfield Cleanup Agreement executed by NYSDEC and the Applicant sets forth the responsibilities of each party in conducting these activities at the site.

Investigation

The Applicant will conduct an investigation of the site officially called a "remedial investigation" (RI). This investigation will be performed with NYSDEC oversight. The Applicant must develop a remedial investigation workplan, which is subject to public comment.

The site investigation has several goals:

- 1) define the nature and extent of contamination in soil, surface water, groundwater and any other parts of the environment that may be affected;

- 2) identify the source(s) of the contamination;
- 3) assess the impact of the contamination on public health and the environment; and
- 4) provide information to support the development of a proposed remedy to address the contamination or the determination that cleanup is not necessary.

NYSDEC will use the information in the investigation report to determine if the site poses a significant threat to public health or the environment. If the site is a "significant threat," it must be cleaned up using a remedy selected by NYSDEC from an analysis of alternatives prepared by the Applicant and approved by NYSDEC. If the site does not pose a significant threat, the Applicant may select the remedy from the approved analysis of alternatives.

Remedy Selection

When the investigation of the site has been determined to be complete, the project likely would proceed in one of two directions:

1. The Applicant may recommend in its investigation report that no action is necessary at the site. In this case, NYSDEC would make the investigation report available for public comment for 45 days. NYSDEC then would complete its review, make any necessary revisions, and, if appropriate, approve the investigation report. NYSDEC would then issue a "Certificate of Completion" (described below) to the Applicant.

or

2. The Applicant may recommend in its investigation report that action needs to be taken to address site contamination. After NYSDEC approves the investigation report, the Applicant may then develop a cleanup plan, officially called a "Remedial Work Plan". The Remedial Work Plan describes the Applicant's proposed remedy for addressing contamination related to the site.

When the Applicant submits a proposed Remedial Work Plan for approval, NYSDEC would announce the availability of the proposed plan for public review during a 45-day public comment period.

Cleanup Action

NYSDEC will consider public comments, and revise the draft cleanup plan if necessary, before approving the proposed remedy. The New York State Department of Health (NYSDOH) must concur with the proposed remedy. After approval, the proposed remedy becomes the selected remedy.

The Applicant may then design and perform the cleanup action to address the site contamination. NYSDEC and NYSDOH oversee the activities. When the Applicant completes cleanup activities, it will prepare a final engineering report that certifies that cleanup requirements have been achieved or

will be achieved within a specific time frame. NYSDEC will review the report to be certain that the cleanup is protective of public health and the environment for the intended use of the site.

Certificate of Completion

When NYSDEC is satisfied that cleanup requirements have been achieved or will be achieved for the site, it will approve the final engineering report. NYSDEC then will issue a Certificate of Completion (COC) to the Applicant. The COC states that cleanup goals have been achieved, and relieves the Applicant from future liability for site-related contamination, subject to certain conditions. The Applicant would be eligible to redevelop the site after it receives a COC.

Site Management

Site management is the last phase of the site cleanup program. This phase begins when the COC is issued. Site management may be conducted by the Applicant under NYSDEC oversight, if contamination will remain in place. Site management incorporates any institutional and engineering controls required to ensure that the remedy implemented for the site remains protective of public health and the environment. All significant activities are detailed in a Site Management Plan.

An institutional control is a non-physical restriction on use of the site, such as a deed restriction that would prevent or restrict certain uses of the property. An institutional control may be used when the cleanup action leaves some contamination that makes the site suitable for some, but not all uses.

An engineering control is a physical barrier or method to manage contamination. Examples include: caps, covers, barriers, fences, and treatment of water supplies.

Site management also may include the operation and maintenance of a component of the remedy, such as a system that is pumping and treating groundwater. Site management continues until NYSDEC determines that it is no longer needed.

Appendix A

Project Contacts and Locations of Reports and Information

Project Contacts

For information about the site's investigation and cleanup program, the public may contact any of the following project staff:

New York State Department of Environmental Conservation (NYSDEC):

James Craft
Project Manager
NYSDEC - Region 8
Division of Environmental Remediation
6274 East Avon-Lima Road
Avon, New York 14414
(585) 226-5352
jhcraft@gw.dec.state.ny.us

New York State Department of Health (NYSDOH):

Katie Fish
Public Health Specialist
NYSDOH
335 E. Main Street
Rochester, New York 14604
(585) 423-8156
kjc05@health.state.ny.us

Locations of Reports and Information

The facilities identified below are being used to provide the public with convenient access to important project documents:

Wood Library

134 North Main Street
Canandaigua, NY 14424

Attn: Carol R. Shama, Executive Director
Phone: (585) 234-4611

(Note: Until April 2011, the library has been temporarily relocated to:
5263 Parkside Dr., Bldg 700
Canandaigua, NY 14424)

NYSDEC Region 8 Office

6274 East Avon-Lima Road
Avon, New York 14414

Attn: James Craft
Phone: (585) 226-5352

Hours: Monday - Friday 8:45AM – 4:30PM
(call for an appointment)

Appendix B – Site Contact List

CITY ADMINISTRATION AND OFFICIALS

Ellen Polimeni
Mayor
190 Spencer Lane
Canandaigua, NY 14424

Richard E. Brown
Director of Development & Planning
2 North Main Street
Canandaigua, NY 14424

Kay W. James
City Manager
2 North Main Street
Canandaigua, NY 14424

Louis L. Loy, Jr.
Public Works Director
205 Saltonstall Street
Canandaigua, NY 14424

SCHOOLS AND DAY CARE

Canandaigua YMCA
Laura O'Shaughnessy, CEO
Todd Freelove, Child Care/Teen Director
32 North Main Street
Canandaigua, NY 14424-1499

LOCAL MEDIA

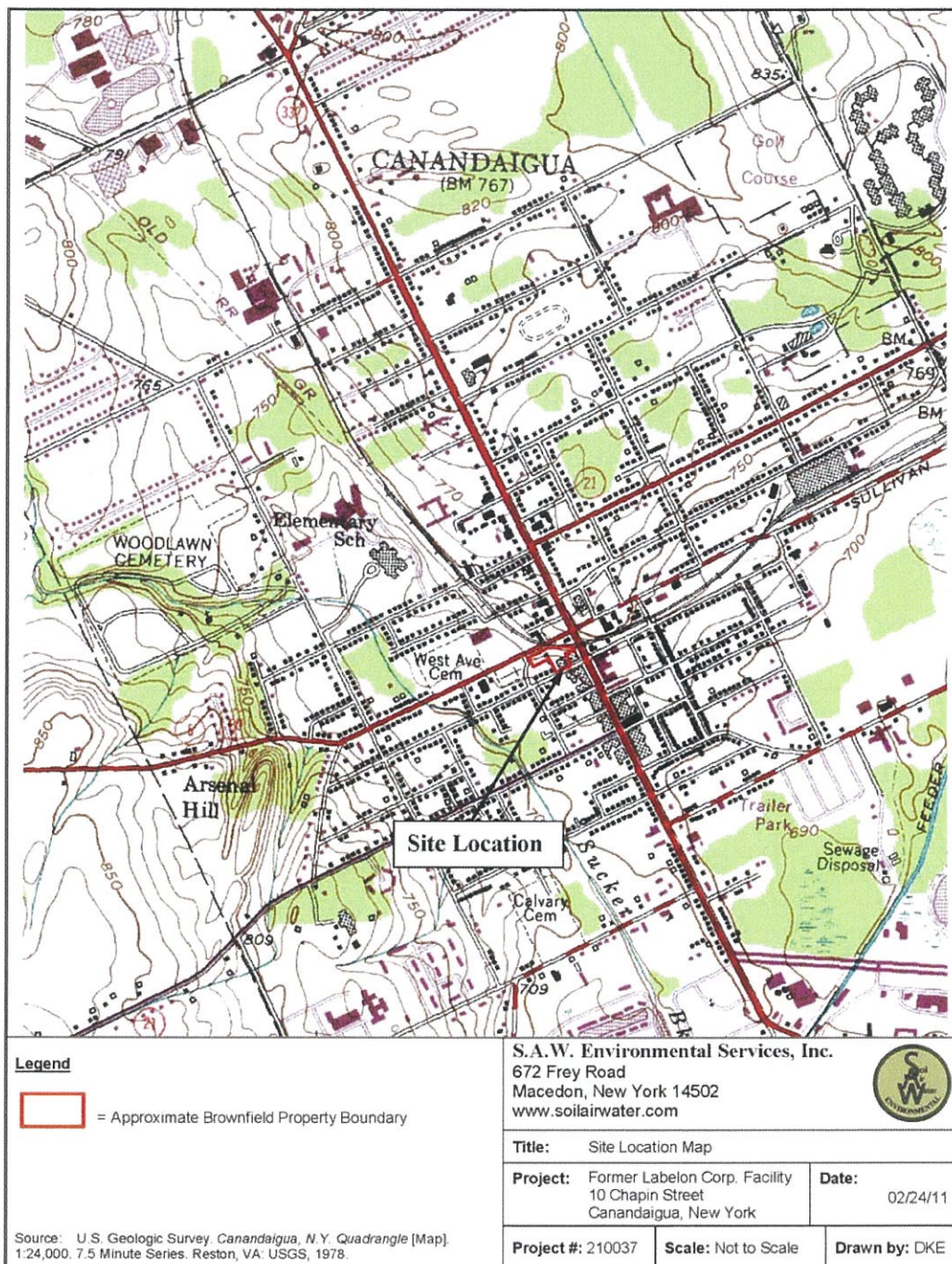
Daily Messenger
73 Buffalo St.
Canandaigua, NY 14424

DOCUMENT REPOSITORY

Wood Library
Carol R. Shama, Executive Director
134 North Main Street
Canandaigua, NY 14424

(Note: Until April 2011, the library has been temporarily relocated to:
5263 Parkside Dr., Bldg 700
Canandaigua, NY 14424)

Appendix C – Site Location Map



Appendix D– Brownfield Cleanup Program Process

