ROUX

Supplemental Investigation Work Plan

2101 Kenmore Avenue Site
NYSDEC BCP #C915391
Tonawanda, New York

March 2025

Prepared for:

Wood and Brooks Properties LLC
2101 Kenmore Avenue
Tonawanda, NY 14207

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Certification

I, Thomas H. Forbes certify that I am currently a NYS registered Professional Engineer and that this March 2025 Supplemental Investigation Work Plan (SIWP) for the 2101 Kenmore Avenue Site C915391 was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

Thomas H. Forbes, P.E.	3-14-25	
NYS Professional Engineer #70950-1	Date	Signature

It is a violation of Article 145 of New York State Education Law for any person to alter this document in any way without the express written verification of adoption by any New York State licensed engineer in accordance with Section 7209(2), Article 145, New York State Education Law.

1.0 Introduction

Roux Environmental Engineering and Geology, DPC (Roux), has prepared this Supplemental Investigation Work Plan (SIWP) on behalf of Wood and Brooks Properties LLC (W&B) to present the scope of work and implementation procedures for completion of post Certificate of Completion (COC) supplemental investigation activities at the 2101 Kenmore Avenue Brownfield Cleanup Program (BCP) Site C915391, located at 2101 Kenmore Avenue, Tonawanda, New York (Site).

The supplemental investigation activities are being completed per the Department's request to further assess indoor ambient air and/or subslab vapor quality within the on-Site and adjacent off-site buildings. The SI will be completed in accordance with the Site Management Plan, 6NYCRR Part 375 and New York State Department of Environmental Conservation (NYSDEC) DER-10, and NYSDOH Soil Vapor Intrusion Guidance (October 2006 and subsequent revisions) guidelines.

1.1 Background and History

The 2.4 acre BCP Site, located at 2101 Kenmore Avenue, Town of Tonawanda, Erie Conty New York (see Figure 1 and Figure 2). The Site includes two (2) interconnected buildings, with associated parking and driveways, with select greenspace that has been redeveloped for a mixed-use commercial and residential (apartments) development.

The Site was historically used for piano key manufacturing from approximately 1900 to the 1970s; and more recently has been used in a variety of commercial manufacturing and warehousing uses. Past use of the onsite buildings after piano key manufacturing, included warehousing and storage of manufacturing components and finished products, fabrication and assembly of various insulation products with packaging and shipment of finished products.

1.2 Summary of Environmental Conditions

Based on the findings of the previous environmental investigations and Remedial Investigation which are further detailed in the Remedial Investigation Alternatives Analysis Report (dated November 2024) and the Site Management Plan (dated October 2024), the following environmental conditions exist at the Site specific to this SIWP (see Figure 3 previous investigation locations). Based on the RI and supplemental investigation air results, two (2) ASD systems were installed, identified as System A and System B (see Figure 4).

1.3 Project Organization and Responsibilities

The supplemental investigation activities will be completed by Roux under contract to W&B. The certifying professional engineer will monitor the activities to verify that the work is performed in accordance with the Brownfield Cleanup Agreement (BCA), the approved SIWP, 6NYCRR Part 375, and NYSDEC DER-10 guidance.

2.0 Supplemental Investigation Activities

As requested by the Department, a supplemental investigation will be completed to further assess SVI after installation of the ASD Systems. Prior to sample collection, W&B, Roux and the Department will inspect the planned areas to determine sampling locations.

As summarized in Section 4.0 a Health and Safety Plan is included in Appendix A for on-Site supplemental investigation activities performed as part of this SIWP. Field documentation forms for supplemental investigation activities, problem identification, corrective measures, etc. are provided in Appendix B.

Sub-slab vapor sampling and indoor ambient air sampling will be completed in conformance with the NYSDOH Soil Vapor Intrusion Guidance (October 2006 and subsequent revisions) and Roux's *Ambient Air and Sub-slab Vapor Sampling* Field Operating Procedures (FOPs 090.0 and 004.6, see Appendix C. The supplemental investigation will be completed in accordance with the most recent update. Air samples will be collected and sent to a NYSDOH-approved laboratory for analysis of USEPA TCL VOCs in accordance with USEPA Method TO-15/TO-15 SIM to allow for low level detections. Field documentation of soil vapor investigation sampling activities will be recorded.

Results of the Supplemental SVI and indoor ambient air sampling will be provided to the Department for review as soon as available from the laboratory. Based on the Supplemental Investigation results, additional mitigation and/or modification of the existing ASD system may be warranted. A sampling and analysis plan is provided as Table 1.

2.1 Supplemental SVI and Indoor Air Sampling

Previous sampling data is provided on Table 2 through Table 6.

2.1.1 SSV-3 Area – Southeastern Building (On-Site)

A supplemental SVI investigation will be completed to assess the efficacy of the existing ASD system, identified as System B, and provide confirmatory sampling in areas previously assessed. Supplemental SVI will include the collection of one (1) paired subslab and indoor air, identified as SSV-7 and IA-10 from the lowest accessible areas within the occupied areas of the building (see Figure 4). This sample location will be collected from the same location as the previously collected sample SSV-3 unless field personnel indicate a different location is required due to obstruction or other factors.

Additionally, two (2) indoor air samples, identified as IA-11 and IA-12 will be collected from the western conference room and southern office space from the on-Site portion of the southeastern building (see Figure 4).

2.1.2 North Building (On-Site)

To supplement previous indoor air quality sampling within the north building, three (3) indoor ambient air samples will be collected from within the occupied 6-story portion of the North Building, identified as IA-13 through IA-15. Figure 3 shows locations of previous sampling events and Figure 4 shows planned locations of air samples.

2.1.3 Supplemental Offsite Building Soil Vapor Investigation

As requested by the Department, supplemental offsite SVI will be completed in the occupied portions of the adjoining building to confirm prior results.

The supplemental offsite SVI will include the collection of three (3) paired subslab and indoor air (OS-SSV-4/OS-IA-4 though OS-SSV-6/OS-IA-6) samples from the lowest accessible areas (e.g., first floor). Approximate sample locations are shown on Figure 4. The planned samples will be located in the same general location as previous subslab/indoor ambient air samples, identified as OS-SSV-1/OS-IA-1 though OS-SSV-3/OS-IA-3 unless field personnel indicate different locations are required due to obstructions or other factors. Figure 3 shows locations of previous sampling events and Figure 4 shows planned locations of air samples.

2.1.4 Outdoor Ambient Air

Concurrent with the SVI and indoor ambient air sampling, one (1) outdoor ambient air sample (OA-3) will be collected (see Table 1 and Figure 4).

2.2 SVI Pre-Sample Assessment

Prior to initiation of SVI and ambient air sampling, a pre-sampling inspection will be performed prior to each sampling event to identify and minimize conditions that may interfere with the proposed testing. The inspection will evaluate the type of structure, floor layout, airflows and physical conditions of the building. This information, along with information on sources of potential indoor air contamination, will be identified on a building inventory form.

2.3 SVI Sample Collection

At each SSV sampling location, Roux personnel will drill a hole (or utilize previous SSV points if deemed satisfactory for use) through the concrete slab using a hand-held hammer drill. Temporary sub-slab vapor probes and tubing will be utilized for the sample collection. Holes in the concrete slab will be filled and sealed after completion of the sampling event. Sub-slab vapor samples will be collected in the following general manner:

- After installation of the probes, complete a tracer gas test to verify the integrity of the soil vapor probe seal;
- Upon completion of a successful tracer gas test, three volumes (i.e., the volume of the sample probe and tube) will be purged prior to collecting the samples to ensure samples collected are representative.
- The sub-slab vapor probes will be sealed to the surface with permagum grout, melted beeswax, putty, or other non-VOC containing and non-shrinking products for temporary installation;
- Flow rates for both purging and collecting will not exceed 0.2 liters per minute to minimize outdoor air infiltration during sampling;
- Sub-slab vapor sample canisters will be equipped with an 24-hour regulator to allow the sample to be collected over an approximate 24-hour period; and,
- Samples will be collected in a laboratory provided container which meets the requirements of the sampling and analytical methods (e.g., low flow rate; Summa® canisters if analyzed by EPA Method TO-15/TO-15 SIM) and is certified clean by the laboratory.

Each canister, with an initial pressure of approximately 30 pounds per square inch (psi), will be fitted with a sampling valve that uses a critical orifice and mass flow controller to regulate the air flow into the canister for the selected sampling period. The mass flow controller will maintain a relative constant air flow rate throughout the sampling period. Summa canister valves will remain closed until the sample holes are complete and all of the canisters are in their respective positions. The valves will then be opened for the designated collection period.

2.4 Active Sub-Slab Depressurization System – Verification Testing

Field vacuum testing will be conducted to confirm the negative pressure created beneath the building slab for ASD System B (located in the southeastern on-Site building, see Figure 5). Specifically, the Department requested additional verification testing in the southern portion of the southeast building. Planned test points are identified as points 5 through 7 on Figure 5. Verification location 4 will also be completed at the Departments request to determine ASD system influence within the western conference room. If vacuum is present at point 4, two (2) additional vacuum points will be added to the conference room with Department approval to verify adequate vacuum throughout the area. To fully verify the influence of ASD System B, points 1 through 3 will be replicated as shown on Figure 5.

Nominal ½ inch-diameter holes will be drilled through the concrete slab at locations in the treatment area. Points will be located strategically through the treatment area to demonstrate that the project objective has been met (i.e., creation of a negative pressure zone beneath the building slab of at least -0.004" of WC). With the depressurization system operating, the vacuum will be measured using a handheld digital micro-manometer or comparable instrument at the test locations. Temporary test locations will not be sealed until the normal system operations discussed in Section 4.1 are achieved. Any temporary locations with the potential to be covered during construction work (i.e., new flooring installation) will be sealed using polyurethane caulk and a new temporary test location will be selected, or a new temporary location will be installed in the same general location of the original location after the new floor is installed. One sample point in the southeastern building will be converted to a permanent sampling port to allow for long-term monitoring; the sample location will be located the farthest away from blowers/suction pits and/or near historic vacuum monitoring points that exhibited the lowest initial vacuum readings in the given space. Locations within non-occupied areas, custodial/mechanical and/or electrical rooms will be favored for future ease of access. Concurrent with subslab testing, manometer readings for the suction fan will be recorded.

If adequate depressurization is not occurring the following procedures will be enacted:

- All testing procedures will be repeated to ensure proper testing protocols were followed; and,
- Client and NYSDEC personnel will be informed of inadequate vacuum results.

Troubleshooting of the system will then be completed, including the following:

- Confirmation of blower operation;
- Inspection of and sealing/re-sealing of all major entry routes and penetrations (if necessary); and,
- Inspection of the HVAC system and determination whether the HVAC system(s) has a negative effect on the performance of the ASD system.

Upon completion of troubleshooting as described above, if re-testing indicates insufficient communication the following measures will be considered:

- Adjustment of the HVAC system(s);
- Blower modification or replacement; and/or
- Installation of additional vacuum suction points.

Further detail regarding ASD system design is provided in the Active Subslab Depressurization System Work Plan (dated December 2024).

4.0 Supplemental Investigation Activities Support Documents

4.1 Health and Safety Protocols

Roux has prepared a HASP for use by our employees in accordance with 40 CFR 300.150 of the NCP and 29 CFR 1910.120. The HASP, provided in Appendix A, includes the following site-specific information:

- A hazard assessment.
- Training requirements.
- Definition of exclusion, contaminant reduction, and other work zones.
- Monitoring procedures for Site operations.
- Safety procedures.
- Personal protective clothing and equipment requirements for various field operations.
- Disposal and decontamination procedures.

Health and safety activities will be monitored throughout the remedial field activities. A member of the field team will be designated to serve as the Site Safety and Health Officer (SSHO). The SSHO will report directly to the Project Manager and the Corporate Health and Safety Coordinator. The HASP will be subject to revision as necessary, based on new information that is discovered during the field investigation and/or remedial activities.

5.0 Reporting and Schedule

Roux environmental professionals will be conducting the supplemental investigation activities and will document: daily reports of investigation activities; building inventory; and progress photographs and sketches.

As soon as the laboratory data is available, a summary of the SVI results, including summary tables and comparison to NYSDOH Matrices A through F, and pre-sample inspection and inventory logs will be provided to the Department for review.

6.0 References

1. New York State Department of Environmental Conservation. *DER-10; Technical Guidance for Site Investigation and Remediation.* May 2010.

2. *6 NYCRR Part 375 Environmental Remediation Programs*. December 2006.

3. New York State Department of Health. *The Guidance for Evaluating Soil Vapor Intrusion in the State of New York.* October 2006, and subsequent updates.

4. Roux Environmental Engineering and Geology, D.P.C. *Site Management Plan, 2101 Kenmore Avenue Site, Tonawanda, New York.* October 2024.

5. Roux Environmental Engineering and Geology, D.P.C. *Remedial Investigation/Alternatives Analysis Report, 2101 Kenmore Avenue Site, Tonawanda, New York*. November 2024.

6. Roux Environmental Engineering and Geology, D.P.C. *Active Subslab Depressurization System Work Plan, 2101 Kenmore Avenue Site, Tonawanda, New York*. December 2024.

TABLES

TABLE 1
SAMPLING AND ANALYSIS PLAN
SUPPLEMENTAL INVESTIGATION WORK PLAN
2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK

Matrix	Investigation Location	Sample Type	Full List VOCs + TICs [1,2]	TCL SVOCs + TICs [2,3]	TAL Metals	PCBs	Pesticide	Herbicide	PFAS[4]
Soil Gas (TO-15/SIM Method)	SSV-7		1						
	IA-10		1						
	IA-11		1						
	IA-12		1						
	IA-13		1						
	IA-14		1						
	IA-15		1						
	OS-SSV-4		1						
	OS-IA-4		1						
	OS-SSV-5		1						
	OS-IA-5		1						
	OS-SSV-6		1						
	OS-IA-6		1						
	OA-3		1						
		TOTAL SOIL VAPOR SAMPLES:	14	--	--	--	--	--	--

Notes:
1. Full List VOCs = TCL plus CP-51 List VOCs via Method 8260. TBD - In the absence of field evidence of VOC impacts, a minimum of 1 VOC will be collected from each soil horizon.
2. Tentaively Identified Compounds (TICs) will be analyzed per DER-10 for the RI samples.
3. 1,4-Dioxane will be analyzed in soil and groundwater samples. Groundwater samples to be analyzed using EPA Method 8270 SIM per NYSDEC guidelines.
4. PFAS = Analysis via EPA Method 1633 for soils and groundwater.
5. Delineation test pits will be analyzed for total arsenic only.

Acronyms:
TCL = Target Compound List
VOCs = volatile organic compounds
SVOCs = semi-volatile organic compounds
TAL = Target Analyte List
PCBs = Polychlorinated Biphenyls
TDB = to be determined.
PFAS = Per- and polyfluoroalkyl Substances
QA/QC = quality control/quality assurance sample
MS = matrix spike
MSD = matrix spike duplicate

TABLE 2
SUMMARY OF RI SUBSLAB VAPOR AND OUTDOOR AIR SAMPLE ANALYTICAL RESULTS
SUPPLEMENTAL INVESTIGATION WORK PLAN
2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK

Parameter	Sample Location & Sample Date			
	SSV-1	SSV-2	SSV-3	OA-1
	9/15/2023			
Volatile Organic Compounds (VOCs, ug/m3)				
1,1,1-Trichloroethane (Matrix B)	33.8	336	10.7	ND
1,2,4-Trimethylbenzene (Matrix D)	1.46	1.15	2.96	2.17
2-Butanone (MEK)	1.73	4.95	6.11	19.4
2-Hexanone	ND	ND	0.91	1.14
2,2,4-Trimethylpentane	1	1.11	ND	1.12
Acetone	8.1	34	154	392
Benzene (Matrix D)	4.89	5.91	9.39	4.38
Carbon Disulfide	2.02	15.7	1.41	1.22
Carbon Tetrachloride (Matrix A)	246	ND	4.82	0.566
Chloroform	48.1	ND	ND	ND
Chloromethane	ND	ND	ND	1.01
Cyclohexane (Matrix D)	1.45	11.6	2.72	ND
Dichlorodifluoromethane	1.98	2.1	1.96	1.83
Ethanol	10.5	14.3	42.2	23.9
Ethylbenzene (Matrix D)	2.86	3.58	5.13	1.1
Heptane (Matrix E)	5	9.02	9.3	3.16
Isopropanol	ND	ND	9.37	2.73
m&p-Xylene (Matrix E)	ND	10.9	15.6	4.69
n-Hexane (Matrix E)	9.09	12.2	197	3.7
o-Xylene (Matrix D)	2.12	2.98	5	1.77
Styrene	ND	ND	0.962	ND
tert-Butyl alcohol	3.12	7.31	2.38	18.2
Tetrachloroethene (Matrix B)	5.03	ND	ND	0.346
Tetrahydrofuran	1.64	2.27	5.46	3.48
Toluene (Matrix F)	25	25.9	43.7	6.71
Trichloroethene (Matrix A)	306	ND	310	0.113
Trichlorofluoromethane	11.5	16.7	17.4	1.34

Notes:
1. Only those parameters detected above the method detection limit, at a minimum of one location, are presented in this table.
2. NYSDOH Soil Vapor/ Indoor Air Quality Standards - (Matrices A-F revised February 2024)

Definitions:
ND = Parameter not detected above laboratory detection limit.

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TABLE 3

COMPARISON OF RI SUBSLAB VAPOR AIR ANALYTICAL RESULTS TO NYSDOH MATRICES
SUPPLEMENTAL INVESTIGATION WORK PLAN
2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK

Sample Location	Carbon Tetrachloride		Trichloroethene (TCE)		cis-1,2-Dichloroethene		1,1-Dichloroethene		Tetrachloroethene (PCE)		1,1,1 -Trichloroethane		Methylene Chloride		Vinyl Chloride	
	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix A	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix A	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix A	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix A	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix B	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix B	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix B	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix C
Subslab Vapor/Indoor Air																
SSV-1	246	NA	306	NA	ND	NA	ND	NA	5.03	NA	33.8	NA	ND	NA	ND	NA
SSV-2	ND		ND		ND		ND		ND		336		ND		ND	
SSV-3	4.82		310		ND		ND		ND		10.7		ND		ND	

Notes:

1. Concentration in micrograms per cubic meter (ug/m^3)

Definitions:

ND = Not Detected

NA = Not applicable

Analytes Assigned:
Trichloroethene (TCE), *cis*-1,2-Dichloroethene (c12-DCE), 1,1-Dichloroethene (11-DCE), Carbon Tetrachloride

SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m³)	INDOOR AIR CONCENTRATION of COMPOUND (mcg/m³) < 0.2	0.2 to < 1	1 and above
< 6	1. No further action	2. No Further Action	3. IDENTIFY SOURCE(S) and RESAMPLE or MITIGATE
6 to < 60	4. No further action	5. MONITOR	6. MITIGATE
60 and above	7. MITIGATE	8. MITIGATE	9. MITIGATE

Analytes Assigned:
Tetrachloroethene (PCE), 1,1,1-Trichloroethane (111-TCA), Methylene Chloride

SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m³)	INDOOR AIR CONCENTRATION of COMPOUND (mcg/m³) < 3	3 to < 10	10 and above
< 100	1. No further action	2. No Further Action	3. IDENTIFY SOURCE(S) and RESAMPLE or MITIGATE
100 to < 1,000	4. No further action	5. MONITOR	6. MITIGATE
1,000 and above	7. MITIGATE	8. MITIGATE	9. MITIGATE

Analytes Assigned:
Vinyl Chloride

SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m³)	INDOOR AIR CONCENTRATION of COMPOUND (mcg/m³) < 0.2	0.2 and above
< 6	1. No further action	2. IDENTIFY SOURCE(S) and RESAMPLE or MITIGATE
6 to < 60	3. MONITOR	4. MITIGATE
60 and above	5. MITIGATE	6. MITIGATE

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TABLE 3

COMPARISON OF RI SUBSLAB VAPOR AIR ANALYTICAL RESULTS TO NYSDOH MATRICES
SUPPLEMENTAL INVESTIGATION WORK PLAN
2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK

Sample Location	Benzene		Ethylbenzene		Naphthalene		Cyclohexane		2,2,4-Trimethylpentane		1,2,4-Trimethylbenzene		1,3,5-Trimethylebenzene		o-Xylene	
	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix D	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix D	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix D	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix D	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix D	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix D	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix D	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix D
Subslab Vapor/Indoor Air																
SSV-1	4.89	NA	2.86	NA	ND	NA	1.45	NA	1	NA	1.46	NA	ND	NA	2.12	NA
SSV-2	5.91		3.58		ND		11.6		1.11		1.15		ND		2.98	
SSV-3	9.39		5.13		ND		2.72		ND		2.96		ND		5	

Notes:
1. Concentration in micrograms per cubic meter (ug/
Definitions:
ND = Not Detected
NA = Not applicable

Analytes Assigned:
Benzene, ethylbenzene, naphthalene, cyclohexane, isooctane (2,2,4-trimethylpentane), 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene *o*-xylene

SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m^3)	INDOOR AIR CONCENTRATION of COMPOUND (mcg/m^3)		
	< 2	2 to < 10	10 and above
< 60	1. No further action	2. No Further Action	3. IDENTIFY SOURCE(S) or RESAMPLE or MITIGATE
60 to < 600	4. No further action	5. MONITOR	6. MITIGATE
600 and above	7. MITIGATE	8. MITIGATE	9. MITIGATE

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TABLE 3

COMPARISON OF RI SUBSLAB VAPOR AIR ANALYTICAL RESULTS TO NYSDOH MATRICES
SUPPLEMENTAL INVESTIGATION WORK PLAN
2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK

Sample Location	m-Xylene		p-Xylene		Heptane		Hexane		Toluene	
	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix E	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix E	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix E	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix E	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix F
Subslab Vapor/Indoor Air										
SSV-1	ND	NA	ND	NA	5	NA	9.09	NA	25	NA
SSV-2	10.9		10.9		9.02		12.2		25.9	
SSV-3	15.6		15.6		9.3		197		43.7	

Notes:

1. Concentration in micrograms per cubic meter (ug/

Definitions:

ND = Not Detected

NA = Not applicable

Analytes Assigned:
m-xylene, *p*-xylene, heptane, hexane

SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m^3)	INDOOR AIR CONCENTRATION of COMPOUND (mcg/m^3)		
	< 6	6 to < 20	20 and above
< 200	1. No further action	2. No Further Action	3. IDENTIFY SOURCE(S) or RESAMPLE or MITIGATE
200 to < 2,000	4. No further action	5. MONITOR	6. MITIGATE
2,000 and above	7. MITIGATE	8. MITIGATE	9. MITIGATE

Analytes Assigned:
Toluene

SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m^3)	INDOOR AIR CONCENTRATION of COMPOUND (mcg/m^3)		
	< 10	10 to < 50	50 and above
< 300	1. No further action	2. No Further Action	3. IDENTIFY SOURCE(S) or RESAMPLE or MITIGATE
300 to < 3,000	4. No further action	5. MONITOR	6. MITIGATE
3,000 and above	7. MITIGATE	8. MITIGATE	9. MITIGATE

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TABLE 4
SUMMARY OF SUPPLEMENTAL SUBSLAB VAPOR, INDOOR, AND OUTDOOR AIR SAMPLE ANALYTICAL RESULTS
SUPPLEMENTAL INVESTIGATION WORK PLAN
2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK

Parameter	Sample Location & Sample Date														
	SSV-4	IA-4	SSV-5	IA-5	SSV-6	IA-6	OS-SSV-1	OS-IA-1	OS-SSV-2	OS-IA-2	OS-SSV-3	OS-IA-3	SV-1	SV-2	OA-2
	8/16/2024	8/18/2024	8/15/2024												
Volatile Organic Compounds (VOCs, ug/m3)															
1,1,1-Trichloroethane (Matrix B)	ND	ND	2.37	ND	ND	ND	1.66	ND	ND	ND	ND	ND	3.96	ND	ND
1,2,4-Trimethylbenzene (Matrix D)	2.28	ND	7.67	5.51	5.01	5.31	7.67	ND	12.7	ND	8.36	7.52	6.64	2.87	ND
1,3,5-Trimethylbenzene	ND	ND	1.98	1.67	1.18	1.55	2.17	ND	3.12	ND	1.96	2.45	1.61	1.18	ND
1,3-Butadiene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.5	ND
2-Butanone (MEK)	2.57	2.41	9.56	15.3	5.6	11.3	14.8	3.42	10.4	3.66	24.4	37.5	7.76	96.4	ND
2-Hexanone	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.91	ND	ND	4.75	ND
2,2,4-Trimethylpentane	11.7	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.22	ND	ND	ND	ND
4-Ethyltoluene	1.38	ND	1.22	ND	ND	ND	1.47	ND	2	ND	1.28	1.35	ND	ND	ND
4-Methyl-2-pentanone	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	3.69	ND
Acetone	5.32	31.1	22.9	333	23.8	125	185	46.3	51.1	48	259	2010	56.1	368	7.36
Benzene (Matrix D)	9.3	ND	0.939	ND	ND	ND	2.41	ND	1.06	ND	6.71	ND	14.2	4.12	ND
Carbon Disulfide	1.28	ND	1.02	ND	6.54	ND	0.67	ND	0.866	ND	1.1	ND	33.9	386	ND
Carbon Tetrachloride (Matrix A)	ND	0.61	ND	0.598	ND	0.585	ND	0.61	ND	0.585	ND	0.579	ND	ND	0.598
Chloroform	1.42	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.86	ND	ND	ND	2.97
Chloromethane	ND	1.27	ND	1.03	ND	1.08	0.622	1.05	ND	1.07	ND	1.07	ND	0.869	1.01
Cyclohexane (Matrix D)	7.3	ND	3.92	9.67	0.785	4.2	2.85	1.89	2.15	3.24	17.5	88.1	194	37.5	ND
Dichlorodifluoromethane	3.07	3.05	13.8	2.96	2.12	3.15	3.02	2.94	3.05	2.97	3.16	3.03	1.69	2.89	2.83
Ethanol	19	37.9	11.6	17.3	ND	14.2	12.2	14.3	15.9	15.2	22.4	20.2	ND	22.8	ND
Ethyl Acetate	ND	2.12	ND	ND	ND	ND	ND	2.17	ND	2.92	ND	ND	ND	ND	ND
Ethylbenzene (Matrix D)	6.65	ND	4.65	1.26	3.66	1.12	6.3	ND	7.43	ND	3.94	1.59	3.18	1.29	ND
Freon 114	ND	ND	1.72	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Heptane (Matrix E)	10.8	ND	3.83	7.7	1.87	6.27	3.02	ND	3.14	ND	18.6	13.6	106	14	ND
Isopropanol	ND	4.33	ND	2.35	ND	2.25	3.52	2.68	1.85	2.7	7.52	8.26	2.39	16.8	ND
m&p-Xylene (Matrix E)	26.1	ND	21	4.15	14.7	3.81	26.5	ND	34	ND	16.7	6.99	13.7	3.11	ND
Methylene chloride (Matrix B)	ND	ND	1.74	1.88	ND	ND	2.25	ND	3.03	ND	3.58	ND	ND	ND	ND
Naphthalene	2.42	ND	2.18	1.79	ND	2.08	2.89	1.75	1.32	1.7	1.28	1.61	ND	2.94	ND
n-Hexane (Matrix E)	18.9	1.17	6.84	2.48	6.56	1.74	6.17	6.73	9.37	6.31	74	5.11	137	21.2	ND
o-Xylene (Matrix D)	5.13	ND	6.52	1.59	4.43	1.47	8.47	ND	10.6	ND	5.08	2.54	5.52	2.73	ND
Styrene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.3	ND	ND	ND
tert-Butyl alcohol	ND	ND	4.24	2	2.66	1.76	5.37	ND	5.67	ND	17.3	2.77	23.2	ND	ND
Tetrahydrofuran	ND	2.88	9.53	31	4.75	16.1	11.4	5.52	8.05	6.43	15.3	63.1	ND	ND	ND
Toluene (Matrix F)	47.9	2.39	3.58	12.6	2.02	9.72	4.64	2.46	3.14	2.82	9.87	33.8	18.6	9.35	ND
Trichloroethene (Matrix A)	ND	ND	ND	ND	ND	ND	16.3	0.177	30.4	0.134	ND	0.134	ND	ND	ND
Trichlorofluoromethane	4.18	1.49	7.08	1.29	2.09	1.34	23.3	1.44	2.78	1.54	8.37	1.96	13.9	1.17	ND

Notes:

1. Only those parameters detected above the method detection limit, at a minimum of one location, are presented in this table.

2. NYSDOH Soil Vapor/ Indoor Air Quality Standards - (Matrices A-F revised February 2024)

Definitions:
ND = Parameter not detected above laboratory detection limit.

ROUX

TABLE 5

COMPARISON OF SUPPLEMENTAL SUBSLAB VAPOR AND INDOOR AIR ANALYTICAL RESULTS TO NYSDOH MATRICES
SUPPLEMENTAL INVESTIGATION WORK PLAN
2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK

Sample Location	Carbon Tetrachloride		Trichloroethene (TCE)		cis-1,2-Dichloroethene		1,1-Dichloroethene		Tetrachloroethene (PCE)		1,1,1 -Trichloroethane		Methylene Chloride		Vinyl Chloride	
	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix A	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix A	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix A	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix A	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix B	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix B	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix B	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix C
Subslab Vapor/Indoor Air																
SSV-4	ND	NFA	ND	NFA	ND	NFA	ND	NFA	ND	NFA	ND	NFA	ND	NFA	ND	NFA
IA-4	0.61		ND		ND		ND		ND		ND		ND		ND	
SSV-5	ND	NFA	ND	NFA	ND	NFA	ND	NFA	ND	NFA	2.37	NFA	1.74	NFA	ND	NFA
IA-5	0.598		ND		ND		ND		ND		ND		1.88		ND	
SSV-6	ND	NFA	ND	NFA	ND	NFA	ND	NFA	ND	NFA	ND	NFA	ND	NFA	ND	NFA
IA-6	0.585		ND		ND		ND		ND		ND		ND		ND	
Subslab Vapor/Indoor Air(Off-site)																
OS-SSV-1	ND	NFA	16.3	NFA	ND	NFA	ND	NFA	ND	NFA	1.66	NFA	2.25	NFA	ND	NFA
OS-IA-1	0.61		0.177		ND		ND		ND		ND		ND		ND	
OS-SSV-2	ND	NFA	30.4	NFA	ND	NFA	ND	NFA	ND	NFA	ND	NFA	3.03	NFA	ND	NFA
OS-IA-2	0.585		0.134		ND		ND		ND		ND		ND		ND	
OS-SSV-3	ND	NFA	ND	NFA	ND	NFA	ND	NFA	ND	NFA	ND	NFA	3.58	NFA	ND	NFA
OS-IA-3	0.579		0.134		ND		ND		ND		ND		ND		ND	

Notes:

1. Concentration in micrograms per cubic meter (ug/m^3)

Definitions:

ND = Not Detected

NFA = No further action.

Analytes Assigned:
Trichloroethene (TCE), *cis*-1,2-Dichloroethene (c12-DCE), 1,1-Dichloroethene (11-DCE), Carbon Tetrachloride

SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m³)	INDOOR AIR CONCENTRATION of COMPOUND (mcg/m³)		
	< 0.2	0.2 to < 1	1 and above
< 6	1. No further action	2. No Further Action	3. IDENTIFY SOURCE(S) and RESAMPLE or MITIGATE
6 to < 60	4. No further action	5. MONITOR	6. MITIGATE
60 and above	7. MITIGATE	8. MITIGATE	9. MITIGATE

Analytes Assigned:
Tetrachloroethene (PCE), 1,1,1-Trichloroethane (111-TCA), Methylene Chloride

SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m³)	INDOOR AIR CONCENTRATION of COMPOUND (mcg/m³)		
	< 3	3 to < 10	10 and above
< 100	1. No further action	2. No Further Action	3. IDENTIFY SOURCE(S) and RESAMPLE or MITIGATE
100 to < 1,000	4. No further action	5. MONITOR	6. MITIGATE
1,000 and above	7. MITIGATE	8. MITIGATE	9. MITIGATE

Analytes Assigned:
Vinyl Chloride

SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m³)	INDOOR AIR CONCENTRATION of COMPOUND (mcg/m³)	
	< 0.2	0.2 and above
< 6	1. No further action	2. IDENTIFY SOURCE(S) and RESAMPLE or MITIGATE
6 to < 60	3. MONITOR	4. MITIGATE
60 and above	5. MITIGATE	6. MITIGATE

ROUX

TABLE 5

COMPARISON OF SUPPLEMENTAL SUBSLAB VAPOR AND INDOOR AIR ANALYTICAL RESULTS TO NYSDOH MATRICES
SUPPLEMENTAL INVESTIGATION WORK PLAN
2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK

Sample Location	Benzene		Ethylbenzene		Naphthalene		Cyclohexane		2,2,4-Trimethylpentane		1,2,4-Trimethylbenzene		1,3,5-Trimethylebenzene		o-Xylene	
	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix D	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix D	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix D	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix D	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix D	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix D	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix D	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix D
Subslab Vapor/Indoor Air																
SSV-4	9.3	NFA	6.65	NFA	2.42	NFA	7.3	NFA	11.7	NFA	2.28	NFA	ND	NFA	5.13	NFA
IA-4	ND		ND		ND		ND		ND		ND		ND		ND	
SSV-5	0.939	NFA	4.65	NFA	2.18	NFA	3.92	NFA	ND	NFA	7.67	NFA	1.98	NFA	6.52	NFA
IA-5	ND		1.26		1.79		9.67		ND		5.51		1.67		1.59	
SSV-6	ND	NFA	3.66	NFA	ND	NFA	0.785	NFA	ND	NFA	5.01	NFA	1.18	NFA	4.43	NFA
IA-6	ND		1.12		2.06		4.2		ND		5.31		1.55		1.47	
Subslab Vapor/Indoor Air(Off-site)																
OS-SSV-1	2.41	NFA	6.3	NFA	2.89	NFA	2.85	NFA	ND	NFA	7.67	NFA	2.17	NFA	8.47	NFA
OS-IA-1	ND		ND		1.75		1.89		ND		ND		ND		ND	
OS-SSV-2	1.06	NFA	7.43	NFA	1.32	NFA	2.15	NFA	ND	NFA	12.7	NFA	3.12	NFA	10.6	NFA
OS-IA-2	ND		ND		1.7		3.24		ND		ND		ND		ND	
OS-SSV-3	6.71	NFA	3.94	NFA	1.28	NFA	17.5	IDENTIFY SOURCE	1.22	NFA	8.36	NFA	1.96	NFA	5.08	NFA
OS-IA-3	ND		1.59		1.61		88.1		ND		7.52		2.45		2.54	

Notes:

1. Concentration in micrograms per cubic meter (ug/r

Definitions:

ND = Not Detected

NFA = No further action.

Analytes Assigned:
Benzene, ethylbenzene, naphthalene, cyclohexane, isooctane (2,2,4-trimethylpentane), 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene *o*-xylene

SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m^3)	INDOOR AIR CONCENTRATION of COMPOUND (mcg/m^3) < 2	2 to < 10	10 and above
< 60	1. No further action	2. No Further Action	3. IDENTIFY SOURCE(S) or RESAMPLE or MITIGATE
60 to < 600	4. No further action	5. MONITOR	6. MITIGATE
600 and above	7. MITIGATE	8. MITIGATE	9. MITIGATE

TABLE 5

COMPARISON OF SUPPLEMENTAL SUBSLAB VAPOR AND INDOOR AIR ANALYTICAL RESULTS TO NYSDOH MATRICES
SUPPLEMENTAL INVESTIGATION WORK PLAN
2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK

Sample Location	m-Xylene		p-Xylene		Heptane		Hexane		Toluene	
	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix E	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix E	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix E	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix E	Lab Reported Concentration (ug/m^3)	Soil Vapor / Indoor Air Matrix F
Subslab Vapor/Indoor Air										
SSV-4	26.1	NFA	26.1	NFA	10.8	NFA	18.9	NFA	47.9	NFA
IA-4	ND		ND		ND		1.17		2.39	
SSV-5	21	NFA	21	NFA	3.83	NFA	6.84	NFA	3.58	NFA
IA-5	4.15		4.15		7.7		2.48		12.6	
SSV-6	14.7	NFA	14.7	NFA	1.87	NFA	6.56	NFA	2.02	NFA
IA-6	3.81		3.81		6.27		1.74		9.72	
Subslab Vapor/Indoor Air(Off-site)										
OS-SSV-1	26.5	NFA	26.5	NFA	3.02	NFA	6.17	NFA	4.64	NFA
OS-IA-1	ND		ND		ND		6.73		2.46	
OS-SSV-2	34	NFA	34	NFA	3.14	NFA	9.37	NFA	3.14	NFA
OS-IA-2	ND		ND		ND		6.31		2.82	
OS-SSV-3	16.7	NFA	16.7	NFA	18.6	NFA	74	NFA	9.87	NFA
OS-IA-3	6.99		6.99		13.6		5.11		33.8	

Notes:

1. Concentration in micrograms per cubic meter (ug/r

Definitions:

ND = Not Detected

NFA = No further action.

Analytes Assigned:
m-xylene, *p*-xylene, heptane, hexane

SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m^3)	INDOOR AIR CONCENTRATION of COMPOUND (mcg/m^3)		
	< 6	6 to < 20	20 and above
< 200	1. No further action	2. No Further Action	3. IDENTIFY SOURCE(S) or RESAMPLE or MITIGATE
200 to < 2,000	4. No further action	5. MONITOR	6. MITIGATE
2,000 and above	7. MITIGATE	8. MITIGATE	9. MITIGATE

Analytes Assigned:
Toluene

SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m^3)	INDOOR AIR CONCENTRATION of COMPOUND (mcg/m^3)		
	< 10	10 to < 50	50 and above
< 300	1. No further action	2. No Further Action	3. IDENTIFY SOURCE(S) or RESAMPLE or MITIGATE
300 to < 3,000	4. No further action	5. MONITOR	6. MITIGATE
3,000 and above	7. MITIGATE	8. MITIGATE	9. MITIGATE

ROUX

TABLE 6
SUMMARY OF SUPPLEMENTAL INDOOR AIR SAMPLE ANALYTICAL RESULTS
SUPPLEMENTAL INVESTIGATION WORK PLAN
2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK

Parameter	Sample Location & Sample Date		
	IA-7	IA-8	IA-9
	10/22/2024		
Volatile Organic Compounds (VOCs, ug/m3)			
1,2,4-Trimethylbenzene (Matrix D)	ND	ND	1.67
2-Butanone (MEK)	4.54	2.35	4.04
Acetone	151	34.7	44.4
Carbon Tetrachloride (Matrix A)	0.616	0.61	0.61
Chloromethane	1.08	0.989	1.03
Dichlorodifluoromethane	2.23	2.2	2.22
Ethanol	17.2	14.9	16.7
Heptane (Matrix E)	1.02	ND	1.33
Hexane	1.1	ND	1.19
Isopropanol	2.53	2.85	3.2
Methylene chloride (Matrix B)	7.47	ND	ND
Naphthalene	3.21	2.5	5.82
Tetrahydrofuran	2.57	1.82	2.49
Toluene (Matrix F)	1.46	1.29	2.55
Total Xylenes	ND	ND	3.6
Trichloroethene (Matrix A)	ND	ND	0.156

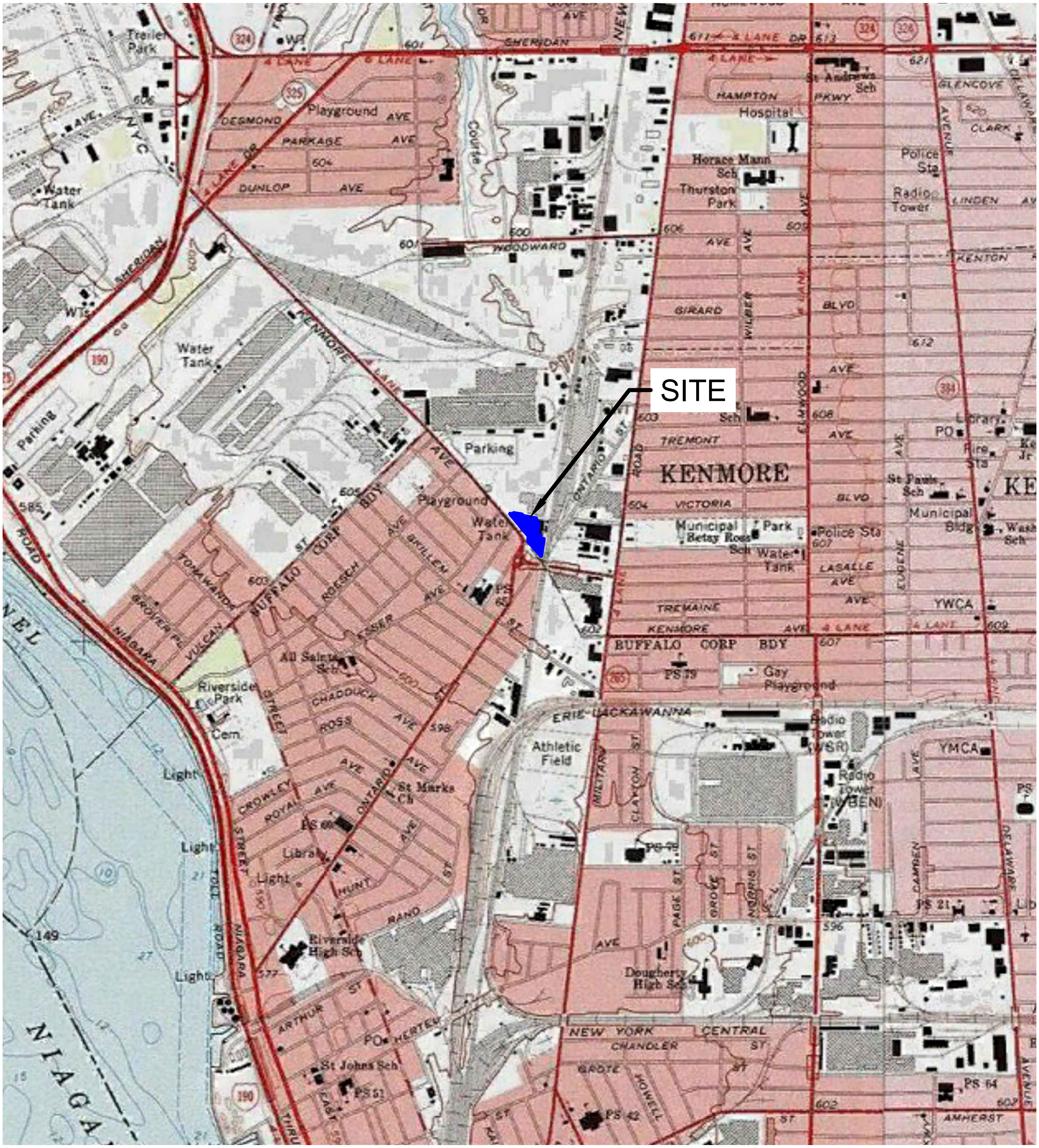
Notes:

1. Only those parameters detected above the method detection limit, at a minimum of one location, are presented in this table.
2. NYSDOH Soil Vapor/ Indoor Air Quality Standards - (Matrices A-F revised February 2024)

Definitions:

ND = Parameter not detected above laboratory detection limit.

FIGURES



N

2000' 0 2000'

Title:

SITE LOCATION AND VICINITY MAP

2101 KENMORE AVENUE SITE

BCP SITE NO. C915391

BUFFALO, NEW YORK

SUPPLEMENTAL INVESTIGATION WORK PLAN

Prepared for:

WOOD AND BROOKS PROPERTIES LLC

ROUX

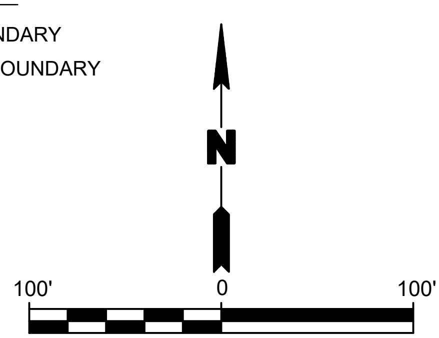
Compiled by: CMS	Date: MARCH 2025	FIGURE
Prepared by: CMS	Scale: AS SHOWN	1
Project Mgr: NTM	Project: 4405.0001B000	
File: FIGURE 1; SITE LOCATION AND VICINITY MAP.DWG		

F:\CAD\BENCHMARK\FRONTIER INSULATION\SIWP-POST COC\FIGURE 1; SITE LOCATION AND VICINITY MAP.DWG

LEGEND:

BCP BOUNDARY

PARCEL BOUNDARY



Title:

SITE PLAN (AERIAL)

2101 KENMORE AVENUE SITE

BCP SITE NO. C915391

BUFFALO, NEW YORK

SUPPLEMENTAL INVESTIGATION WORK PLA N

Prepared for:

WOOD AND BROOKS PROPERTIES LLC

ROUX	Compiled by: CMS	Date: MARCH 2025	FIGURE
	Prepared by: CMS	Scale: AS SHOWN	2
	Project Mgr: NTM	Project: 4405.0001B000	
	File: FIGURE 2; SITE PLAN (AERIAL).DWG		

F:\CAD\BENCHMARK\FRONTIER INSULATION\SIWP-POST COC\FIGURE 2; SITE PLAN (AERIAL).DWG

LEGEND:

(red line)	BCP SITE BOUNDARY
(dash-dot line)	PARCEL BOUNDARY
SSV-1	RI SUBSLAB VAPOR SAMPLE
OA-1	RI OUTDOOR AIR SAMPLE
SSV-6/IA-6	SI SUBSLAB VAPOR SAMPLE/INDOOR AMBIENT AIR SAMPLE
OS-SSV-3/OS-IA-3	SI OFF-SITE SUBSLAB VAPOR SAMPLE/INDOOR AMBIENT AIR SAMPLE
SV-1	SI SOIL VAPOR SAMPLE
OA-2	SI OUTDOOR AMBIENT AIR SAMPLE
IA-8	SI INDOOR AMBIENT AIR SAMPLE

N

80' 0 80'

Title:

PREVIOUS INVESTIGATION LOCATIONS

2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK

SUPPLEMENTAL INVESTIGATION WORK PLAN

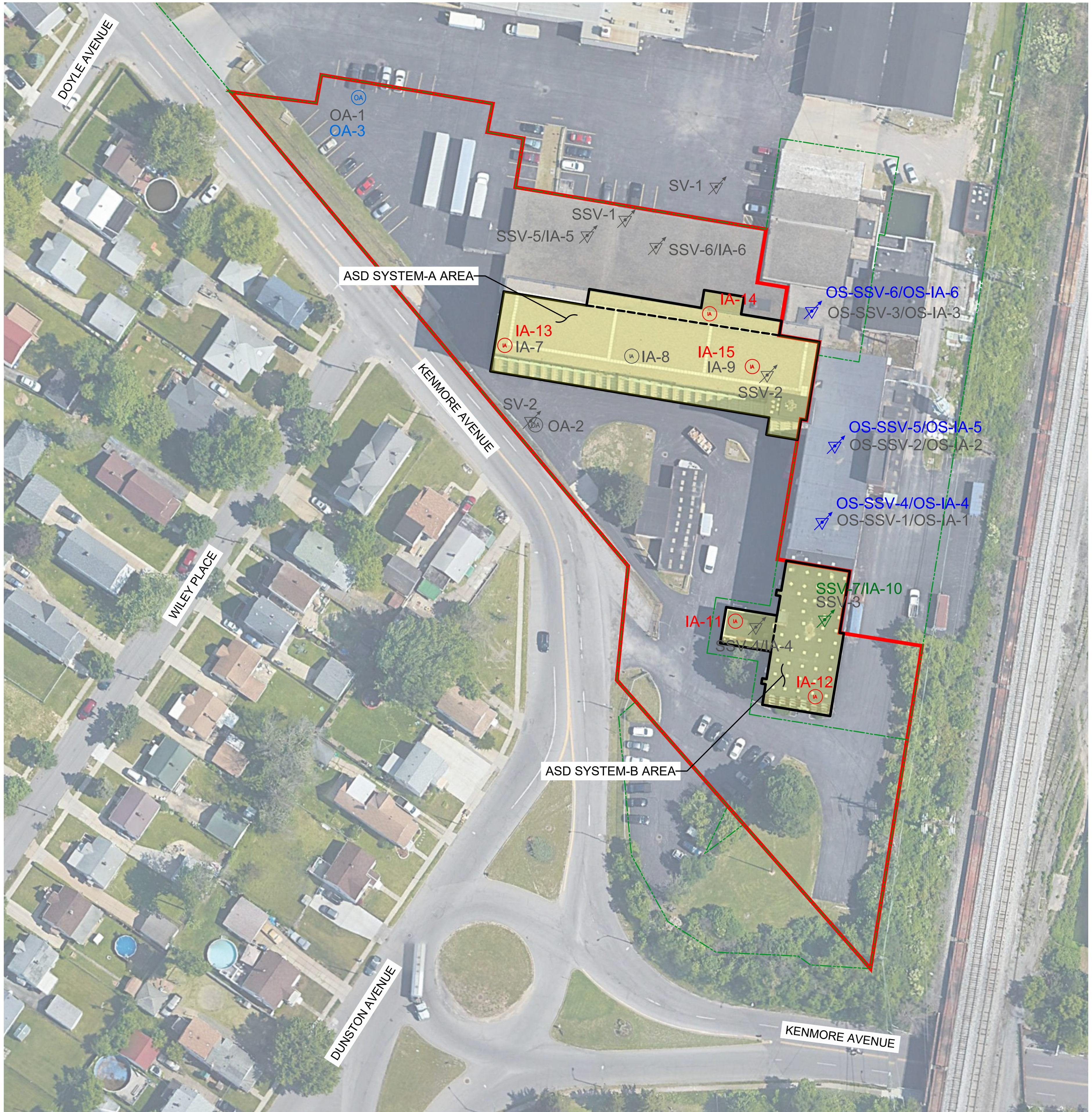
Prepared for:

WOOD AND BROOKS PROPERTIES LLC

ROUX

Compiled by: CMS	Date: MARCH 2025	FIGURE
Prepared by: CMS	Scale: AS SHOWN	3
Project Mgr: NTM	Project: 4405.0001B000	
File: FIGURE 3; PREVIOUS INVESTIGATION LOCATIONS.DWG		

F:\CAD\BENCHMARK\FRONTIER INSULATION\SIWP-POST COC\FIGURE 3; PREVIOUS INVESTIGATION LOCATIONS.DWG



LEGEND:

(red line)	BCP SITE BOUNDARY
(green dash-dot line)	PARCEL BOUNDARY
SSV-1	RI SUBSLAB VAPOR SAMPLE
OA-1	RI OUTDOOR AIR SAMPLE
SSV-6/IA-6	SI SUBSLAB VAPOR SAMPLE/INDOOR AMBIENT AIR SAMPLE
OS-SSV-3/OS-IA-3	SI OFF-SITE SUBSLAB VAPOR SAMPLE/INDOOR AMBIENT AIR SAMPLE
SV-1	SI SOIL VAPOR SAMPLE
OA-2	SI OUTDOOR AMBIENT AIR SAMPLE
IA-8	SI INDOOR AMBIENT AIR SAMPLE
SSV-7/IA-10	PLANNED SI SUBSLAB VAPOR SAMPLE/INDOOR AMBIENT AIR SAMPLE
OS-SSV-4/OS-IA-4	PLANNED SI OFF-SITE SUBSLAB VAPOR SAMPLE/INDOOR AMBIENT AIR SAMPLE
OA-3	PLANNED SI OUTDOOR AMBIENT AIR SAMPLE
IA-11	PLANNED SI INDOOR AMBIENT AIR SAMPLE

N

80' 0 80'

Title:
PLANNED INVESTIGATION LOCATIONS

2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK

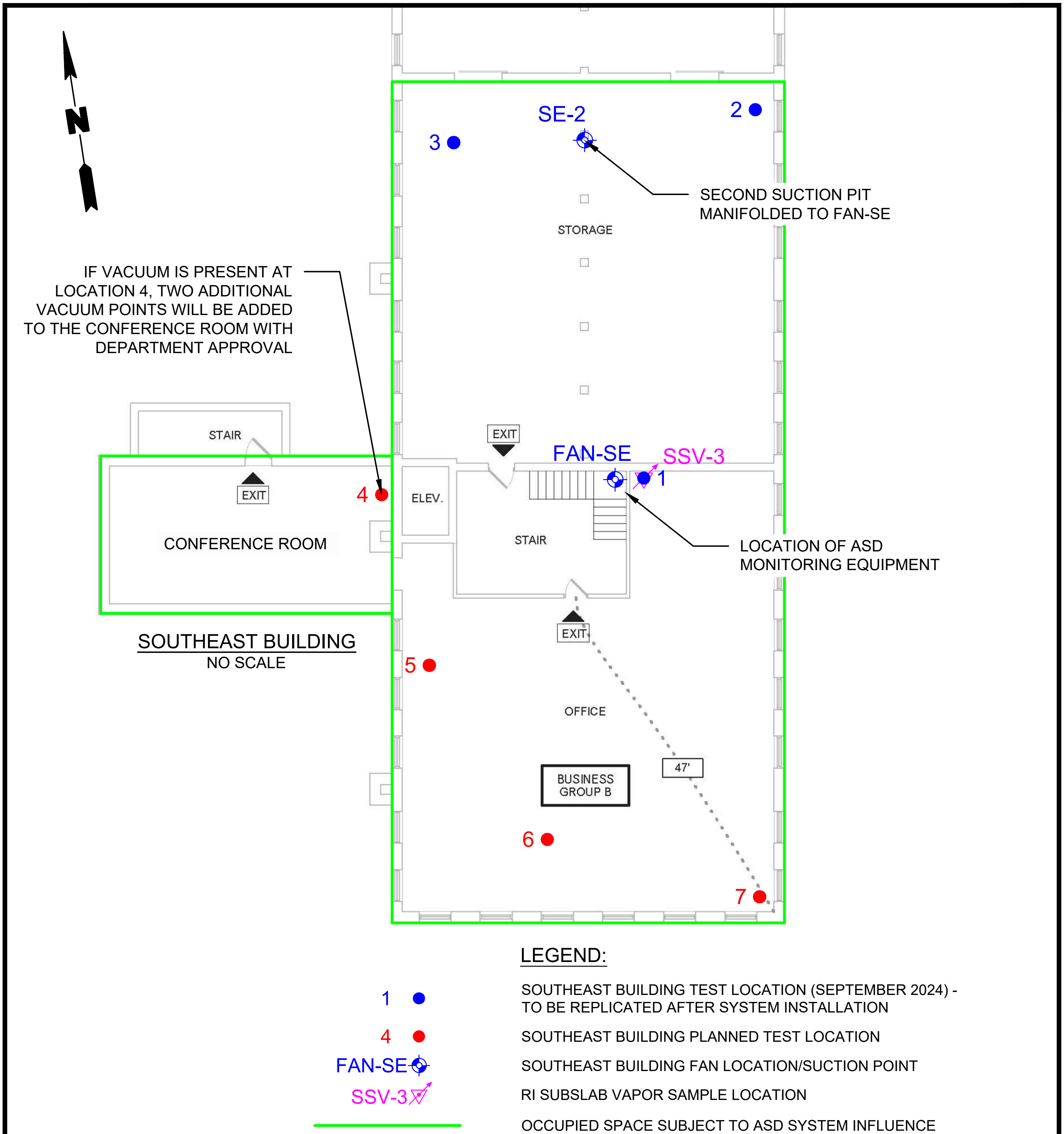
SUPPLEMENTAL INVESTIGATION WORK PLAN

Prepared for:
WOOD AND BROOKS PROPERTIES LLC

ROUX

Compiled by: CMS	Date: MARCH 2025	FIGURE
Prepared by: CMS	Scale: AS SHOWN	4
Project Mgr: NTM	Project: 4405.0001B000	
File: FIGURE 4; PLANNED INVESTIGATION LOCATIONS.DWG		

F:\CAD\BENCHMARK\FRONTIER INSULATION\SIWP-POST COC\FIGURE 4; PLANNED INVESTIGATION LOCATIONS.DWG



F:\CAD\BENCHMARK\FRONTIER INSULATION\SIWP-POST COC\FIGURE 5; ASD SYSTEM DESIGN - SYSTEM B.DWG

SUBSLAB AIR FLOW TESTING RESULTS (SOUTHEAST BLDG.)

TEST POINT	FAN(S) IN USE	VACUUM (IN.WC)	TEST DATE
1	FAN-SE	-0.301	9/4/2024
2	FAN-SE	-0.007	9/4/2024
3	FAN-SE	-0.005	9/4/2024

Title:

ASD SYSTEM DESIGN - SYSTEM B

2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK

SUPPLEMENTAL INVESTIGATION WORK PLAN

Prepared for:

WOOD AND BROOKS PROPERTIES LLC

ROUX

Compiled by: CMS	Date: MARCH 2025	FIGURE
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APPENDIX A

HEALTH AND SAFETY PLAN

Health and Safety Plan

2101 Kenmore Avenue Site
NYSDEC BCP #C915391
Tonawanda, New York

March 2025

Prepared for:

Wood and Brooks Properties LLC
2101 Kenmore Avenue
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Prepared by:

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ACKNOWLEDGEMENT

Plan Reviewed by (initial):

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Project Manager:	Nathan Munley
Designated Site Safety and Health Officer:	Nathan Munley

Acknowledgement:

I acknowledge that I have reviewed the information contained in this site-specific Health and Safety Plan, and understand the hazards associated with performance of the field activities described herein. I agree to comply with the requirements of this plan.

NAME (PRINT)	SIGNATURE	DATE

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1. INTRODUCTION

1.1 General

In accordance with OSHA requirements contained in 29 CFR 1910.120, this Health and Safety Plan (HASP) describes the specific health and safety practices and procedures to be employed by Roux Environmental Engineering and Geology, DPC (Roux) employees during Supplemental Investigation (SI) activities at the 2101 Kenmore Avenue Site (Site) located in Tonawanda, Erie County, New York. This HASP presents procedures for Roux employees who will be involved with SI field activities; it does not cover the activities of other contractors, subcontractors or other individuals on the Site. These firms will be required to develop and enforce their own HASPs as discussed in Section 2.0. Roux accepts no responsibility for the health and safety of contractor, subcontractor or other personnel.

This HASP presents information on known Site health and safety hazards using available historical information, and identifies the equipment, materials and procedures that will be used to eliminate or control these hazards. Environmental monitoring will be performed during the course of field activities to provide real-time data for on-going assessment of potential hazards.

1.2 Background

The Site is a ±2.4-acre parcel addressed as a portion of the greater 2101 Kenmore Avenue property which is located on the northeast side of Kenmore Avenue in the Town of Tonawanda, New York. The Site has two (2) interconnected commercial use buildings, with associated parking and driveways, with select greenspace. Some portions of the buildings are used as commercial and storage operations, with other areas currently vacant.

The Site was historically used for piano key manufacturing from approximately 1900 to the 1970s; and more recently has been used in a variety of commercial manufacturing and warehousing.

1.3 Known and Suspected Environmental Conditions

Previous investigations completed at the Site identified elevated levels of polycyclic aromatic hydrocarbons (PAHs), and metals at concentrations exceeding 6 NYCRR Part 375 Restricted-Residential Use, Commercial Use, Industrial Use Soil Cleanup Objectives (SCOs), and/or Site-Specific Action Levels (SSALs). Details of the previous investigation as it pertains to the subject Site are presented below.

<u>July 2021 – Limited Phase II Environmental Investigation</u>

Investigation activities indicated Site-wide soils comprised of fill material, consisting of cinders, ash, brick, and glass ranging in depth from 0 to 2.5 feet below ground surface (fbgs).

Laboratory analytical results indicated elevated PAHs and metals exceeding Restricted-Residential Use SCOs (RRSCOs), Commercial Use SCOs (CSCOs), and/or Industrial Use SCOs (ISCOs), including:

- Elevated metals, specifically arsenic, was identified exceeding its ISCO at several locations.

- Elevated concentrations of PAHs exceeding their respective RRSCOs, CSCOs, and ISCOs at multiple locations.

March 2024 – Draft Remedial Investigation/Alternatives Analysis (RI/AA) Report

Based on the data and analyses presented in RI/AA Report, the following is a summary of investigation findings:

Soil/Fill

- Based on the previous investigation and RI activities, PAHs and metals, concentrations were observed exceeding RRSCOs in the surface and subsurface soil/fill material across the Site at depths ranging from surface to average of 5 fbgs.
- No elevated concentrations of VOCs, PCBs, pesticides, herbicides, PFAS and 1,4-dixane were detected exceeding the RRSCOs in the subsurface soil samples.

Groundwater

- No elevated VOCs, herbicides, PCBs, PFAS, and 1,4-dioxane were detected above GWQS.
- Certain PAHs, naturally occurring metals, iron, magnesium and sodium, and dieldrin (estimated) were detected exceeding their GWQS.

Soil Vapor

- Preliminary SVI sample results indicate potential for mitigation in portions of the buildings. Supplemental SVI assessment is needed to determine extents and/or requirements for future mitigation, if necessary.

1.4 Primary Constituents of Potential Concern

Based on the previous investigations, constituents of potential concern (COPCs) in soil and, potentially groundwater, at the Site include:

- **Volatile Organic Compounds (VOCs)** – VOCs are present in soil vapor beneath the building at levels requiring mitigation, including carbon tetrachloride and trichloroethene (TCE).
- **Semivolatile Organic Compounds (SVOCs)** – SVOCs present at elevated concentration may include PAHs, which are byproducts of incomplete combustion and impurities in petroleum products. PAHs present at elevated levels in the soil/fill samples include: are benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, chrysene, dibenzo(a,h)anthracene, fluoranthene, indeno(1,2,3-cd)pyrene, and phenanthrene.
- **Metals** – Metals present at elevated concentrations of soil/fill may include arsenic.

1.5 Remedial Action Objectives

The supplemental investigation activities for the 2101 Kenmore Avenue Site must satisfy Remedial Action Objectives (RAOs). RAOs are Site-specific statements that convey the goals for minimizing substantial risks to public health and the environment. RAOs have been defined for the Site as follows:

Soil Vapor RAOs

RAOs for Public Health Protection

- Mitigate impacts to public health resulting from existing, or the potential for, soil vapor intrusion into buildings at the Site.

1.6 Overview of SI Activities

Roux personnel will be on-site to observe and perform remedial activities. The field activities to be completed as part of the SI are described below.

Supplemental Investigation Activities

1. Soil vapor intrusion (SVI) investigation and ambient air investigation for assessment of the ASD system;
2. Off-site SVI and ambient air investigation to assess vapor intrusion concerns within adjoining buildings.

2. ORGANIZATIONAL STRUCTURE

This section of the HASP describes the lines of authority, responsibility and communication as they pertain to health and safety functions at the Site. The purpose of this chapter is to identify the personnel who impact the development and implementation of the HASP and to describe their roles and responsibilities. This chapter also identifies other contractors and subcontractors involved in work operations and establish the lines of communications among them for health and safety matters. The organizational structure described in this chapter is consistent with the requirements of 29 CFR 1910.120(b)(2). This section will be reviewed by the Project Manager and updated as necessary to reflect the current organizational structure at this Site.

2.1 Roles and Responsibilities

All Roux personnel on the Site must comply with the minimum requirements of this HASP. The specific responsibilities and authority of management, safety and health, and other personnel on this Site are detailed in the following paragraphs.

2.1.1 Corporate Health and Safety Director

The Roux Corporate Health and Safety Director is ***Mr. Thomas H. Forbes, P.E.*** The Corporate Health and Safety Director responsible for developing and implementing the Health and Safety program and policies for Roux Environmental Engineering & Geology, D.P.C. and consulting with corporate management to ensure adequate resources are available to properly implement these programs and policies. The Corporate Health and Safety Director coordinates Roux's Health and Safety training and medical monitoring programs and assists project management and field staff in developing site-specific health and safety plans.

2.1.2 Project Manager

The Project Manager for this Site is ***Mr. Nathan Munley.*** The Project Manager has the responsibility and authority to direct all Roux work operations at the Site. The Project Manager coordinates safety and health functions with the Site Safety and Health Officer, and bears ultimate responsibility for proper implementation of this HASP. He may delegate authority to expedite and facilitate any application of the program, including modifications to the overall project approach as necessary to circumvent unsafe work conditions. Specific duties of the Project Manager include:

- Preparing and coordinating the Site work plan.
- Providing Roux workers with work assignments and overseeing their performance.
- Coordinating health and safety efforts with the Site Safety and Health Officer (SSHO).
- Reviewing the emergency response coordination plan to assure its effectiveness.
- Serving as the primary liaison with Site contractors and the property owner.

2.1.3 Site Safety and Health Officer

The SSHO for this Site is ***Mr. Nathan Munley***. The qualified alternate SSHO is ***Mr. Christopher Boron.*** The SSHO reports to the Project Manager. The SSHO is on-Site or readily accessible to the Site during all work operations and has the authority to halt Site work if unsafe conditions are detected. The specific responsibilities of the SSHO are:

- Managing the safety and health functions for Roux personnel on the Site.
- Serving as the point of contact for safety and health matters.
- Ensuring that Roux field personnel working on the Site have received proper training (per 29 CFR Part 1910.120(e)), that they have obtained medical clearance to wear respiratory protection (per 29 CFR Part 1910.134), and that they are properly trained in the selection, use and maintenance of personal protective equipment, including qualitative respirator fit testing.
- Performing or overseeing Site monitoring as required by the HASP.
- Assisting in the preparation and review of the HASP.
- Maintaining site-specific safety and health records as described in this HASP.
- Coordinating with the Project Manager, Site Workers, and Contractor's SSHO as necessary for safety and health efforts.

2.1.4 Site Workers

Site workers are responsible for complying with this HASP or a more stringent HASP, if appropriate (i.e., Contractor and Subcontractor's HASP); using proper PPE; reporting unsafe acts and conditions to the SSHO; and following the safety and health instructions of the Project Manager and SSHO.

2.1.5 Other Site Personnel

Other Site personnel will be responsible for developing, implementing and enforcing a Health and Safety Plan equally stringent or more stringent than Roux's HASP. Roux assumes no responsibility for the health and safety of anyone outside its direct employ. Each Contractor's HASP shall cover all non- Roux Site personnel. Each Contractor shall assign a SSHO who will coordinate with Roux's SSHO as necessary to ensure effective lines of communication and consistency between contingency plans.

In addition to Roux and Contractor personnel, other individuals who may have responsibilities in the work zone include subcontractors and governmental agencies performing Site inspection work (i.e., the New York State Department of Environmental Conservation). The Contractor shall be responsible for ensuring that these individuals have received OSHA-required training (29 CFR 1910.120(e)), including initial, refresher and site-specific training, and shall be responsible for the safety and health of these individuals while they are on-site.

3. HAZARD EVALUATION

Due to the presence of certain contaminants at the Site, the possibility exists that workers will be exposed to hazardous substances during field activities. The principal points of exposure would be through direct contact with and incidental ingestion of soil, and through the inhalation of contaminated particles or vapors. Other points of exposure may include direct contact with groundwater. In addition, the use of drilling and/or medium to large-sized construction equipment (e.g., excavator) will also present conditions for potential physical injury to workers. Further, since work will be performed outdoors, the potential exists for heat/cold stress to impact workers, especially those wearing protective equipment and clothing. Adherence to the medical evaluations, worker training relative to chemical hazards, safe work practices, proper personal protection, environmental monitoring, establishment of work zones and Site control, appropriate decontamination procedures and contingency planning outlined herein will reduce the potential for chemical exposures and physical injuries.

3.1 Chemical Hazards

As discussed in Section 1.3, VOC, SVOC and metals impacts have been identified at the Site. Table 1 lists exposure limits for airborne concentrations of the COPCs identified in Section 1.4 of this HASP. Brief descriptions of the toxicology of the prevalent COPCs and related health and safety guidance and criteria are provided below.

- **Carbon Tetrachloride** Carbon tetrachloride is a manufactured chemical that does not occur naturally. It is a clear liquid with a sweet smell that can be detected at low levels. It is also called carbon chloride, methane tetrachloride, perchloromethane, tetrachloroethane, or benziform. Carbon tetrachloride is most often found in the air as a colorless gas. It is not flammable and does not dissolve in water very easily. It was used in the production of refrigeration fluid and propellants for aerosol cans, as a pesticide, as a cleaning fluid and degreasing agent, in fire extinguishers, and in spot removers. Because of its harmful effects, these uses are now banned and it is only used in some industrial applications. Exposure routes include inhalation, skin absorption, ingestion, and skin and/or eye contact with symptoms including irritation of the eyes/skin, central nervous system depression, nausea, vomiting, liver or kidney injury, drowsiness, dizziness, or incoordination. It is a potential occupational carcinogen.
- **Trichloroethene (TCE)** is a nonflammable, colorless liquid with a somewhat sweet odor and a sweet, burning taste. It is used mainly as a solvent to remove grease from metal parts, but it is also an ingredient in adhesives, paint removers, typewriter correction fluids, and spot removers. Trichloroethylene is not thought to occur naturally in the environment. However, it has been found in underground water sources and many surface waters as a result of the manufacture, use, and disposal of the chemical. Exposure routes include inhalation, skin absorption, ingestion, and skin and/or eye contact with symptoms including irritation of the eyes/skin, headache, visual disturbance, lassitude (weakness, exhaustion), dizziness, tremors, drowsiness, nausea, vomiting, dermatitis, cardiac arrhythmias, paresthesia, or liver injury. It is a potential occupational carcinogen.

- **Polycyclic Aromatic Hydrocarbons (PAHs)** are formed as a result of the pyrolysis and incomplete combustion of organic matter such as fossil fuel. PAH aerosols formed during the combustion process disperse throughout the atmosphere, resulting in the deposition of PAH condensate in soil, water and on vegetation. In addition, several products formed from petroleum processing operations (e.g., roofing materials and asphalt) also contain elevated levels of PAHs. Hence, these compounds are widely dispersed in the environment. PAHs are characterized by a molecular structure containing three or more fused, unsaturated carbon rings. Seven of the PAHs are classified by USEPA as probable human carcinogens (USEPA Class B2). These are: benzo(a)anthracene; benzo(a)pyrene; benzo(b)fluoranthene; and dibenzo(a,h)anthracene. The primary route of exposure to PAHs is through incidental ingestion and inhalation of contaminated particulates. PAHs are characterized by an organic odor and exist as oily liquids in pure form. Acute exposure symptoms may include acne-type blemishes in areas of the skin exposed to sunlight.
- **Arsenic (CAS #7440-38-2)** is a naturally occurring element found throughout nature. Inhalation is a more important exposure route than ingestion. First phase exposure symptoms include nausea, vomiting, diarrhea and pain in the stomach. Prolonged contact is corrosive to the skin and mucus membranes. Arsenic is considered a Group A human carcinogen by the USEPA. Exposure via inhalation is associated with an increased risk of lung cancer. Exposure via the oral route is associated with an increased risk of skin cancer.

With respect to the anticipated SI activities discussed in Section 1.6, possible routes of exposure to the above-mentioned contaminants are presented in Table 2. The use of proper respiratory equipment, as outlined in Section 7.0 of this HASP, will minimize the potential for exposure to airborne contamination, if deemed necessary. Exposure to contaminants through dermal and other routes will also be minimized through the use of protective clothing (Section 7.0), safe work practices (Section 6.0), and proper decontamination procedures (Section 12.0).

3.2 Physical Hazards

SI field activities at the 2101 Kenmore Avenue Site may present the following physical hazards:

- The potential for physical injury during heavy construction equipment use, such as backhoes, excavators and drilling equipment.
- The potential for heat/cold stress to employees during the summer/winter months (see Section 10.0).
- The potential for slip and fall injuries due to rough, uneven terrain and/or open excavations.

These hazards represent only some of the possible means of injury that may be present during SI operations and sampling activities at the Site. Since it is impossible to list all potential sources of injury, it shall be the responsibility of each individual to exercise proper care and caution during all phases of the work.

4. TRAINING

4.1 Site Workers

All personnel performing SI activities at the Site (such as, but not limited to, equipment operators, general laborers, and drillers) and who may be exposed to hazardous substances, health hazards, or safety hazards and their supervisors/managers responsible for the Site shall receive training in accordance with 29 CFR 1910.120(e) before they are permitted to engage in operations in the exclusion zone or contaminant reduction zone. This training includes an initial 40-hour Hazardous Waste Site Worker Protection Course, an 8-hour Annual Refresher Course subsequent to the initial 40-hour training, and 3 days of actual field experience under the direct supervision of a trained, experienced supervisor. Additional site-specific training shall also be provided by the SSHO prior to the start of field activities. A description of topics to be covered by this training is provided below.

4.1.1 Initial and Refresher Training

Initial and refresher training is conducted by a qualified instructor as specified under OSHA 29 CFR 1910.120(e)(5), and is specifically designed to meet the requirements of OSHA 29 CFR 1910.120(e)(3) and 1910.120(e)(8). The training covers, as a minimum, the following topics:

- OSHA HAZWOPER regulations.
- Site safety and hazard recognition, including chemical and physical hazards.
- Medical monitoring requirements.
- Air monitoring, permissible exposure limits, and respiratory protection level classifications.
- Appropriate use of personal protective equipment (PPE), including chemical compatibility and respiratory equipment selection and use.
- Work practices to minimize risk.
- Work zones and Site control.
- Safe use of engineering controls and equipment.
- Decontamination procedures.
- Emergency response and escape.
- Confined space entry procedures.
- Heat and cold stress monitoring.
- Elements of a Health and Safety Plan.
- Spill containment.

Initial training also incorporates workshops for PPE and respiratory equipment use (Levels A, B and C), and respirator fit testing. Records and certification received from the course instructor documenting each employee's successful completion of the training identified above are maintained on file at Roux's Buffalo, NY office. Contractors and Subcontractors are required to provide similar documentation of training for all their personnel who will be involved in on-site work activities.

Any employee who has not been certified as having received health and safety training in conformance with 29 CFR 1910.120(e) is prohibited from working in the exclusion and contamination reduction zones, or to engage in any on-site work activities that may involve exposure to hazardous substances or wastes.

4.1.2 Site Training

Site workers are given a copy of the HASP and provided a site-specific briefing prior to the commencement of work to ensure that employees are familiar with the HASP and the information and requirements it contains. The Site briefing shall be provided by the SSHO prior to initiating field activities and shall include:

- Names of personnel and alternates responsible for Site safety and health.
- Safety, health and other hazards present on the Site.
- The site lay-out including work zones and places of refuge.
- The emergency communications system and emergency evacuation procedures.
- Use of PPE.
- Work practices by which the employee can minimize risks from hazards.
- Safe use of engineering controls and equipment on the site.
- Medical surveillance, including recognition of symptoms and signs of over-exposure as described in Chapter 5 of this HASP.
- Decontamination procedures as detailed in Chapter 12 of this HASP.
- The emergency response plan as detailed in Chapter 15 of this HASP.
- Confined space entry procedures, if required, as detailed in Chapter 13 of this HASP.
- The spill containment program as detailed in Chapter 9 of this HASP.
- Site control as detailed in Chapter 11 of this HASP.

Supplemental health and safety briefings will also be conducted by the SSHO on an as-needed basis during the course of the work. Supplemental briefings are provided as necessary to notify employees of any changes to this HASP as a result of information gathered during ongoing Site characterization and analysis. Conditions for which the SSHO may schedule additional briefings include, but are not limited to: a change in Site conditions (e.g., based on monitoring results); changes in the work schedule/plan; newly discovered hazards; and safety incidents occurring during Site work.

4.2 Supervisor Training

On-site safety and health personnel who are directly responsible for or who supervise the safety and health of workers engaged in hazardous waste operations (i.e., SSHO) shall receive, in addition to the appropriate level of worker training described in Section 4.1, above, 8 additional hours of specialized supervisory training, in compliance with 29 CFR 1910.120(e)(4).

4.3 Emergency Response Training

Emergency response training is addressed in Attachment A of this HASP, Emergency Response Plan.

4.4 Site Visitors

Each Contractor's SSHO will provide a site-specific briefing to all Site visitors and other non- Roux personnel who enter the Site beyond the Site entry point. The site-specific briefing will provide information about Site hazards, the Site layout including work zones and places of refuge, the emergency communications system and emergency evacuation procedures, and other pertinent safety and health requirements as appropriate.

Site visitors will not be permitted to enter the exclusion zone or contaminant reduction zones unless they have received the level of training required for Site workers as described in Section 4.1.

5. MEDICAL MONITORING

Medical monitoring examinations are provided to Roux employees as stipulated under 29 CFR Part 1910.120(f). These exams include initial employment, annual and employment termination physicals for all Roux employees involved in hazardous waste site field operations. Post-exposure examinations are also provided for employees who may have been injured, received a health impairment, or developed signs or symptoms of over-exposure to hazardous substances or were accidentally exposed to substances at concentrations above the permissible exposure limits without necessary personal protective equipment. Such exams are performed as soon as possible following development of symptoms or the known exposure event.

Medical evaluations are performed by Health Works, an occupational health care provider under contract with Roux. Health Works is located in Seneca Square Plaza, 1900 Ridge Road, West Seneca, New York 14224. The facility can be reached at (716) 823-5050 to schedule routine appointments or post-exposure examinations.

Medical evaluations are conducted according to the Roux Medical Monitoring Program and include an evaluation of the workers' ability to use respiratory protective equipment. The examinations include:

- Occupational/medical history review.
- Physical exam, including vital sign measurement.
- Spirometry testing.
- Eyesight testing.
- Audio testing (minimum baseline and exit, annual for employees routinely exposed to greater than 85db).
- EKG (for employees >40 yrs age or as medical conditions dictate).
- Chest X-ray (baseline and exit, and every 5 years).
- Blood biochemistry (including blood count, white cell differential count, serum multiplastic screening).
- Medical certification of physical requirements (i.e., sight, musculoskeletal, cardiovascular) for safe job performance and to wear respiratory protection equipment.

The purpose of the medical evaluation is to determine an employee's fitness for duty on hazardous waste sites; and to establish baseline medical data. In conformance with OSHA regulations, Roux will maintain and preserve medical records for a period of 30 years following termination of employment. Employees are provided a copy of the physician's post-exam report, and have access to their medical records and analyses.

6. SAFE WORK PRACTICES

All Roux employees shall conform to the following safe work practices during all on-site work activities conducted within the exclusion and contamination reduction zones:

- Eating, drinking, chewing gum or tobacco, smoking, or any practice that increases the probability of hand-to-mouth contact is strictly prohibited.
- The hands and face must be thoroughly washed upon leaving the work area and prior to engaging in any activity indicated above.
- Respiratory protective equipment and clothing must be worn by all personnel entering the Site as required by the HASP or as modified by the Site safety officer. Excessive facial hair (i.e., beards, long mustaches or sideburns) that interferes with the satisfactory respirator-to-face seal is prohibited.
- Contact with surfaces/materials either suspected or known to be contaminated will be avoided to minimize the potential for transfer to personnel, cross contamination and need for decontamination.
- Medicine and alcohol can synergize the effects of exposure to toxic chemicals. Due to possible contraindications, use of prescribed drugs should be reviewed with the Roux occupational physician. Alcoholic beverage and illegal drug intake are strictly forbidden during the workday.
- All personnel shall be familiar with standard operating safety procedures and additional instructions contained in this Health and Safety Plan.
- On-site personnel shall use the “buddy” system. No one may work alone (i.e., out of earshot or visual contact with other workers) in the exclusion zone.
- Personnel and equipment in the contaminated area shall be minimized, consistent with effective Site operations.
- All employees have the obligation to immediately report and if possible, correct unsafe work conditions.
- Use of contact lenses on-site will not be permitted. Spectacle kits for insertion into full-face respirators will be provided for Roux employees, as requested and required.

The recommended specific safety practices for working around the contractor’s equipment (e.g., backhoes, bulldozers, excavators, drill rigs etc.) are as follows:

- Although the Contractor and subcontractors are responsible for their equipment and safe operation of the Site, Roux personnel are also responsible for their own safety.
- Subsurface work will not be initiated without first clearing underground utility services.
- Heavy equipment should not be operated within 20 feet of overhead wires. This distance may be increased if windy conditions are anticipated or if lines carry high voltage. The Site should

also be sufficiently clear to ensure the project staff can move around the heavy machinery safely.

- Care should be taken to avoid overhead wires when moving heavy-equipment from location to location.
- Hard hats, safety boots and safety glasses should be worn at all times in the vicinity of heavy equipment. Hearing protection is also recommended.
- The work Site should be kept neat. This will prevent personnel from tripping and will allow for fast emergency exit from the Site.
- Proper lighting must be provided when working at night.
- Construction activities should be discontinued during an electrical storm or severe weather conditions.
- The presence of combustible gases should be checked before igniting any open flame.
- Personnel shall stand upwind of any construction operation when not immediately involved in sampling/logging/observing activities.
- Personnel will not approach the edge of an unsecured trench/excavation closer than 2 feet.

7. PERSONAL PROTECTIVE EQUIPMENT

7.1 Equipment Selection

PPE will be donned when work activities may result in exposure to physical or chemical hazards beyond acceptable limits, and when such exposure can be mitigated through appropriate PPE. The selection of PPE will be based on an evaluation of the performance characteristics of the PPE relative to the requirements and limitations of the Site, the task-specific conditions and duration, and the hazards and potential hazards identified at the Site.

Equipment designed to protect the body against contact with known or suspect chemical hazards are grouped into four categories according to the degree of protection afforded. These categories designated A through D consistent with United States Environmental Protection Agency (USEPA) Level of Protection designation, are:

- **Level A:** Should be selected when the highest level of respiratory, skin and eye protection is needed.
- **Level B:** Should be selected when the highest level of respiratory protection is needed, but a lesser level of skin protection is required. Level B protection is the minimum level recommended on initial Site entries until the hazards have been further defined by on-site studies. Level B (or Level A) is also necessary for oxygen-deficient atmospheres.
- **Level C:** Should be selected when the types of airborne substances are known, the concentrations have been measured and the criteria for using air-purifying respirators are met. In atmospheres where no airborne contaminants are present, Level C provides dermal protection only.
- **Level D:** Should not be worn on any Site with elevated respiratory or skin hazards. This is generally a work uniform providing minimal protection.

OSHA requires the use of certain PPE under conditions where an immediate danger to life and health (IDLH) may be present. Specifically, OSHA 29 CFR 1910.120(g)(3)(iii) requires use of a positive pressure self-contained breathing apparatus, or positive pressure air-line respirator equipped with an escape air supply when chemical exposure levels present a substantial possibility of immediate serious injury, illness or death, or impair the ability to escape. Similarly, OSHA 29 CFR 1910.120(g)(3)(iv) requires donning totally-encapsulating chemical protective suits (with a protection level equivalent to Level A protection) in conditions where skin absorption of a hazardous substance may result in a substantial possibility of immediate serious illness, injury or death, or impair the ability to escape.

In situations where the types of chemicals, concentrations, and possibilities of contact are unknown, the appropriate level of protection must be selected based on professional experience and judgment until the hazards can be further characterized. The individual components of clothing and equipment must be assembled into a full protective ensemble to protect the worker from site-specific hazards, while at the same time minimizing hazards and drawbacks of the personal protective gear itself. Ensemble components are detailed below for levels A/B, C, and D protection.

7.2 Protection Ensembles

7.2.1 Level A/B Protection Ensemble

Level A/B ensembles include similar respiratory protection, however Level A provides a higher degree of dermal protection than Level B. Use of Level A over Level B is determined by: comparing the concentrations of identified substances in the air with skin toxicity data, and assessing the effect of the substance (by its measured air concentrations or splash potential) on the small area of the head and neck unprotected by Level B clothing.

The recommended PPE for level A/B is:

- Pressure-demand, full-face piece self-contained breathing apparatus (MSHA/NIOSH approved) or pressure-demand supplied-air respirator with escape self-contained breathing apparatus (SCBA).
- Chemical-resistant clothing. For Level A, clothing consists of totally-encapsulating chemical resistant suit. Level B incorporates hooded one-or two-piece chemical splash suit.
- Inner and outer chemical resistant gloves.
- Chemical-resistant safety boots/shoes.
- Hardhat.

7.2.2 Level C Protection Ensemble

Level C protection is distinguished from Level B by the equipment used to protect the respiratory system, assuming the same type of chemical-resistant clothing is used. The main selection criterion for Level C is that conditions permit wearing an air-purifying device. The device (when required) must be an air-purifying respirator (MSHA/NIOSH approved) equipped with filter cartridges. Cartridges must be able to remove the substances encountered. Respiratory protection will be used only with proper fitting, training and the approval of a qualified individual. In addition, an air-purifying respirator can be used only if: oxygen content of the atmosphere is at least 19.5% in volume; substances are identified and concentrations measured; substances have adequate warning properties; the individual passes a qualitative fit-test for the mask; and an appropriate cartridge/canister is used, and its service limit concentration is not exceeded.

Recommended PPE for Level C conditions includes:

- Full-face piece, air-purifying respirator equipped with MSHA and NIOSH approved organic vapor/acid gas/dust/mist combination cartridges or as designated by the SSHO.
- Chemical-resistant clothing (hooded, one or two-piece chemical splash suit or disposable chemical-resistant one-piece suit).
- Inner and outer chemical-resistant gloves.
- Chemical-resistant safety boots/shoes.
- Hardhat.

An air-monitoring program is part of all response operations when atmospheric contamination is known or suspected. It is particularly important that the air be monitored thoroughly when personnel are wearing air-purifying respirators. Continual surveillance using direct-reading instruments is needed to detect any changes in air quality necessitating a higher level of respiratory protection.

7.2.3 Level D Protection Ensemble

As indicated above, Level D protection is primarily a work uniform. It can be worn in areas where only boots can be contaminated, where there are no inhalable toxic substances and where the atmospheric contains at least 19.5% oxygen.

Recommended PPE for Level D includes:

- Coveralls.
- Safety boots/shoes.
- Safety glasses or chemical splash goggles.
- Hardhat.
- Optional gloves; escape mask; face shield.

7.2.4 Recommended Level of Protection for Site Tasks

Based upon current information regarding both the contaminants suspected to be present at the Site and the various tasks that are included in the remedial activities, the minimum required levels of protection for these tasks shall be as identified in Table 3.

8. EXPOSURE MONITORING

8.1 General

Based on the results of historic sample analysis and the nature of the proposed work activities at the Site, the possibility exist that organic vapors and/or particulates may be released to the air during intrusive construction activities. Ambient breathing zone concentrations may at times, exceed the permissible exposure limits (PELs) established by OSHA for the individual compounds (see Table 1), in which case respiratory protection will be required. Respiratory and dermal protection may be modified (upgraded or downgraded) by the SSHO based upon real-time field monitoring data.

8.1.1 On-Site Work Zone Monitoring

Roux personnel will conduct routine, real-time air monitoring during all intrusive construction phases such as excavation, backfilling, drilling, etc. The work area will be monitored at regular intervals using a PID, combustible gas meter and a particulate meter. Observed values will be recorded and maintained as part of the permanent field record.

Additional air monitoring measurements may be made by Roux personnel to verify field conditions during subcontractor oversight activities. Monitoring instruments will be protected from surface contamination during use. Additional monitoring instruments may be added if the situations or conditions change. Monitoring instruments will be calibrated in accordance with manufacturer's instructions before use.

8.1.2 Off-Site Community Air Monitoring

In addition to on-site monitoring within the work zone(s), monitoring at the downwind portion of the Site perimeter will be conducted. This will provide a real-time method for determination of vapor and/or particulate releases to the surrounding community as a result of ground intrusive investigation work.

Ground intrusive activities are defined in the Generic Community Air Monitoring Plan and attached as Attachment C. Ground intrusive activities include soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells. Non-intrusive activities include the collection of soil and sediment samples or the collection of groundwater samples from existing wells. Continuous monitoring is required for ground intrusive activities and periodic monitoring is required for non-intrusive activities. Periodic monitoring consists of taking a reading upon arrival at a sample location, monitoring while opening a well cap or overturning soil, monitoring while bailing a well, and taking a reading prior to leaving a sampling location. This may be upgraded to continuous if the sampling location is in close proximity to individuals not involved in the Site activity (i.e., on a curb of a busy street). The action levels below will be used during periodic monitoring.

8.2 Monitoring Action Levels

8.2.1 On-Site Work Zone Action Levels

The PID, or other appropriate instrument(s), will be used by Roux personnel to monitor organic vapor concentrations as specified in this HASP. Combustible gas will be monitored with the “combustible gas” option on the combustible gas meter or other appropriate instrument(s). In addition, fugitive dust/particulate concentrations will be monitored during major soil intrusion (viz., well/boring installation) using a real-time particulate monitor as specified in this plan. In the absence of such monitoring, appropriate respiratory protection for particulates shall be donned. Sustained readings obtained in the breathing zone may be interpreted (with regard to other Site conditions) as follows for Roux personnel:

- Total atmospheric concentrations of unidentified vapors or gases ranging from 0 to 1 ppm above background on the PID) - Continue operations under Level D.
- Total atmospheric concentrations of unidentified vapors or gases yielding sustained readings from >1 ppm to 5 ppm above background on the PID (vapors not suspected of containing high levels of chemicals toxic to the skin) - Continue operations under Level C.
- Total atmospheric concentrations of unidentified vapors or gases yielding sustained readings of >5 ppm to 50 ppm above background on the PID - Continue operations under Level B, re-evaluate and alter (if possible) construction methods to achieve lower vapor concentrations.
- Total atmospheric concentrations of unidentified vapors or gases above 50 ppm on the PID - Discontinue operations and exit the work zone immediately.

The particulate monitor will be used to monitor respirable dust concentrations during all intrusive activities and during handling of Site soil/fill. Action levels based on the instrument readings shall be as follows:

- Less than 50 mg/m^3 - Continue field operations.
- 50-150 mg/m^3 - Don dust/particulate mask or equivalent
- Greater than 150 mg/m^3 - Don dust/particulate mask or equivalent. Initiate engineering controls to reduce respirable dust concentration (viz., wetting of excavated soils or tools at discretion of Site Health and Safety Officer).

Readings from the field equipment will be recorded and documented on the appropriate Project Field Forms. All instruments will be calibrated before use on a daily basis and the procedure will be documented on the appropriate Project Field Forms.

8.2.2 Community Air Monitoring Action Levels

In addition to the action levels prescribed in Section 8.2.1 for Roux personnel on-site, the following criteria shall also be adhered to for the protection of downwind receptors consistent with NYSDOH requirements (Attachment C):

ORGANIC VAPOR PERIMETER MONITORING:

- If the sustained ambient air concentration of organic vapors at the downwind perimeter of the exclusion zone exceeds 5 ppm above background for the 15-minute average, work activities will be temporarily halted and monitoring continued. If the sustained organic vapor decreases below 5 ppm over background, work activities can resume with continued monitoring.
- If the sustained ambient air concentration of organic vapors at the downwind perimeter of the exclusion zone are greater than 5 ppm over background but less than 25 ppm for the 15-

minute average, activities can resume provided that: the organic vapor level 200 feet downwind of the working site or half the distance to the nearest off-site residential or commercial structure, whichever is less, but in no case less than 20 feet, is below 5 ppm over background; and more frequent intervals of monitoring, as directed by the Site Health and Safety Officer, are conducted.

- If the sustained organic vapor level is above 25 ppm at the perimeter of the exclusion zone for the 15-minute average, the Site Health and Safety Officer must be notified and work activities shut down. The Site Health and Safety Officer will determine when re-entry of the exclusion zone is possible and will implement downwind air monitoring to ensure vapor emissions do not impact the nearest off-site residential or commercial structure at levels exceeding those specified in the **Organic Vapor Contingency Monitoring Plan** below. All readings will be recorded and will be available for New York State Department of Environmental Conservation (DEC) and Department of Health (DOH) personnel to review.

ORGANIC VAPOR CONTINGENCY MONITORING PLAN:

- If the sustained organic vapor level is greater than 5 ppm over background 200 feet downwind from the work area or half the distance to the nearest off-site residential or commercial property, whichever is less, all work activities must be halted.
- If, following the cessation of the work activities or as the result of an emergency, sustained organic levels persist above 5 ppm above background 200 feet downwind or half the distance to the nearest off-site residential or commercial property from the work area, then the air quality must be monitored within 20 feet of the perimeter of the nearest off-site residential or commercial structure (20-foot zone).
- If efforts to abate the emission source are unsuccessful and if sustained organic vapor levels approach or exceed 5 ppm above background within the 20-foot zone for more than 30 minutes, or are sustained at levels greater than 10 ppm above background for longer than one minute, then the ***Major Vapor Emission Response Plan*** (see below) will automatically be placed into effect.

MAJOR VAPOR EMISSION RESPONSE PLAN:

Upon activation, the following activities will be undertaken:

1. All Emergency Response Contacts as listed in this Health and Safety Plan and the Emergency Response Plan (Attachment A) will be advised.
2. The local police authorities will immediately be contacted by the Site Health and Safety Officer and advised of the situation.
3. Frequent air monitoring will be conducted at 30-minute intervals within the 20-foot zone. If two sustained successive readings below action levels are measured, air monitoring may be halted or modified by the Site Health and Safety Officer.

The following personnel are to be notified in the listed sequence in the event that a Major Vapor Emission Plan is activated:

Responsible Person	Contact	Phone Number
SSHO	Police	911
SSHO	State Emergency Response Hotline	(800) 457-7362

Additional emergency numbers are listed in the Emergency Response Plan included as Attachment A.

EXPLOSIVE VAPORS:

- Sustained atmospheric concentrations of greater than 10% LEL in the work area - Initiate combustible gas monitoring at the downwind portion of the Site perimeter.
- Sustained atmospheric concentrations of greater than 10% LEL at the downwind Site perimeter – Halt work and contact local Fire Department.

AIRBORNE PARTICULATE COMMUNITY AIR MONITORING

Respirable (PM-10) particulate monitoring will be performed on a continuous basis at the upwind and downwind perimeter of the exclusion zone. The monitoring will be performed using real-time monitoring equipment capable of measuring PM-10 and integrating over a period of 15-minutes for comparison to the airborne particulate action levels. The equipment will be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration will be visually assessed during all work activities. All readings will be recorded and will be available for NYSDEC and NYSDOH review. Readings will be interpreted as follows:

- If the downwind PM-10 particulate level is 100 micrograms per cubic meter (ug/m^3) greater than the background (upwind perimeter) reading 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 provided that the downwind PM-10 particulate levels do not exceed 150 ug/m^3 above the upwind level and that visible dust is not migrating from the work area.
- If, after implementation of dust suppression techniques downwind PM-10 levels are greater than 150 ug/m^3 above the upwind level, work activities must be stopped and dust suppression controls re-evaluated. Work can resume provided that supplemental dust suppression measures and/or other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 ug/m^3 of the upwind level and in preventing visible dust migration.

Pertinent emergency response information including the telephone number of the Fire Department is included in the Emergency Response Plan (Attachment A).

9. SPILL RELEASE/RESPONSE

This chapter of the HASP describes the potential for and procedures related to spills or releases of known or suspected petroleum and/or hazardous substances on the Site. The purpose of this Section of the HASP is to plan appropriate response, control, counter-measures and reporting, consistent with OSHA requirements in 29 CFR 1910.120(b)(4)(ii)(J) and (j)(1)(viii). The spill containment program addresses the following elements:

- Potential hazardous material spills and available controls.
- Initial notification and evaluation.
- Spill response.
- Post-spill evaluation.

9.1 Potential Spills and Available Controls

An evaluation was conducted to determine the potential for hazardous material and oil/petroleum spills at this Site. For the purpose of this evaluation, hazardous materials posing a significant spill potential are considered to be:

- CERCLA Hazardous Substances as identified in 40 CFR Part 302, where such materials pose the potential for release in excess of their corresponding Reportable Quantity (RQ).
- Extremely Hazardous Substances as identified in 40 CFR Part 355, Appendix A, where such materials pose the potential for release in excess of their corresponding Reportable Quantity (RQ).
- Hazardous Chemicals as defined under Section 311(e) of the Emergency Planning and Community Right-To-Know Act of 1986, where such chemicals are present or will be stored in excess of 10,000 lbs.
- Toxic Chemicals as defined in 40 CFR Part 372, where such chemicals are present or will be stored in excess of 10,000 lbs.
- Chemicals regulated under 6NYCRR Part 597, where such materials pose the potential for release in excess of their corresponding Reportable Quantity (RQ).

Oil/petroleum products are considered to pose a significant spill potential whenever the following situations occur:

- The potential for a “harmful quantity” of oil (including petroleum and non-petroleum-based fuels and lubricants) to reach navigable waters of the U.S. exists (40 CFR Part 112.4). Harmful quantities are considered by USEPA to be volumes that could form a visible sheen on the water or violate applicable water quality standards.

- The potential for any amount of petroleum to reach any waters of NY State, including groundwater, exists. Petroleum, as defined by NY State in 6NYCRR Part 612, is a petroleum-based heat source, energy source, or engine lubricant/maintenance fluid.
- The potential for any release, to soil or water, of petroleum from a bulk storage facility regulated under 6NYCRR Part 612. A regulated petroleum storage facility is defined by NY State as a site having stationary tank(s) and intra-facility piping, fixtures and related equipment with an aggregate storage volume of 1,100 gallons or greater.

The evaluation indicates that, based on Site history and decommissioning records, a hazardous material spill and/or a petroleum product spill is not likely to occur during SI efforts.

9.2 Initial Spill Notification and Evaluation

Any worker who discovers a hazardous substance or oil/petroleum spill will immediately notify the Project Manager and SSHO. The worker will, to the best of his/her ability, report the material involved, the location of the spill, the estimated quantity of material spilled, the direction/flow of the spill material, related fire/explosion incidents, if any, and any associated injuries. The Emergency Response Plan presented in Attachment A of this HASP will immediately be implemented if an emergency release has occurred.

Following initial report of a spill, the Project Manager will make an evaluation as to whether the release exceeds RQ levels. If an RQ level is exceeded, the Project Manager will notify the Site owner and NYSDEC at 1-800-457-7362 within 2 hours of spill discovery. The Project Manager will also determine what additional agencies (e.g., USEPA) are to be contacted regarding the release, and will follow-up with written reports as required by the applicable regulations.

9.3 Spill Response

For all spill situations, the following general response guidelines will apply:

- Only those personnel involved in overseeing or performing containment operations will be allowed within the spill area. If necessary, the area will be roped, ribboned, or otherwise blocked off to prevent unauthorized access.
- Appropriate PPE, as specified by the SSHO, will be donned before entering the spill area.
- Ignition points will be extinguished/removed if fire or explosion hazards exist.
- Surrounding reactive materials will be removed.
- Drains or drainage in the spill area will be blocked to prevent inflow of spilled materials or applied materials.

For minor spills, the Contractor will maintain a Spill Control and Containment Kit in the Field Office or other readily accessible storage location. The kit will consist of, at a minimum, a 50 lb. bag of “speedy dry” granular absorbent material, absorbent pads, shovels, empty 5-gallon pails and an empty open-top 55-gallon drum. Spilled materials will be absorbed, and shoveled into a 55-gallon drum for proper disposal (NYSDEC approval will be secured for on-site treatment of the impacted soils/absorbent materials, if applicable). Impacted soils will be hand-excavated to the point that no visible signs of contamination remains, and will be drummed with the absorbent.

In the event of a major release or a release that threatens surface water, a spill response contractor will be called to the Site. The response contractor may use heavy equipment (e.g., excavator, backhoe, etc.) to berm the soils surrounding the spill Site or create diversion trenching to mitigate overland migration or release to navigable waters. Where feasible, pumps will be used to transfer free liquid to storage containers. Spill control/cleanup contractors in the Western New York area that may be contacted for assistance include:

- The Environmental Service Group of NY, Inc.: (716) 695-6720
- Environmental Products and Services, Inc.: (716) 447-4700
- Op-Tech: (716) 873-7680

9.4 Post-Spill Evaluation

If a reportable quantity of hazardous material or oil/petroleum is spilled as determined by the Project Manager, a written report will be prepared as indicated in Section 9.2. The report will identify the root cause of the spill, type and amount of material released, date/time of release, response actions, agencies notified and/or involved in cleanup, and procedures to be implemented to avoid repeat incidents. In addition, all re-useable spill cleanup and containment materials will be decontaminated, and spill kit supplies/disposable items will be replenished.

10. HEAT/COLD STRESS MONITORING

Since some of the work activities at the Site will be scheduled for both the summer and winter months, measures will be taken to minimize heat/cold stress to Roux employees. The Site Safety and Health Officer and/or his or her designee will be responsible for monitoring Roux field personnel for symptoms of heat/cold stress.

10.1 Heat Stress Monitoring

Personal protective equipment may place an employee at risk of developing heat stress, a common and potentially serious illnesses often encountered at construction, landfill, waste disposal, industrial or other unsheltered sites. The potential for heat stress is dependent on a number of factors, including environmental conditions, clothing, workload, physical conditioning and age. Personal protective equipment may severely reduce the body's normal ability to maintain temperature equilibrium (via evaporation and convection), and require increased energy expenditure due to its bulk and weight.

Proper training and preventive measures will mitigate the potential for serious illness. Heat stress prevention is particularly important because once a person suffers from heat stroke or heat exhaustion, that person may be predisposed to additional heat related illness. To avoid heat stress, the following steps should be taken:

- Adjust work schedules.
- Modify work/rest schedules according to monitoring requirements.
- Mandate work slowdowns as needed.
- Perform work during cooler hours of the day if possible or at night if adequate lighting can be provided.
- Provide shelter (air-conditioned, if possible) or shaded areas to protect personnel during rest periods.
- Maintain worker's body fluids at normal levels. This is necessary to ensure that the cardiovascular system functions adequately. Daily fluid intake must approximately equal the amount of water lost in sweat (i.e., eight fluid ounces must be ingested for approximately every 1 lb of weight lost). The normal thirst mechanism is not sensitive enough to ensure that enough water will be consumed to replace lost perspiration. When heavy sweating occurs, workers should be encouraged to drink more.
- Train workers to recognize the symptoms of heat related illness.

Heat-Related Illness - Symptoms:

- Heat rash may result from continuous exposure to heat or humid air.
- Heat cramps are caused by heavy sweating with inadequate electrolyte replacement. Signs and symptoms include: muscle spasms; pain in the hands, feet and abdomen.

- Heat exhaustion occurs from increased stress on various body organs including inadequate blood circulation due to cardiovascular insufficiency or dehydration. Signs and symptoms include: pale, cool, moist skin; heavy sweating; dizziness; nausea; fainting.
- Heat stroke is the most serious form of heat stress. Temperature regulation fails and the body temperature rises to critical levels. Immediate action must be taken to cool the body before serious injury and death occur. Competent medical help must be obtained. Signs and symptoms are: red, hot, usually dry skin; lack of or reduced perspiration; nausea; dizziness and confusion; strong, rapid pulse; coma.

The monitoring of personnel wearing protective clothing should commence when the ambient temperature is 70 degrees Fahrenheit or above. For monitoring the body's recuperative ability to excess heat, one or more of the following techniques should be used as a screening mechanism.

- Heart rate may be measured by the radial pulse for 30 seconds as early as possible in the resting period. The rate at the beginning of the rest period should not exceed 100 beats per minute. If the rate is higher, the next work period should be shortened by 10 minutes (or 33%), while the length of the rest periods stay the same, If the pulse rate is 100 beats per minute at the beginning of the nest rest period, the following work cycle should be further shortened by 33%.
- Body temperature may be measured orally with a clinical thermometer as early as possible in the resting period. Oral temperature at the beginning of the rest period should not exceed 99.6 degrees Fahrenheit. If it does, the next work period should be shortened by 10 minutes (or 33%), while the length of the rest period remains the same. However, if the oral temperature exceeds 99.6 degrees Fahrenheit at the beginning of the next period, the work cycle may be further shortened by 33%. Oral temperature should be measured at the end of the rest period to make sure that it has dropped below 99.6 degrees Fahrenheit. No Roux employee will be permitted to continue wearing semi-permeable or impermeable garments when his/her oral temperature exceeds 100.6 degrees Fahrenheit.

10.2 Cold Stress Monitoring

Exposure to cold conditions may result in frostbite or hypothermia, each of which progresses in stages as shown below.

- **Frostbite** occurs when body tissue (usually on the extremities) begins to freeze. The three states of frostbite are:

  1) **Frost nip** - This is the first stage of the freezing process. It is characterized by a whitened area of skin, along with a slight burning or painful sensation. Treatment consists of removing the victim from the cold conditions, removal of boots and gloves, soaking the injured part in warm water (102 to 108 degrees Fahrenheit) and drinking a warm beverage. Do not rub skin to generate friction/ heat.

  2) **Superficial Frostbite** - This is the second stage of the freezing process. It is characterized by a whitish gray area of tissue, which will be firm to the touch but will yield little pain. The treatment is identical for Frost nip.

3) **Deep Frostbite** - In this final stage of the freezing process the affected tissue will be cold, numb and hard and will yield little to no pain. Treatment is identical to that for Frost nip.

- **Hypothermia** is a serious cold stress condition occurring when the body loses heat at a rate faster than it is produced. If untreated, hypothermia may be fatal. The stages of hypothermia may not be clearly defined or visible at first, but generally include:
  1) Shivering
  2) Apathy (i.e., a change to an indifferent or uncaring mood)
  3) Unconsciousness
  4) Bodily freezing

Employees exhibiting signs of hypothermia should be treated by medical professionals. Steps that can be taken while awaiting help include:

1) Remove the victim from the cold environment and remove wet or frozen clothing. (Do this carefully as frostbite may have started.)
2) Perform active re-warming with hot liquids for drinking (Note: do not give the victim any liquid containing alcohol or caffeine) and a warm water bath (102 to 108 degrees Fahrenheit).
3) Perform passive re-warming with a blanket or jacket wrapped around the victim.

In any potential cold stress situation, it is the responsibility of the Site Health and Safety Officer to encourage the following:

- Education of workers to recognize the symptoms of frostbite and hypothermia.
- Workers should dress warmly, with more layers of thin clothing as opposed to one thick layer.
- Personnel should remain active and keep moving.
- Personnel should be allowed to take shelter in a heated area, as necessary.
- Personnel should drink warm liquids (no caffeine or alcohol if hypothermia has set in).
- For monitoring the body's recuperation from excess cold, oral temperature recordings should occur:
  - At the Site Safety Technicians discretion when suspicion is based on changes in a worker's performance or mental status.
  - At a workers request.
  - As a screening measure, two times per shift, under unusually hazardous conditions (e.g., wind chill less than 20 degrees Fahrenheit or wind chill less than 30 degrees Fahrenheit with precipitation).
  - As a screening measure, whenever anyone worker on-site develops hypothermia.

Any person developing moderate hypothermia (a core body temperature of 92 degrees Fahrenheit) will not be allowed to return to work for 48 hours without the recommendation of a qualified medical doctor.

11. WORK ZONES AND SITE CONTROL

Work zones around the areas designated for construction activities will be established on a daily basis and communicated to all employees and other Site users by the SSHO. It shall be each Contractor's Site Safety and Health Officer's responsibility to ensure that all Site workers are aware of the work zone boundaries and to enforce proper procedures in each area. The zones will include:

- Exclusion Zone ("Hot Zone") - The area where contaminated materials may be exposed, excavated or handled and all areas where contaminated equipment or personnel may travel. Flagging tape will delineate the zone. All personnel entering the Exclusion Zone must wear the prescribed level of personal protective equipment identified in Section 7.
- Contamination Reduction Zone - The zone where decontamination of personnel and equipment takes place. Any potentially contaminated clothing, equipment and samples must remain in the Contamination Reduction Zone until decontaminated.
- Support Zone - The part of the site that is considered non-contaminated or "clean." Support equipment will be located in this zone, and personnel may wear normal work clothes within this zone.

In the absence of other task-specific work zone boundaries established by the SSHO, the following boundaries will apply to all investigation and construction activities involving disruption or handling of Site soils or groundwater:

- Exclusion Zone: 50-foot radius from the outer limit of the sampling/construction activity.
- Contaminant Reduction Zone: 100-foot radius from the outer limit of the sampling/construction activity.
- Support Zone: Areas outside the Contaminant Reduction Zone.

Access of non-essential personnel to the Exclusion and Contamination Reduction Zones will be strictly controlled by the SSHO. Only personnel who are essential to the completion of the task will be allowed access to these areas and only if they are wearing the prescribed level of protection. Entrance of all personnel must be approved by the SSHO.

The SSHO will maintain a Health and Safety Logbook containing the names of Roux workers and their level of protection. The zone boundaries may be changed by the SSHO as environmental conditions warrant, and to respond to the necessary changes in work locations on-site.

12. DECONTAMINATION

12.1 Decontamination for Roux Employees

The degree of decontamination required is a function of a particular task and the environment within which it occurs. The following decontamination procedure will remain flexible, thereby allowing the decontamination crew to respond appropriately to the changing environmental conditions that may arise at the Site. All Roux personnel on-site shall follow the procedure below, or the Contractor's procedure (if applicable), whichever is more stringent.

Station 1 - Equipment Drop: Deposit visibly contaminated (if any) re-useable equipment used in the contamination reduction and exclusion zones (tools, containers, monitoring instruments, radios, clipboards, etc.) on plastic sheeting.

Station 2 - Boots and Gloves Wash and Rinse: Scrub outer boots and outer gloves. Deposit tape and gloves in waste disposal container.

Station 3 - Tape, Outer Boot and Glove Removal: Remove tape, outer boots and gloves. Deposit tape and gloves in waste disposal container.

Station 4 - Canister or Mask Change: If worker leaves exclusive zone to change canister (or mask), this is the last step in the decontamination procedure. Worker's canister is exchanged, new outer gloves and boot cover donned, and worker returns to duty.

Station 5 - Outer Garment/Face Piece Removal: Protective suit removed and deposited in separate container provided by Contractor. Face piece or goggles are removed if used. Avoid touching face with fingers. Face piece and/or goggles deposited on plastic sheet. Hard hat removed and placed on plastic sheet.

Station 6 - Inner Glove Removal: Inner gloves are the last personal protective equipment to be removed. Avoid touching the outside of the gloves with bare fingers. Dispose of these gloves in waste disposal container.

Following PPE removal, personnel shall wash hands, face and forearms with absorbent wipes. If field activities proceed for duration of 6 consecutive months or longer, shower facilities will be provided for worker use in accordance with OSHA 29 CFR 1910.120(n).

12.2 Decontamination for Medical Emergencies

In the event of a minor, non-life threatening injury, personnel should follow the decontamination procedures as defined, and then administer first-aid.

In the event of a major injury or other serious medical concern (e.g., heat stroke), immediate first-aid is to be administered and the victim transported to the hospital in lieu of further decontamination efforts unless exposure to a Site contaminant would be considered "Immediately Dangerous to Life or Health."

12.3 Decontamination of Field Equipment

The Contractor in accordance with his approved Health and Safety Plan in the Contamination Reduction Zone will conduct decontamination of heavy equipment. As a minimum, this will include manually removing heavy soil contamination, followed by steam cleaning on an impermeable pad.

Roux personnel will conduct decontamination of all tools used for sample collection purposes. It is expected that all tools will be constructed of nonporous, nonabsorbent materials (i.e., metal), which will aid in the decontamination effort. Any tool or part of a tool made of porous, absorbent material (i.e., wood) will be placed into suitable containers and prepared for disposal.

Decontamination of bailers, split-spoons, spatula knives, and other tools used for environmental sampling and examination shall be as follows:

- Disassemble the equipment
- Water wash to remove all visible foreign matter.
- Wash with detergent.
- Rinse all parts with distilled-deionized water.
- Allow to air dry.
- Wrap all parts in aluminum foil or polyethylene.

13. CONFINED SPACE ENTRY

OSHA 29 CFR 1910.146 identifies a confined space as a space that is large enough and so configured that an employee can physically enter and do assigned work, has limited or restricted means for entry and exit, and is not intended for continuous employee occupancy. Confined spaces include, but are not limited to, trenches, storage tanks, process vessels, pits, sewers, tunnels, underground utility vaults, pipelines, sumps, wells, and excavations.

Confined space entry by Roux employees is not anticipated to be necessary to complete the SI activities identified in Section 2.0. In the event that the scope of work changes or confined space entry appears necessary, the Project Manager will be consulted to determine if feasible engineering alternatives to confined space entry can be implemented. If confined space entry by Roux employees cannot be avoided through reasonable engineering measures, task-specific confined space entry procedures will be developed and a confined-space entry permit will be issued through Roux's corporate Health and Safety Director. Roux employees shall not enter a confined space without these procedures and permits in place.

14. FIRE PREVENTION AND PROTECTION

14.1 General Approach

Recommended practices and standards of the National Fire Protection Association (NFPA) and other applicable regulations will be followed in the development and application of Project Fire Protection Programs. When required by regulatory authorities, the project management will prepare and submit a Fire Protection Plan for the approval of the contracting officers, authorized representative or other designated official. Essential considerations for the Fire Protection Plan will include:

- Proper Site preparation and safe storage of combustible and flammable materials.
- Availability of coordination with private and public fire authorities.
- Adequate job-site fire protection and inspections for fire prevention.
- Adequate indoctrination and training of employees.

14.2 Equipment and Requirements

Fire extinguishers will be provided by each Contractor and are required on all heavy equipment and in each field trailer. Fire extinguishers will be inspected, serviced, and maintained in accordance with the manufacturer's instructions. As a minimum, all extinguishers shall be checked monthly and weighed semi-annually, and recharged if necessary. Recharge or replacement shall be mandatory immediately after each use.

14.3 Flammable and Combustible Substances

All storage, handling or use of flammable and combustible substances will be under the supervision of qualified persons. All tanks, containers and pumping equipment, whether portable or stationary, used for the storage and handling of flammable and combustible liquids, will meet the recommendations of the National Fire Protection Association.

14.4 Hot Work

If the scope of work necessitates welding or blowtorch operation, the hot work permit presented in Attachment B will be completed by the SSHO and reviewed/issued by the Project Manager.

15. EMERGENCY INFORMATION

In accordance with OSHA 29 CFR Part 1910, an Emergency Response Plan is attached to this HASP as Attachment A. The hospital route map is presented within Attachment A as Figure 1.

16. REFERENCES

New York State Department of Environmental Conservation. *DER-10; Technical Guidance for Site Investigation and Remediation.* May 2010.

TABLES

TABLE 1
TOXICITY DATA FOR CONSTITUENTS OF POTENTIAL CONCERN
HEALTH AND SAFETY PLAN
2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK

Parameter	Synonyms	CAS No.	Code	Concentration Limits [1]		
				PEL	TLV	IDLH
Volatile Organic Compounds (VOCs): ppm						
Carbon Tetrachloride	*Carbon chloride, carbon tet, Freon 10, Halon 104, Tetrachloromethane*	56-23-5	*Ca*	10	5	200
Trichloroethene	*Ethylene trichloride, TCE, Trilene*	79-01-6	*Ca*	100	100	1000
Semi-volatile Organic Compounds (SVOCs) [2] : mg/kg						
Benzo(a)anthracene	*none*	56-55-3	*none*	--	--	--
Benzo(a)pyrene	*none*	50-32-8	*none*	0.2	0.2	80
Benzo(b)fluoranthene	*none*	205-99-2	*none*	--	--	--
Chrysene	*none*	218-01-9	*none*	0.2	0.2	80
Dibenzo(a,h)anthracene	*none*	53-70-3	*none*	--	--	--
Indeno(1,2,3-cd)pyrene	*none*	193-39-5	*none*	--	--	--
Inorganic Compounds [2] : mg/kg						
Arsenic	*none*	7440-38-2	*Ca*	0.01	0.01	5

Notes:
1. Concentration limits as reported by NIOSH Pocket Guide to Chemical Hazards, February 2004 (NIOSH Publication No. 97-140, fourth printing with chages and updates.
2. " -- " = concentration limit not available; exposure should be minimized to the extent feasible through appropriate engineering controls & PPE.

Explanation:
Ca = NIOSH considers constituent to be a potential occupational carcinogen.
IDLH = Immediately Dangerous to Life or Health.
TLV = Threshold Limit Value, established by American Conference of Industrial Hygienists (ACGIH), equals the maximum exposure concentration allowable for 8 hours/day @ 40 hours/week. TLVs are the amounts of chemicals in the air that almost all healthy adult workers are predicted to be able to tolerate without adverse effects. There are three types.
TLV-TWA (TLV-Time-Weighted Average) which is averaged over the normal eight-hour day/forty-hour work week. (Most TLVs.)
TLV-C or Ceiling limits are the concentration that should not be exceeded during any part of the working exposure.
Unless the initials "STEL" or "C" appear in the Code column, the TLV value should be considered to be the eight-hour TLV-TWA.
PEL = Permissible Exposure Limit, established by OSHA, equals the maximium exposure conconcentration allowable for 8 hours/day @ 40 hours/week

ROUX

TABLE 2
POTENTIAL ROUTES OF EXPOSURE TO THE CONSTITUENTS OF POTENTIAL CONCERN
HEALTH AND SAFETY PLAN
2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK

Activity [1]	Direct Contact with Soil/Fill	Inhalation of Vapors or Dust	Direct Contact with Groundwater
Remedial Action Tasks			
3. Verification Sampling	x	x	
7. SVI and Ambient Air Sampling	x	x	

Notes:
1. Activity as described in Section 1.5 of the Health and Safety Plan.

ROUX

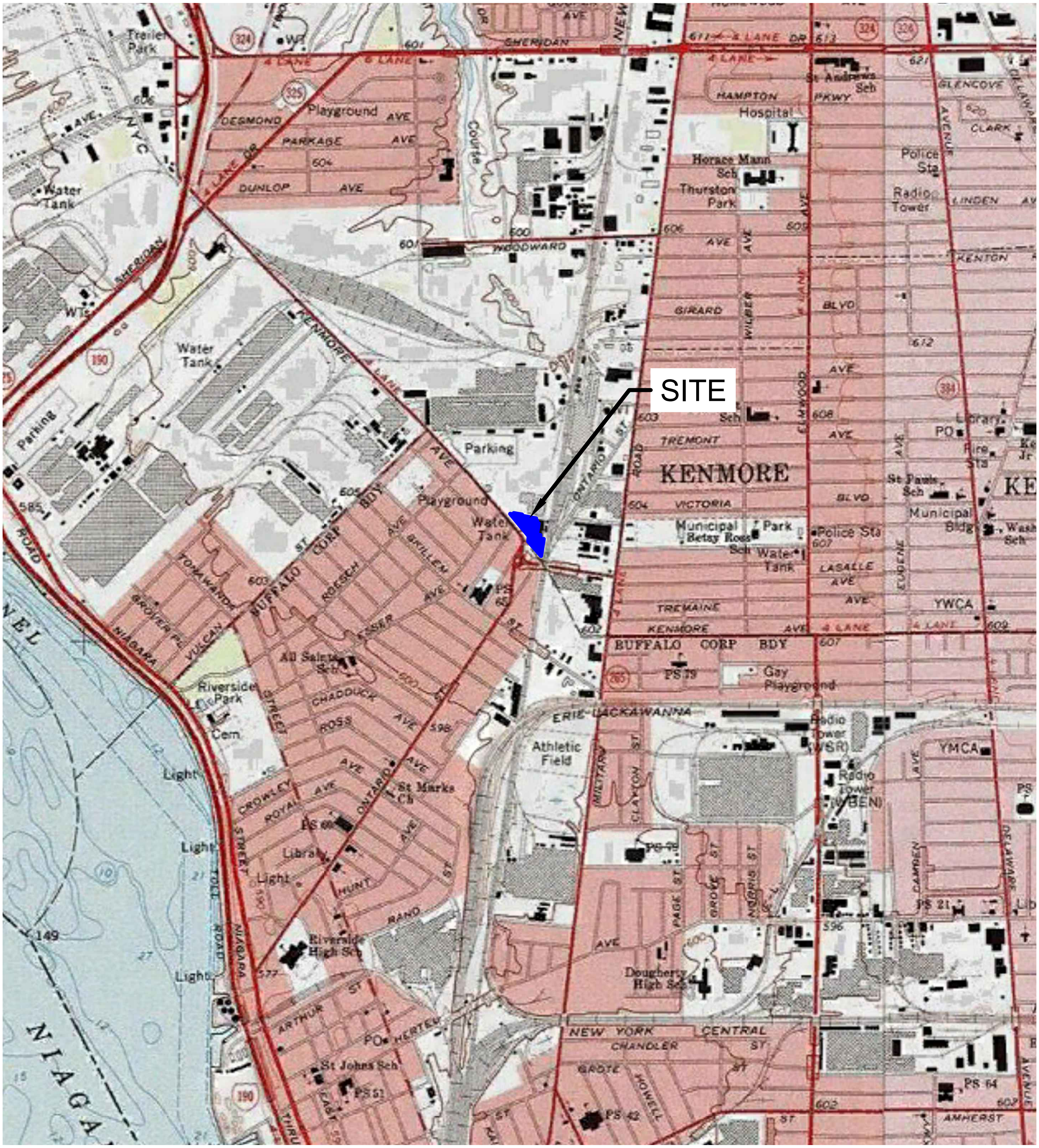
TABLE 3
REQUIRED LEVELS OF PROTECTION FOR RA TASTS
HEALTH AND SAFETY PLAN
2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK

Activity	Respiratory Protection [1]	Clothing	Gloves [2]	Boots [2, 3]	Other Required PPE/Modifications [2, 4]
Remedial Action Tasks					
3. Verification Sampling	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	HH SGSS
7. SVI and Ambient Air Sampling	Level D (upgrade to Level C if necessary)	Work Uniform or Tyvek	L/N	outer: L inner: STSS	HH SGSS

Notes:

1. Respiratory equipment shall conform to guidelines presented in Section 7.0 of this HASP. The Level C requirement is an air-purifying respirator equiped with organic compound/acid gas/dust cartridge.
2. HH = hardhat; L= Latex; L/N = latex inner glove, nitrile outer glove; N = Nitrile; S = Saranex; SG = safety glasses; SGSS = safety glasses with sideshields; STSS = steel toe safety shoes.
3. Latex outer boot (or approved overboot) required whenever contact with contaminated materials may occur. SSHO may downgrade to STSS (steel-toed safety shoes) if contact will be limited to cover/replacement soils.
4. Dust masks shall be donned as directed by the SSHO (site safety and health officer) or site safety technician whenever potentially contaminated airborne particulates (i.e., dust) are present in significant amounts in the breathing zone. Goggles may be substituted with safety glasses w/side-shields whenever contact with contaminated liquids is not anticipated.

FIGURES



N

2000' 0 2000'

Title:

SITE LOCATION AND VICINITY MAP

2101 KENMORE AVENUE SITE

BCP SITE NO. C915391

TONAWANDA, NEW YORK

HEALTH AND SAFETY PLAN

Prepared for:

WOOD AND BROOKS PROPERTIES LLC

ROUX

Compiled by: CMS	Date: MARCH 2025	FIGURE
Prepared by: CMS	Scale: AS SHOWN	1
Project Mgr: NTM	Project: 4405.0001B000	
File: FIGURE 1; SITE LOCATION AND VICINITY MAP.DWG		

F:\CAD\BENCHMARK\FRONTIER INSULATION\RAWP\HASP AND ERP\FIGURE 1; SITE LOCATION AND VICINITY MAP.DWG

LEGEND:

BCP BOUNDARY

PARCEL BOUNDARY

N

100' 0 100'

Title:

SITE PLAN (AERIAL)

2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK

HEALTH AND SAFETY PLAN

Prepared for:

WOOD AND BROOKS PROPERTIES LLC

ROUX

Compiled by: CMS	Date: MARCH 2025	FIGURE
Prepared by: CMS	Scale: AS SHOWN	2
Project Mgr: NTM	Project: 4405.0001B000	
File: FIGURE 2; SITE PLAN (AERIAL).DWG		

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ATTACHMENT A

EMERGENCY RESPONSE PLAN

Table of Contents

1. General 1
2. Pre-Emergency Planning 2
3. On-site Emergency Response Equipment 3
4. Emergency Planning Maps 4
5. Emergency Contacts 5
6. Emergency Alerting & Evacuation 6
7. Extreme Weather Conditions 7
8. Emergency Medical Treatment & First Aid 8
9. Emergency Response Critique & Record Keeping 9
10. Emergency Response Training 10

Figures

1. Hospital Route Map

1. General

This report presents the site-specific Emergency Response Plan (ERP) referenced in the Site Health and Safety Plan (HASP) prepared for Supplemental Investigation (SI) activities at the 2101 Kenmore Avenue Site in Tonawanda, New York. This attachment of the HASP describes potential emergencies that may occur at the Site; procedures for responding to those emergencies; roles and responsibilities during emergency response; and training all workers must receive in order to follow emergency procedures. This ERP also describes the provisions this Site has made to coordinate its emergency response planning with other contractors on-site and with off-site emergency response organizations.

This ERP is consistent with the requirements of 29 CFR 1910.120(l) and provides the following site-specific information:

- Pre-emergency planning.
- Personnel roles, lines of authority, and communication.
- Emergency recognition and prevention.
- Safe distances and places of refuge.
- Evacuation routes and procedures.
- Decontamination procedures.
- Emergency medical treatment and first aid.
- Emergency alerting and response procedures.
- Critique of response and follow-up.
- Emergency personal protective equipment (PPE) and equipment.

2. Pre-Emergency Planning

This Site has been evaluated for potential emergency occurrences, based on site hazards, the required work tasks, the site topography, and prevailing weather conditions. The results of that evaluation indicate the potential for the following site emergencies to occur at the locations indicated.

<u>Type of Emergency:</u>

1. Medical, due to physical injury

<u>Source of Emergency:</u>

1. Slip/trip/fall

<u>Location of Source:</u>

1. Non-specific

3. On-site Emergency Response Equipment

Emergency procedures may require specialized equipment to facilitate worker rescue, contamination control and reduction, or post-emergency clean up. Emergency response equipment available on the Site is listed below. The equipment inventory and storage locations are based on the potential emergencies described above. This equipment inventory is designed to meet on-site emergency response needs and any specialized equipment needs that off-site responders might require because of the hazards at this Site but not ordinarily stocked.

Any additional personal protective equipment (PPE) required and stocked for emergency response is also listed in below. During an emergency, the Emergency Response Coordinator (ERC) is responsible for specifying the level of PPE required for emergency response. At a minimum, PPE used by emergency responders will comply with Section 7.0, Personal Protective Equipment, of this HASP. Emergency response equipment is inspected at regular intervals and maintained in good working order. The equipment inventory is replenished as necessary to maintain response capabilities.

Emergency Equipment	Quantity	Location
First Aid Kit	1	Site Vehicle
Chemical Fire Extinguisher	2 (minimum)	All heavy equipment and Site Vehicle

Emergency PPE	Quantity	Location
Full-face respirator	1 for each worker	Site Vehicle
Chemical-resistant suits	4 (minimum)	Site Vehicle

4. Emergency Planning Maps

An area-specific map of the Site will be developed on a daily basis during performance of field activities. The map will be marked to identify critical on-site emergency planning information, including: emergency evacuation routes, a place of refuge, an assembly point, and the locations of key site emergency equipment. Site zone boundaries will be shown to alert responders to known areas of contamination. There are no major topographical features; however, the direction of prevailing winds/weather conditions that could affect emergency response planning are also marked on the map. The map will be posted at site-designated place of refuge and inside the Roux personnel field vehicle.

5. Emergency Contacts

The following identifies the emergency contacts for this ERP.

Emergency Telephone Numbers:

Project Manager: *Nathan Munley*

Work: (716) 856-0599

Mobile: (716) 289-1072

Corporate Health and Safety Director: *Thomas H. Forbes*

Work: (716) 856-0599

Mobile: (716) 864-1730

Site Safety and Health Officer (SSHO): *Nathan Munley*

Work: (716) 856-0599

Mobile: (716) 289-1072

Alternate SSHO: *Christopher Boron*

Work: (716) 856-0599

Mobile: (716) 864-2726

KENMORE MERCY HOSPITAL (ER):	(716) 447-6100
FIRE:	911
AMBULANCE:	911
PENN YAN POLICE:	911
STATE EMERGENCY RESPONSE HOTLINE:	(800) 457-7362
NATIONAL RESPONSE HOTLINE:	(800) 424-8802
NYSDOH:	(716) 847-4385
NYSDEC:	(716) 851-7220
NYSDEC 24-HOUR SPILL HOTLINE:	(800) 457-7252

The Site location is:

p/o 2101 Kenmore Avenue
Tonawanda, New York 14207
Site Phone Number: Roux Staff Cell Phones to be used.

6. Emergency Alerting & Evacuation

Internal emergency communication systems are used to alert workers to danger, convey safety information, and maintain site control. Any effective system can be employed. Two-way radio headsets or field telephones are often used when work teams are far from the command post. Hand signals and air-horn blasts are also commonly used. Every system must have a backup. It shall be the responsibility of each contractor's Site Health and Safety Officer to ensure all personnel entering the site understand an adequate method of internal communication. Unless all personnel are otherwise informed, the following signals shall be used.

1. Emergency signals by portable air horn, siren, or whistle: two short blasts, personal injury; continuous blast, emergency requiring site excavation.
2. Visual signals: hand gripping throat, out of air/cannot breathe; hands on top of head, need assistance; thumbs up, affirmative/ everything is OK; thumbs down, no/negative; grip partner's wrist or waist, leave area immediately.

If evacuation notice is given, site workers leave the worksite with their respective buddies, if possible, by way of the nearest exit. Emergency decontamination procedures detailed in Section 12.0 of the HASP are followed to the extent practical without compromising the safety and health of site personnel. The evacuation routes and assembly area will be determined by conditions at the time of the evacuation based on wind direction, the location of the hazard source, and other factors as determined by rehearsals and inputs from emergency response organizations. Wind direction indicators are located so that workers can determine a safe up wind or cross wind evacuation route and assembly area if not informed by the emergency response coordinator at the time the evacuation alarm sounds. Since work conditions and work zones within the site may be changing on daily basis, it shall be the responsibility of the construction Site Health and Safety Officer to review evacuation routes and procedures as necessary and to inform all Roux workers of any changes.

Personnel exiting the site will gather at a designated assembly point. To determine that everyone has successfully exited the site, personnel will be accounted for at the assembly site. If any worker cannot be accounted for, notification is given to the SSHO (***Nathan Munley*** or ***Christopher Boron***) so that appropriate action can be initiated. Contractors and subcontractors on this site have coordinated their emergency response plans to ensure that these plans are compatible and that source(s) of potential emergencies are recognized, alarm systems are clearly understood, and evacuation routes are accessible to all personnel relying upon them.

7. Extreme Weather Conditions

In the event of adverse weather conditions, the Site Safety and Health Officer in conjunction with the Contractor's SSHO will determine if engineering operations can continue without sacrificing the health and safety of site personnel. Items to be considered prior to determining if work should continue include but are not limited to:

- Potential for heat/cold stress.
- Weather-related construction hazards (e.g., flooding or wet conditions producing undermining of structures or sheeting, high wind threats, etc).
- Limited visibility.
- Potential for electrical storms.
- Limited site access/egress (e.g., due to heavy snow)

8. Emergency Medical Treatment & First Aid

Personnel Exposure:

The following general guidelines will be employed in instances where health impacts threaten to occur acute exposure is realized:

- Skin Contact: Use copious amounts of soap and water. Wash/rinse affected area for at least 15 minutes. Decontaminate and provide medical attention. Eyewash stations will be provided on site. If necessary, transport to Kenmore Mercy Hospital (Hospital).
- Inhalation: Move to fresh air and, if necessary, transport to Hospital.
- Ingestion: Decontaminate and transport to Hospital.

Personal Injury:

Minor first-aid will be applied on-site as deemed necessary. In the event of a life-threatening injury, the individual should be transported to Hospital via ambulance. The Site Health and Safety Officer will supply available chemical specific information to appropriate medical personnel as requested.

First aid kits will conform to Red Cross and other applicable good health standards, and shall consist of a weatherproof container with individually sealed packages for each type of item. First aid kits will be fully equipped before being sent out on each job and will be checked weekly by the SSHO to ensure that the expended items are replaced.

Directions to Kenmore Mercy Hospital (see Figure 1):

The following directions describe the best route from the Site to Kenmore Mercy Hospital:

- Turn left (southeast) from Site onto Kenmore Avenue toward the Kenmore Ave./Ontario St./Dunston Ave. traffic circle.
- Continue through traffic circle and follow Kenmore Avenue (east)
- Turn left (north) onto Military Road
- Turn right (east) onto Woodward Avenue
- Turn left (north) onto Elmwood Avenue
- Turn left (west) into Kenmore Mercy Hospital (2.0 miles total)

9. Emergency Response Critique & Record Keeping

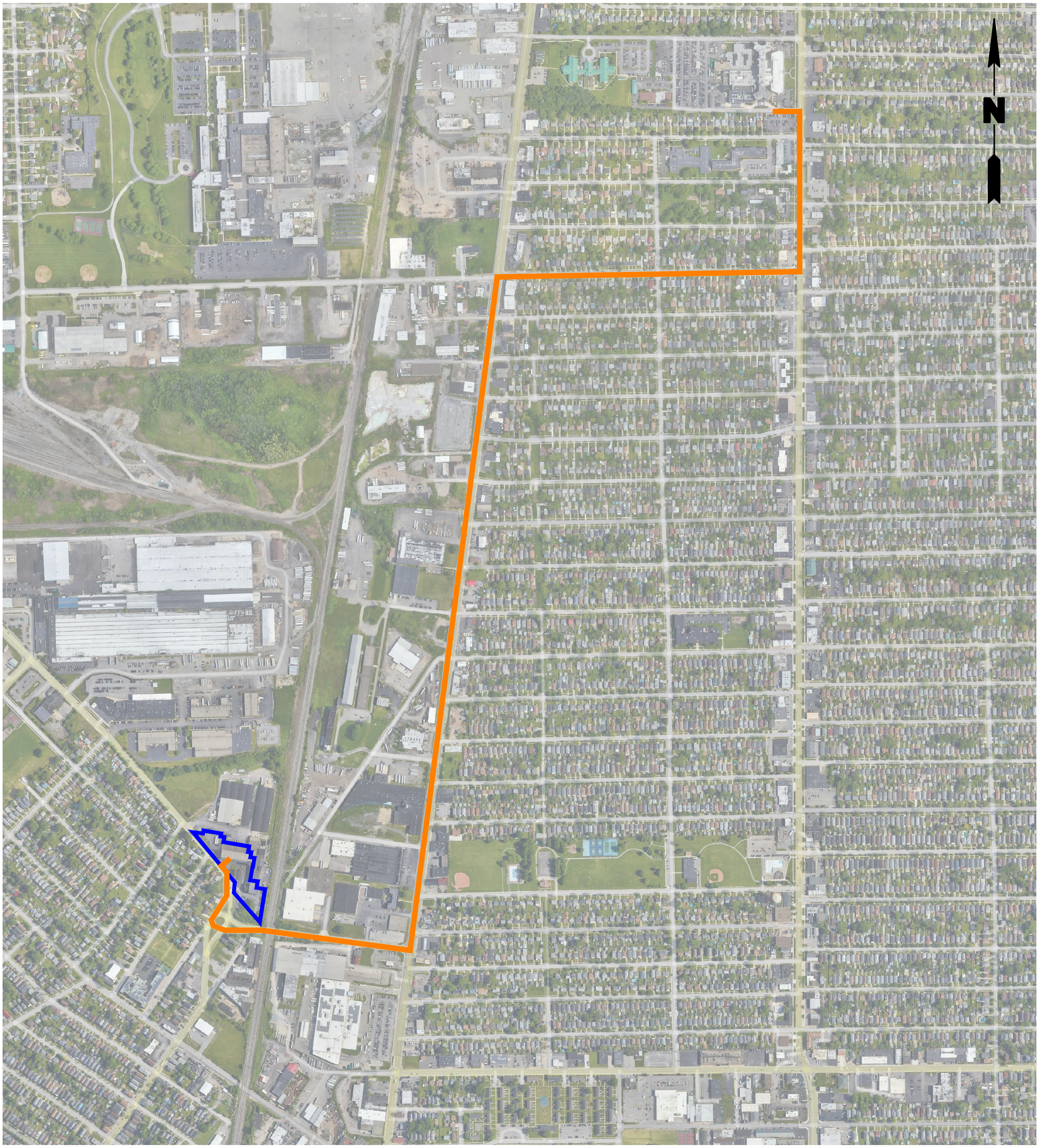
Following an emergency, the SSHO and Project Manager shall review the effectiveness of this Emergency Response Plan (ERP) in addressing notification, control and evacuation requirements. Updates and modifications to this ERP shall be made accordingly. It shall be the responsibility of each contractor to establish and assure adequate records of the following:

- Occupational injuries and illnesses.
- Accident investigations.
- Reports to insurance carrier or State compensation agencies.
- Reports required by the client.
- Records and reports required by local, state, federal and/or international agencies.
- Property or equipment damage.
- Third party injury or damage claims.
- Environmental testing logs.
- Explosive and hazardous substances inventories and records.
- Records of inspections and citations.
- Safety training.

10. Emergency Response Training

All persons who enter the worksite, including visitors, shall receive a site-specific briefing about anticipated emergency situations and the emergency procedures by the SSHO. Where this site relies on off-site organizations for emergency response, the training of personnel in those off-site organizations has been evaluated and is deemed adequate for response to this site.

FIGURE



- Turn left (southeast) from Site onto Kenmore Avenue toward the Kenmore Ave./Ontario St./Dunston Ave. traffic circle.
- Continue through traffic circle and follow Kenmore Avenue (east)
- Turn left (north) onto Military Road
- Turn right (east) onto Woodward Avenue
- Turn left (north) onto Elmwood Avenue
- Turn left (west) into Kenmore Mercy Hospital (2.0 miles total)

1000' 0 1000'

Title:

HOSPITAL ROUTE MAP
2101 KENMORE AVENUE SITE
BCP SITE NO. C915391
TONAWANDA, NEW YORK

EMERGENCY RESPONSE PLAN

Prepared for:

WOOD AND BROOKS PROPERTIES LLC

ROUX

Compiled by: CMS	Date: MARCH 2025	FIGURE
Prepared by: CMS	Scale: AS SHOWN	1
Project Mgr: NTM	Project: 4405.0001B000	
File: FIGURE 1; HOSPITAL ROUTE MAP.DWG		

F:\CAD\BENCHMARK\FRONTIER INSULATION\RAW\HASP AND ERP\FIGURE 1; HOSPITAL ROUTE MAP.DWG

ATTACHMENT B

HOT WORK PERMIT

ROUX

HOT WORK PERMIT

PART 1 - INFORMATION

Issue Date:

Date Work to be Performed: Start: Finish (permit terminated):

Performed By:

Work Area:

Object to be Worked On:

PART 2 - APPROVAL

(for 1, 2 or 3: mark Yes, No or NA)*

Will working be on or in: Finish (permit terminated):

1. Metal partition, wall, ceiling covered by combustible material?	yes	no
2. Pipes, in contact with combustible material?	yes	no
3. Explosive area?	yes	no

* = If any of these conditions exist (marked "yes"), a permit will not be issued without being reviewed and approved by Thomas H. Forbes (Corporate Health and Safety Director). Required Signature below.

PART 3 - REQUIRED CONDITIONS**

(Check all conditions that must be met)

	PROTECTIVE ACTION		PROTECTIVE EQUIPMENT
	Specific Risk Assessment Required		Goggles/visor/welding screen
	Fire or spark barrier		Apron/fireproof clothing
	Cover hot surfaces		Welding gloves/gauntlets/other:
	Move movable fire hazards, specifically		Wellintons/Knee pads
	Erect screen on barrier		Ear protection: Ear muffs/Ear plugs
	Restrict Access		B.A.: SCBA/Long Breather
	Wet the ground		Respirator: Type:
	Ensure adequate ventilation		Cartridge:
	Provide adequate supports		Local Exhaust Ventilation
	Cover exposed drain/floor or wall cracks		Extinguisher/Fire blanket
	Fire watch (must remain on duty during duration of permit)		Personal flammable gas monitor
	Issue additional permit(s):		

Other precautions:

** Permit will not be issued until these conditions are met.

SIGNATURES

Orginating Employee: Date:

Project Manager: Date:

Part 2 Approval: Date:

Prepared By: ___________

ATTACHMENT C

COMMUNITY AIR MONITORING PLAN

Appendix 1A
New York State Department of Health
Generic Community Air Monitoring Plan

<u>Overview</u>

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.

<u>Community Air Monitoring Plan</u>

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 <u>ground intrusive</u> 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 <u>non-intrusive</u> 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 mcg/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 mcg/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 mcg/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^{o} C (14 to 122^{o} 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.

Odor Management Plan

During intrusive remedial activities, the excavation of Grossly Contaminated Media (GCM) and/or In-Situ Solidification (ISS) activities may result in nuisance odors that require mitigation. Odor control measures may be implemented during intrusive activities, if needed, to address nuisance odors, including:

- Minimizing size and duration of open excavations;
- Minimizing size and duration of temporary soil/fill stockpiles, if any;
- Covering temporary soil/fill stockpiles, if any, with plastic sheeting;
- Placing tarps over open excavation faces when active excavation of that face is not being completed;
- Application of a commercially available odor control product on active excavation faces and/or stockpiled soil/fill;
- Application of commercially available odor masking product on the active excavation faces and/or upwind of the nuisance area;
- If odor mitigation measures noted above do not effectively mitigate nuisance odors, the excavation(s) may be backfilled and excavation work protocols reassessed.

This Plan is intended to supplement vapor and particulate monitoring that will be implemented at the Site in accordance with the Community Air Monitoring Plan. As part of this Odor Management Plan, odor assessments will be completed approximately every two hours during active remedial activities. Roux personnel will document the odor assessments on Inspector's Daily Reports and, when odor mitigation concerns require mitigation, problem identification and corrective measures reports as necessary. These project documentation forms are provided in Appendix F of the Remedial Action Work Plan (RAWP).

APPENDIX B

PROJECT DOCUMENTATION FORMS

AIR CANISTER FIELD RECORD

PROJECT INFORMATION:

Project:
Job No:
Location:
Field Staff:
Client:

SAMPLE I.D.:

Size of Canister:
Canister Serial No.:
Flow Controller No.:
Sample Date(s):
Shipping Date:
Sample Type: ☐ Indoor Air ☐ Outdoor Air
☐ Subslab, complete section below ☐ Soil Gas
Soil Gas Probe Depth:

WEATHER CONDITIONS:

Ambient Air Temp. - A.M.:
Ambient Air Temp. - P.M.:
Wind Direction:
Wind Speed:
Precipitation:

FIELD SAMPLING INFORMATION:

READING	TIME	VACUUM (inches Hg) or PRESSURE (psig)	DATE	INITIALS
Lab Vacuum (on tag)				
Field Vacuum Check [1]				
Initial Field Vacuum [2]				
Final Field Vacuum [3]				
Duration of Sample Collection				

LABORATORY CANISTER PRESSURIZATION:

Initial Vacuum (inches Hg and psia)		
Final Pressure (psia)		
Pressurization Gas		

SUBSLAB SHROUD:

Shroud Helium Concentration:
Calculated tubing volume: x 3 =
Purged Tubing Volume Concentration:
Is the purged volume concentration less than or equal to 10% in shroud?
☐ YES, continue sampling
☐ NO, improve surface seal and retest

COMPOSITE TIME (hours)	FLOW RATE RANGE (ml/min)
15 Min.	316 - 333
0.5 Hours	158 - 166.7
1	79.2 - 83.3
2	39.6 - 41.7
4	19.8 - 20.8
6	13.2 - 13.9
8	9.9 - 10.4
10	7.92 - 8.3
12	6.6 - 6.9
24	3.5 - 4.0

NOTES:

1 Vacuum measured using portable vacuum gauge (provided by Lab)
2 Vacuum measured by canister gauge upon opening valve
3 Vacuum measured by canister gauge prior to closing valve

Signed:

ROUX

COMMUNITY AIR MONITORING DAILY LOG

Date:
Project:
Job No.:
Client:

LOCATION of ACTIVITIES/MONITORING STATIONS (Provide Sketch on Attached Map):

WEATHER CONDITIONS:

Time of Day:	A.M.	P.M.
Ambient Air Temp.:		
Wind Direction:		
Wind Speed:		
Precipitation:		

DESCRIPTION OF SITE ACTIVITIES:

PARTICULATE MONITORING	Location	Time	Value	Duration	Corrective Measures Taken (Eng Controls/Work Stoppage, etc.)
Exceedence of 100 ug/m3 [1]					
Exceedence of 150 ug/m3 [1]					
Visual Observation of Fugitive Dust			NA		
			NA		
			NA		

VOC MONITORING	Location	Time	Value	Duration	Corrective Measures Taken (Eng Controls/Work Stoppage, etc.)
Exceedence of 5 ppm [1]					Temporarily halt Work and continue monitoring
Reading of 5 to 25 ppm [1]					Temporarily halt Work, abate emissions with corrective actions and continue monitoring [3]
Exceedence of 25 ppm [2]					Shut Down Work Immediately and notify Site Safety & Health Officer

1. Above background for 15 minute moving average.
2. Above background at Site perimeter (indicate location on attached sketch)
3. Work may resume when total VOC conc. 200 ft downwind or half the distance to nearest receptor (whicever is less) is below 5 ppm for 15 min.

NOTE: All exceedences are to be reported to Benchmark within 15 minutes.

Prepared By: Date:
Checked By: Date:

ROUX

INDOOR AIR QUALITY QUESTIONNAIRE & BUILDING INVENTORY

Project Name: Project No.

Project Location: Client:

Preparer's Name: Date/Time:

Preparer's Affiliation: Phone No:

Purpose of Investigation:

1. OCCUPANT:

Interviewed: yes no

Last Name: First Name:

Address:

County:

Home Phone: Office Phone:

Number of Occupants/persons at this location: Age of Occupants:

2. OWNER OR LANDLORD: (check if same as occupant_____)

Interviewed: yes no

Last Name: First Name:

Address:

County:

Home Phone: Office Phone:

3. BUILDING CHARACTERISTICS

Type of Building: check appropriate response)

☐ Residential	☐ School	☐ Commercial/Multi-use
☐ Industrial	☐ Church	☐ Other:

If the property is residential, type? (check appropriate response)

☐ Ranch	☐ 2-Family	☐ 3-Family
☐ Raised Ranch	☐ Split Level	☐ Colonial
☐ Cape Cod	☐ Contemporary	☐ Mobile Home
☐ Duplex	☐ Apartment House	☐ Townhouse/Condo
☐ Modular	☐ Log Home	☐ Other:

If multiple units, how many?

If the property is commercial, type?

Business Type(s):

Does it include residences (i.e., multi-use)? yes no If yes, how many?

Other Characteristics:

Number of floors Building age

Is the building insulated? yes no How air tight? tight average not tight

INDOOR AIR QUALITY QUESTIONNAIRE & BUILDING INVENTORY

4. AIR FLOW

Use air current tubes or tracer smoke to evaluate air flow patterns and qualitatively describe:

Airflow between floors

Airflow near source

Outdoor air infiltration

Infiltration into air ducts

5. BASEMENT AND CONSTRUCTION CHARACTERISTICS (check all that apply)

a. Above grade construction:	☐ wood frame	☐ concrete	☐ stone
b. Basement type:	☐ full	☐ crawlspace	☐ slab
c. Basement floor:	☐ concrete	☐ dirt	☐ stone
d. Basement floor:	☐ uncovered	☐ covered	☐ covered with
e. Concreter floor:	☐ unsealed	☐ sealed	☐ sealed with
f. Foundation walls:	☐ poured	☐ block	☐ stone
g. Foundation walls:	☐ unsealed	☐ sealed	☐ sealed with
h. The basement is:	☐ wet	☐ damp	☐ dry
i. The basement is:	☐ finished	☐ unfinished	☐ partially finished
j. Sump present?	☐ yes	☐ no	
k. Water in Sump?	☐ yes	☐ no	☐ not applicable

Basement/Lowest level depth below grade:

Identify potential soil vapor entry points and approximate size (e.g., cracks, utility ports, drains)

INDOOR AIR QUALITY QUESTIONNAIRE & BUILDING INVENTORY

6. HEATING, VENTING, and AIR CONDITIONING (check all that apply)

Type of heating system(s) used in this building: (check all that apply - note primary)

☐ Hot air circulation ☐ Heat pump ☐ Hot water baseboard
☐ Space Heaters ☐ Steam radiation ☐ Radiant floor
☐ Electric baseboard ☐ Wood stove ☐ Outdoor wood boiler
☐ Other ____________________

The primary type of fuel used is:

☐ Natural Gas ☐ Fuel oil ☐ Kerosene
☐ Electric ☐ Propane ☐ Solar
☐ Wood ☐ Coal ☐ Other ____________________

Domestic hot water tank fueled by: ____________________

Boiler/furnace located in:

☐ Basement ☐ Outdoors ☐ Main Floor ☐ Other ____________________

Air Conditioning:

☐ Central Air ☐ Window units ☐ Open Windows ☐ None ____________________

Are there air distribution ducts present? ☐ yes ☐ no

Describe the supply and cold air return ductwork, and its condition where visible, including whether there is a cold air return and the tightness of duct joints. Indicate the locations on the floor plan diagram.

____
____
____
____

7. OCCUPANCY

Is basement/lowest level occupied? ☐ Full-time ☐ Occaisionally ☐ Seldom ☐ Almost Never

Level	**General Use of Each Floor** (e.g., family room, bedroom, laundry, workshop, storage)
Basement	
First Floor	
Second Floor	
Third Floor	
Fourth Floor	

8. FACTORS THAT MAY INFLUENCE INDOOR AIR QUALITY

a. Is there an attached garage? ☐ yes ☐ no

b. Does the garage have a separate heating unit? ☐ yes ☐ no ☐ NA

c. Are petroleum-powered machines or vehicles stored in the garage? ☐ yes ☐ no ☐ NA
(e.g., lawnmower, atv, car) If yes, please specify: ____________________

d. Has the building ever had a fire? ☐ yes ☐ no
If yes, when? ____________________

e. Is a kerosene or unvented gas space heater present? ☐ yes ☐ no
If yes, where? ____________________

f. Is there a workshop or hobby/craft area? ☐ yes ☐ no
If yes, where and type? ____________________

g. Is there smoking in the building? ☐ yes ☐ no
If yes, how frequently? ____________________

h. Have cleaning products been used recently? ☐ yes ☐ no
If yes, when & type? ____________________

i. Have cosmetic products been used recently? ☐ yes ☐ no
If yes, when & type? ____________________

j. Has painting/staining been done in the last 6 months? ☐ yes ☐ no
If yes, where & when? ____________________

k. Is there new carpet, drapes, or other textiles? ☐ yes ☐ no
If yes, where & when? ____________________

l. Have air fresheners been used recently? ☐ yes ☐ no
If yes, when & type? ____________________

m. Is there a kitchen exhaust fan? ☐ yes ☐ no
If yes, where vented? ____________________

n. Is there a bathroom exhaust fan? ☐ yes ☐ no
If yes, where vented? ____________________

8. FACTORS THAT MAY INFLUENCE INDOOR AIR QUALITY (continued)

o. Is there a clothes dryer? ☐ yes ☐ no

If yes, is it vented outside? yes no

p. Has there been a pesticide application? ☐ yes ☐ no

If yes, when & type? ______

q. Are there odors in the building? ☐ yes ☐ no

If yes, please describe? ______

r. Do any of the building occupants use solvents at work? ☐ yes ☐ no

(e.g., chemical manufacturing or laboratory, auto mechanic or auto body shop, painting, fuel oil delivery, boiler mechanic, pesticide application, cosmetologist)

If yes, what types of solvents are used? ______

If yes, are their clothes washed at work? ☐ yes ☐ no

s. Do any of the building occupants regularly use or work at a dry-cleaning service?

(check appropriate response)

☐ yes, use dry-cleaning regularly (weekly) ☐ no

☐ yes, use dry-cleaning infrequently (monthly or less) ☐ unknown

☐ yes, work at a dry-cleaning service

t. Is there a radon mitigation system for the building/structure? ☐ yes ☐ no

If yes, date of installation? ______

Is the system active or passive? ______

9. WATER AND SEWAGE

Water Supply: ☐ Public Water ☐ Drilled Well ☐ Driven Well ☐ Dug Well

☐ Other: ______

Sewage Disposal: ☐ Public Sewer ☐ Septic Tank ☐ Leach Field ☐ Dry Well

☐ Other: ______

10. RELOCATION INFORMATION (for oil spill residential emergency)

a. Provide reasons why relocation is recommended: ______

b. Residents choose to: ☐ remain in home ☐ relocate to friends/family ☐ relocate to hotel/motel

c. Responsibility for costs associated with reimbursement explained? ☐ yes ☐ no

d. Relocation package provided and explained to residents? ☐ yes ☐ no

11. FLOOR PLANS

Draw a plan view sketch of the basement and first floor of the building. Indicate air sampling locations, possible indoor air pollution sources and PID meter readings. If the building does not have a basement, please note.

Basement:

First Floor:

12. OUTDOOR PLOT

Draw a sketch of the area surrounding the building being sampled. If applicable, provide information on spill locations, potential air contamination sources (industries, gas stations, repair shops, landfills, etc.), outdoor air sampling location(s), and PID meter readings.

Also indicate compass direction, wind direction and speed during sampling, the locations of the well and spetic system, if applicable, and a qualifying statement to help locate the site on a topographic map.

13. PRODUCT INVENTORY FORM

Make & Model of field instrument used: ______________________

List specific products found in the structure that have the potential to affect indoor air quality.

Location	Product Description	Size (units)	Condition [1]	Chemical Ingredients	Field Instrument Reading (units)	Photo (Y/N)

Notes:
1. Describe the condition of the product containers as **Unopened (UO), Used (U),** or **Deteriorated (D).**
2. Photographs of the **front and back** of product containers can replace the handwritten list of chemical ingredients. However, the photographs must be of good quality and ingredient labels must be legible.

ROUX

DAILY LOG				
	DATE			
	REPORT NO.			
	PAGE	OF		

CORRECTIVE MEASURES REPORT

Date:
Project:
Job No:
Location:
CQA Monitor(s):
Client:
Contractor:
Contractor's Supervisor:

WEATHER CONDITIONS:

Ambient Air Temp. - A.M.:
Ambient Air Temp. - P.M.:
Wind Direction:
Wind Speed:
Precipitation:

Corrective Measures Undertaken (reference Problem Identification Report No.)

Retesing Location:

Suggested Method of Minimizing Re-Occurrence:

Approvals (initial):

CQA Engineer:

Project Manager:

Signed:

CQA Representative

ROUX

DAILY LOG			
DATE			
NO.			
SHEET	OF		

FIELD ACTIVITY DAILY LOG

PROJECT NAME:	PROJECT NO.
PROJECT LOCATION:	CLIENT:
FIELD ACTIVITY:	
DESCRIPTION OF DAILY ACTIVITIES AND EVENTS:	
TIME	DESCRIPTION

VISITORS ON SITE:	CHANGES FROM PLANS AND SPECIFICATIONS, AND OTHER SPECIAL ORDERS AND IMPORTANT DECISIONS:
WEATHER CONDITIONS: A.M.: P.M.:	IMPORTANT TELEPHONE CALLS:
PERSONNEL ON SITE:	
SIGNATURE	DATE:

DAILY LOG				
	DATE			
	REPORT NO.			
	PAGE	OF		

Date:

Project:

Job No:

Location:

CQA Monitor(s):

Client:

Contractor:

Contractor's Supervisor:

PROBLEM IDENTIFICATION REPORT

WEATHER CONDITIONS:

Ambient Air Temp. - A.M.:

Ambient Air Temp. - P.M.:

Wind Direction:

Wind Speed:

Precipitation:

Problem Description:

Problem Location (reference test location, sketch on back of form as appropriate):

Problem Causes:

Suggested Corrective Measures or Variances:

Linked to Corrective Measures Report No. or Variance Log No.

Approvals (initial):

CQA Engineer:

Project Manager:

Signed:

CQA Representative

APPENDIX C

FIELD OPERATING PROCEDURES

FIELD OPERATING PROCEDURES

ROUX ENVIRONMENTAL ENGINEERING & GEOLOGY, D.P.C.

FOP Number	Description
004.7	Soil Vapor Sample Collection Procedure
090.0	Outdoor Ambient Air VOC Sample Collection Procedure

Notes:

1. FOPs are identified by the sequential FOP number and revision number.

ROUX

FIELD OPERATING PROCEDURES

Soil Vapor Sample Collection Procedures

FOP 004.7

SOIL VAPOR SAMPLE
COLLECTION PROCEDURE

BACKGROUND

In October 2006, the New York State Department of Health (NYSDOH) finalized their vapor intrusion guidance document entitled "Guidance for Evaluating Soil Vapor Intrusion in the State of New York." (www.health.state.ny.us/nysdoh/gas/svi_guidance/), which has been guiding NYSDOH and New York State Department of Environmental Conservation (NYSDEC) decisions concerning the need for subslab vapor mitigation at sites undergoing investigation, cleanup and monitoring under formal NY Sate remedial programs (e.g., Brownfield Cleanup Program sites, Inactive Hazardous Waste Site Remediation Program sites, etc.). Per the most recent update, February 2024, guidance presents six (6) soil vapor/indoor air matrices to assist in interpreting the comparison of subslab and ambient air data. As of February 2024, 20 compounds have been assigned to these six (6) current matrices (i.e., "Matrix A", "Matrix B", "Matrix C", "Matrix D", "Matrix E", and "Matrix F") as follows:

Soil Vapor / Indoor Air Matrix	Volatile Chemical
Matrix A	Carbon tetrachloride
	1,1-Dichloroethene
	cis-1,2-Dichloroethene
	Trichloroethene
Matrix B	Methylene Chloride
	Tetrachlorethene
	1,1,1-Trichloroethane
Matrix C	Vinyl chloride
Matrix D	Benzene
	Ethylbenzene
	Naphthalene

	Cyclohexane
	Isooctane (2,2,4-Trimethylpentane)
	1,2,4-Trimethylbenzene
	1,3,5-Trimethylbenzene
	o-Xylene
Matrix E	m,p-Xylene
	Heptane
	Hexane
Matrix F	Toluene

The matrices are attached as Figures 1 through 6.

PURPOSE

The procedures presented herein delineate the scope of additional investigation at a building on the project site to determine if volatile organic compounds (VOCs) detected in groundwater and/or soil near the building are intruding into the building airspace or have the potential, in sufficient concentrations, to adversely impact indoor air quality. The soil vapor, subslab vapor, and ambient air monitoring procedures follow the NYSDOH Guidance for Evaluating Soil Vapor Intrusion in the State of New York (October 2006) as well as USEPA Methods TO-14 and TO-15, for volatile organic compounds (VOCs) using Summa passive canisters.

SURVEYS AND PRE-SAMPLING BUILDING PREPARATION (IF REQUIRED)

If required, a pre-sampling inspection should be performed prior to each sampling event to identify and minimize conditions that may interfere with the proposed testing. The inspection should evaluate the type of structure, floor layout, airflows, and physical conditions of the building(s) being studied. This information, along with information on sources of potential indoor air contamination, should be identified on a building inventory form. An example of the building inventory form is attached. Items to be included in the building inventory include the following:

- Construction characteristics, including foundation cracks and utility penetrations or other openings that may serve as preferential pathways for vapor intrusion;
- Presence of an attached garage;
- Recent renovations or maintenance to the building (e.g., fresh paint, new carpet or furniture);
- Mechanical equipment that can affect pressure gradients (e.g., heating systems, clothes dryers or exhaust fans);
- Use or storage of petroleum products (e.g., fuel containers, gasoline operated equipment and unvented kerosene heaters); and
- Recent use of petroleum-based finishes or products containing volatile chemicals.

Each room on the floor of the building being tested and on lower floors, if possible, should be inspected. This is important because even products stored in another area of a building can affect the air of the room being tested.

The presence and description of odors (e.g., solvent, moldy) and portable vapor monitoring equipment readings (e.g., PIDs, ppb RAE, Jerome Mercury Vapor Analyzer, etc.) should be noted and used to help evaluate potential sources. This includes taking readings near products stored or used in the building.

Potential interference from products or activities releasing volatile chemicals may need to be controlled. Removing the source from the indoor environment prior to testing is the most effective means of reducing interference. Ensuring that containers are tightly sealed may be acceptable. When testing for volatile organic compounds, containers should be tested with portable vapor monitoring equipment to determine whether compounds are leaking. The inability to eliminate potential interference may be justification for not testing, especially when testing for similar compounds at low levels. The investigator should consider the possibility that chemicals may adsorb onto porous materials and may take time to dissipate.

In some cases, the goal of the testing is to evaluate the impact from products used or stored in the building (e.g., pesticide misapplications, school renovation projects). If the goal of the testing is to determine whether products are an indoor volatile chemical contaminant source, the removing these sources does not apply.

Once interfering conditions are corrected (if applicable), ventilation may be needed prior to sampling to eliminate residual contamination in the indoor air. If ventilation is appropriate, it should be completed 24 hours or more prior to the scheduled sampling time. Where applicable, ventilation can be accomplished by operating the building's HVAC system to maximize outside air intake. Opening windows and doors, and operating exhaust fans may also help or may be needed if the building has no HVAC system.

Air samples are sometimes designed to represent typical exposure in a mechanically ventilated building and the operation of HVAC systems during sampling should be noted on the building inventory form (see attached sample). In general, the building's HVAC system should be operating under normal conditions. Unnecessary building ventilation should be avoided within 24 hours prior to and during sampling. During colder months, heating systems should be operating to maintain normal indoor air temperatures (i.e., 65 – 75 °F) for at least 24 hours prior to and during the scheduled sampling time.

Depending upon the goal of the indoor air sampling, some situations may warrant deviation from the above protocol regarding building ventilation. In such cases, building conditions and sampling efforts should be understood and noted within the framework and scope of the investigation.

To avoid potential interferences and dilution effects, every effort should be made to avoid the following for 24 hours prior to sampling:

- Opening any windows, fireplace dampers, openings or vents;
- Operating ventilation fans unless special arrangements are made;
- Smoking in the building;
- Painting;
- Using a wood stove, fireplace or other auxiliary heating equipment (e.g., kerosene heater);
- Operating or storing automobile in an attached garage;
- Allowing containers of gasoline or oil to remain within the house or garage area, except for fuel oil tanks;
- Cleaning, waxing or polishing furniture, floors or other woodwork with petroleum- or oil-based products;
- Using air fresheners, scented candles or odor eliminators;
- Engaging in any hobbies that use materials containing volatile chemicals;
- Using cosmetics including hairspray, nail polish, nail polish removers, perfume/cologne, etc.;
- Lawn mowing, paving with asphalt, or snow blowing;
- Applying pesticides; and
- Using building repair or maintenance products, such as caulk or roofing tar.

PRODUCT INVENTORY (IF REQUIRED)

If required, the primary objective of the product inventory is to identify potential air sampling interference by characterizing the occurrence and use of chemicals and products throughout the building, keeping in mind the goal of the investigation and site-specific contaminants of concern. For example, it is not necessary to provide detailed information for each individual container of like items. However, it is necessary to indicate that "20 bottles of perfume" or "12 cans of latex paint" were present with containers in good condition. This information is used to help formulate an indoor environment profile.

An inventory should be provided for each room on the floor of the building being tested and on lower floors, if possible. This is important because even products stored in another area of a building can affect the air of the room being tested.

The presence and description of odors (e.g., solvent, moldy) and portable vapor monitoring equipment readings (e.g., PIDs, ppb RAE, Jerome Mercury Vapor Analyzer, etc.) should be noted and used to help evaluate potential sources. This includes taking readings near products stored or used in the building. Products in buildings should be inventoried every time air is tested to provide an accurate assessment of the potential contribution of volatile chemicals. If available, chemical ingredients of interest (e.g., analyte list) should be recorded for each product. If the ingredients are not listed on the label, record the product's exact and full name, and the manufacturer's name, address and telephone number, if available. In some cases, Material Safety Data Sheets (MSDS) may be useful for identifying confounding sources of volatile chemicals in air. Adequately documented photographs of the products and their labeled ingredients can supplement the inventory and facilitate recording the information.

SAMPLE LOCATIONS

The following are types of samples that are collected to investigate the soil vapor intrusion pathway:

- Subsurface vapor samples:

  - *Soil vapor* samples (i.e., soil vapor samples not beneath the foundation or slab of a building) and
  - *Sub-slab vapor* samples (i.e., soil vapor samples immediately beneath the foundation or slab of a building);
- Indoor air samples; and
- Outdoor air samples.

The types of samples that should be collected depend upon the specific objective(s) of the sampling, as described below.

- <u>Soil vapor</u>
  Soil vapor samples are collected to determine whether this environmental medium is contaminated, characterize the nature and extent of contamination, and identify possible sources of the contamination. Soil vapor sampling results are used when evaluating the following:
  - The potential for *current* human exposures;
  - The potential for *future* human exposures (e.g., should a building be constructed); and
  - The effectiveness of measures implemented to remediate contaminated subsurface vapors.

- <u>Sub-slab vapor</u>
  Sub-slab vapor samples are collected to characterize the nature and extent of soil vapor contamination immediately beneath a building with a basement foundation and/or a slab-on-grade. Sub-slab vapor sampling results are used when evaluating the following:
  - *Current* human exposures;
  - The potential for *future* human exposures (e.g., if the structural integrity of the building changes or the use of the building changes); and
  - Site-specific attenuation factors (i.e., the ratio of indoor air to sub-slab vapor concentrations).

  Sub-slab vapor samples are collected after soil vapor characterization and/or other environmental sampling (e.g., soil and groundwater characterization) indicate a need. Subslab samples are typically collected concurrently with indoor and outdoor air samples. However, outside of the heating season, sub-slab vapor samples may be collected independently depending on the sampling objective (e.g., characterize the extent of subsurface vapor contamination outside of the heating season to develop a more comprehensive, focused investigation plan for the heating season).

- Indoor air

  Indoor air samples are collected to characterize exposures to air within a building, including those with earthen floors and crawlspaces. Indoor air sampling results are used when evaluating the following:
  - *Current* human exposures;
  - The potential for *future* exposures (e.g., if a currently vacant building should become occupied); and
  - Site-specific attenuation factors (e.g., the ratio of indoor air to sub-slab vapor concentrations).

  Indoor air samples are collected after subsurface vapor characterization and other environmental sampling (e.g., soil and groundwater characterization) indicate a need. When indoor air samples are collected, concurrent sub-slab vapor and outdoor air samples are collected to evaluate the indoor air results appropriately. However, indoor air and outdoor air samples, without sub-slab vapor samples, may be collected when confirming the effectiveness of a mitigation system.

  In addition, site-specific situations may warrant collecting indoor air samples prior to characterizing subsurface vapors and/or without concurrent sub-slab sampling due to a need to examine immediate inhalation hazards. Examples of such situations may include, but are not limited to, the following:
  - In response to a spill event when there is a need to qualitatively and/or quantitatively characterize the contamination;
  - If high readings are obtained in a building when screening with field equipment (e.g., a photoionization detector (PID), an organic vapor analyzer, or an explosimeter) and the source is unknown;
  - If significant odors are present and the source needs to be characterized; or
  - If groundwater beneath the building is contaminated, the building is prone to groundwater intrusion or flooding (e.g., sump pit overflows), and subsurface vapor sampling is not feasible.

- Outdoor air

  Outdoor air samples are collected to characterize site-specific background outdoor air conditions. These samples must be collected simultaneously with indoor air samples. They may also be collected concurrently with soil vapor samples. Outdoor air sampling results are primarily used when evaluating the extent to which outdoor sources may be influencing indoor air quality. They may also be used in the evaluation of soil vapor results (i.e., to identify potential outdoor air interferences associated with the infiltration of outdoor air into the sampling apparatus while the soil vapor sample was collected).

SOIL VAPOR SAMPLE COLLECTION PROCEDURES

Soil vapor probe installations (see Figure 4 attached) may be permanent, semi-permanent, or temporary. In general, permanent installations are preferred for data consistency reasons. Soil implants or probes should be constructed in the same manner at all sampling locations to minimize possible discrepancies. The following procedures should be included in any construction protocol:

- Soil vapor probes should be installed using direct push technology or, if necessary to attain the desired depth, using an auger;

- Porous backfill material (e.g., glass beads or coarse sand) should be used to create a sampling zone 1 to 2 feet in length;

- Soil vapor probes should be fitted with inert tubing (e.g., polyethylene, stainless steel, or Teflon®) of the appropriate size (typically 1/8 inch to 1/4 inch diameter) and of laboratory or food grade quality to the surface;

- Soil vapor probes should be sealed above the sampling zone with a bentonite slurry for a minimum distance of 3 feet to prevent outdoor air infiltration and the remainder of the borehole backfilled with clean material;

- For multiple probe depths, the borehole should be grouted with bentonite between probes to create discrete sampling zones; and

- For permanent installations, a protective casing should be set around the top of the probe tubing and grouted in place to the top of bentonite to minimize infiltration of water or outdoor air, as well as to prevent accidental damage.

Soil vapor samples should be collected in the same manner at all locations to minimize possible discrepancies. The following procedures should be included in any sampling protocol:

- At least 24 hours after the installation of permanent probes and shortly after the installation of temporary probes, one to three implant volumes (i.e., the volume of the sample probe and tube) must be purged prior to collecting the samples to ensure samples collected are representative;

- Flow rates for both purging and collecting must not exceed 0.2 liters per minute to minimize outdoor air infiltration during sampling;

- The target final field vacuum after 24 hours will be approximately -5 inches of mercury. Samples with a final field vacuum of greater than -10 inches of mercury, or equal to zero, will be flagged (usability of data will depend on sample volume and reporting limits that can be achieved).

- Samples must be collected, using conventional sampling methods, in an appropriate container — one which meets the objectives of the sampling (e.g., investigation of areas where low or high concentrations of volatile chemicals are expected; to minimize losses of volatile chemicals that are susceptible to photodegradation), meets the requirements of the sampling and analytical methods (e.g., low flow rate; Summa® canisters if analyzing by using EPA Method TO-15), and is certified clean by the laboratory;

- Sample size depends upon the volume of sample required to achieve minimum reporting limit requirements; and

- A tracer gas (e.g., helium, butane, or sulfur hexafluoride) must be used when collecting soil vapor samples to verify that adequate sampling techniques are being implemented (i.e., to verify infiltration of outdoor air is not occurring) (discussed later in this procedure). Once verified, continued use of the tracer gas may be reconsidered.

When soil vapor samples are collected, the following actions should be taken to document local conditions during sampling that may influence interpretation of the results:

- If sampling near a commercial or industrial building, uses of volatile chemicals during normal operations of the facility should be identified;

- Outdoor plot sketches should be drawn that include the site, area streets, neighboring commercial or industrial facilities (with estimated distance to the site), outdoor ambient air sample locations (if applicable), and compass orientation (north);

- Weather conditions (e.g., precipitation, outdoor temperature, barometric pressure, wind speed and direction) should be noted for the past 24 to 48 hours; and

- Any pertinent observations should be recorded, such as odors and readings from field instrumentation.

The field sampling team must maintain a sample log sheet summarizing the following:

- Sample identification,
- Date and time of sample collection,
- Sampling depth,
- Identity of samplers,
- Sampling methods and devices,
- Purge volumes,
- Volume of soil vapor extracted,
- If canisters used, the vacuum before and after samples collected,
- Apparent moisture content (dry, moist, saturated, etc.) of the sampling zone, and
- Chain of custody protocols and records used to track samples from sampling point to analysis.

SUB-SLAB VAPOR SAMPLE COLLECTION PROCEDURES

During colder months, heating systems should be operating to maintain normal indoor air temperatures (i.e., 65 – 75 °F) for at least 24 hours prior to and during the scheduled sampling time. Prior to installation of the sub-slab vapor probe, the building floor should be inspected and any penetrations (cracks, floor drains, utility perforations, sumps, etc.) should be noted and recorded. Probes should be installed at locations where the potential for ambient air infiltration via floor penetrations is minimal.

Sub-slab vapor probe installations (see Figure 5 attached) may be permanent, semi-permanent, or temporary. Sub-slab implants or probes should be constructed in the same manner at all sampling locations to minimize possible discrepancies. The following procedures should be included in any construction protocol:

- Permanent recessed probes must be constructed with brass or stainless steel tubing and fittings;
- Temporary probes must be constructed with polyethylene or Teflon® tubing of laboratory or food grade quality;
- Tubing should not extend further than 2 inches into the sub-slab material;
- Coarse sand or glass beads should be added to cover about 1 inch of the probe tip for permanent installations; and
- The soil vapor probe should be sealed to the surface with permagum grout, melted beeswax, putty or other non-VOC-containing and non-shrinking products for temporary installations or cement for permanent installations.

Sub-slab vapor samples should be collected in the following manner:

- After installation of the probes, one to three volumes (i.e., the volume of the sample probe and tube) must be purged prior to collecting the samples to ensure samples collected are representative;
- Flow rates for both purging and collecting must not exceed 0.2 liters per minute to minimize outdoor air infiltration during sampling;
- The target final field vacuum after 24 hours will be approximately -5 inches of mercury. Samples with a final field vacuum of greater than -10 inches of mercury,

or equal to zero, will be flagged (usability of data will depend on sample volume and reporting limits that can be achieved).

- Samples must be collected, using conventional sampling methods, in an appropriate container — one which meets the objectives of the sampling (e.g., investigation of areas where low or high concentrations of volatile chemicals are expected; to minimize losses of volatile chemicals that are susceptible to photodegradation), meets the requirements of the sampling and analytical methods (e.g., low flow rate; Summa® canisters if analyzing by using EPA Method TO-15), and is certified clean by the laboratory;
- Sample size depends upon the volume of sample required to achieve minimum reporting limit requirements [Section 2.9 of the Guidance], the flow rate, and the sampling duration; and
- Ideally, samples should be collected over the same period of time as concurrent indoor and outdoor air samples.

When sub-slab vapor samples are collected, the following actions should be taken to document conditions during sampling and ultimately to aid in the interpretation of the sampling results:

- If sampling within a commercial or industrial building, uses of volatile chemicals in commercial or industrial processes and/or during building maintenance, should be identified;
- The use of heating or air conditioning systems during sampling should be noted;
- Floor plan sketches should be drawn that include the floor layout with sample locations, chemical storage areas, garages, doorways, stairways, location of basement sumps or subsurface drains and utility perforations through building foundations, HVAC system air supply and return registers, compass orientation (north), and any other pertinent information should be completed;
- If possible, photographs should accompany floor plan sketches;
- Outdoor plot sketches should be drawn that include the building site, area streets, outdoor air sample locations (if applicable), compass orientation (north), footings that create separate foundation sections, and paved areas;
- Weather conditions (e.g., precipitation, indoor and outdoor temperature, and barometric pressure) and ventilation conditions (e.g., heating system active and windows closed) should be reported;

- Smoke tubes or other devices should be used to confirm pressure relationships and air flow patterns, especially between floor levels and between suspected contaminant sources and other areas; and
- Any pertinent observations, such as spills, floor stains, smoke tube results, odors and readings from field instrumentation (e.g., vapors via PID, ppb RAE, Jerome Mercury Vapor Analyzer, etc.), should be recorded.

The field sampling team must maintain a sample log sheet summarizing the following:

- Sample identification,
- Date and time of sample collection,
- Sampling depth,
- Identity of samplers,
- Sampling methods and devices,
- Soil vapor purge volumes,
- Volume of soil vapor extracted,
- If canisters used, the vacuum before and after samples collected,
- Apparent moisture content (dry, moist, saturated, etc.) of the sampling zone, and
- Chain of custody protocols and records used to track samples from sampling point to analysis.

The following describes the subslab air sampling procedure:

1. Canisters will be supplied by the laboratory that will be conducting the analysis.

2. Sampling will take place in accordance with the project work plan sufficiently spaced to allow locations to be modified, if necessary.

3. The number of Summa canisters required as well as the flow rate of the constant differential low volume flow controllers will be supplied by the laboratory in accordance with the project work plan.

4. The sampling program will consist of concurrently collecting and analyzing one sub-slab vapor sample and one indoor ambient air sample (discussed in

the next section). Sample locations should be selected based on the likelihood for potential continuous human occupancy during the workday (i.e., due to the size of the areas and available infrastructure), and to account for the possibility of varying foundation depths in different areas of the building. In addition, sample locations typically are based upon the results of a subsurface investigation (i.e., soil gas survey or boring advancement) conducted prior to air sample collection activities. Canisters are typically placed in areas where the highest concentrations of soil gas were observed. Indoor air sample locations preferably should be selected near the middle of the sampled room, well away from the edges where dilution is more likely to occur.

5. Collect at least one outdoor ambient air sample from a location on the building roof or designated background area of the site positioned away from building ventilation system equipment on the highest portion of the building roof or site. See the Outdoor Ambient Air Sampling Procedure section in this procedure.

6. Field personnel should assure conservative sampling conditions prior to and throughout the sampling event. The building should be closed (windows and doors shut) and existing building ventilation systems should be turned off 12 to 24 hours before the air sampling is scheduled to begin as well as during sample collection. Any air-handling units that may induce large pressure gradients (i.e., exhaust fans, HVAC units etc.) should also be turned off.

7. Any activity being conducted by current building tenants involving volatile organic compounds, such as the use of lacquer thinner and cleaning solvents, prior to and/or during air sampling activities should be noted in the Project Field Book. These activities have the potential to bias the analytical results.

8. At each location, drill an approximately ¾-inch diameter hole through the concrete slab (typically 6-8 inches thick) using a hand-held hammer drill.

9. Measure and record the concrete thickness in the Project Field Book.

10. Insert polyethylene or Teflon® tubing of laboratory or food grade quality into the drilled hole and <u>no further than 2 inches</u> into the subslab material.

11. Seal the tubing with an appropriately sized volatile organic compound-free stopper (i.e., permagum grout, melted beeswax, putty, or other non-VOC-containing and non-shrinking product) into the concrete core hole and secure in-place making sure the fit is very snug. Supplement any visible gaps between the stopper and concrete slab with a VOC-free sealant, such as beeswax or bentonite slurry.

12. Run the tubing assembly through a shroud (plastic pail, cardboard box, or garbage bag) creating a tight seal with the surface making sure not to disturb the seal around the tubing penetration.

13. Enrich the atmosphere of the shroud with helium. Measure and record the helium concentration within the shroud.

14. Purge approximately 1 to 3 tubing volumes (i.e., the volume of the sample probe and tube) using a hand pump (or similar approved device) to ensure the collection of a representative sample.

15. Flow rates for both purging and sample collection must not exceed 0.2 liters per minute to minimize outdoor air infiltration during sampling.

16. Use a portable monitoring device to analyze a sample of soil vapor for the tracer **prior to and after** sampling for the compounds of concern. Note that the tracer gas samples can be collected via syringe, Tedlar bag etc. They need not be collected in Summa® canisters or minicans.

17. If concentrations greater than 10% of tracer gas are observed either prior to and/or after sampling, the probe seal should be enhanced to reduce the infiltration of outdoor air. Following enhancement of the seal, repeat steps 14 through 17 above until purged concentrations are less than 10% of the tracer gas within the shroud.

18. Following tubing purge and adequate seal integrity testing via helium tracer gas, immediately attach a 6-liter Summa Canister fitted with a 24-hour regulator (or approved other duration) to the opposite end of the tubing.

Concurrent with each subslab sample location, prepare an indoor ambient air sample by staging a second Summa Canister on a ladder (approximately 2 to 5-feet above the floor) adjacent to the sub-slab sample location.

19. All Summa Canister valves should remain closed until all subslab borings are complete and all of the canisters in their respective positions.

20. Open the valves to all of the canisters for the required collection period (i.e., 24-hours). Record initial canister pressure on the Air Canister Field Record form.

21. Following sample collection and prior to closing canister valve, record final canister pressure on the Air Canister Field Record form. Close canister valve.

22. Collect all Summa Canisters and ship, under chain-of-custody command to an approved analytical laboratory for VOC analysis in accordance with USEPA Method TO-14 or TO-15.

23. Repair all concrete openings with a cement patch.

24. Analytical results submitted by the laboratory should be reported as concentrations of each VOC at each location, typically in parts per billion by volume (ppbv).

INDOOR AIR SAMPLE COLLECTION PROCEDURES

During colder months, heating systems should be operating to maintain normal indoor air temperatures (i.e., 65 – 75 °F) for at least 24 hours prior to and during the scheduled sampling time. If possible, prior to collecting indoor samples, a pre-sampling inspection, discussed earlier in this procedure, should be performed to evaluate the physical layout and conditions of the building being investigated, to identify conditions that may affect or interfere with the proposed sampling, and to prepare the building for sampling.

In general, indoor air samples should be collected in the following manner:

- Sampling duration should reflect the exposure scenario being evaluated without compromising the detection limit or sample collection flow rate (e.g., an 8 hour sample from a workplace with a single shift versus a 24 hour sample from a workplace with multiple shifts). To ensure that air is representative of the locations sampled and to avoid undue influence from sampling personnel, samples should be collected for at least 1 hour. If the goal of the sampling is to represent average concentrations over longer periods, then longer duration sampling periods may be appropriate. Typically, 24 hour samples are collected from residential settings;

- Personnel should avoid lingering in the immediate area of the sampling device while samples are being collected;

- Sample flow rates must conform to the specifications in the sample collection method and, if possible, should be consistent with the flow rates for concurrent outdoor air and sub-slab samples;

- The target final field vacuum after 24 hours will be approximately -5 inches of mercury. Samples with a final field vacuum of greater than -10 inches of mercury, or equal to zero, will be flagged (usability of data will depend on sample volume and reporting limits that can be achieved); and

- Samples must be collected, using conventional sampling methods, in an appropriate container — one which meets the objectives of the sampling (e.g., investigation of areas where low or high concentrations of volatile chemicals are expected; to minimize losses of volatile chemicals that are susceptible to photodegradation), meets the requirements of the sampling and analytical methods (e.g., low flow rate; Summa® canisters if analyzing by using EPA Method TO-15), and is certified clean by the laboratory.

At sites with tetrachloroethene contamination, passive air monitors that are specifically analyzed for tetrachloroethene (i.e., "perc badges") are commonly used to collect indoor and outdoor air samples. If site characterization activities indicate that degradation products of tetrachloroethene also represent a vapor intrusion concern, perc badges may be used to indicate the likelihood of vapor intrusion (i.e., by using tetrachloroethene as a surrogate) followed, as needed, by more comprehensive sampling and laboratory analyses to quantify both tetrachloroethene and its degradation products. Perc badge samples ideally should be collected over a twenty-four hour period, but for no less than eight hours.

The following actions should be taken to document conditions during indoor air sampling and ultimately to aid in the interpretation of the sampling results:

- A product inventory survey must be completed (discussed earlier);
- The use of heating or air conditioning systems during sampling should be noted;
- Floor plan sketches should be drawn that include the floor layout with sample locations, chemical storage areas, garages, doorways, stairways, location of basement sumps or subsurface drains and utility perforations through building foundations, HVAC system supply and return registers, compass orientation (north), and any other pertinent information should be completed;
- If possible, photographs should accompany floor plan sketches;
- Outdoor plot sketches should be drawn that include the building site, area streets, outdoor air sample locations (if applicable), compass orientation (north), footings that create separate foundation sections, and paved areas;
- Weather conditions (e.g., precipitation, indoor and outdoor temperature, and barometric pressure) and ventilation conditions (e.g., heating system active and windows closed) should be reported;
- Smoke tubes or other devices should be used to confirm pressure relationships and air flow patterns, especially between floor levels and between suspected contaminant sources and other areas; and

- Any pertinent observations, such as spills, floor stains, smoke tube results, odors and readings from field instrumentation (e.g., vapors via PID, ppb RAE, Jerome Mercury Vapor Analyzer, etc.), should be recorded.

The field sampling team must maintain a sample log sheet summarizing the following:

- Sample identification,
- Date and time of sample collection,
- Sampling height,
- Identity of samplers,
- Sampling methods and devices,
- Depending upon the method, volume of air sampled,
- If canisters used, the vacuum before and after samples collected,
- Chain of custody protocols and records used to track samples from sampling point to analysis.

The following describes the indoor air sampling procedure:

1. Canisters will be supplied by the laboratory that will be conducting the analysis.

2. Sampling will take place in accordance with the project work plan sufficiently spaced to allow locations to be modified, if necessary.

3. The number of Summa canisters required as well as the flow rate of the constant differential low volume flow controllers will be supplied by the laboratory in accordance with the project work plan. Indoor air sampling typically requires the continuous collection of samples over a 24-hour period.

4. The sampling program will consist of concurrently collecting and analyzing one sub-slab vapor sample and one indoor ambient air sample. Sample locations should be selected based on the likelihood for potential continuous human occupancy during the workday (i.e., due to the size of the areas and available infrastructure), and to account for the possibility of varying foundation depths in different areas of the building. In addition, sample locations typically are based upon the results of a subsurface investigation (i.e.,

soil gas survey or boring advancement) conducted prior to air sample collection activities. Canisters are typically placed in areas where the highest concentrations of soil gas were observed. Indoor air sample locations preferably should be selected near the middle of the sampled room, well away from the edges where dilution is more likely to occur.

5. Collect at least one outdoor ambient air sample from a location on the building roof or designated background area of the site positioned away from building ventilation system equipment on the highest portion of the building roof or site. See the Outdoor Ambient Air Sampling Procedure presented in this procedure.

6. Field personnel should assure conservative sampling conditions prior to and throughout the sampling event. The building should be closed (windows and doors shut) and existing building ventilation systems should be turned off 12 to 24 hours before the air sampling is scheduled to begin as well as during sample collection. Any air-handling units that may induce large pressure gradients (i.e., exhaust fans, HVAC units etc.) should also be turned off.

7. Any activity being conducted by current building tenants involving volatile organic compounds, such as the use of lacquer thinner and cleaning solvents, prior to and/or during air sampling activities should be noted in the Project Field Book. These activities have the potential to bias the analytical results.

8. Concurrent with each subslab sample location, prepare an indoor ambient air sample by staging a second Summa Canister on a ladder (approximately 2 to 5-feet above the floor) adjacent to the sub-slab sample location.

9. All Summa Canister valves should remain closed until all subslab borings are complete and all of the canisters in their respective positions.

10. Open the valves to all of the canisters for the required collection period (i.e., 24-hours). Record initial canister pressure on the Air Canister Field Record form.

11. Following sample collection and prior to closing canister valve, record final canister pressure on the Air Canister Field Record form. Close canister valve.

12. Collect all Summa Canisters and ship, under chain-of-custody command to an approved analytical laboratory for VOC analysis in accordance with USEPA Method TO-14 or TO-15.

13. Analytical results submitted by the laboratory should be reported as concentrations of each VOC at each location, typically in parts per billion by volume (ppbv).

OUTDOOR AIR SAMPLE COLLECTION PROCEDURES

Outdoor air samples must be collected simultaneously with indoor air samples and may be collected concurrently with subsurface vapor samples. Outdoor air samples must be collected in the same manner as indoor samples.

The following actions should be taken to document conditions during outdoor air sampling and ultimately to aid in the interpretation of the sampling results:

- Outdoor plot sketches should be drawn that include the building site, area streets, outdoor air sample locations (if applicable), the location of potential interferences (e.g., gasoline stations, factories, lawn movers, etc.), compass orientation (north), footings that create separate foundation sections, and paved areas;

- Weather conditions (e.g., precipitation, indoor and outdoor temperature, and barometric pressure) and ventilation conditions (e.g., heating system active and windows closed) should be reported; and

- Any pertinent observations, such as odors, readings from field instrumentation, and significant activities in the vicinity (e.g., operation of heavy equipment or dry cleaners) should be recorded.

The following describes the outdoor air sampling procedure:

SOIL VAPOR SAMPLE COLLECTION PROCEDURE

1. Canisters will be supplied by the laboratory that will be conducting the analysis.

2. Sampling will take place in accordance with the project work plan sufficiently spaced to allow locations to be modified, if necessary.

3. The number of Summa canisters required as well as the flow rate of the constant differential low volume flow controllers will be supplied by the laboratory in accordance with the project work plan.

4. Sample locations typically are collected upwind of the facility.

5. Collect at least one outdoor ambient air sample from a location on the building roof or designated background area of the site positioned away from building ventilation system equipment on the highest portion of the building roof or site. Place canisters on the ground or step ladder, with a clear plastic sheet beneath to prevent contamination. Locate the sampling inlet approximately 18-inches above the ground surface.

6. Sample collection should take place on warm, dry days. If rain or high humidity conditions develop during sampling, the sampling event should be suspended. Temperature, barometric pressure, and wind speed should be monitored during the sampling event, for use in analysis of the results.

7. The combination of sampling location, height, and meteorological conditions will assure that sampling will measure VOCs at their highest concentrations.

8. All Summa Canister valves should remain closed until all subslab borings are complete and all of the indoor and outdoor canisters in their respective positions.

9. Open the valves to all of the canisters for the required collection period (i.e., 24-hours). Record initial canister pressure on the Air Canister Field Record form.

10. Following sample collection and prior to closing canister valve, record final canister pressure on the Air Canister Field Record form. Close canister valve.

11. Collect all Summa Canisters and ship, under chain-of-custody command to an approved analytical laboratory for VOC analysis in accordance with USEPA Method TO-14 or TO-15.

12. Air samples will be analyzed by Gas Chromatography/Mass Spectroscopy (GC/MS) in accordance with EPA Method TO-14 or TO-15.

13. Analytical results will be reported as concentrations of each VOC at each location during each sampling event, typically in parts per billion by volume (ppbv).

TRACER GAS

When collecting soil vapor samples as part of a vapor intrusion evaluation, a tracer gas serves as a quality assurance/quality control device to verify the integrity of the soil vapor probe seal. Without the use of a tracer, there is no way to verify that a soil vapor sample has not been diluted by surface air.

Depending on the nature of the contaminants of concern, a number of different compounds can be used as a tracer. Typically, sulfur hexafluoride (SF6) or helium are used as tracers because they are readily available, have low toxicity, and can be monitored with portable measurement devices. Butane and propane (or other gases) could also be used as a tracer in some situations. The protocol for using a tracer gas is straightforward: simply enrich the atmosphere in the immediate vicinity of the area where the probe intersects the ground surface with the tracer gas, and measure a vapor sample from the probe for the presence of high concentrations (> 10%) of the tracer. A cardboard box, a plastic pail, or even a garbage bag can serve to keep the tracer gas in contact with the probe during the testing.

There are two basic approaches to testing for the tracer gas:

- Include the tracer gas in the list of target analytes reported by the laboratory; or
- Use a portable monitoring device to analyze a sample of soil vapor for the tracer prior to and after sampling for the compounds of concern. (Note that the tracer gas samples can be collected via syringe, Tedlar bag etc. They need not be collected in Summa® canisters or minicans.)

The advantage of the second approach is that the real time tracer sampling results can be used to confirm the integrity of the probe seals prior to formal sample collection. Figure 6 (attached) depicts common methods for using tracer gas. In each of the examples, a, b and c, the tracer gas is released in the enclosure prior to initially purging the sample point. Care should be taken to avoid excessive purging prior to sample collection. Care should also be taken to prevent pressure build-up in the enclosure during introduction of the tracer gas. Inspection of the installed sample probe, specifically noting the integrity of the surface seal and the porosity of the soil in which the probe is installed, will help to determine the tracer gas setup. Figure 6(a) may be most effective at preventing tracer gas infiltration; however, it may not be required in some situations depending on site-specific conditions. Figures 6(b) and 6(c) may be sufficient for probes installed in tight soils with well-constructed surface seals. In all cases, the same tracer gas application should be used for all probes at any given site.

Because minor leakage around the probe seal should not materially affect the usability of the soil vapor sampling results, the mere presence of the tracer gas in the sample should not be a cause for alarm. Consequently, portable field monitoring devices with detection limits in the low ppm range are more than adequate for screening samples for the tracer. If high concentrations (> 10%) of tracer gas are observed in a sample, the probe seal should be enhanced to reduce the infiltration of ambient air.

During the initial stages of a soil vapor sampling program, tracer gas samples should be collected at each of the sampling probes. If the results of the initial samples indicate that the probe seals are adequate, the project manager can consider reducing the number of locations at which tracer gas samples are employed. At a minimum, at least 10% of the subsequent samples should be supported with tracer gas analyses. When using permanent soil vapor probes as part of a long-term monitoring program, annual testing of the probe integrity is recommended.

QUALITY ASSURANCE / QUALITY CONTROL (QA/QC)

Extreme care should be taken during all aspects of sample collection to ensure that sampling error is minimized and high quality data are obtained. The sampling team members should avoid actions (e.g., fueling vehicles, using permanent marking pens, and wearing freshly dry-cleaned clothing or personal fragrances), which can cause sample interference in the field. Appropriate QA/QC protocols must be followed for sample collection and laboratory analysis, such as use of certified clean sample devices, meeting sample holding times and temperatures, sample accession, chain of custody, etc. Samples should be delivered to the analytical laboratory as soon as possible after collection. In addition, laboratory accession procedures must be followed including field documentation (sample collection information and locations), chain of custody, field blanks, field sample duplicates, and laboratory duplicates, as appropriate.

Some methods require collecting samples in duplicate (e.g., indoor air sampling using passive sampling devices for tetrachloroethene) to assess errors. Duplicate and/or split samples should be collected in accordance with the requirements of the sampling and analytical methods being implemented.

For certain regulatory programs, a Data Usability Summary Report (DUSR) may be required to determine whether or not the data, as presented, meets the site or project specific criteria for data quality and data use. This requirement may dictate the level of QC and the category of data deliverable to request from the laboratory. Guidance on preparing a DUSR is available by contacting the NYSDEC's Division of Environmental Remediation.

New York State Public Health Law requires laboratories analyzing environmental samples collected from within New York State to have current Environmental Laboratory Approval Program (ELAP) certification for the appropriate analyte and environmental matrix combinations. If ELAP certification is not currently required for an analyte (e.g., trichloroethene), the analysis should be performed by a laboratory that has ELAP certification for similar compounds in air and uses analytical methods with detection limits similar to background (e.g., tetrachloroethene via EPA Method TO-15).

The work plan must state that all samples that will be used to make decisions on appropriate actions to address exposures and environmental contamination will be analyzed by an ELAP-certified laboratory. If known, the name of the laboratory should also be provided. Similarly, the name of the laboratory that was used must be included in the report of the sampling results. For samples collected and tested in the field for screening purposes by using field testing technology, the qualifications of the field technician must be documented in the work plan.

The target final field vacuum of any sample canister after 24 hours will be approximately -5 inches of mercury. Samples with a final field vacuum of greater than -10 inches of mercury, or equal to zero, will be flagged (usability of data will depend on sample volume and reporting limits that can be achieved).

DECISION MATRICES (FIGURES 1 THROUGH 6)

The considerations in assigning a chemical to a matrix include the following:

- Human health risks, including such factors as a chemical's ability to cause cancer, reproductive, developmental, liver, kidney, nervous system, immune system or other effects, in animals and humans and the doses that may cause those effects;

- The data gaps in its toxicological database;

- Background concentrations of volatile chemicals in indoor air [Section 3.2.4]; and

- Analytical capabilities currently available.

To use the matrices accurately as a tool in the decision-making process, the following must be noted:

- The matrices are generic. As such, it may be necessary to modify recommended actions to accommodate building-specific conditions (e.g., dirt floor in basement, crawl spaces, etc.) and/or site-specific conditions (e.g., proximity of building to identified subsurface contamination) for the protection of public health. Additionally, actions more conservative than those specified within the matrix may be implemented at any time. For example, the decision to implement more conservative actions may be based on a comparison of the costs associated with resampling or monitoring to the costs associated with installation and monitoring of a mitigation system.

- Indoor air concentrations detected in samples collected from the building's basement or, if the building has a slab-on-grade foundation, from the building's lowest occupied living space should be used.

- Actions provided in the matrix are specific to addressing human exposures. Implementation of these actions does not preclude the need to investigate possible sources of vapor contamination, nor does it preclude the need to remediate contaminated soil vapors or the source of soil vapor contamination.

- When current exposures are attributed to sources other than vapor intrusion, the agencies must be provided documentation (e.g., applicable environmental data, completed indoor air sampling questionnaire, digital photographs, etc.) to support a proposed action other than that provided in the matrix and to support assessment and follow-up by the agencies.

RECOMMENDED ACTIONS

Actions recommended in the matrix are based on the relationship between sub-slab vapor concentrations and corresponding indoor air concentrations. They are intended to address both potential and current human exposures and include the following:

- *No further action*
  When the volatile chemical is not detected in the indoor air sample and the concentration detected in the corresponding sub-slab vapor sample is not expected to substantially affect indoor air quality.

- *Identify source(s) and resample or mitigate*
  Reasonable and practical actions are recommended to identify the source(s) affecting indoor air quality and that actions be implemented to reduce indoor air concentrations to within background ranges. The concentration detected in the indoor air sample is likely due to indoor and/or outdoor sources rather than soil vapor intrusion given the concentration detected in the sub-slab vapor sample. Resampling may be required in the event indoor and/or outdoor sources are not readily identified or confirmed to demonstrate SVI mitigation actions are not needed. Steps should be taken to identify potential source(s) and to reduce exposures accordingly (e.g., by keeping containers tightly capped or by storing volatile chemical-containing products in places where people do not spend much time, such as a garage or shed). Mitigation may be required if soil vapor intrusion cannot be ruled out.

- *Monitor*
  Monitoring, including sub-slab vapor, basement air, lowest occupied living space air, and outdoor air sampling, is needed to determine whether concentrations in

the indoor air or sub-slab vapor have changed. Monitoring may also be needed to determine whether existing building conditions (e.g., positive pressure HVAC systems) are maintaining the desired mitigation endpoint and to determine whether changes are needed. The type and frequency of monitoring is determined on a site-specific and building specific basis, taking into account applicable environmental data and building operating conditions.

- *Mitigate*
  Mitigation is needed to minimize current or potential exposures associated with soil vapor intrusion. Methods to mitigate exposures related to soil vapor intrusion are described in Section 4 of the Guidance.

TIME OF YEAR

Sub-slab vapor samples and, unless there is an immediate need for sampling, indoor air samples are typically collected during the heating season because soil vapor intrusion is more likely to occur when a building's heating system is in operation and air is being drawn into the building. In general, heating systems are expected to be operating routinely from November 15th to March 31st throughout the state. However, this timeframe may vary depending on factors, such as the location of the site (e.g., upstate versus downstate) and the weather conditions for a particular year.

A vapor intrusion investigation may also be conducted outside of the heating season. However, the results may not be used to rule out exposures. For example, results indicating "no further action" or "monitoring required" must be verified during the heating season to ensure these actions are protective during the heating season as well.

SAMPLING ROUNDS

Investigating a soil vapor intrusion pathway usually requires more than one round of subsurface vapor, indoor air, and/or outdoor air sampling, for reasons such as the following:

- To characterize the nature and extent of subsurface vapor contamination (similar to the delineation of groundwater contamination) and to address corresponding exposure concerns;

- To evaluate fluctuations in concentrations due to
  - Different weather conditions (e.g., seasonal effects),
  - Changes in building conditions (e.g., various operating conditions of a building's HVAC system),
  - Changes in source strength, or
  - Vapor migration or contaminant biodegradation processes (particularly when degradation products may be more toxic than the parent compounds); or
- To confirm sampling results or the effectiveness of mitigation or remedial systems.

Overall, successive rounds of sampling are conducted until the following questions can be answered:

- Are subsurface vapors contaminated? If so, what are the nature and extent of contamination? What is/are the source(s) of the contamination?
- What are the current and potential exposures to contaminated subsurface vapors?
- What actions, if any, are needed to prevent or mitigate exposures and to remediate subsurface vapor contamination?

Toward this end, multiple rounds of sampling may be required to characterize the nature and extent of subsurface vapor contamination such that

- Both potential and current exposures are adequately addressed;
- Measures can be designed to remediate subsurface vapor contamination, either directly (e.g., SVE system) or indirectly (e.g., soil excavation or groundwater remediation), given that monitoring and mitigation are considered temporary measures implemented to address exposures related to vapor intrusion until contaminated environmental media are remediated; and
- The effectiveness of remedial measures can be monitored and confirmed (e.g., endpoint sampling).

ATTACHMENTS

Figure 1 *Soil Vapor/Indoor Air Matrix A*
Figure 2 *Soil Vapor/Indoor Air Matrix B*
Figure 3 *Soil Vapor/Indoor Air Matrix C*
Figure 4 *Soil Vapor/Indoor Air Matrix D*
Figure 5 *Soil Vapor/Indoor Air Matrix E*
Figure 6 *Soil Vapor/Indoor Air Matrix F*
Figure 7 *Schematics of a permanent soil vapor probe and permanent nested soil vapor probes*
Figure 8 *Schematic of a sub-slab vapor probe*
Figure 9 *Schematics of tracer gas applications*

Air Canister Field Record

Indoor Air Quality Questionnaire and Building Inventory

REFERENCES

New York State Department of Health, *Guidance for Evaluating Soil Vapor Intrusion in the State of New York*, October 2006.

New York State Department of Health, *Indoor Air Sampling & Analysis Guidance.* (February 1, 2005).

Office of Solid Waste and Emergency Response (OSWER). *Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway from Groundwater and Soils (Subsurface Vapor Intrusion Guidance)*. November 2002.

United States Environmental Protection Agency. *EPA Compendium of Methods for the Determination of Toxic Organic Compounds in Ambient Air*. 1988

- Method TO-15, Determination of Volatile Organic Compounds (VOCs) in Air Collected in Specially Prepared Canisters and Analyzed by Gas Chromatography/Mass Spectrometry (GC/MS). Pp. 15-1 through 15-62.

- Method TO-17, Determination of Volatile Organic Compounds in Ambient Air using Active Sampling on Sorbent Tubes. Pp. 17-1 through 17-49.

- Compendium of Methods for the Determination of Air Pollutants in Indoor Air, EPA/600/4-90-010.

FIGURE 1

Soil Vapor/Indoor Air Matrix A

May 2017

Analytes Assigned:
Trichloroethene (TCE), *cis*-1,2-Dichloroethene (*c*12-DCE), 1,1-Dichloroethene (11-DCE), Carbon Tetrachloride

	INDOOR AIR CONCENTRATION of COMPOUND (mcg/m^3)		
SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m^3)	< 0.2	0.2 to < 1	1 and above
< 6	1. No further action	2. No Further Action	3. IDENTIFY SOURCE(S) and RESAMPLE or MITIGATE
6 to < 60	4. No further action	5. MONITOR	6. MITIGATE
60 and above	7. MITIGATE	8. MITIGATE	9. MITIGATE

No further action: No additional actions are recommended to address human exposures.

Identify Source(s) and Resample or Mitigate: We recommend that reasonable and practical actions be taken to identify the source(s) affecting the indoor air quality and that actions be implemented to reduce indoor air concentrations to within background ranges. For example, if an indoor or outdoor air source is identified, we recommend the appropriate party implement actions to reduce the levels. In the event that indoor or outdoor sources are not readily identified or confirmed, resampling (which might include additional sub-slab vapor and indoor air sampling locations) is recommended to demonstrate that SVI mitigation actions are not needed. Based on the information available, mitigation might also be recommended when soil vapor intrusion cannot be ruled out.

Monitor: We recommend monitoring (sampling on a recurring basis), including but not necessarily limited to sub-slab vapor, basement air and outdoor air sampling, to determine whether concentrations in the indoor air or sub-slab vapor have changed and/or to evaluate temporal influences. Monitoring might also be recommended to determine whether existing building conditions (e.g., positive pressure heating, ventilation and air-conditioning systems) are maintaining the desired mitigation endpoint and to determine whether changes are needed. The type and frequency of monitoring is determined based on site-, building- and analyte-specific information, taking into account applicable environmental data and building operating conditions. Monitoring is an interim measure required to evaluate exposures related to soil vapor intrusion until contaminated environmental media are remediated.

Mitigate: We recommend mitigation to minimize current or potential exposures associated with soil vapor intrusion. The most common mitigation methods are sealing preferential pathways in conjunction with installing a sub-slab depressurization system and changing the pressurization of the building in conjunction with monitoring. The type, or combination of types, of mitigation is determined on a building-specific basis, taking into account building construction and operating conditions. Mitigation is considered a temporary measure implemented to address exposures related to soil vapor intrusion until contaminated environmental media are remediated.

These general recommendations are made with consideration being given to the additional notes on page 2.

MATRIX A Page 1 of 2

ADDITIONAL NOTES FOR MATRIX A

This matrix summarizes actions recommended to address current and potential exposures related to soil vapor intrusion. To use the matrix appropriately as a tool in the decision-making process, the following should be noted:

[1] The matrix is generic. As such, it may be appropriate to modify a recommended action to accommodate analyte-specific, building-specific conditions (e.g., dirt floor in basement, crawl spaces, thick slabs, current occupancy, etc.), and/or factors provided in Section 3.2 of the guidance (e.g., current land use, environmental conditions, etc.). For example, collection of additional samples may be recommended when the matrix indicates "no further action" for a particular building, but the results of adjacent buildings (especially sub-slab vapor results) indicate a need to take actions to address exposures related to soil vapor intrusion. Mitigation might be recommended when the results of multiple contaminants indicate monitoring is recommended. Proactive actions may be proposed at any time. For example, the party implementing the actions may decide to install sub-slab depressurization systems on buildings where the matrix indicates "no further action" or "monitoring." Such an action might be undertaken for reasons other than public health (e.g., seeking community acceptance, reducing costs, etc.). However, actions implemented *in lieu* of sampling will typically be expected to be captured in the final engineering report and site management plan, and might not rule out the need for post-implementation sampling (e.g., to document effectiveness or to support terminating the action).

[2] Actions provided in the matrix are specific to addressing human exposures. Implementation of these actions does not preclude investigating possible sources of soil vapor contamination, nor does it preclude remediating contaminated soil vapor or the source of soil vapor contamination.

[3] Appropriate care should be taken during all aspects of sample collection to ensure that high quality data are obtained. Since the data are being used in the decision-making process, the laboratory analyzing the environmental samples must have current Environmental Laboratory Approval Program (ELAP) certification for the appropriate analyte and environmental matrix combinations. Furthermore, samples should be analyzed by methods that can achieve a minimum reporting limit of 0.20 microgram per cubic meter for indoor and outdoor air samples. For sub-slab vapor samples and dirt floor soil vapor samples, a minimum reporting limit of 1 microgram per cubic meter is recommended.

[4] Sub-slab vapor and indoor air samples are typically collected when the likelihood of soil vapor intrusion is considered to be the greatest (i.e., worst-case conditions). If samples are collected at other times (typically, samples collected outside of the heating season), then resampling during worst-case conditions might be appropriate to verify that actions taken to address exposures related to soil vapor intrusion are protective of human health.

[5] When current exposures are attributed to sources other than soil vapor intrusion, the agencies should be given documentation (e.g., applicable environmental data, completed indoor air sampling questionnaire, digital photographs, etc.) to support a proposed action other than that provided in the matrix box and to support agency assessment and follow-up.

[6] The party responsible for implementing the recommended actions will differ depending upon several factors, including but not limited to the following: the identified source of the volatile chemicals, the environmental remediation program, and analyte-specific, site-specific and building-specific factors.

FIGURE 2

Soil Vapor/Indoor Air Matrix B

May 2017

Analytes Assigned:
Tetrachloroethene (PCE), 1,1,1-Trichloroethane (111-TCA), Methylene Chloride

	INDOOR AIR CONCENTRATION of COMPOUND (mcg/m^3)		
SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m^3)	< 3	3 to < 10	10 and above
< 100	1. No further action	2. No Further Action	3. IDENTIFY SOURCE(S) and RESAMPLE or MITIGATE
100 to < 1,000	4. No further action	5. MONITOR	6. MITIGATE
1,000 and above	7. MITIGATE	8. MITIGATE	9. MITIGATE

No further action: No additional actions are recommended to address human exposures.

Identify Source(s) and Resample or Mitigate: We recommend that reasonable and practical actions be taken to identify the source(s) affecting the indoor air quality and that actions be implemented to reduce indoor air concentrations to within background ranges. For example, if an indoor or outdoor air source is identified, we recommend the appropriate party implement actions to reduce the levels. In the event that indoor or outdoor sources are not readily identified or confirmed, resampling (which might include additional sub-slab vapor and indoor air sampling locations) is recommended to demonstrate that SVI mitigation actions are not needed. Based on the information available, mitigation might also be recommended when soil vapor intrusion cannot be ruled out.

Monitor: We recommend monitoring (sampling on a recurring basis), including but not necessarily limited to sub-slab vapor, basement air and outdoor air sampling, to determine whether concentrations in the indoor air or sub-slab vapor have changed and/or to evaluate temporal influences. Monitoring might also be recommended to determine whether existing building conditions (e.g., positive pressure heating, ventilation and air-conditioning systems) are maintaining the desired mitigation endpoint and to determine whether changes are needed. The type and frequency of monitoring is determined based on site-, building- and analyte-specific information, taking into account applicable environmental data and building operating conditions. Monitoring is an interim measure required to evaluate exposures related to soil vapor intrusion until contaminated environmental media are remediated.

Mitigate: We recommend mitigation to minimize current or potential exposures associated with soil vapor intrusion. The most common mitigation methods are sealing preferential pathways in conjunction with installing a sub-slab depressurization system and changing the pressurization of the building in conjunction with monitoring. The type, or combination of types, of mitigation is determined on a building-specific basis, taking into account building construction and operating conditions. Mitigation is considered a temporary measure implemented to address exposures related to soil vapor intrusion until contaminated environmental media are remediated.

These general recommendations are made with consideration being given to the additional notes on page 2.

MATRIX B Page 1 of 2

ADDITIONAL NOTES FOR MATRIX B

This matrix summarizes actions recommended to address current and potential exposures related to soil vapor intrusion. To use the matrix appropriately as a tool in the decision-making process, the following should be noted:

[1] The matrix is generic. As such, it may be appropriate to modify a recommended action to accommodate analyte-specific, building-specific conditions (e.g., dirt floor in basement, crawl spaces, thick slabs, current occupancy, etc.), and/or factors provided in Section 3.2 of the guidance (e.g., current land use, environmental conditions, etc.). For example, collection of additional samples may be recommended when the matrix indicates "no further action" for a particular building, but the results of adjacent buildings (especially sub-slab vapor results) indicate a need to take actions to address exposures related to soil vapor intrusion. Mitigation might be recommended when the results of multiple contaminants indicate monitoring is recommended. Proactive actions may be proposed at any time. For example, the party implementing the actions may decide to install sub-slab depressurization systems on buildings where the matrix indicates "no further action" or "monitoring." Such an action might be undertaken for reasons other than public health (e.g., seeking community acceptance, reducing costs, etc.). However, actions implemented *in lieu* of sampling will typically be expected to be captured in the final engineering report and site management plan, and might not rule out the need for post-implementation sampling (e.g., to document effectiveness or to support terminating the action).

[2] Actions provided in the matrix are specific to addressing human exposures. Implementation of these actions does not preclude investigating possible sources of soil vapor contamination, nor does it preclude remediating contaminated soil vapor or the source of soil vapor contamination.

[3] Appropriate care should be taken during all aspects of sample collection to ensure that high quality data are obtained. Since the data are being used in the decision-making process, the laboratory analyzing the environmental samples must have current Environmental Laboratory Approval Program (ELAP) certification for the appropriate analyte and environmental matrix combinations. Furthermore, samples should be analyzed by methods that can achieve a minimum reporting limit of 1 microgram per cubic meter for indoor and outdoor air samples. For sub-slab vapor samples and dirt floor soil vapor samples, a minimum reporting limit of 1 microgram per cubic meter is recommended.

[4] Sub-slab vapor and indoor air samples are typically collected when the likelihood of soil vapor intrusion is considered to be the greatest (i.e., worst-case conditions). If samples are collected at other times (typically, samples collected outside of the heating season), then resampling during worst-case conditions might be appropriate to verify that actions taken to address exposures related to soil vapor intrusion are protective of human health.

[5] When current exposures are attributed to sources other than soil vapor intrusion, the agencies should be given documentation (e.g., applicable environmental data, completed indoor air sampling questionnaire, digital photographs, etc.) to support a proposed action other than that provided in the matrix box and to support agency assessment and follow-up.

[6] The party responsible for implementing the recommended actions will differ depending upon several factors, including but not limited to the following: the identified source of the volatile chemicals, the environmental remediation program, and analyte-specific, site-specific and building-specific factors.

FIGURE 3

Soil Vapor/Indoor Air Matrix C

May 2017

Analytes Assigned:
Vinyl Chloride

	INDOOR AIR CONCENTRATION of COMPOUND (mcg/m^3)	
SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m^3)	< 0.2	0.2 and above
< 6	1. No further action	2. IDENTIFY SOURCE(S) and RESAMPLE or MITIGATE
6 to < 60	3. MONITOR	4. MITIGATE
60 and above	5. MITIGATE	6. MITIGATE

No further action: No additional actions are recommended to address human exposures.

Identify Source(s) and Resample or Mitigate: We recommend that reasonable and practical actions be taken to identify the source(s) affecting the indoor air quality and that actions be implemented to reduce indoor air concentrations to within background ranges. For example, if an indoor or outdoor air source is identified, we recommend the appropriate party implement actions to reduce the levels. In the event that indoor or outdoor sources are not readily identified or confirmed, resampling (which might include additional sub-slab vapor and indoor air sampling locations) is recommended to demonstrate that SVI mitigation actions are not needed. Based on the information available, mitigation might also be recommended when soil vapor intrusion cannot be ruled out.

Monitor: We recommend monitoring (sampling on a recurring basis), including but not necessarily limited to sub-slab vapor, basement air and outdoor air sampling, to determine whether concentrations in the indoor air or sub-slab vapor have changed and/or to evaluate temporal influences. Monitoring might also be recommended to determine whether existing building conditions (e.g., positive pressure heating, ventilation and air-conditioning systems) are maintaining the desired mitigation endpoint and to determine whether changes are needed. The type and frequency of monitoring is determined based on site-, building- and analyte-specific information, taking into account applicable environmental data and building operating conditions. Monitoring is an interim measure required to evaluate exposures related to soil vapor intrusion until contaminated environmental media are remediated.

Mitigate: We recommend mitigation to minimize current or potential exposures associated with soil vapor intrusion. The most common mitigation methods are sealing preferential pathways in conjunction with installing a sub-slab depressurization system and changing the pressurization of the building in conjunction with monitoring. The type, or combination of types, of mitigation is determined on a building-specific basis, taking into account building construction and operating conditions. Mitigation is considered a temporary measure implemented to address exposures related to soil vapor intrusion until contaminated environmental media are remediated.

These general recommendations are made with consideration being given to the additional notes on page 2.

MATRIX C Page 1 of 2

ADDITIONAL NOTES FOR MATRIX C

This matrix summarizes actions recommended to address current and potential exposures related to soil vapor intrusion. To use the matrix appropriately as a tool in the decision-making process, the following should be noted:

[1] The matrix is generic. As such, it may be appropriate to modify a recommended action to accommodate analyte-specific, building-specific conditions (e.g., dirt floor in basement, crawl spaces, thick slabs, current occupancy, etc.), and/or factors provided in Section 3.2 of the guidance (e.g., current land use, environmental conditions, etc.). For example, collection of additional samples may be recommended when the matrix indicates "no further action" for a particular building, but the results of adjacent buildings (especially sub-slab vapor results) indicate a need to take actions to address exposures related to soil vapor intrusion. Mitigation might be recommended when the results of multiple contaminants indicate monitoring is recommended. Proactive actions may be proposed at any time. For example, the party implementing the actions may decide to install sub-slab depressurization systems on buildings where the matrix indicates "no further action" or "monitoring." Such an action might be undertaken for reasons other than public health (e.g., seeking community acceptance, reducing costs, etc.). However, actions implemented *in lieu* of sampling will typically be expected to be captured in the final engineering report and site management plan, and might not rule out the need for post-implementation sampling (e.g., to document effectiveness or to support terminating the action).

[2] Actions provided in the matrix are specific to addressing human exposures. Implementation of these actions does not preclude investigating possible sources of soil vapor contamination, nor does it preclude remediating contaminated soil vapor or the source of soil vapor contamination.

[3] Appropriate care should be taken during all aspects of sample collection to ensure that high quality data are obtained. Since the data are being used in the decision-making process, the laboratory analyzing the environmental samples must have current Environmental Laboratory Approval Program (ELAP) certification for the appropriate analyte and environmental matrix combinations. Furthermore, samples should be analyzed by methods that can achieve a minimum reporting limit of 0.20 microgram per cubic meter for indoor and outdoor air samples. For sub-slab vapor samples and dirt floor soil vapor samples, a minimum reporting limit of 1 microgram per cubic meter is recommended.

[4] Sub-slab vapor and indoor air samples are typically collected when the likelihood of soil vapor intrusion is considered to be the greatest (i.e., worst-case conditions). If samples are collected at other times (typically, samples collected outside of the heating season), then resampling during worst-case conditions might be appropriate to verify that actions taken to address exposures related to soil vapor intrusion are protective of human health.

[5] When current exposures are attributed to sources other than soil vapor intrusion, the agencies should be given documentation (e.g., applicable environmental data, completed indoor air sampling questionnaire, digital photographs, etc.) to support a proposed action other than that provided in the matrix box and to support agency assessment and follow-up.

[6] The party responsible for implementing the recommended actions will differ depending upon several factors, including but not limited to the following: the identified source of the volatile chemicals, the environmental remediation program, and analyte-specific, site-specific and building-specific factors.

FIGURE 4

Soil Vapor/Indoor Air Matrix D

February 2024

Analytes Assigned:
Benzene, ethylbenzene, naphthalene, cyclohexane, isooctane (2,2,4-trimethylpentane), 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, ***o***-xylene

	INDOOR AIR CONCENTRATION of COMPOUND (mcg/m³)		
SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m³)	< 2	2 to < 10	10 and above
< 60	1. No further action	2. No Further Action	3. IDENTIFY SOURCE(S) or RESAMPLE or MITIGATE
60 to < 600	4. No further action	5. MONITOR	6. MITIGATE
600 and above	7. MITIGATE	8. MITIGATE	9. MITIGATE

mcg/m³ = micrograms per cubic meter

No further action: No additional actions are recommended to address human exposures.

Identify Source(s) or Resample or Mitigate: We recommend that reasonable and practical actions be taken to identify the source(s) affecting the indoor air quality and that actions be implemented to reduce indoor air concentrations to within background ranges. For example, if an indoor or outdoor air source is identified, we recommend the appropriate party implement actions to reduce the levels. In the event that indoor or outdoor sources are not readily identified or confirmed, resampling (which might include additional sub-slab vapor and indoor air sampling locations) is recommended to demonstrate that SVI mitigation actions are not needed. Based on the information available, mitigation might also be recommended when soil vapor intrusion cannot be ruled out.

Monitor: We recommend monitoring (sampling on a recurring basis), including but not necessarily limited to sub-slab vapor, basement air and outdoor air sampling, to determine whether concentrations in the indoor air or sub-slab vapor have changed and/or to evaluate temporal influences. Monitoring might also be recommended to determine whether existing building conditions (e.g., positive pressure heating, ventilation, and air-conditioning systems) are maintaining the desired mitigation endpoint and to determine whether changes are needed. The type and frequency of monitoring is determined based on site-, building- and analyte-specific information, taking into account applicable environmental data and building operating conditions. Monitoring is an interim measure required to evaluate exposures related to soil vapor intrusion until contaminated environmental media are remediated.

Mitigate: We recommend mitigation to minimize current or potential exposures associated with soil vapor intrusion. The most common mitigation methods are sealing preferential pathways in conjunction with installing a sub-slab depressurization system and changing the pressurization of the building in conjunction with monitoring. The type, or combination of types, of mitigation is determined on a building -specific basis, taking into account building construction and operating conditions. Mitigation is considered a temporary measure implemented to address exposures related to soil vapor intrusion until contaminated environmental media are remediated.

These general recommendations are made with consideration being given to the additional notes on page 2. **MATRIX D Page 1 of 2**

ADDITIONAL NOTES FOR MATRIX D

This matrix summarizes actions recommended to address current and potential exposures related to soil vapor intrusion. To use the matrix appropriately as a tool in the decision-making process, the following should be noted:

[1] The matrix is generic. As such, it may be appropriate to modify a recommended action to accommodate analyte-specific, building-specific conditions (e.g., dirt floor in basement, crawl spaces, thick slabs, current occupancy, etc.), and/or factors provided in Section 3.2 of the guidance (e.g., current land use, environmental conditions, etc.). For example, collection of additional samples may be recommended when the matrix indicates "no further action" for a particular building, but the results of adjacent buildings (especially sub-slab vapor results) indicate a need to take actions to address exposures related to soil vapor intrusion. Mitigation might be recommended when the results of multiple contaminants indicate monitoring is recommended. Proactive actions may be proposed at any time. For example, the party implementing the actions may decide to install sub-slab depressurization systems on buildings where the matrix indicates "no further action" or "monitoring." Such an action might be undertaken for reasons other than public health (e.g., seeking community acceptance, reducing costs, etc.). However, actions implemented ***in lieu*** of sampling will typically be expected to be captured in the final engineering report and site management plan, and might not rule out the need for post-implementation sampling (e.g., to document effectiveness or to support terminating the action).

[2] Actions provided in the matrix are specific to addressing human exposures. Implementation of these actions does not preclude investigating possible sources of soil vapor contamination, nor does it preclude remediating contaminated soil vapor or the source of soil vapor contamination.

[3] Appropriate care should be taken during all aspects of sample collection to ensure that high quality data are obtained. Since the data are being used in the decision-making process, the laboratory analyzing the environmental samples must have current Environmental Laboratory Approval Program (ELAP) certification for the appropriate analyte and environmental matrix combinations. Furthermore, samples should be analyzed by methods that can achieve a minimum reporting limit of 1 microgram per cubic meter for indoor and outdoor air samples. For sub-slab vapor samples and dirt floor soil vapor samples, a minimum reporting limit of 1 microgram per cubic meter is recommended.

[4] Sub-slab vapor and indoor air samples are typically collected when the likelihood of soil vapor intrusion to occur is considered to be the greatest (i.e., worst-case conditions). If samples are collected at other times (typically, samples collected outside of the heating season), then resampling during worst-case conditions might be appropriate to verify that actions taken to address exposures related to soil vapor intrusion are protective of human health.

[5] When current exposures are attributed to sources other than soil vapor intrusion, the agencies should be given documentation (e.g., applicable environmental data, completed indoor air sampling questionnaire, digital photographs, etc.) to support a proposed action other than that provided in the matrix box and to support agency assessment and follow-up.

[6] The party responsible for implementing the recommended actions will differ depending upon several factors, including but not limited to the following: the identified source of the volatile chemicals, the environmental remediation program, and analyte-specific, site-specific and building-specific factors.

MATRIX D Page 2 of 2

FIGURE 5

Soil Vapor/Indoor Air Matrix E

February 2024

Analytes Assigned:
m,p-xylene, heptane, hexane

	INDOOR AIR CONCENTRATION of COMPOUND (mcg/m^3)		
SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m^3)	< 6	6 to < 20	20 and above
< 200	1. No further action	2. No Further Action	3. IDENTIFY SOURCE(S) or RESAMPLE or MITIGATE
200 to < 2,000	4. No further action	5. MONITOR	6. MITIGATE
2,000 and above	7. MITIGATE	8. MITIGATE	9. MITIGATE

mcg/m^3 = micrograms per cubic meter

No further action: No additional actions are recommended to address human exposures.

Identify Source(s) or Resample or Mitigate: We recommend that reasonable and practical actions be taken to identify the source(s) affecting the indoor air quality and that actions be implemented to reduce indoor air concentrations to within background ranges. For example, if an indoor or outdoor air source is identified, we recommend the appropriate party implement actions to reduce the levels. In the event that indoor or outdoor sources are not readily identified or confirmed, resampling (which might include additional sub-slab vapor and indoor air sampling locations) is recommended to demonstrate that SVI mitigation actions are not needed. Based on the information available, mitigation might also be recommended when soil vapor intrusion cannot be ruled out.

Monitor: We recommend monitoring (sampling on a recurring basis), including but not necessarily limited to sub-slab vapor, basement air and outdoor air sampling, to determine whether concentrations in the indoor air or sub-slab vapor have changed and/or to evaluate temporal influences. Monitoring might also be recommended to determine whether existing building conditions (e.g., positive pressure heating, ventilation, and air-conditioning systems) are maintaining the desired mitigation endpoint and to determine whether changes are needed. The type and frequency of monitoring is determined based on site-, building- and analyte-specific information, taking into account applicable environmental data and building operating conditions. Monitoring is an interim measure required to evaluate exposures related to soil vapor intrusion until contaminated environmental media are remediated.

Mitigate: We recommend mitigation to minimize current or potential exposures associated with soil vapor intrusion. The most common mitigation methods are sealing preferential pathways in conjunction with installing a sub-slab depressurization system and changing the pressurization of the building in conjunction with monitoring. The type, or combination of types, of mitigation is determined on a building -specific basis, taking into account building construction and operating conditions. Mitigation is considered a temporary measure implemented to address exposures related to soil vapor intrusion until contaminated environmental media are remediated.

These general recommendations are made with consideration being given to the additional notes on page 2. **MATRIX E Page 1 of 2**

ADDITIONAL NOTES FOR MATRIX E

This matrix summarizes actions recommended to address current and potential exposures related to soil vapor intrusion. To use the matrix appropriately as a tool in the decision-making process, the following should be noted:

[1] The matrix is generic. As such, it may be appropriate to modify a recommended action to accommodate analyte-specific, building-specific conditions (e.g., dirt floor in basement, crawl spaces, thick slabs, current occupancy, etc.), and/or factors provided in Section 3.2 of the guidance (e.g., current land use, environmental conditions, etc.). For example, collection of additional samples may be recommended when the matrix indicates "no further action" for a particular building, but the results of adjacent buildings (especially sub-slab vapor results) indicate a need to take actions to address exposures related to soil vapor intrusion. Mitigation might be recommended when the results of multiple contaminants indicate monitoring is recommended. Proactive actions may be proposed at any time. For example, the party implementing the actions may decide to install sub-slab depressurization systems on buildings where the matrix indicates "no further action" or "monitoring." Such an action might be undertaken for reasons other than public health (e.g., seeking community acceptance, reducing costs, etc.). However, actions implemented ***in lieu*** of sampling will typically be expected to be captured in the final engineering report and site management plan, and might not rule out the need for post-implementation sampling (e.g., to document effectiveness or to support terminating the action).

[2] Actions provided in the matrix are specific to addressing human exposures. Implementation of these actions does not preclude investigating possible sources of soil vapor contamination, nor does it preclude remediating contaminated soil vapor or the source of soil vapor contamination.

[3] Appropriate care should be taken during all aspects of sample collection to ensure that high quality data are obtained. Since the data are being used in the decision-making process, the laboratory analyzing the environmental samples must have current Environmental Laboratory Approval Program (ELAP) certification for the appropriate analyte and environmental matrix combinations. Furthermore, samples should be analyzed by methods that can achieve a minimum reporting limit of 1 microgram per cubic meter for indoor and outdoor air samples. For sub-slab vapor samples and dirt floor soil vapor samples, a minimum reporting limit of 1 microgram per cubic meter is recommended.

[4] Sub-slab vapor and indoor air samples are typically collected when the likelihood of soil vapor intrusion to occur is considered to be the greatest (i.e., worst-case conditions). If samples are collected at other times (typically, samples collected outside of the heating season), then resampling during worst-case conditions might be appropriate to verify that actions taken to address exposures related to soil vapor intrusion are protective of human health.

[5] When current exposures are attributed to sources other than soil vapor intrusion, the agencies should be given documentation (e.g., applicable environmental data, completed indoor air sampling questionnaire, digital photographs, etc.) to support a proposed action other than that provided in the matrix box and to support agency assessment and follow-up.

[6] The party responsible for implementing the recommended actions will differ depending upon several factors, including but not limited to the following: the identified source of the volatile chemicals, the environmental remediation program, and analyte-specific, site-specific and building-specific factors.

MATRIX E Page 2 of 2

FIGURE 6

Soil Vapor/Indoor Air Matrix F

February 2024

Analytes Assigned:
Toluene

SUB-SLAB VAPOR CONCENTRATION of COMPOUND (mcg/m³)	INDOOR AIR CONCENTRATION of COMPOUND (mcg/m³) < 10	10 to < 50	50 and above
< 300	1. No Further Action	2. No Further Action	3. IDENTIFY SOURCE(S) or RESAMPLE or MITIGATE
300 to < 3,000	4. No Further Action	5. MONITOR	6. MITIGATE
3,000 and above	7. MITIGATE	8. MITIGATE	9. MITIGATE

mcg/m³ = micrograms per cubic meter

No further action: No additional actions are recommended to address human exposures.

Identify Source(s) or Resample or Mitigate: We recommend that reasonable and practical actions be taken to identify the source(s) affecting the indoor air quality and that actions be implemented to reduce indoor air concentrations to within background ranges. For example, if an indoor or outdoor air source is identified, we recommend the appropriate party implement actions to reduce the levels. In the event that indoor or outdoor sources are not readily identified or confirmed, resampling (which might include additional sub-slab vapor and indoor air sampling locations) is recommended to demonstrate that SVI mitigation actions are not needed. Based on the information available, mitigation might also be recommended when soil vapor intrusion cannot be ruled out.

Monitor: We recommend monitoring (sampling on a recurring basis), including but not necessarily limited to sub-slab vapor, basement air and outdoor air sampling, to determine whether concentrations in the indoor air or sub-slab vapor have changed and/or to evaluate temporal influences. Monitoring might also be recommended to determine whether existing building conditions (e.g., positive pressure heating, ventilation, and air-conditioning systems) are maintaining the desired mitigation endpoint and to determine whether changes are needed. The type and frequency of monitoring is determined based on site-, building- and analyte-specific information, taking into account applicable environmental data and building operating conditions. Monitoring is an interim measure required to evaluate exposures related to soil vapor intrusion until contaminated environmental media are remediated.

Mitigate: We recommend mitigation to minimize current or potential exposures associated with soil vapor intrusion. The most common mitigation methods are sealing preferential pathways in conjunction with installing a sub-slab depressurization system and changing the pressurization of the building in conjunction with monitoring. The type, or combination of types, of mitigation is determined on a building -specific basis, taking into account building construction and operating conditions. Mitigation is considered a temporary measure implemented to address exposures related to soil vapor intrusion until contaminated environmental media are remediated.

These general recommendations are made with consideration being given to the additional notes on page 2. **MATRIX F Page 1 of 2**

ADDITIONAL NOTES FOR MATRIX F

This matrix summarizes actions recommended to address current and potential exposures related to soil vapor intrusion. To use the matrix appropriately as a tool in the decision-making process, the following should be noted:

[1] The matrix is generic. As such, it may be appropriate to modify a recommended action to accommodate analyte-specific, building-specific conditions (e.g., dirt floor in basement, crawl spaces, thick slabs, current occupancy, etc.), and/or factors provided in Section 3.2 of the guidance (e.g., current land use, environmental conditions, etc.). For example, collection of additional samples may be recommended when the matrix indicates "no further action" for a particular building, but the results of adjacent buildings (especially sub-slab vapor results) indicate a need to take actions to address exposures related to soil vapor intrusion. Mitigation might be recommended when the results of multiple contaminants indicate monitoring is recommended. Proactive actions may be proposed at any time. For example, the party implementing the actions may decide to install sub-slab depressurization systems on buildings where the matrix indicates "no further action" or "monitoring." Such an action might be undertaken for reasons other than public health (e.g., seeking community acceptance, reducing costs, etc.). However, actions implemented ***in lieu*** of sampling will typically be expected to be captured in the final engineering report and site management plan, and might not rule out the need for post-implementation sampling (e.g., to document effectiveness or to support terminating the action).

[2] Actions provided in the matrix are specific to addressing human exposures. Implementation of these actions does not preclude investigating possible sources of soil vapor contamination, nor does it preclude remediating contaminated soil vapor or the source of soil vapor contamination.

[3] Appropriate care should be taken during all aspects of sample collection to ensure that high quality data are obtained. Since the data are being used in the decision-making process, the laboratory analyzing the environmental samples must have current Environmental Laboratory Approval Program (ELAP) certification for the appropriate analyte and environmental matrix combinations. Furthermore, samples should be analyzed by methods that can achieve a minimum reporting limit of 1 microgram per cubic meter for indoor and outdoor air samples. For sub-slab vapor samples and dirt floor soil vapor samples, a minimum reporting limit of 1 microgram per cubic meter is recommended.

[4] Sub-slab vapor and indoor air samples are typically collected when the likelihood of soil vapor intrusion to occur is considered to be the greatest (i.e., worst-case conditions). If samples are collected at other times (typically, samples collected outside of the heating season), then resampling during worst-case conditions might be appropriate to verify that actions taken to address exposures related to soil vapor intrusion are protective of human health.

[5] When current exposures are attributed to sources other than soil vapor intrusion, the agencies should be given documentation (e.g., applicable environmental data, completed indoor air sampling questionnaire, digital photographs, etc.) to support a proposed action other than that provided in the matrix box and to support agency assessment and follow-up.

[6] The party responsible for implementing the recommended actions will differ depending upon several factors, including but not limited to the following: the identified source of the volatile chemicals, the environmental remediation program, and analyte-specific, site-specific and building-specific factors.

MATRIX F Page 2 of 2

FIGURE 7

Schematics of a permanent soil vapor probe and permanent nested soil vapor probes

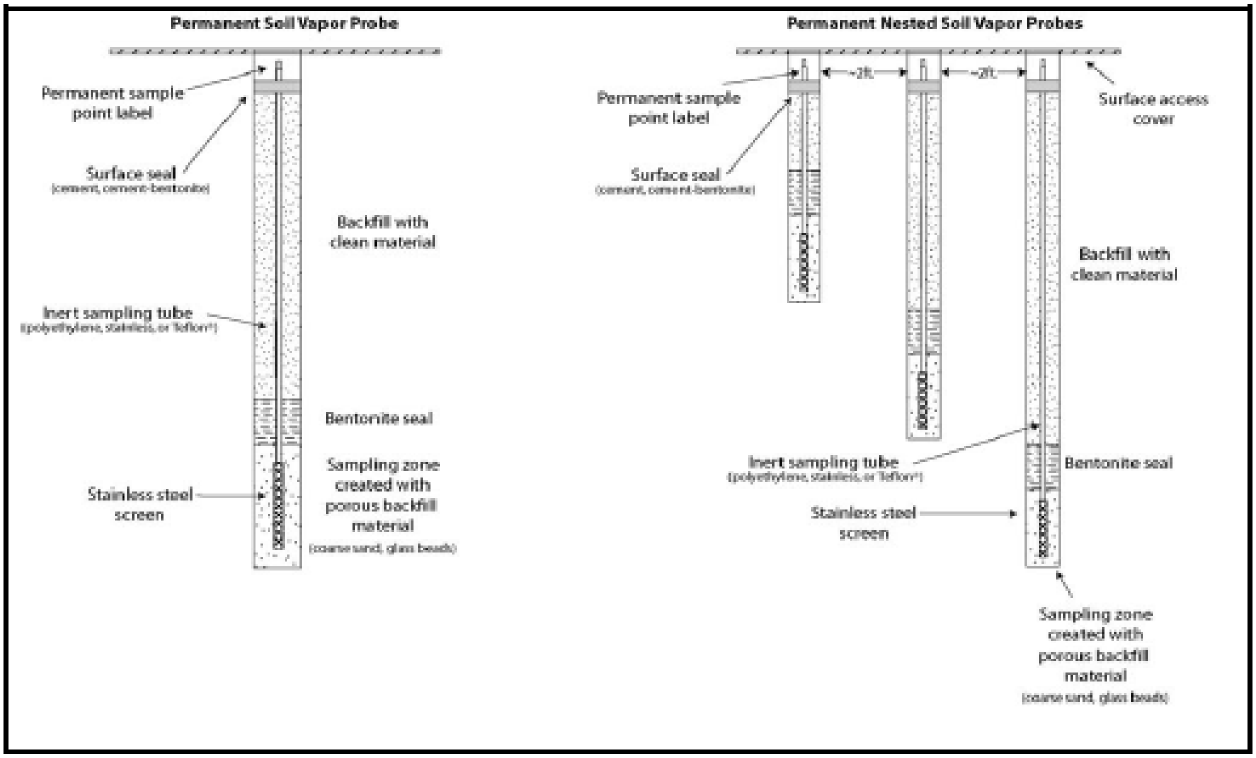
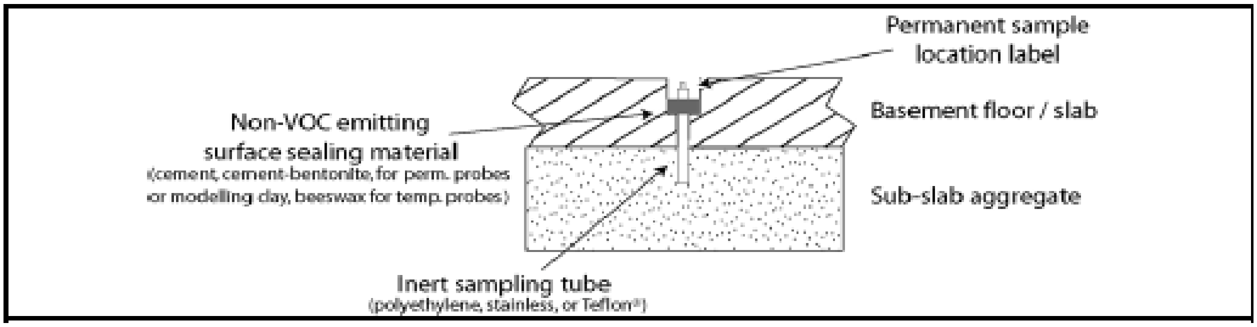


FIGURE 8

Schematic of a sub-slab vapor probe



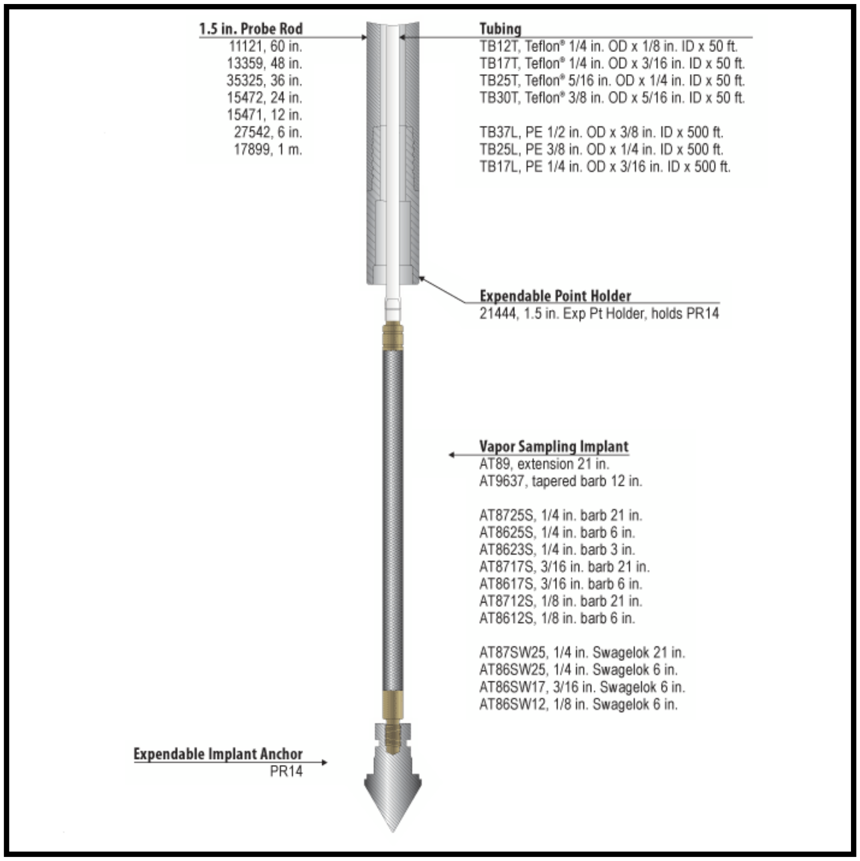
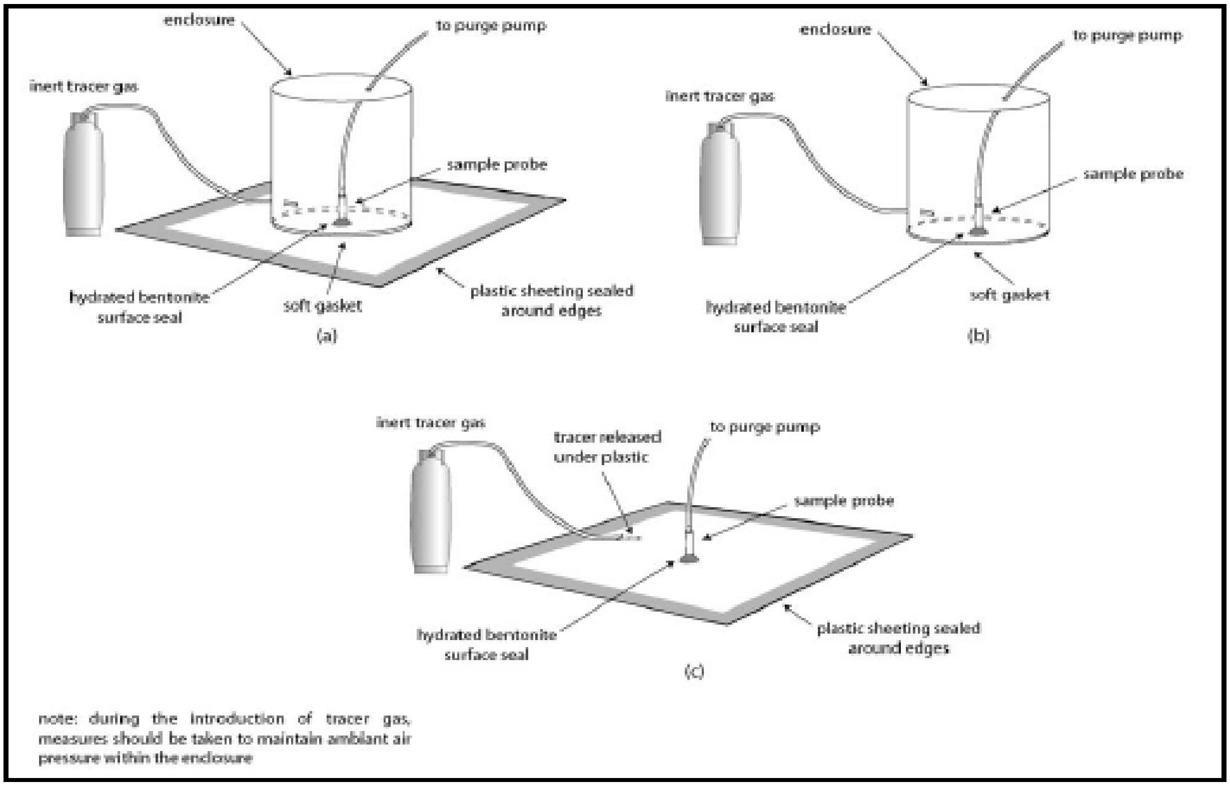


FIGURE 9

Schematics of tracer gas applications



BENCHMARK
ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

AIR CANISTER FIELD RECORD

PROJECT INFORMATION:

Project:
Job No:
Location:
Field Staff:
Client:

SAMPLE I.D.:

WEATHER CONDITIONS:

Ambient Air Temp. - A.M.:
Ambient Air Temp. - P.M.:
Wind Direction:
Wind Speed:
Precipitation:

Size of Canister:
Canister Serial No.:
Flow Controller No.:
Sample Date(s):
Shipping Date:
Sample Type: ☐ ☐ ☐ ☐
Soil Gas Probe Depth:

FIELD SAMPLING INFORMATION:

READING	TIME	VACUUM (inches Hg) or PRESSURE (psig)	DATE	INITIALS
Lab Vacuum (on tag)				
Field Vacuum Check [1]				
Initial Field Vacuum [2]				
Final Field Vacuum [3]				
Duration of Sample Collection				

LABORATORY CANISTER PRESSURIZATION:

Initial Vacuum (inches Hg and psia)		
Final Pressure (psia)		
Pressurization Gas		

SUBSLAB SHROUD:

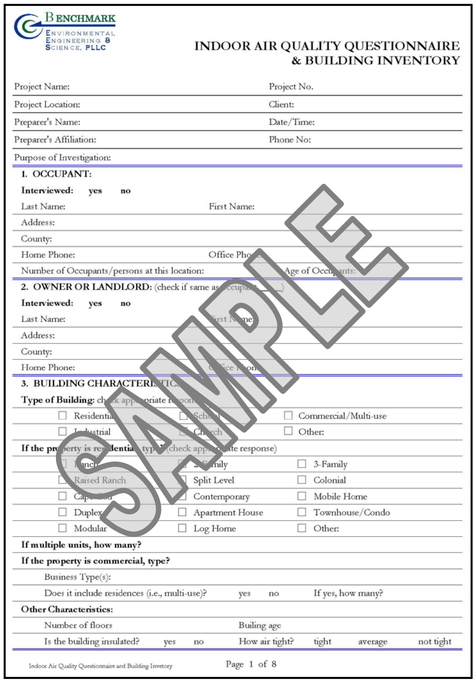
Shroud Helium Concentration:
Calculated tubing volume: x 3 =
Purged Tubing Volume Concentration:
Is the purged volume concentration less than or equal to 10% in shroud?
☐
☐

COMPOSITE TIME (hours)	FLOW RATE RANGE (ml/min)
15 Min.	316 - 333
0.5 Hours	158 - 166.7
1	79.2 - 83.3
2	39.6 - 41.7
4	19.8 - 20.8
6	13.2 - 13.9
8	9.9 - 10.4
10	7.92 - 8.3
12	6.6 - 6.9
24	3.5 - 4.0

NOTES:

1 Vacuum measured using portable vacuum gauge (provided by Lab)
2 Vacuum measured by canister gauge upon opening valve
3 Vacuum measured by canister gauge prior to closing valve

Signed:



BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

INDOOR AIR QUALITY QUESTIONNAIRE
& BUILDING INVENTORY

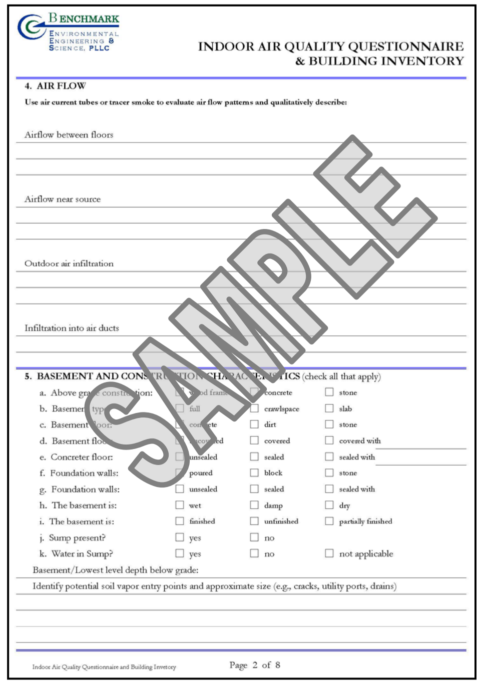
Project Name: Project No.
Project Location: Client:
Preparer's Name: Date/Time:
Preparer's Affiliation: Phone No:
Purpose of Investigation:

1. OCCUPANT:
Interviewed: yes no
Last Name: First Name:
Address:
County:
Home Phone: Office Phone:
Number of Occupants/persons at this location: Age of Occupants:

2. OWNER OR LANDLORD: (check if same as occupant ____)
Interviewed: yes no
Last Name: First Name:
Address:
County:
Home Phone: Office Phone:

3. BUILDING CHARACTERISTICS
Type of Building: check appropriate response
☐ Residential ☐ School ☐ Commercial/Multi-use
☐ Industrial ☐ Church ☐ Other:
If the property is residential, type? (check appropriate response)
☐ Ranch ☐ 2-Family ☐ 3-Family
☐ Raised Ranch ☐ Split Level ☐ Colonial
☐ Cape Cod ☐ Contemporary ☐ Mobile Home
☐ Duplex ☐ Apartment House ☐ Townhouse/Condo
☐ Modular ☐ Log Home ☐ Other:
If multiple units, how many?
If the property is commercial, type?
Business Type(s):
Does it include residences (i.e., multi-use)? yes no If yes, how many?
Other Characteristics:
Number of floors Builing age
Is the building insulated? yes no How air tight? tight average not tight

Indoor Air Quality Questionnaire and Building Invetory Page 1 of 8



BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

INDOOR AIR QUALITY QUESTIONNAIRE
& BUILDING INVENTORY

4. AIR FLOW
Use air current tubes or tracer smoke to evaluate air flow patterns and qualitatively describe:

Airflow between floors

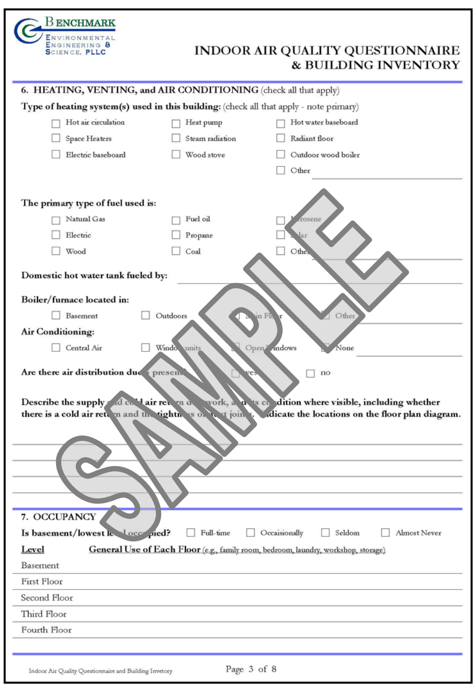
Airflow near source

Outdoor air infiltration

Infiltration into air ducts

5. BASEMENT AND CONSTRUCTION CHARACTERISTICS (check all that apply)
a. Above grade construction: ☐ wood frame ☐ concrete ☐ stone
b. Basement type: ☐ full ☐ crawlspace ☐ slab
c. Basement floor: ☐ concrete ☐ dirt ☐ stone
d. Basement floor: ☐ uncovered ☐ covered ☐ covered with
e. Concreter floor: ☐ unsealed ☐ sealed ☐ sealed with
f. Foundation walls: ☐ poured ☐ block ☐ stone
g. Foundation walls: ☐ unsealed ☐ sealed ☐ sealed with
h. The basement is: ☐ wet ☐ damp ☐ dry
i. The basement is: ☐ finished ☐ unfinished ☐ partially finished
j. Sump present? ☐ yes ☐ no
k. Water in Sump? ☐ yes ☐ no ☐ not applicable
Basement/Lowest level depth below grade:
Identify potential soil vapor entry points and approximate size (e.g., cracks, utility ports, drains)

Indoor Air Quality Questionnaire and Building Invetory Page 2 of 8



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INDOOR AIR QUALITY QUESTIONNAIRE
& BUILDING INVENTORY

6. HEATING, VENTING, and AIR CONDITIONING (check all that apply)
Type of heating system(s) used in this building: (check all that apply - note primary)
☐ Hot air circulation ☐ Heat pump ☐ Hot water baseboard
☐ Space Heaters ☐ Steam radiation ☐ Radiant floor
☐ Electric baseboard ☐ Wood stove ☐ Outdoor wood boiler
☐ Other

The primary type of fuel used is:
☐ Natural Gas ☐ Fuel oil ☐ Kerosene
☐ Electric ☐ Propane ☐ Solar
☐ Wood ☐ Coal ☐ Other

Domestic hot water tank fueled by:

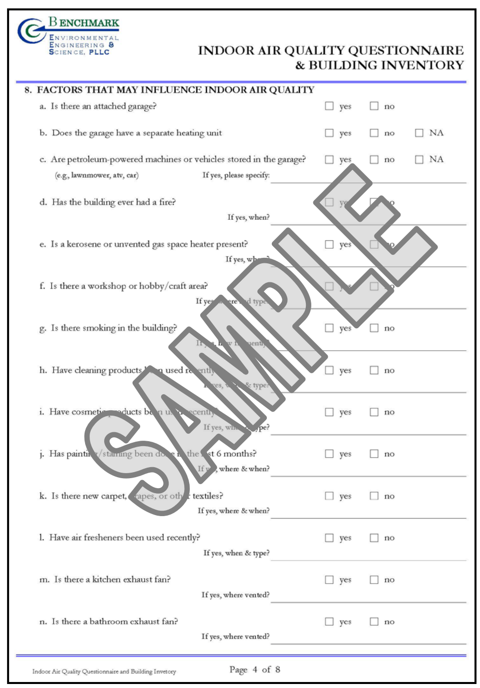
Boiler/furnace located in:
☐ Basement ☐ Outdoors ☐ Main Floor ☐ Other
Air Conditioning:
☐ Central Air ☐ Window units ☐ Open Windows ☐ None

Are there air distribution ducts present? ☐ yes ☐ no

Describe the supply and cold air return ductwork, and its condition where visible, including whether there is a cold air return and the tightness of duct joints. Indicate the locations on the floor plan diagram.

7. OCCUPANCY
Is basement/lowest level occupied? ☐ Full-time ☐ Occaisionally ☐ Seldom ☐ Almost Never
Level **General Use of Each Floor** (e.g., family room, bedroom, laundry, workshop, storage)
Basement
First Floor
Second Floor
Third Floor
Fourth Floor

Indoor Air Quality Questionnaire and Building Invetory Page 3 of 8



BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

INDOOR AIR QUALITY QUESTIONNAIRE
& BUILDING INVENTORY

8. FACTORS THAT MAY INFLUENCE INDOOR AIR QUALITY
a. Is there an attached garage? ☐ yes ☐ no
b. Does the garage have a separate heating unit ☐ yes ☐ no ☐ NA
c. Are petroleum-powered machines or vehicles stored in the garage? ☐ yes ☐ no ☐ NA
(e.g., lawnmower, atv, car) If yes, please specify:
d. Has the building ever had a fire? ☐ yes ☐ no
If yes, when?
e. Is a kerosene or unvented gas space heater present? ☐ yes ☐ no
If yes, where?
f. Is there a workshop or hobby/craft area? ☐ yes ☐ no
If yes, where and type?
g. Is there smoking in the building? ☐ yes ☐ no
If yes, how frequently?
h. Have cleaning products been used recently? ☐ yes ☐ no
If yes, when & type?
i. Have cosmetic products been used recently? ☐ yes ☐ no
If yes, when & type?
j. Has painting/staining been done in the last 6 months? ☐ yes ☐ no
If yes, where & when?
k. Is there new carpet, drapes, or other textiles? ☐ yes ☐ no
If yes, where & when?
l. Have air fresheners been used recently? ☐ yes ☐ no
If yes, when & type?
m. Is there a kitchen exhaust fan? ☐ yes ☐ no
If yes, where vented?
n. Is there a bathroom exhaust fan? ☐ yes ☐ no
If yes, where vented?

Indoor Air Quality Questionnaire and Building Invetory Page 4 of 8

8. FACTORS THAT MAY INFLUENCE INDOOR AIR QUALITY (continued)

o. Is there a clothes dryer? ☐ yes ☐ no

If yes, is it vented outside? yes no

p. Has there been a pesticide application ☐ yes ☐ no

If yes, when & type? ______

q. Are there odors in the building? ☐ yes ☐ no

If yes, please describe? ______

r. Do any of the building occupants use solvents at work? ☐ yes ☐ no

(e.g., chemical manufacturing or laboratory, auto mechanic or auto body shop, painting, fuel oil delivery, boiler mechanic, pesticide application, cosmetologist)

If yes, what types of solvents are used? ______

If yes, are their clothes washed at work? ☐ yes ☐ no

s. Do any of the building occupants regularly use or work at a dry-cleaning service?

(check appropriate response)

☐ yes, use dry-cleaning regularly (weekly) ☐ no

☐ yes, use dry-cleaning infrequently (monthly or less) ☐ unknown

☐ yes, work at a dry-cleaning service

t. Is there a radon mitigation system for the building/structure? ☐ yes ☐ no

If yes, date of installation? ______

Is the system active or passive? ______

9. WATER AND SEWAGE

Water Supply: ☐ Public Water ☐ Drilled Well ☐ Driven Well ☐ Dug Well ☐ Other: ______

Sewage Disposal: ☐ Public Sewer ☐ Septic Tank ☐ Leach Field ☐ Dry Well ☐ Other: ______

10. RELOCATION INFORMATION (for oil spill residential emergency)

a. Provide reasons why relocation is recommended: ______

b. Residents choose to: ☐ remain in home ☐ relocate to friends/family ☐ relocate to hotel/motel

c. Responsibility for costs associated with reimbursement explained? ☐ yes ☐ no

d. Relocation package provided and explained to residents? ☐ yes ☐ no

11. FLOOR PLANS

Draw a plan view sketch of the basement and first floor of the building. Indicate air sampling locations, possible indoor air pollution sources and PID meter readings. If the building does not have a basement, please note.

Basement:

First Floor:

12. OUTDOOR PLOT

Draw a sketch of the area surrounding the building being sampled. If applicable, provide information on spill locations, potential air contamination sources (industries, gas stations, repair shops, landfills, etc.), outdoor air sampling location(s), and PID meter readings.

Also indicate compass direction, wind direction and speed during sampling, the locations of the well and spetic system, if applicable, and a qualifying statement to help locate the site on a topographic map.

13. PRODUCT INVENTORY FORM

Make & Model of field instrument used: ______

List specific products found in the structure that have the potential to affect indoor air quality.

Location	Product Description	Size (units)	Condition [1]	Chemical Ingredients	Field Instrument Reading (units)	Photo (Y/N)

Notes:

1. Describe the condition of the product containers as **Unopened (UO), Used (U), or Deteriorated (D).**
2. Photographs of the **front and back** of product containers can replace the handwritten list of chemical ingredients. However, the photographs must be of good quality and ingredient labels must be legible.

ROUX

FIELD OPERATING PROCEDURES

Outdoor Ambient Air VOC Sample Collection Procedure

OUTDOOR AMBIENT AIR VOC SAMPLE COLLECTION PROCEDURE

PURPOSE

This procedure describes the methods for collecting outdoor ambient air samples for volatile organic compound (VOC) analysis via USEPA Method TO-15 using Summa® canisters (or approved other). Typically, outdoor air samples are collected to characterize and document site-specific VOCs that may be present in outdoor ambient air. For sample collection associated with intrusive activities that may potentially release VOCs to the ambient air, sample location(s) typically are collected downwind of the intrusive activity at the perimeter of the work area and/or exclusion zone for the Site. Upwind sample location(s) may be utilized if regional facilities (e.g. gasoline service station, factories) are located proximate to the Site to assess off-site ambient VOC contributions (background).

SAMPLE COLLECTION PROCEDURES

The following actions should be taken to document conditions during outdoor air sampling and ultimately to aid in the interpretation of the analytical results:

- A site map should be prepared to indicate the outdoor ambient air sample locations including all site improvements (e.g., buildings, access roads, etc.), public roads/streets (if applicable), the location of potential VOC contributors (e.g., gasoline stations, factories, lawn movers, etc.), compass orientation (north), and scale.

- Weather conditions (e.g., precipitation, wind speed, outdoor temperature, and barometric pressure) should be reported on the Air Canister Field Record (sample attached); and

- Any pertinent observations, such as odors, readings from field instrumentation, and significant activities in the vicinity (e.g., operation of heavy equipment or dry cleaners) should be recorded.

The following describes the outdoor air sampling procedure:

1. Typically, a 6-liter, passivated (inert), stainless steel, evacuated sampling sphere (e.g., Summa canister) (or approved other) will be supplied by the laboratory that will be conducting the analysis. The canister should be received from the laboratory, certified clean, evacuated, and prepared for sampling.

2. Sampling will take place in accordance with the project work plan. Selected sample locations will be sufficiently spaced to allow location(s) to be field modified, if necessary.

3. The number of Summa canisters required as well as the flow rate of the constant differential low volume flow controllers will be supplied by the laboratory in accordance with the project work plan.

4. Prior to placement, complete an Air Canister Field Record (sample attached) of each canister, which includes: project information, field staff, weather conditions, canister serial number, flow controller number, sample date(s)/time(s), shipping date(s), canister lab vacuum, field vacuum check, initial field vacuum, final field vacuum, and duration of sample collection.

5. The pressure in the canisters must be monitored with the laboratory provided pressure gauge at the beginning and the end of the sampling period as well as before and after shipment of the canisters at the laboratory. The **target final field vacuum must be approximately 5 inches of mercury. Samples with a final field vacuum of greater than 10 inches of mercury, or equal to zero, will be flagged** and usability of the data will depend on the sample volume and reporting limits that can be achieved.

6. Canisters may be placed on the ground provided there is a clear plastic sheet beneath it to prevent cross contamination. The intake tubing, however, must be positioned at a height of approximately 3 to 5-feet above grade to collect air at an elevation representative of ambient air within the breathing zone. Typically, the canister is chained and locked to a secure step ladder with the intake tubing tethered to the ladder.

7. Ship the canisters to the laboratory under chain-of-custody command within three days of sample collection so that no sample will exceed the 30-day holding time (since receipt from the lab) per USEPA TO-15.

8. Air samples will be analyzed by Gas Chromatography/Mass Spectroscopy (GC/MS) in accordance with EPA Method TO-15, or as specified. Analytical results will be reported as concentrations of each VOC at each location during each sampling event, typically in parts per billion by volume (ppbv).

9. Sample collection should take place on warm, dry days. If rain or high humidity conditions develop during sampling, the sampling event should be suspended. Temperature, barometric pressure, and wind speed should be monitored during the sampling event, for use in analysis of the results. The combination of sampling location, height, and meteorological conditions will assure that sampling will measure VOCs at their highest concentrations.

QUALITY ASSURANCE / QUALITY CONTROL (QA/QC)

Extreme care should be taken during all aspects of sample collection to ensure that sampling error is minimized and high quality data are obtained. The sampling team members should avoid actions (e.g., fueling vehicles, using permanent marking pens, and wearing freshly dry-cleaned clothing or personal fragrances), which can cause sample interference in the field. Appropriate QA/QC protocols must be followed for sample collection and laboratory analysis, such as use of certified clean sample devices, meeting sample holding times and temperatures, sample accession, chain of custody, etc. Samples should be delivered to the analytical laboratory as soon as possible after collection. In addition, laboratory accession procedures must be followed including field documentation (sample collection information and locations), chain of custody, field blanks, field sample duplicates, and laboratory duplicates, as appropriate.

Some methods require collecting samples in duplicate to assess errors. Duplicate and/or split samples should be collected in accordance with the requirements of the sampling and analytical methods being implemented.

For certain regulatory programs, a Data Usability Summary Report (DUSR) may be required to determine whether or not the data, as presented, meets the site or project specific criteria for data quality and data use. This requirement may dictate the level of QC and the category of data deliverable to request from the laboratory. Guidance on preparing a DUSR is available by contacting the NYSDEC's Division of Environmental Remediation.

New York State Public Health Law requires laboratories analyzing environmental samples collected from within New York State to have current Environmental Laboratory Approval Program (ELAP) certification for the appropriate analyte and environmental matrix combinations. If ELAP certification is not currently required for an analyte (e.g., trichloroethene); then the analysis should be performed by a laboratory that has ELAP certification for similar compounds in air and uses analytical methods with detection limits similar to background (e.g., tetrachloroethene via EPA Method TO-15).

ATTACHMENTS

Air Canister Field Record (sample)

REFERENCES

United States Environmental Protection Agency. *Compendium of Methods for the Determination of Toxic Organic Compounds in Ambient Air*. Second Addition (EPA/625/R-96/010b). January 1999.

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

AIR CANISTER FIELD RECORD

PROJECT INFORMATION:

Project:

Job No:

Location:

Field Staff:

Client:

SAMPLE I.D.:

Size of Canister:

Canister Serial No.:

Flow Controller No.:

Sample Date(s):

Shipping Date:

Sample Type: ☐ ☐

☐ ☐

Soil Gas Probe Depth:

WEATHER CONDITIONS:

Ambient Air Temp. - A.M.:

Ambient Air Temp. - P.M.:

Wind Direction:

Wind Speed:

Precipitation:

FIELD SAMPLING INFORMATION:

READING	TIME	VACUUM (inches Hg) or PRESSURE (psig)	DATE	INITIALS
Lab Vacuum (on tag)				
Field Vacuum Check [1]				
Initial Field Vacuum [2]				
Final Field Vacuum [3]				
Duration of Sample Collection				

LABORATORY CANISTER PRESSURIZATION:

Initial Vacuum (inches Hg and psia)		
Final Pressure (psia)		
Pressurization Gas		

SUBSLAB SHROUD:

Shroud Helium Concentration:

Calculated tubing volume: x 3 =

Purged Tubing Volume Concentration:

Is the purged volume concentration less than or equal to 10% in shroud?

☐

☐

COMPOSITE TIME (hours)	FLOW RATE RANGE (ml/min)
15 Min.	316 - 333
0.5 Hours	158 - 166.7
1	79.2 - 83.3
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10	7.92 - 8.3
12	6.6 - 6.9
24	3.5 - 4.0

NOTES:

1 Vacuum measured using portable vacuum gauge (provided by Lab)

2 Vacuum measured by canister gauge upon opening valve

3 Vacuum measured by canister gauge prior to closing valve

Signed: