Melnyk, Eugene W (DEC)

From: Jesse Alt-Winzig <JAltWinzig@cscos.com>
Sent: Wednesday, June 19, 2024 1:42 PM
To: Melnyk, Eugene W (DEC)
Cc: Daniel G. Keane; Nicole Kane; Caprio, Andrea (DEC)
Subject: RE: 1803 Elmwood Avenue BCP (C915394) - RI Progress and PCB Concrete Sampling
Attachments: Figure 1 - Proposed Slab Sampling.pdf; 1803 Elmwood Avenue BCP - Concrete Sampling Figure.pdf

Hello Gene,

The Project Team intends to follow up with this by collecting eight (8) concrete samples from the warehouse slab in order to identify the presence of PCB contamination; and if it is discrete to one location, or throughout the entire slab. The work plan is described below.

Scope of Services

C&S will complete concrete chip sampling to identify the presence of PCB contamination on the concrete slab.

C&S will collect eight samples of the concrete slab within the Site warehouse.

- The slab will be chipped in eight discrete locations using a hammer drill to an approximate depth of 2 centimeters below slab surface.
- Any drilling equipment that has the potential to come in contact with the sampled media will either be decontaminated prior to each use or will disposable, dedicated materials.
- C&S will place the samples for analysis in pre-cleaned bottles provided by the laboratory with a decontaminated stainless-steel spoon or by gloved hand.
- C&S will submit eight samples under standard chain-of-custody procedures for laboratory analyses using United States Environmental Protection Agency (USEPA) methods.
- QA/QC samples will include one field duplicate and one MS/MSD sample.
- The sample will be analyzed for 6 NYCRR Part 375 PCBs per EPA method 8082 with detection level of 100 parts per billion (ppb).

Reporting

The results of the investigation will be included in the Remedial Investigation Report (RIR) to the NYSDEC.

Schedule

C&S anticipates completing the field program within two weeks of receipt of notice to proceed.

Assumptions

The following assumptions were made in the preparation of this proposal:

- Samples will be analyzed on a standard turnaround time.
- The proposed scope is limited in nature and was not designed to fully characterize the nature and extent of contamination on the Site. The proposed services are intended to identify the presence or absence of PCB contamination on the Site warehouse concrete slab and are not intended to comprehensively delineate any contamination encountered. Performance of these services may lead to a recommendation to perform further investigative work in the remedial action plan.
- Permission to access the project site will be provided to C&S by the property owner, and free and easy site access will be granted to C&S and its subcontractors without delay throughout the duration of the field investigation.
- Containerization, characterization, and disposal of investigation-derived waste will not be required.
- All field work will be performed under Level D health and safety specifications. A half-face respirator will also be worn during chipping activities to reduce silica dust exposure. If conditions are encountered that necessitate the need for a higher level of protection of personnel (e.g. high levels of volatile organic vapors or sample media that is hazardous), this will be considered an additional service. The Client will be notified if such conditions arise.
- The locations of each sample location will be documented.
- Sample locations will be patched with concrete.
- The field program will be completed in one day.

If you deem this approach to be sufficient to identify the PCB contamination, please let us know. Also note that this is an investigation to determine the presence of PCB contamination throughout the entire slab, not a delineation of the known PCB location. If the DEC would like to see that location delineated in all directions, we will include that. We will be collecting one (1) sample (C-01) from the location of the sample collected in the Phase II. Attached is our proposed sampling map and the Phase II map showing where the original concrete sample was collected from.

Thanks,
Jesse

Jesse Alt-Winzig
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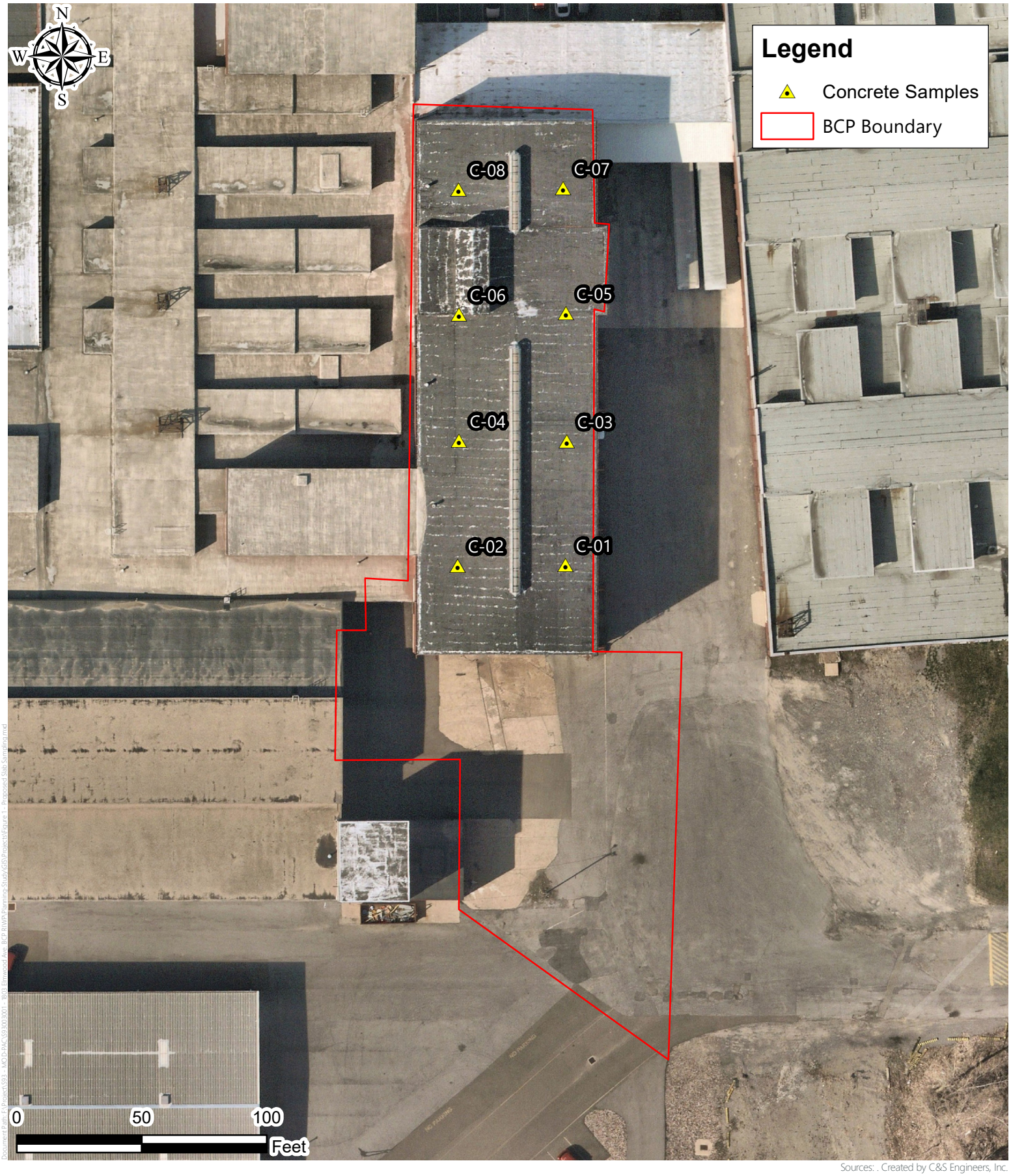
Subject: RE: 1803 Elmwood Avenue BCP (C915394) - RI Progress and PCB Concrete Sampling

Jesse:
Thank you for resurrecting the information on the oily residue sampling conducted during a previous Phase 2 investigation. The results of the oily residue on the concrete clearly indicate PCB contamination. And the removal of the oily residue to expose the concrete surface below for sampling shows nominal PCB contamination of the concrete surface. This data can be included the RI report providing an assessment of this material for existing contamination inside the building and used for developing a remedy for the concrete flooring. Additional sampling is not necessary at this time, but will likely be necessary for a remedial action plan.



Sources: . Created by C&S Engineers, Inc.

Modified: 6/18/2024 @ 1:49:45 PM

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Figure 1 | Proposed Concrete Sampling

1803 Elmwood Avenue BCP

MOD-PAC Folding Cartons Stock Packaging
Expect the expected.

If you have any questions regarding the above, please contact me.

Sincerely
Gene

Eugene Melnyk, PE
Project Manager
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From: Jesse Alt-Winzig <JAltWinzig@cscos.com>
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Subject: RE: 1803 Elmwood Avenue BCP (C915394) - RI Progress and PCB Concrete Sampling

Good Morning Gene,

We have another update to share. When you visited the site, you made note of the condition of the concrete slab within the warehouse structure as being quite dirty/oily. Collecting samples from the surface of the concrete slab was brought up.

After some discussions with the project team, we were able to locate documentation regarding PCB sampling that has already occurred. Three oily residue samples on the concrete slab were collected and analyzed for PCBs with DEXSIL Clor-N-Soil BCP Screening Kits. The results are reported in Section 3.2 (pg. 6 of report, pg. 9 of PDF) and locations shown on figure 3 (pg. 82 of the PDF). I have attached Figure 3 separately for your records. The PCB results are also summarized below:

- Surafce-001: >50 ppm
- Surafce-002: ~35 ppm
- Surface-003: ~40 ppm

As reported in Section 3.2 of the report, the concrete floor was scraped clean at location Surafce-001. One concrete sample (Concrete-001) was then collected in the location of Surface-001. The analytical results identified three (3) PCB Aroclors at concentrations above method detection limits in the one (1) concrete sample

collected. Total PCBs were 1.75 ppm in concrete sample Concrete-001 which is in exceedance of the CUSCO. The Alpha Report (L2031763) is included on page 167 of the PDF.

This type of sampling seems to align with what you discussed on site. Please let us know if this analysis is sufficient or if additional investigative actions are recommended. Thanks!

Jesse

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Subject: RE: 1803 Elmwood Avenue BCP (C915394) - RI Progress and Lead Paint Evaluation

Jesse:
Thank you for the RI update and for providing the lead paint evaluation report. Lead mitigation is not central to the BCP program, but effective management of lead based paint will serve to reduce lead paint exposure, and eliminates the generation of potential hazardous waste in the form spalled paint chip debris which can create a source of hazardous material on ground surfaces at the site.

Sincerely
Gene

Eugene Melnyk, PE
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N

KEY

= Sub-slab sample location.

= Concrete sample location.

= Surface sample location.

ENVIRONMENTAL ADVANTAGE, INC.

Regulatory Compliance – Site Investigations – Facility Inspections

FOCUSED PHASE II ENVIRONMENTAL SITE ASSESSMENT
SUB-SLAB & CONCRETE BORING LOCATIONS
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BUFFALO, NEW YORK

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CHECKED BY: CMH	DATE: 02/2022	FIGURE NO: 3