

July 17, 2007

Mr. Todd Caffoe, P.E.
New York State Department of Environmental Conservation
Division of Environmental Remediation
6271 East Avon-Lima Road
Avon, New York 14414-0057

Re: Off-Site Soil Gas Investigation Work Plan
Former Brainerd Manufacturing Facility

Dear Mr. Caffoe:

Per our recent discussions, we have prepared this Off-Site Soil Gas Investigation Work Plan for the property located northwest of the Former Brainerd Manufacturing Site (Site). The soil gas investigation work will be performed in response to groundwater data collected at monitoring well MW-9 during remedial investigation (RI) activities at the Site (see Figure 1 and Table 1). Specifically, the NYSDEC has indicated that, based on the parameters and concentrations detected in MW-9, supplemental groundwater investigation work may be required to define the extent of off-site volatile organic compound (VOC) impacts. A passive soil gas survey has been recommended by the NYSDEC as a preliminary step in evaluating the extent of off-site groundwater impacts. The soil gas survey will characterize subsurface soil gas northwest and hydraulically downgradient of the Former Despatch property on the adjacent EJ Del Monte property to provide surrogate VOC data indicative of the magnitude of groundwater concentrations. Depending on sample results, the soil gas survey may then be followed by a focused supplemental monitoring well installation and sampling program to confirm soil gas investigation findings.

Our planned scope of work for the Off-Site Soil Gas Investigation is presented below.

1.0 PASSIVE SOIL GAS INVESTIGATION EQUIPMENT

The Off-Site Soil Gas Investigation will employ Gore-Sorber® sampling modules. The Gore-Sorber® module is a passive soil gas sampler that consists of several separate sorbent collection units deemed “sorbers”. Each sorber contains sorbent materials specific to the range of target VOCs and hydrophobic characteristics. The sorbers are sheathed in a vapor permeable insertion and retrieval cord constructed of inert, hydrophobic material that allows vapors to move freely across a membrane and onto the sorbent material. Gore-Sorber® sampling modules will be provided by the manufacturer based on the list of target analytes (see Table 2).

2.0 SITE GRID

Twenty Gore-Sorber® soil gas sampling modules will be installed approximately 50 feet apart to assess the soil gas northwest and hydraulically downgradient of well MW-9 located on the EJ Del Monte property (see Figure 2). Prior to Gore-Sorber® module deployment, the field crew will layout a 50 foot by 50 foot grid as presented in Figure 2. Each grid point will be surveyed for northing and easting (i.e., X-Y) coordinates using a Trimble GeoXT handheld GPS unit. Surveying these points will facilitate re-locating and retrieval of the modules upon completion of the required exposure time and will assist the siting of possible future exploratory borings/wells if soil gas impacts are discovered.

3.0 MODULE INSTALLATION

The Gore-Sorber® modules will be furnished by the manufacturer and will remain in their laboratory provided containers within the shipping box until deployment per the manufacturer's instructions. The modules will not be stored near potential sources of organic vapors including petroleum fuels, fuel exhaust, and solvents, etc.

Underground utility clearance will be secured prior to passive soil gas sampling activities. Module installation will not be conducted within 15 feet of monitoring wells, utility trenches, or other conduits, because they may act as a preferential pathway for soil vapor migration.

To facilitate installation of modules, the module cord and surface seal corks will be prepared per manufacturers' specifications before initiating field activities. Gore-Sorber® Modules will be installed to a depth of 2 to 3 feet below ground surface through a narrow pilot hole (approximately 1/2-inch to 3/4-inch in diameter). The pilot holes will be drilled with an electric rotary hammer drill equipped with appropriate-sized carbide-tipped auger bits or augers (1/2 to 3/4-inch diameter up to 36 inches long). If sandier soils are encountered that collapse upon drill removal, therefore de-ionized water may be added to the pilot hole to temporarily compact the soil and keep the hole open for module insertion.

Wearing clean nitrile gloves, the field scientist will remove the module from its designated container. The identification numbers of the containers and modules will be compared to confirm matching codes. Once deployed to the desired depth, the insertion rod will be removed and the pilot hole will be sealed at the surface with the provided cork. All excess module cord will be placed within the pilot hole prior to cork placement. Upon installation, the module number, date, and time of installation along with any other pertinent comments will be recorded on the Installation/Retrieval Log (see Attachment 1). In addition, module identification numbers will be recorded on a field map to provide a cross-reference for data plotting.

Prior to use at the next module location, the drill bit/auger and the module insertion rod will be cleaned with a non-phosphate soap and laboratory-grade water rinse. Nitrile gloves will be replaced between each module location to prevent cross-contamination.

4.0 MODULE RETRIEVAL AND ANALYSIS

Following the module exposure period (10 to 14 calendar days), each module will be located and identified using the installation field map described in the previous section. Upon arrival at each location, the cork and module will be removed, checked against the installation map and Installation/Retrieval Log entry, placed in the laboratory provided containers, and transported under chain-of-custody command to Screening Modules Laboratory located in Elkton, Maryland. The modules will be analyzed for chlorinated VOCs per USEPA Method 8260 for the parameters presented in Table 1. The laboratory will report the soil gas results by target compound desorbed from the module in units of micrograms (mass).

5.0 GROUNDWATER SAMPLING AND ANALYSIS

During the Gore-Sorber® module exposure period, a sample will be collected from MW-9 following low flow purge and sample collection procedures per the October 2005 SI/RAS Work Plan. The sample will be analyzed by TestAmerica (formerly Severn Trent Laboratories) for Target Compound List (TCL) VOCs per USEPA Method 8260. The groundwater data will be compared to proximate Gore-Sorber® module data to provide a correlation between groundwater concentrations and soil gas data, thereby facilitating evaluation of the Gore-Sorber® results across the sample grid.

6.0 QUALITY ASSURANCE/QUALITY CONTROL (QA/QC)

One trip blank module, prepared by the laboratory, will be included with the entire module set delivered to the sampling team prior to the sampling event. The trip blank will be transported and handled in the same manner as the actual samples during installation and retrieval. The trip blank module will be kept in the laboratory-provided sample box and stored as described above until sample retrieval and submittal to the laboratory. The results of the trip blank analysis will be reviewed to evaluate if the potential for sample contamination during transportation and handling exists. The trip blank will be analyzed for the parameters listed in Table 2.

7.0 REPORTING

The results of the passive soil gas investigation and groundwater sampling will be summarized, mapped and presented in a brief report describing the investigation findings. Recommendations for supplemental groundwater investigation work, if warranted by the results, will be prepared as well.

8.0 PROJECT SCHEDULING

Fieldwork will be scheduled as soon as possible following NYSDEC authorization and EJ Del Monte access approval, with the goal of initiating work in August 2007. We anticipate that module installation will be completed within one day. Following the prescribed 10 to 14 day period, an additional day will be required for module retrieval and shipping to the laboratory.

Mr. Todd Caffoe
NYSDEC

July 17, 2007
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Please do not hesitate to contact us if you have any questions or comments.

Sincerely,
Benchmark Environmental Engineering & Science, PLLC

Thomas H. Forbes
Project Manager

C: A. Shaffer
 S. Chalifoux

file: 0040-002-400, CG

TABLES

TABLE 1
RI GROUNDWATER ANALYTICAL DATA SUMMARY

Former Brainerd Manufacturing Site
East Rochester, New York

Parameter ¹	Monitoring Well Location														GWQS/GV ⁴
	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6 ⁵	MW-7	MW-8	MW-9 ³	Blind Dup MW-9	MW-10	PW-1 ²	OW-1	OW-2	
TCL VOCs (ug/L)															
Acetone	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	50
Methylene chloride	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5
Toluene	ND	ND	ND	ND	ND	3.2 J	ND	ND	ND	ND	ND	1.8 J	ND	ND	5
Chloroform	ND	0.91 J	ND	0.86 J	1.4 J	ND	ND	ND	2 J	2.1 J	ND	0.55 J	0.58 J	ND	7
Tetrachloroethene	3.1 J	8.2	ND	87	1600	3100	ND	13	3100	2800	17	780	570	ND	5
Trichloroethene	0.78 J	6.3	11	240	1400	1500	6.0	20	2700	2500	15	540	470	320	5
Trichlorofluoromethane	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5
1,1 Dichloroethene	ND	ND	ND	ND	0.56 J	ND	ND	ND	3.5 J	3.9 J	ND	ND	1 J	ND	5
cis-1,2-Dichloroethene	ND	ND	ND	ND	0.80 J	ND	ND	ND	3.2 J	3.2 J	ND	1.3 J	0.65 J	4 J	5
trans-1,2-Dichloroethene	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.3 J	5
1,1,1-Trichloroethane	ND	ND	0.74 J	2.6 J	11	16 J	ND	ND	34	36	0.60 J	3.6 J	5.4	ND	5
1,1,2-Trichloroethane	ND	ND	ND	ND	1.5 J	ND	ND	ND	3.8 J	3.7 J	ND	0.51 J	ND	ND	1
1,1 Dichloroethane	ND	ND	ND	ND	ND	ND	ND	ND	0.62 J	0.57 J	ND	ND	ND	ND	5
TCL SVOCs - acid extractables (ug/L)															
Di-n-butyl phthalate	NA	ND	NA	NA	NA	NA	NA	NA	ND	ND	NA	ND	NA	NA	50
Total and Soluble Metals ⁴ (ug/L)															
Aluminum, Total	NA	511	NA	NA	NA	ND	NA	NA	917	907	NA	ND	NA	NA	100
Barium, Total	NA	40.2	NA	NA	NA	ND	NA	NA	66.5	66.6	NA	57.2	NA	NA	1000
Calcium, Total	NA	85700	NA	NA	NA	ND	NA	NA	144000	146000	NA	119000	NA	NA	
Chromium, Total	NA	5.6	NA	NA	NA	ND	NA	NA	212	212	NA	12.4	NA	NA	50
Iron, Total	NA	604	NA	NA	NA	4870	NA	NA	1320	1290	NA	ND	NA	NA	300
Iron, Soluble	NA	ND	NA	NA	NA	ND	NA	NA	ND	ND	NA	ND	NA	NA	300
Magnesium, Total	NA	20400	NA	NA	NA	ND	NA	NA	35400	35700	NA	40600	NA	NA	35000
Manganese, Total	NA	16.4	NA	NA	NA	558	NA	NA	322	326	NA	95.6	NA	NA	300
Manganese, Soluble	NA	ND	NA	NA	NA	337	NA	NA	ND	ND	NA	ND	NA	NA	300
Nickel, Total	NA	ND	NA	NA	NA	ND	NA	NA	11.4	11.0	NA	ND	NA	NA	100
Potassium, Total	NA	5270 J	NA	NA	NA	ND	NA	NA	6020 J	6040 J	NA	22600 N*J	NA	NA	
Selenium, Total	NA	ND	NA	NA	NA	ND	NA	NA	22.9	24.3	NA	ND	NA	NA	10
Sodium, Total	NA	283000	NA	NA	NA	ND	NA	NA	452000	455000	NA	237000	NA	NA	20000
Zinc, Total	NA	ND	NA	NA	NA	ND	NA	NA	12.3	11.5	NA	ND	NA	NA	2000
Wet Chemistry (units as indicated)															
Chemical Oxygen Demand (mg/L)	NA	NA	NA	NA	NA	18.8	NA	NA	NA	NA	NA	NA	NA	NA	
Cyanide, Total (mg/L)	NA	ND	NA	NA	NA	NA	NA	NA	0.033	0.036	NA	ND	NA	NA	0.2
Nitrate (mg/L) (as N)	NA	NA	NA	NA	NA	2.6	NA	NA	NA	NA	NA	NA	NA	NA	10
Sulfate (mg/L)	NA	NA	NA	NA	NA	1830	NA	NA	NA	NA	NA	NA	NA	NA	250
Field Measurements (units as indicated)															

TABLE 1
RI GROUNDWATER ANALYTICAL DATA SUMMARY

Former Brainerd Manufacturing Site
East Rochester, New York

Parameter ¹	Monitoring Well Location																												GWQS/GV ⁴
	MW-1		MW-2		MW-3		MW-4		MW-5		MW-6 ⁵		MW-7		MW-8		MW-9 ³		Blind Dup MW-9		MW-10		PW-1 ²		OW-1		OW-2		
pH (units)	7.28	7.27	7.43	7.46	7.45	7.46	7.2	7.21	7.24	7.24	6.98	6.97	7.33	7.34	7.3	7.30	6.97	7.04	6.97	7.04	7.58	7.61	7.25	7.17	7.04	7.08	7.58	7.58	6.5 - 8.5
Temperature (°C)	19.1	18.1	16.8	17.5	19.8	19.3	19	19.3	15.8	15.7	18.1	18.1	14	13.9	14.3	13.8	15.2	15.5	15.2	15.5	16.2	15.7	17.4	16.6	14.6	14.5	15.9	15.7	
Specific Conductance (uS)	1010	1009	1795	1805	2806	2824	2566	2603	2076	2077	3190	3192	495.6	500.1	511.7	532.4	2912	2957	2912	2957	1546	1541	1987	2031	3228	3207	484.4	486.5	
Turbidity	6.5	5.25	19.8	13.7	22.1	16.5	32.3	27.3	45.1	40.4	107	68	15.6	11.4	5.52	3.24	30.5	17.3	30.5	17.3	155	106	3.48	2.37	39.2	15.1	97.2	80.9	50**
DO (ppm)	1.43	1.47	4.72	5.53	5.06	5.45	5.53	5.56	3.04	2.91	3.25	3.21	6.74	6.95	6.49	6.25	1.68	1.74	1.68	1.74	3.32	3.54	4.77	5.14	3.16	2.66	1.32	1.41	
ORP (mV)	-27	-32	62	67	138	134	120	118	118	119	129	128	127	127	125	124	149	165	149	165	157	157	97	101	66	89	-17	-25	

Notes:

1. Only those parameters detected at a minimum of one sample location are presented in this table; all other compounds were reported as non-detect.
2. MS/MSD collected at PW-1.
3. Blind Duplicate collected at monitoring well MW-9.
4. NYSDEC Class "GA" Groundwater Quality Standards/Guidance Values (GWQS/GV), 6 NYCRR Part 703.
5. Groundwater collected from well MW-6 was analyzed for soluble iron and manganese, in addition to TAL Metals.

Definitions:

- J = Estimated value; result is less than the sample quantitation limit but greater than zero.
- ND = parameter not detected above laboratory detection limit.
- NA = Not analyzed
- NJ = parameter has been 'tentatively identified' with its approximate concentration.
- N* = Indicates the spike or duplicate analysis is not within the quality control limits
- "**" = field threshold value; when exceeded, field filtered metals sample is collected (i.e., dissolved metals).

BOLD = Analytical result exceeds individual GWQS/GV.

TABLE 2

SUMMARY OF ANALYTICAL PARAMETERS

**Former Brainerd Manufacturing Facility
East Rochester, New York**

Gore Module® Chlorinated Analysis
1,1-Dichloroethene
trans-1,2-Dichloroethene
cis-1,2-Dichloroethene
Trichloroethene
Tetrachloroethene
1,1-Dichloroethane
1,2-Dichloroethane
1,1,2-Trichloroethane
1,1,1-Trichloroethane
1,1,2,2-Tetrachloroethane
1,1,1,2-Tetrachloroethane
Chloroform
Carbon Tetrachloride
Chlorobenzene
1,2-Dichlorobenzene
1,3-Dichlorobenzene
1,4-Dichlorobenzene
Vinyl Chloride

FIGURES

DATE: JULY 2007
DRAFTED BY: BCH

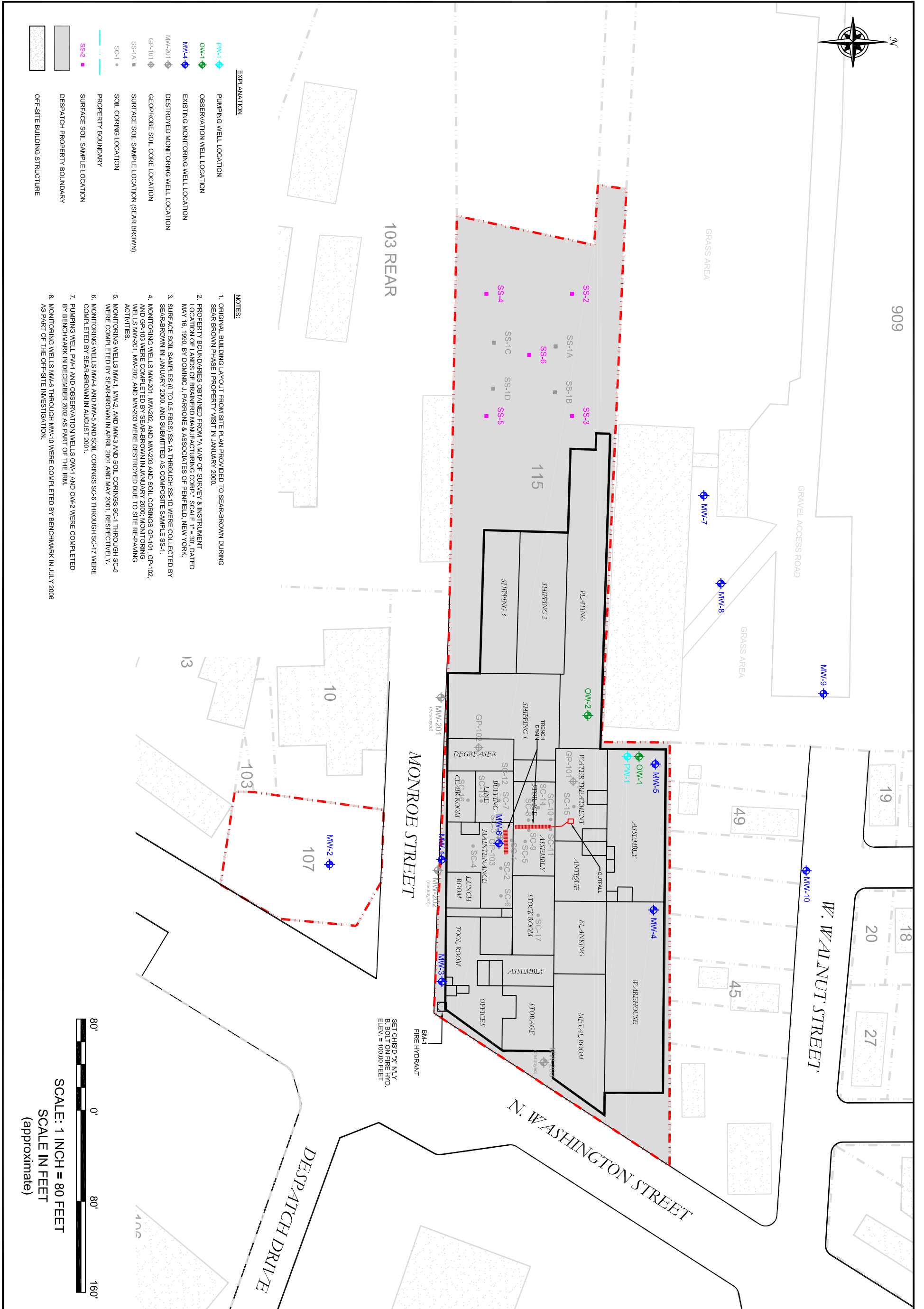


FIGURE 1

SITE PLAN
OFF-SITE SOIL GAS SAMPLING WORK PLAN
FORMER BRAINERD MANUFACTURING FACILITY
EAST ROCHESTER, NEW YORK

PREPARED FOR
DEPATCH INDUSTRIES, INC.



726 EXCHANGE STREET
SUITE 624
BUFFALO, NEW YORK 14210
(716) 856-0599

JOB NO.: 0040-002-400

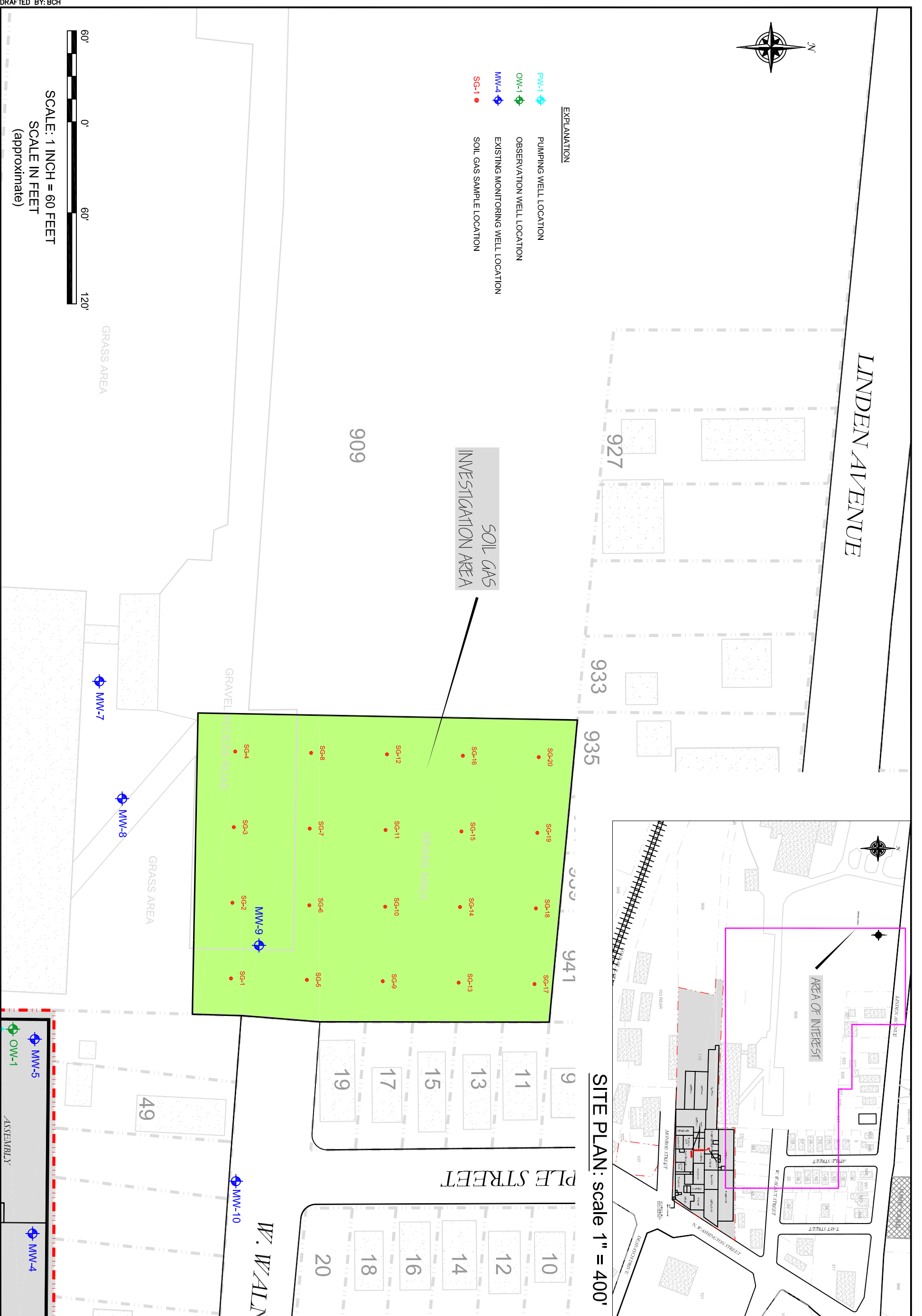



FIGURE 2	PLANNED SOIL GAS SAMPLING LOCATIONS OFF-SITE SOIL GAS SAMPLING WORK PLAN FORMER BRAINERD MANUFACTURING FACILITY EAST ROCHESTER, NEW YORK	 726 EXCHANGE STREET SUITE 624 BUFFALO, NEW YORK 14210 (716) 856-0599
	PREPARED FOR DESPATCH INDUSTRIES, INC.	

ATTACHMENT 1

PROJECT FIELD FORMS