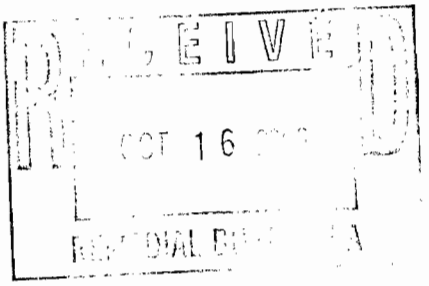
P.W. GROSSER CONSULTING





October 12, 2006

Mr. Nathan Putnam
NYS Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway, 11th Floor
Albany, N.Y. 12233-7015

Re: Sub-Slab Vapor and Indoor Air Sampling Plan
Safeguard Storage Properties LLC, Baldwin, New York
VCP # V00523

Dear Mr. Putnam:

P.W. Grosser Consulting, Inc. (PWGC) has prepared this Sub-Slab Vapor and Indoor Air Sampling Plan for the above referenced site. The purpose of this document is to adequately investigate soil vapor quality and its potential impact on indoor air at the above referenced facility.

Included in our sub-slab and indoor air investigation timeline is a schedule to complete other investigation activates at the site as requested by your Department.

As indicated in the work plan, the sampling will be conducted pursuant to the New York State Department of Health (NYSDOH) "Guidance for Evaluating Soil Vapor Intrusion in the State of New York" Public Comment Draft, February, 2005. It is anticipated that the sampling will be completed in November to represent conditions during the heating season.

Please call if you have any questions.

Very truly yours,
PWGC

James P. Rhodes, C.P.G.
Vice President

cc: G. Bobersky, NYSDEC
W. Parrish, NYSDEC
J. Nealon, NYSDOH

ACEC
American Council of Engineering Companies
Peer Reviewed Member

1170 Atlantic Avenue
Baldwin, NY
Section 54, Block 46, Lot 62
NYSDEC VCP # V00523

PWGC Project No. SSS0601

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OCT 1 6
REMEDIAL BURREAU

SUB-SLAB VAPOR AND INDOOR SAMPLING PLAN

October 2006

Submitted to:

New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway, 11th Floor
Albany, NY 12233-7015

Prepared for:

Safeguard Storage Properties, LLC

Prepared by:

PWGC
Strategic Environmental & Engineering Solutions

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TABLE OF CONTENTS

Sub-Slab Vapor and Indoor Air Sampling Plan
1170 Atlantic Avenue - Baldwin, NY

Page

1.0 INTRODUCTION AND OBJECTIVES 1
1.1 Site Description 1
1.2 Site History 2
2.0 SITE SAMPLING 4
2.1 Pre-Sampling Building Inspection 4
2.2 Sub-Slab Vapor Sampling 4
2.3 Indoor Air Sampling 7
2.4 Outdoor Air Sampling 7
3.0 Quality Assurance / Quality Control (QA/QC) 9
4.0 Analytical Methods 10
5.0 Sampling Results and Recommended Actions 11

FIGURES

Figure 1 - Site Location Map
Figure 2 - Site Plan with Sample Locations Map

APPENDICES

Appendix A - NYSDOH Indoor Air Quality Questionnaire
Appendix B - Sampling Investigation Schedule

1.0 INTRODUCTION AND OBJECTIVES

This Sub-Slab Vapor and Indoor Air Sampling Plan has been prepared by P.W. Grosser Consulting, Inc. (PWGC) to detail a plan to investigate the sub-slab soil vapor properties and the indoor air quality at the Safeguard Storage property (the Site) located at 1170 Atlantic Avenue, Baldwin, N.Y. The work is being conducted on behalf of Safeguard Storage Properties LLC under the New York State Department of Environmental Conservation (NYSDEC) Voluntary Cleanup Program (VCP # V00523). This work was originally proposed by ATC Associates Inc. (ATC), in their December 24, 2003 Final Remedial Investigation Workplan. ATC implemented the work in February, 2005 and prepared a report in March, 2006 which was subsequently submitted to the NYSDEC. Following their review of the report, the NYSDEC indicated that the sub-slab soil vapor and indoor air required resampling since the work did not adhere to the procedures specified in the workplan as well as the protocol specified in the New York State Department of Health (NYSDOH) "Guidance for Evaluating Soil Vapor Intrusion in the State of New York" Public Comment Draft, February, 2005. Overall, the sub-slab sampling will address the possibility of soil gas contamination directly beneath the structure and indoor air sampling will detect air contamination within the building, if present.

The objective of this plan is to describe the work that will be performed on the site, including the installation and sampling of permanent sub-slab vapor points, installation and sampling of a soil vapor point, indoor air sampling, and outdoor air sampling. This work will follow the procedures described in the NYSDOH document referenced above. This document will also discuss the reasoning of the plan with respect to the quantity and placement of the sampling points throughout the site.

1.1 Site Description

The subject Site consists of a 2.7-ace parcel of land on the south side of Atlantic Avenue, in the Hamlet of Baldwin, Town of Hempstead, Nassau County, New York. The property is identified in Nassau County Tax maps as Section 54, Block 46, Lot 62. The property is improved with a

44,600 square foot one-story steel frame commercial building with sheet metal siding. The building is currently used for self storage and the interior is divided into individual self storage units ranging in size from 25 – 300 square foot spaces. The remainder of the site consists of asphalt-paved driveway/parking areas and grass.

The Site was reportedly built up from the Millburn Creek streambed and the creek rerouted around the resulting peninsula. The Site is bounded on four sides by wooden bulkheads, except for the Site's access driveway over Millburn Creek at the northeast corner of the property.

The property is generally bounded by commercial and residential properties. East of the site, across Milburn Creek, is a boat storage yard. South of the site, across a boat canal connected to Milburn Creek, is a residential development and vacant land. North of the Site is a portion of a boat canal connected to Milburn Creek, followed by a commercial building facing Atlantic Avenue. A Site Location Map is included as **Figure 1**.

1.2 Site History

The site was originally used as a boat storage and repair yard dating back to at least 1941. In 1974, the currently existing building was constructed and was used as an indoor tennis facility. The site usage of the building changed in 1983 (according to building department records) as Lightalarms Electronics Corporation (LEC) took over the site. LEC manufactured emergency lighting equipment at this facility until the operation moved in 1998. LEC was known to have used paints and solvents in their operation. LEC's operations included the use of a spray booth, with a permitted exhaust to the outside, to spray paint light fixtures and other components. Xylene and toluene were reported to have been used to clean the paint spray guns. Prior to painting the facility utilized a solvent dip tank, consisting of 1,1,1-trichlorothane) to clean metal parts in preparation for paint.

The above information was discovered in the preparation of a number of Phase I Environmental Site Assessments (ESA). In addition, a number of subsurface investigations have been

performed at the site. For a complete and detailed history including subsurface investigation results we refer the reader to the Final Remedial Investigation Workplan prepared by ATC in December 24, 2003, and previously submitted to the NYSDEC.

2.0 SITE SAMPLING

Do to the Site's history, a soil gas survey and indoor air quality assessment was included in ATC's Final Remedial Investigation Workplan. ATC indicated that soil gas sampling would be conducted beneath the slab of the building at the former production area, former spray booth area, current office area, and from the southern portion of the building. They further indicated that indoor air quality samples would also be collected in a rough grid pattern which generally corresponds to the areas described above. As previously mentioned, the sub-slab and indoor air sampling activities were carried out by ATC. However, the NYSDEC in conjunction with the NYSDOH indicated that the work did not meet the procedures and protocols described in the workplan and the sub-slab soil gas and indoor air would have to be resampled. The new proposed sampling will consist of sub-slab vapor, indoor air, and outdoor air sampling. These three different methods, performed concurrently, will be used to obtain data from underneath, within, and outside the on-site structure and will be used to determine if there is a health risk to site occupants, and how to monitor or mitigate the risk, if it exists. Given the Site's current use as a self storage facility, with the exception of a site representative, the occupancy of the building is transient in nature.

2.1 Pre-Sampling Building Inspection

Prior to the sampling event, a NYSDOH Center for Environmental Health's Indoor Air Quality Questionnaire and Building Inventory will be completed. A copy of this questionnaire is included as **Appendix A**. This will facilitate an accurate assessment of the potential contribution of volatile chemicals. During the building inventory, PWGC does not expect to gain access to the private self storage units and the contents of these units will not be assessed during this investigation.

2.2 Sub-Slab Vapor Sampling

In order to determine the vapor quality in the soil beneath the on-site structure, sub-slab vapor samples will be collected. These samples will be taken from permanent boring points, installed

with a concrete coring device, through the floor. A total of four (4) sampling points will be installed throughout the building which consists of a common, single concrete slab. The locations of the sampling points are shown on **Figure 2** and the locations generally follow the rationale presented in the ATC workplan. The first sub-slab sample (SS-1) will be located in the vicinity of the office area.. Sample SS-2 will be located in the former production area. Sample SS-3 will be located in the former spray booth area. The fourth sub-slab vapor point (SS-4) will be installed in the southern portion of the building as shown.

The sampling will be conducted after November 1st to be consistent with the heating season. For at least 24 hours prior to and during sampling, the heating systems will be operating to maintain normal indoor air temperatures (i.e., 65 to 75 degrees F). Prior to installation of the sub-slab vapor probes, the building floors will be inspected and any penetrations (cracks, floor drains, utility perforations, sumps, etc.) will be noted and recorded. Probes will be installed where the potential for ambient air infiltration via floor penetrations is minimal.

The sub-slab vapor probes will be constructed in the same manner at each location to minimize possible discrepancies. Probes will be constructed with brass or stainless steel tubing and fittings and will not extend further than two inches into the sub-slab material. Coarse sand or glass beads will be added to cover about one inch of the probe tips and the implant will be sealed to the surface with cement.

After installation of the probes, one to 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. Flow rates for both purging and collecting will not exceed 0.2 liters per minute to minimize outdoor air infiltration during sampling. Samples will be collected in Summa® canisters which have been certified clean by the laboratory and analyzed by using USEPA Method TO-15. All samples will be collected over the same period of time and submitted to Ecotest Laboratories, Inc. (Ecotest), an Environmental Laboratory Approval Program (ELAP) certified laboratory.

To aid in the interpretation of the sampling results, uses of volatile chemicals during building maintenance activities, will be identified. The use of heating or air conditioning systems during sampling will be noted, as well as weather conditions and ventilation conditions. Pertinent observations, such as spills, floor drains, odors, and readings from field instrumentation will be recorded. As the building is primarily used for self storage and the individual units are locked, the potential for chemicals to be stored within the units without the knowledge of the Site owner exists. Products potentially containing volatile chemicals, which are located outside of the storage units, in view of the sampler, will be noted and evaluated.

A sample log sheet will be maintained summarizing 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, vacuum of canisters before and after samples are collected, apparent moisture content of the sampling zone, and chain of custody protocols.

As part of the vapor intrusion evaluation, a tracer gas serves as a quality assurance/quality control (QA/QC) device to verify the integrity of the soil vapor probe seal. Helium will be used as the tracer gas and a box will serve to keep it in contact with the probe during the testing. A portable monitoring device will be used to analyze a sample of soil vapor for the tracer prior to sampling. If tracer sample results show a significant presence of the tracer, the probe seals will be adjusted to prevent infiltration. At the conclusion of the sampling round, a second tracer sample will be collected to confirm the integrity of the probe seals.

After the collection of the analytical sample, a field reading will be recorded at each of the sub-slab sampling points utilizing a photoionization detector capable of detecting organic compounds in the parts per billion range.

2.3 Indoor Air Sampling

Indoor air samples will be collected to characterize exposures to air within the on-site building. For each sub-slab sample collected, one indoor air sample will be collected in its immediate vicinity as shown on **Figure 2**. A total of four indoor air samples will be collected concurrently with the four sub-slab samples. Samples will be taken from a height of approximately four - five feet above the floor to represent the breathing zone of transient site occupants.

Again, for at least 24 hours prior to and during sampling, the heating systems will be operating to maintain normal indoor air temperatures (i.e., 65 to 75 degrees F) and sampling personnel will avoid lingering in the immediate area of the sampling device while samples are being collected.

Flow rates will not exceed 0.2 liters per minute as to remain consistent with sub-slab sample collection. Samples will be collected in Summa® canisters which have been certified clean by the laboratory and analyzed by using USEPA Method TO-15. Samples will be collected over the same period of time.

A sample log sheet will be maintained summarizing sample identification, date and time of sample collection, sampling height, identity of samplers, sampling methods and devices, volume of air sampled, vacuum of canisters before and after samples are collected, and chain of custody protocols.

2.4 Outdoor Air Sampling

An outdoor air sample (OA-1) will be collected to characterize site-specific background outdoor air conditions. This sample will be collected concurrently with the sub-slab vapor and the indoor air 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 sub-slab vapor results (i.e., to identify potential outdoor air interferences associated with the infiltration of outdoor air into the sampling apparatus while the sub-slab vapor sample is collected).

The sample will be collected from a representative upwind location, away from wind obstructions, and at a height of four to five feet. A representative sample is one that is not biased toward obvious sources of volatile chemicals.

The outdoor air sample will be collected in the same manner as the indoor samples. Weather conditions and ventilation conditions will be recorded, as well as any pertinent observations, such as odors, readings from field instrumentation, and significant activities in the vicinity.

3.0 Quality Assurance / Quality Control (QA/QC)

Extreme care will 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 will avoid actions (e.g., using permanent marker pens and wearing freshly dry-cleaned clothes or personal fragrances) which can cause sample interference in the field. QA/QC protocols will be followed for sample collection and laboratory analysis, such as use of certified clean sample devices, meeting sample holding times and temperatures, sample accession, and chain of custody.

A tracer gas, used for the sub-slab vapor sampling, serves as a QA/QC device to verify the integrity of the soil vapor probe seals.

Samples will be delivered to the analytical laboratory as soon as possible after collection. The laboratory analyzes QC samples with each analytical batch, including a Method Blank (MB), Laboratory Control Sample (LCS), and a Laboratory Control Sample Duplicate (LCSD). Internal standards are added to all calibration standards, samples, and blanks to verify that the analytical system is in control.

A Data Usability Summary Report (DUSR) will be included in the report of the sampling results to determine whether or not the data, as presented, meets the site specific criteria for data quality and data use.

4.0 Analytical Methods

Analytical procedures that were used and corresponding reporting limits will be identified when reporting the sampling results. Samples will be analyzed by USEPA Method TO-15 for the full analyte list of volatile organic compounds. All samples will be analyzed by Ecotest , an ELAP certified laboratory.

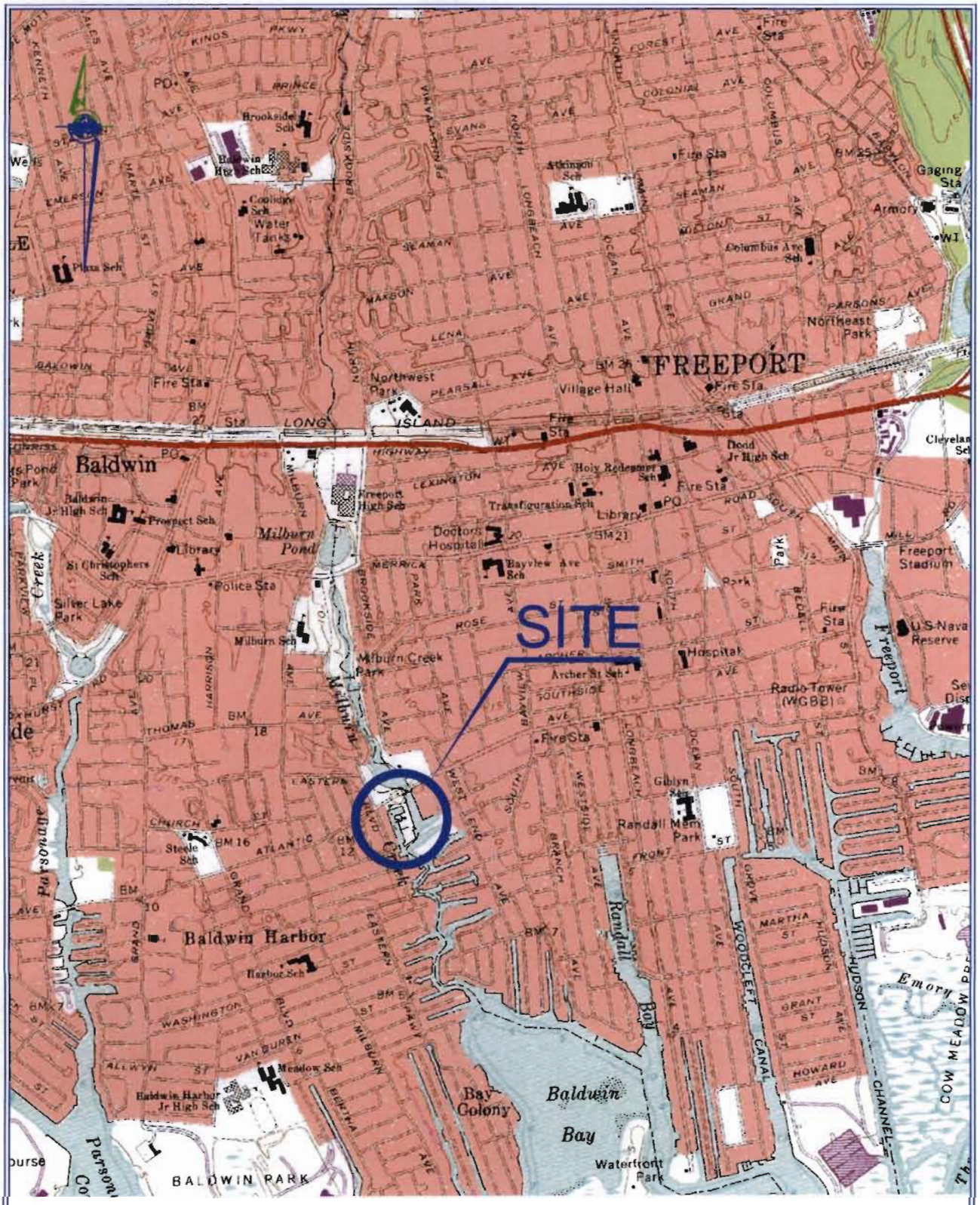
5.0 Sampling Results and Recommended Actions

The detection of volatile chemicals in sub-slab vapor samples does not necessarily indicate soil vapor intrusion is occurring or actions are needed to address exposures. This determination is made taking into account all samples, including sub-slab vapor, indoor air, and outdoor air. New York State Department of Health (NYSDOH) guidelines for volatile chemicals in air will be taken into account, as well as human health risks and attenuation factors (i.e., the ratio of indoor air to sub-slab vapor concentrations).

Based on the evaluation, no further action, additional sampling, or mitigation may be recommended. The NYSDOH has included examples of "decision matrices" in the Guidance for Evaluating Soil Vapor Intrusion document.

A schedule of this sampling investigation is included in this report as **Appendix B**. Also included in the schedule is a time line to complete other investigation activities at the Site as requested by the NYSDEC. Results of the sampling investigation will be presented and discussed in a comprehensive sampling report.

FIGURES



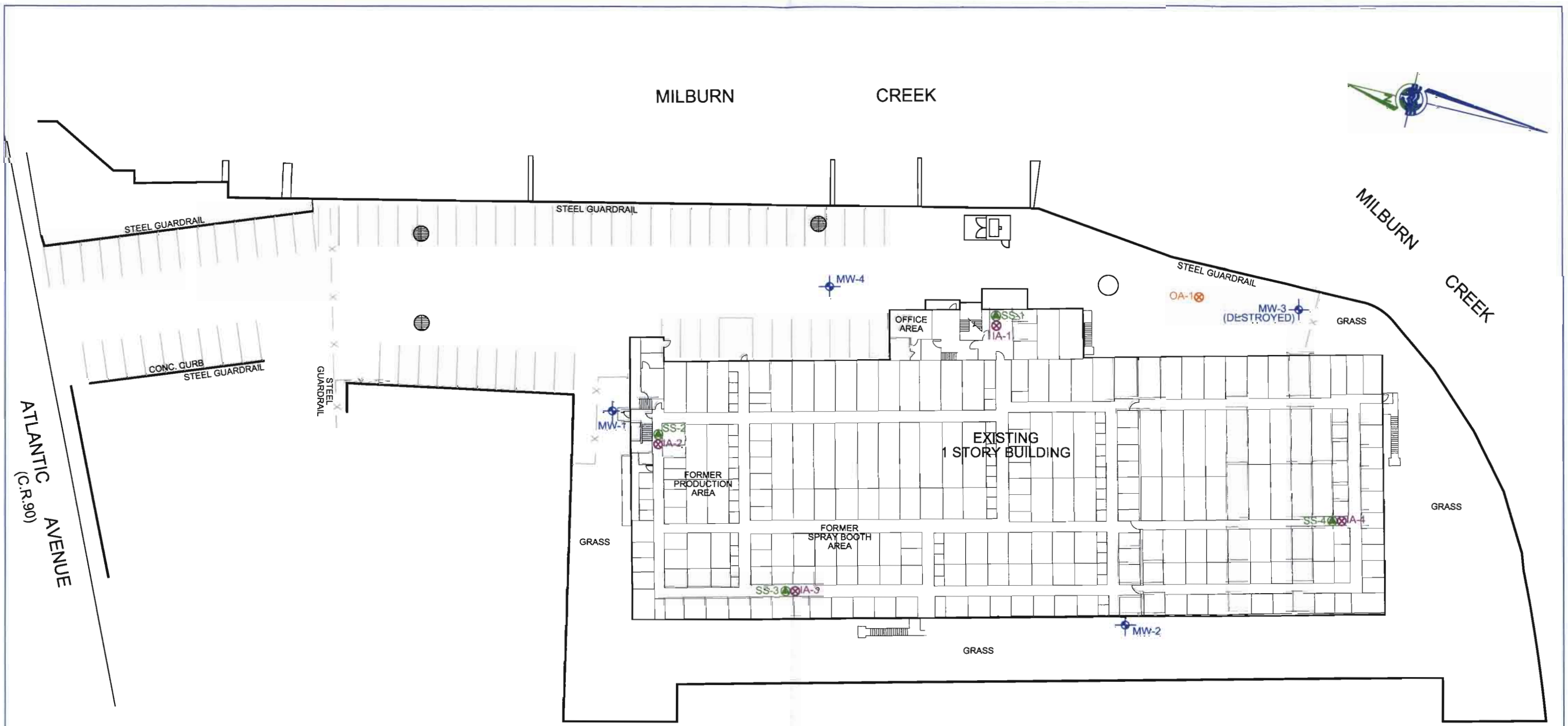
VICINITY MAP

SCALE: 1:24,000

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1170 ATLANTIC AVENUE
BALDWIN, NY 11510

Project No.	SSS0601
Drawn By	NER
Approved By	PWG
Drawn By	LLG
Figure No.	1
Date	10/05/06



LEGEND

- MW-1 — MONITORING WELL
- SS-1 — SUB SLAB VAPOR SAMPLE
- IA-1 — INDOOR AIR SAMPLE
- OA-1 — OUTDOOR AIR SAMPLE
- DRY WELL
- CATCH BASIN
- CHAIN LINK FENCE
- STORAGE UNIT

BASEMAP PROVIDED BY:
ATC ASSOCIATES INC.
ENVIRONMENTAL, GEOTECHNICAL AND
MATERIALS PROFESSIONALS
104 E.25th ST. 10th FLOOR
NEW YORK, NY 10010

40 0 40 80

SCALE: 1"=40'

SITE PLAN & SAMPLE LOCATION
1170 ATLANTIC AVENUE
BALDWIN, NY 11510

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Strategic Environmental & Engineering Solutions
630 Johnson Ave. Suite 7 Bohemia, N.Y. 11716-2618
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Project: SSS0601	Designed By: JPR	Figure No: 2
CAD Operator: LLG	Approved By: PWG	Date: 10/05/06

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APPENDIX A

NEW YORK STATE DEPARTMENT OF HEALTH
INDOOR AIR QUALITY QUESTIONNAIRE AND BUILDING INVENTORY
CENTER FOR ENVIRONMENTAL HEALTH

This form must be completed for each residence involved in indoor air testing.

Preparer's Name _____ Date/Time Prepared _____

Preparer's Affiliation _____ Phone No._____

Purpose of Investigation_____

1. OCCUPANT:

Interviewed: Y / N

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: Y / N

Last Name: _____First Name: _____

Address: _____

County: _____

Home Phone: _____ Office Phone: _____

3. BUILDING CHARACTERISTICS

Type of Building: (Circle appropriate response)

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

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

Ranch	2-Family	3-Family
Raised Ranch	Split Level	Colonial
Cape Cod	Contemporary	Mobile Home
Duplex	Apartment House	Townhouses/Condos
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)? Y / N If yes, how many? _____

Other characteristics:

Number of floors_____ Building age_____

Is the building insulated? Y / N How air tight? Tight / Average / Not Tight

4. AIRFLOW

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

Airflow between floors

_____

_____

_____

Airflow near source

_____

_____

_____

Outdoor air infiltration

_____

_____

_____

Infiltration into air ducts

_____

_____

_____

5. **BASEMENT AND CONSTRUCTION CHARACTERISTICS** (Circle all that apply)

a. Above grade construction:	wood frame	concrete	stone	brick
b. Basement type:	full	crawlspace	slab	other _____
c. Basement floor:	concrete	dirt	stone	other _____
d. Basement floor:	uncovered	covered	covered with _____	
e. Concrete floor:	unsealed	sealed	sealed with _____	
f. Foundation walls:	poured	block	stone	other _____
g. Foundation walls:	unsealed	sealed	sealed with _____	
h. The basement is:	wet	damp	dry	moldy
i. The basement is:	finished	unfinished	partially finished	
j. Sump present?	Y / N			
k. Water in sump?	Y / N / not applicable			

Basement/Lowest level depth below grade: _____(feet)

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

_____

_____

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

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

Hot air circulation	Heat pump	Hot water baseboard	
Space Heaters	Stream 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	

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? Y / N

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 Occasionally Seldom Almost Never

Level	General Use of Each Floor (e.g., familyroom, bedroom, laundry, workshop, storage)
Basement	_____
1st Floor	_____
2nd Floor	_____
3rd Floor	_____
4th Floor	_____

8. FACTORS THAT MAY INFLUENCE INDOOR AIR QUALITY

a. Is there an attached garage? Y / N

b. Does the garage have a separate heating unit? Y / N / NA

c. Are petroleum-powered machines or vehicles stored in the garage (e.g., lawnmower, atv, car) Y / N / NA Please specify_____

d. Has the building ever had a fire? Y / N When?_____

e. Is a kerosene or unvented gas space heater present? Y / N Where?_____

f. Is there a workshop or hobby/craft area? Y / N Where & Type? _____

g. Is there smoking in the building? Y / N How frequently? _____

h. Have cleaning products been used recently? Y / N When & Type? _____

i. Have cosmetic products been used recently? Y / N When & Type? _____

j. Has painting/staining been done in the last 6 months? Y / N Where & When? _____

k. Is there new carpet, drapes or other textiles? Y / N Where & When? _____

l. Have air fresheners been used recently? Y / N When & Type? _____

m. Is there a kitchen exhaust fan? Y / N If yes, where vented?_____

n. Is there a bathroom exhaust fan? Y / N If yes, where vented?_____

o. Is there a clothes dryer? Y / N If yes, is it vented outside? Y / N

p. Has there been a pesticide application? Y / N When & Type?_____

Are there odors in the building? Y / N
If yes, please describe: _____

Do any of the building occupants use solvents at work? Y / N
(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? Y / N

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

Is there a radon mitigation system for the building/structure? Y / N Date of Installation: _____
Is the system active or passive? Active/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

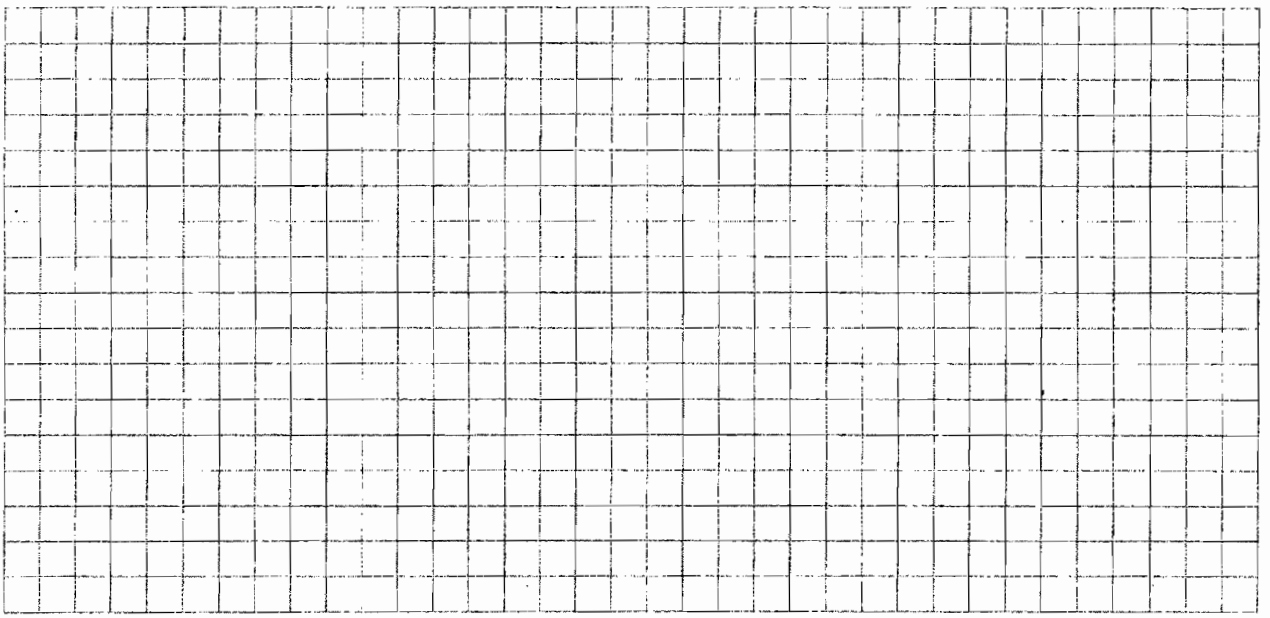
c. Responsibility for costs associated with reimbursement explained? Y / N

d. Relocation package provided and explained to residents? Y / N

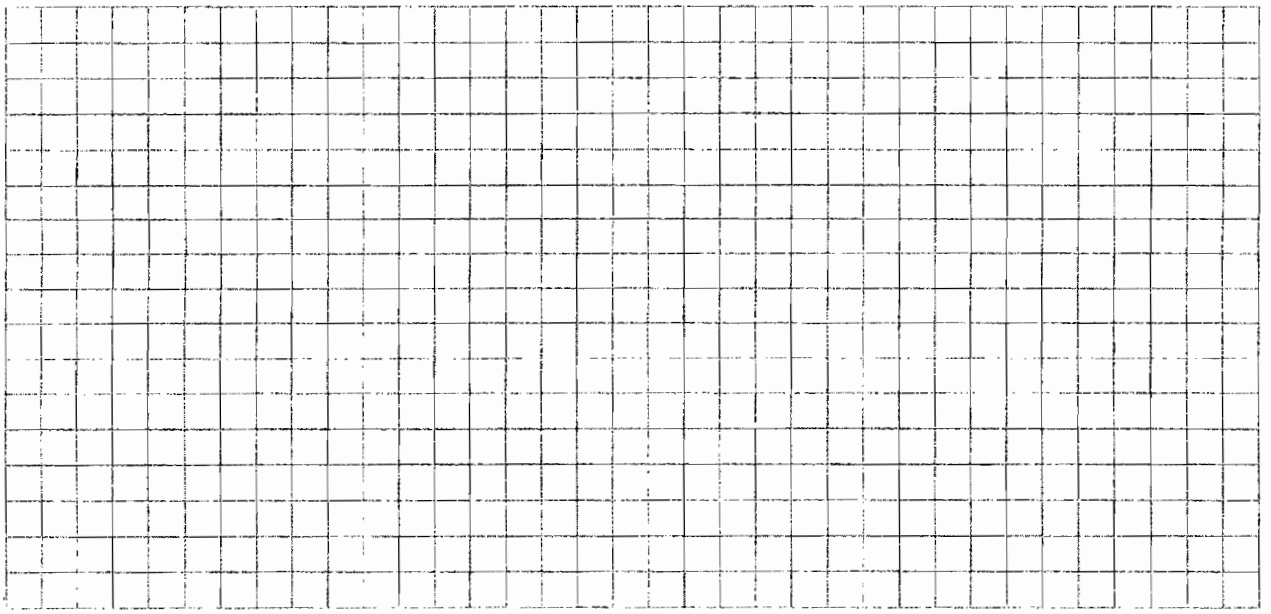
11. FLOOR PLANS

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:



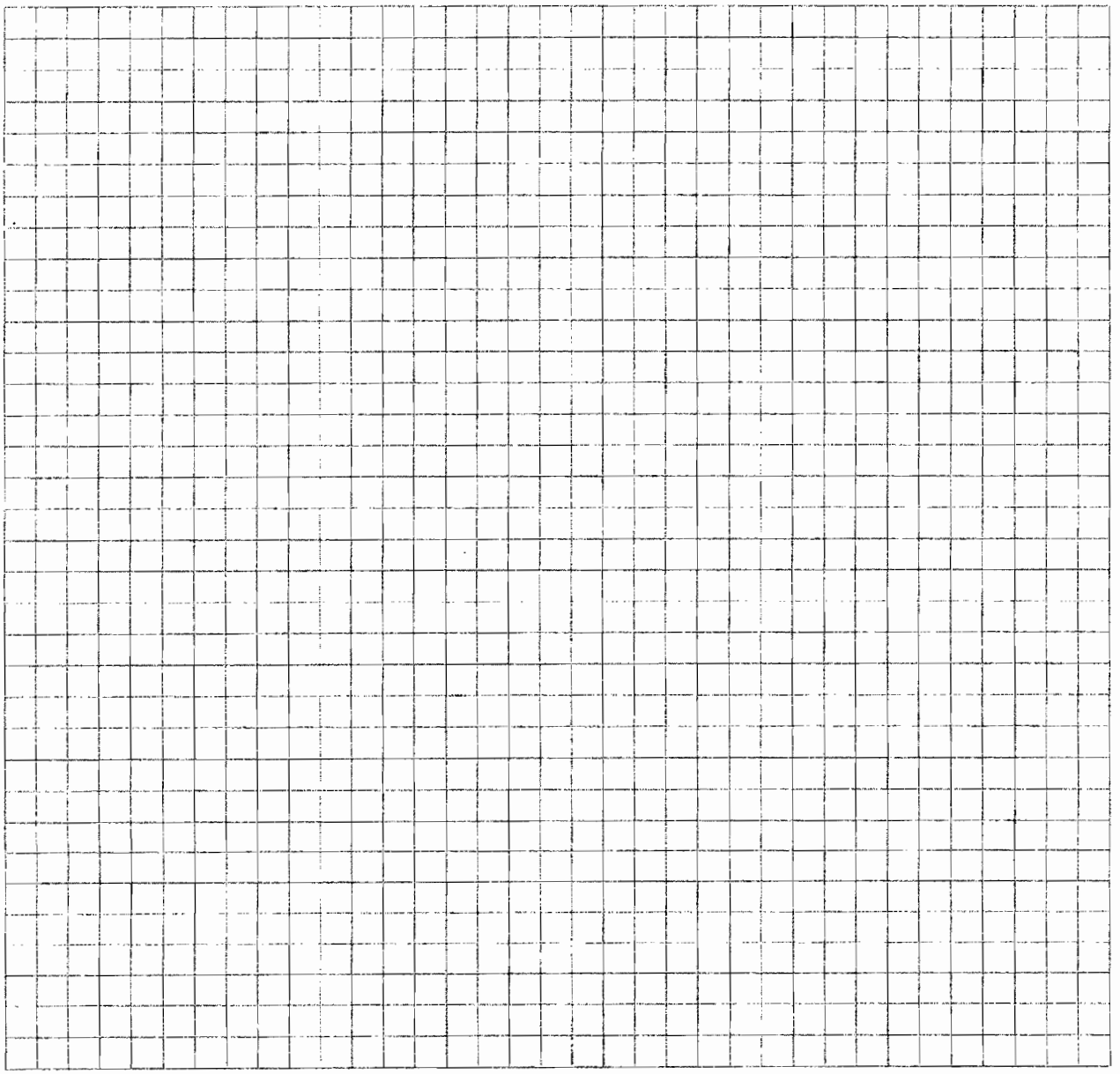
First Floor:



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 septic 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 residence that have the potential to affect indoor air quality.

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

* Describe the condition of the product containers as **Unopened (UO), Used (U),** or **Deteriorated (D)**
** 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.

APPENDIX B

Sub-Slab Vapor Sampling
and Additional Sampling Activity Schedule
Safeguard Storage Properties LLC
Baldwin, New York
VCP # V00523

