

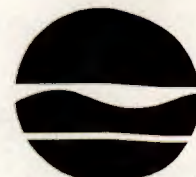
New York State Department of Environmental Conservation

Division of Environmental Remediation, Region 8

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Denise M. Sheehan
Commissioner

September 15, 2006

Mr. Antonio Gabrielle
1214 Lake Road
Webster, New York 14580

Mr. Joseph Ognibene
3875 North Byron Road
Byron, New York 14020

Dear Messrs. Gabriele and Ognibene:

**Re: Churchville Ford Site # V00658-8
Voluntary Cleanup Program Work Plan; August 2006
Village of Churchville, Monroe County**

The Department of Environmental Conservation (DEC) has reviewed the August 2006 Voluntary Cleanup Program Work Plan (August 2006 Work Plan) prepared by Lu Engineers for the Churchville Ford site and has determined that it is substantively equivalent to the DEC approved December 9, 2005 Revised Work Plan Addendum prepared by Entrix with the following modifications and clarifications:

1. Per Page 4 of the December 9, 2005 Revised Work Plan Addendum, the location of all utility line runs on the property will be identified to the extent possible. The underground utility information will be used to evaluate any preferential pathways for constituents to migrate along. The information will also be compared with utility line markings prior to monitoring well installation for verification purposes.
2. Section 3.2, first paragraph: The final well locations and well depths will be determined in the field subject to the approval of the DEC project manager.
3. Section 3.2, first paragraph: The depths of the existing wells will be measured prior to well installation.
4. Section 3.2, first paragraph: The location of any wells on the adjacent property to the north will be identified prior to installation of well MW-JCL-3.

5. Section 3.2, first paragraph: The March 2004 Investigation Work Plan indicated that split spoon samples could be collected every 5-ft for the Voluntary Cleanup Program (VCP) Phase II well installations. However, since the boring logs for the VCP Phase I well installations are not currently available, split spoon samples will be collected and logged continuously.
6. Section 3.2, second paragraph: All investigation derived wastes will be logged and managed in accordance with the March 2004 Investigation Work Plan. As specified in SOP 21 of the March 2004 Investigation Work Plan, all investigation derived wastes will be placed in drums; the drums will be labeled, inventoried, and stored in a secure location; the waste material will be properly and promptly characterized and disposed of off-site. The drum inventory, waste characterizations and disposal documentation will be included in the final investigation report.
7. Section 3.2, third paragraph: The soil samples collected for laboratory analysis will not be "representative", rather the soil samples will be collected from the most contaminated areas based on field screening. If contamination is not indicated by field screening methods, then the soil sample will be collected from just above the water table. Additionally, the soil and groundwater analytical data may not be sufficient to properly characterize the waste material as the material sampled is not necessarily representative of the waste material in the drums.
8. Section 3.2, third paragraph: Nitric acid solution will not be used for decontamination.
9. Table 3.3.1 and Section 3.3.2: As specified in the DEC approved December 9, 2005 Revised Work Plan Addendum and noted in the September 13, 2006 Progress Report, soil samples will also be analyzed for TAL metals.
10. Section 3.3.1, first paragraph: Per SOP 13 of the March 2004 Investigation Work Plan, the wells will be allowed to set for at least seven (7) days between development and sampling.
11. Section 4: The final investigation report will be consistent with the requirements of the Voluntary Cleanup Agreement and section 3.14 of the of the document entitled "Draft DER-10 Technical Guidance For Site Investigation and Remediation," (DER-10) dated December 2002 and subsequent updates.
12. Section 4: Site-specific contaminant levels will be compared to DEC TAGM 4046 guidance values or other guidance values which may be applicable at the time that the investigation report is prepared.

13. Coordinates for all sample locations will be provided in meters using the NAD 83 UTM Zone 18 (NYTM) coordinate system. Well elevations will be provided in feet using the NAVD 88 coordinate system.
14. Data Usability Summary Reports (DUSRs) will be completed. Please provide the qualifications of the person completing the DUSRs.
15. The DEC approved December 9, 2005 Revised Work Plan Addendum specified four groundwater sampling events. Two sampling events during seasonal low groundwater conditions and two sampling events during seasonal high groundwater conditions. The August 2006 Work Plan changes this requirement to two groundwater sampling events. One sampling event will be completed during seasonal low groundwater conditions (Fall 2006) and one sampling event during seasonal high groundwater conditions (Spring 2007). This revision is consistent with DEC guidance and is not considered a substantive change. The sample results will be evaluated to determine if additional data are necessary, including additional rounds of groundwater sampling, additional wells, etc.
16. As discussed in the December 9, 2005 Revised Work Plan Addendum, the recently submitted Indoor Air Quality Questionnaire and Building Inventory will be reviewed to determine what, if any, additional information is needed to evaluate vapor intrusion at the site. At this time, it is anticipated that additional vapor intrusion sampling, to be completed soon after the start of the 2006 heating season (typically November 15), will be requested.
17. Field activities will be completed by the end April 2007. The final investigation report will be submitted by the end of June 2007 unless significant additional investigation activities are needed.
18. All sampling/testing, QA/QC samples (such as equipment rinseate blanks, duplicate samples, etc.), operating procedures, the community air monitoring plan, and other requirements included in the March 2004 Investigation Work Plan are included in the August 2006 Work Plan by reference.
19. Two additional hardcopies and an electronic copy of the August 2006 Work Plan will be submitted to DEC by October 16, 2006. The electronic copy will be submitted on CD as a searchable Adobe Acrobat file. One hardcopy and one electronic copy will also be sent to the following:

Matt Forcucci
NYSDOH
584 Delaware Avenue
Buffalo, NY 14202

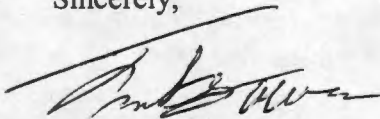
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Joseph Albert
Monroe County Health Department
111 Westfall Road - PO Box 90832
Rochester, NY 14692

Please include Matt and Joe on all future correspondence.

DEC understands that field work is scheduled to begin on Monday September 18, 2006. Please contact me at (585) 226-5357 if this schedule changes or if you have any questions.

Sincerely,



Frank Sowers, P.E.
Environmental Engineer 2

cc:
Greg Andrus (Lu Engineers)
John Campbell (Okar Equipment)
Benjamin Bonarigo (Bonarigo & McCutcheon)

ec:
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