

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 8
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August 25, 2023

Tony Kirik
Commerce CRE, LLC
105 McLaughlin Road
Suite A
Rochester, New York 14615

Re: Draft Pre-Design Investigation Work Plan
300 Commerce Drive
Site No.: C828158
Rochester (T), Monroe (C)

Dear Mr. Kirik:

The New York State Department of Environmental Conservation (Department) in conjunction with the New York State Department of Health (NYSDOH) have completed a review of the Draft Pre-Design Investigation Work Plan (Work Plan) dated June 27, 2023, for the 300 Commerce Drive site (Site) located at 300 Commerce Drive, Rochester, New York 14623. Based on the information presented in the Work Plan, the Work Plan is conditionally approved based on the clarifications, and modifications presented below.

1. The submitted Work Plan provides no schedule for the implementation of the field work activities; therefore, the Department understands that the field work activities associated with the Work Plan will commence no later than 30 days from the date of this letter. The Department also understands that a letter report will be submitted to the Department detailing the field work activities completed, and will provide summary tables of the data collected as well as all supporting documentation including but not limited to waste disposal manifests, field logs, etc.
2. The Department understands that the Work Plan will define the horizontal and vertical extent of contamination underneath the building slab that exceeds the protection of groundwater SCOs for PCE, TCE, and associated daughter products.
3. In accordance with the Brownfield Cleanup Agreement (BCA), a seven-day advance notification of any field work activities will be provided to the Department so that appropriate field work oversight can be provided.

4. A contained in determination will be required for the off-sited disposal of ALL waste generated during the pre-design investigation (PDI) activities. All waste generated will be containerized, characterized, and disposed off-site at a permitted facility in accordance with all applicable local, State, and Federal regulations. All approvals will be provided in the letter report. All documentation of the disposal activities will be provided in the letter report.
5. Prior to any ground intrusive activities at the Site, a utility survey will be completed and properly staked out.
6. The Department understands that at a minimum 20 Geo-probe borings will be installed to delineate the horizontal and vertical extent of contamination with respect to the protection of groundwater SCO's for PCE, TCE, and all associated daughter products. The Department also understands that at least 1 soil sample from each boring sleeve will be submitted for laboratory analysis at an ELAP certified laboratory. The Department also understands that headspace screening will be completed for each boring sleeve. Soil cores will be screened using a PID calibrated as per manufacture's specification as well as visual and olfactory impacts. Head space screening results will be recorded in the field logbook and readings will be provided in the letter report.
7. The Department understands that the geo-probe will be deconned between each boring completed. The Department understands that a decon pad will be established, and the material generated during decon activities will be containerized, characterized, and disposed off-site at a permitted facility in accordance with all applicable local, State, and Federal regulation.
8. The CAMP, as outlined in DER-10 Appendix 1, will be implemented for all ground intrusive activities completed at the Site. The Special CAMP will be implemented if within 20 feet of potentially exposed populations. The Special CAMP has been attached for your convenience. If the drill rig is powered by an internal combustion engine, then monitoring for exhaust gases will be completed, as well as ensuring proper ventilation and air flow for all on-site workers.
9. Safety measures will need to be implemented so that the buildings occupants are not impacted (exposed) during the PDI activities.
10. Structural Assessment: The Structural Assessment section that details the temporary framing as well as the Confirmatory Soil Sampling section are not applicable to the Work Plan or the proposed PDI activities. Those details must be provided in the Remedial Action Work Plan.
11. The PE of record who is registered and licensed in NYS, or a direct report to a PE of record will oversee all PDI field work activities and must be on-site to oversee all ground intrusive activity.

12. All Investigation Derive Waste (IDW) will be managed in accordance with DER-10, NYCRR Part 360, and all applicable local, State, and Federal regulations. All supporting documentation such as, but not limited to, manifests, approvals, etc. will be provided in the letter report. Note a contained-in determination will be needed for off-site disposal.
13. Boring logs will be completed for each boring.
14. The Department understands that the abandonment of all soil borings will use either bentonite or Portland cement and will be completed in accordance with best engineering practices. Note that any fill material to be imported to the site must be approved by the DER project manager prior to import to the site. A Request to Import/Reuse Fill or Soil form must be completed and submitted to the Department's PM for approval; the form is attached for your convenience.
15. Procedures: All soil samples submitted will be analyzed at an ELAP certified laboratory. The laboratory data package can be Category A.
16. The Department understands that the results of the PDI activities and the horizontal and vertical delineation of the source area contamination will be used for the structural evaluation for the building. A report detailing the building's structural integrity must be submitted to the Department. The report must be prepared by a NYS registered and licensed PE and must have a PE stamp and signature. The NYSDEC will not be responsible for any problems or insufficient assessment that might be encountered based on the Structural Evaluation.
17. In all future submittals, ensure all tables within the document are presented in a manner that is readable. The Work Plan's Table 1 is in portrait and is unreadable.

Within fifteen (15) days of the date of this letter and prior to any fieldwork activities associated with remedy implementation, the Applicant must elect in writing (electronic notification is acceptable) one of the following options:

- Option A: Accept the modified work plan;
- Option B: Invoke dispute resolution as set forth in 6 NYCRR Part 35-1.5(b)(2); or
- Option C: Terminate the Brownfield Cleanup Agreement in accordance with 6 NYCRR Part 375-3.5.

If the Applicant chooses to accept Option A, then this letter becomes part of the approved Pre-Design Investigation Work Plan (Work Plan) dated June 27, 2023. Also, if Option A is chosen then a copy of the approved Pre-Design Investigation Work Plan (Work Plan) dated June 27, 2023, along with this letter attached must be placed in the document repository within 1 week of accepting Option A and prior to any fieldwork activities associated with remedy implementation. Please provide notification to the Department that Pre-Design Investigation Work Plan (Work Plan) dated June 27, 2023,

and a copy of this letter have been placed in the document repository (electronic notification is acceptable).

The State seeks to resolve the outstanding differences in a mutually agreeable manner, which addresses the requirements of the Brownfield Cleanup Agreement and associated work plans.

If your technical team have any questions or concerns regarding this letter or need further assistance with the Site, please feel free to contact me at (585) 226-5349 or via e-mail Joshua.Ramsey@dec.ny.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Joshua J. Ramsey". The signature is written in a cursive, flowing style.

Joshua J. Ramsey
Project Manager

ec:

Lynn Zicari (Ravi)

Peter Morton (Ravi)

Nancy Van Dussen (Ravi)

Paul Sylvestri (Harter, Secrest, & Emery, LLP)

Justin Deming (NYSDOH)

Christopher Budd (NYSDOH)

Jennifer Andaloro (NYSDEC)

David Pratt (NYSDEC)

Charlotte Theobald (NYSDEC)

June 27, 2023

Joshua J. Ramsey, Project Manager
NYS Department of Environmental Conservation
6274 East Avon-Lima Road
Avon, New York 14414

**Re: Draft Pre-Design Investigation Work Plan
300 Commerce Drive
Rochester, New York 14623
Site ID: C828158**

Dear Mr. Ramsey:

Ravi Engineering & Land Surveying, P.C. (RE&LS) has prepared this draft Pre-Design Investigation (PDI) Work Plan to delineate the extent of sub-slab soils proposed for removal at 300 Commerce Drive in the Town of Henrietta, New York (the “Site”). The Site is New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP) Site number C828158. The draft PDI Work Plan identifies the methods, sample methodology, and laboratory analysis to be implemented in this evaluation.

Background

RE&LS submitted an April 2023 Remedial Alternatives Analysis & Remedial Action Work Plan for the Site. Trichloroethylene (TCE) is the predominant contaminant detected in soil and groundwater at the Site. The primary TCE impacts in soil are present around the loading dock on the west side of the building. Labella’s SB-1, SB-2, SB-8, and GP-9 exhibited TCE levels in soils in exceedance of the Part 375 SCO for Protection of Groundwater.

Although Labella estimated that approximately 150 cubic yards, or 240 tons of grossly impacted soils are present, a Pre-Design Investigation (PDI) is proposed in this area to delineate the extent of TCE-impacted soils that will need to be addressed.

RE&LS proposed to remove these impacted soils to obtain compliance with the NYSDEC Protection of Groundwater Soil Cleanup Objective (SCO).

In a May 3, 2023 email to the Site owner, NYSDEC requested that a structural assessment of the existing building be completed prior to remedy selection.

Structural Assessment

We propose this Pre-Design Investigation to delineate the extent of TCE-contaminated soils, and serve as a basis for the structural assessment.

Due to the potential location of the majority of the contaminated soils proposed for removal being directly beneath the existing primary foundation system that supports both the roof and interior mezzanine framing system, temporary framing supports will be required during the contaminated soil removal. The proposed temporary framing supports will consist of strategically placed, deep foundation helical piles/pile caps and a structural steel beam/column system to support the existing roof and mezzanine framing systems.

The temporary framing systems will be staged in a manner that will allow for soil removal to be completed directly beneath the existing primary foundation system and prevent its movement.

Procedures

As indicated on Figure 1, we propose to install approximately 20 Geoprobe borings around the area proposed for excavation. The borings will be drilled to depths of 12 feet beneath ground surface (BGS) or to the depth of Geoprobe refusal, whichever comes first.

Four-foot soil cores will be obtained in two-inch diameter acetate sleeves. The soil cores will be screened for visual and olfactory indications of contamination and screened for organic vapors with a calibrated photoionization detector (PID).

RE&LS will collect one soil sample from each 4-foot Geoprobe sleeve and submit the samples to Paradigm Environmental Services, Inc. (Paradigm) for analysis for halogenated volatile organic compounds (VOCs) by USEPA Method 8260b with Standard Reportables.

The TCE results will be compared to the NYSDEC Part 375-6.8(b) Protection of Groundwater SCO. If the outer extent of TCE contamination is not identified, additional sampling will be recommended to determine the extent of soils proposed for removal.

Confirmatory Soil Samples

The purpose of the PDI is to determine the extent of soil removal that will be required only. After remedial activities are completed, confirmatory soil samples will be collected in compliance with DER-10 and analyzed for VOCs in conformance with NYS Department of Health (DOH) Analytical Services Protocol (ASP) methodology with a Category B deliverable.

CAMP Monitoring

RE&LS will perform Community Air Monitoring Plan (CAMP) monitoring for total organic vapors and particulates (i.e., dust) at the downwind perimeter during the exterior drilling activities.

Health & Safety

Field work will be performed in conformance with the attached Health & Safety Plan (HASP).

Certification

I, Timothy F. Wade, certify that I am currently a NYS registered professional engineer (P.E. License Number 084238) and that this Pre-Design Work Plan 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).

Sincerely,



Peter S. Morton, P.G., C.P.G.
Project Manager

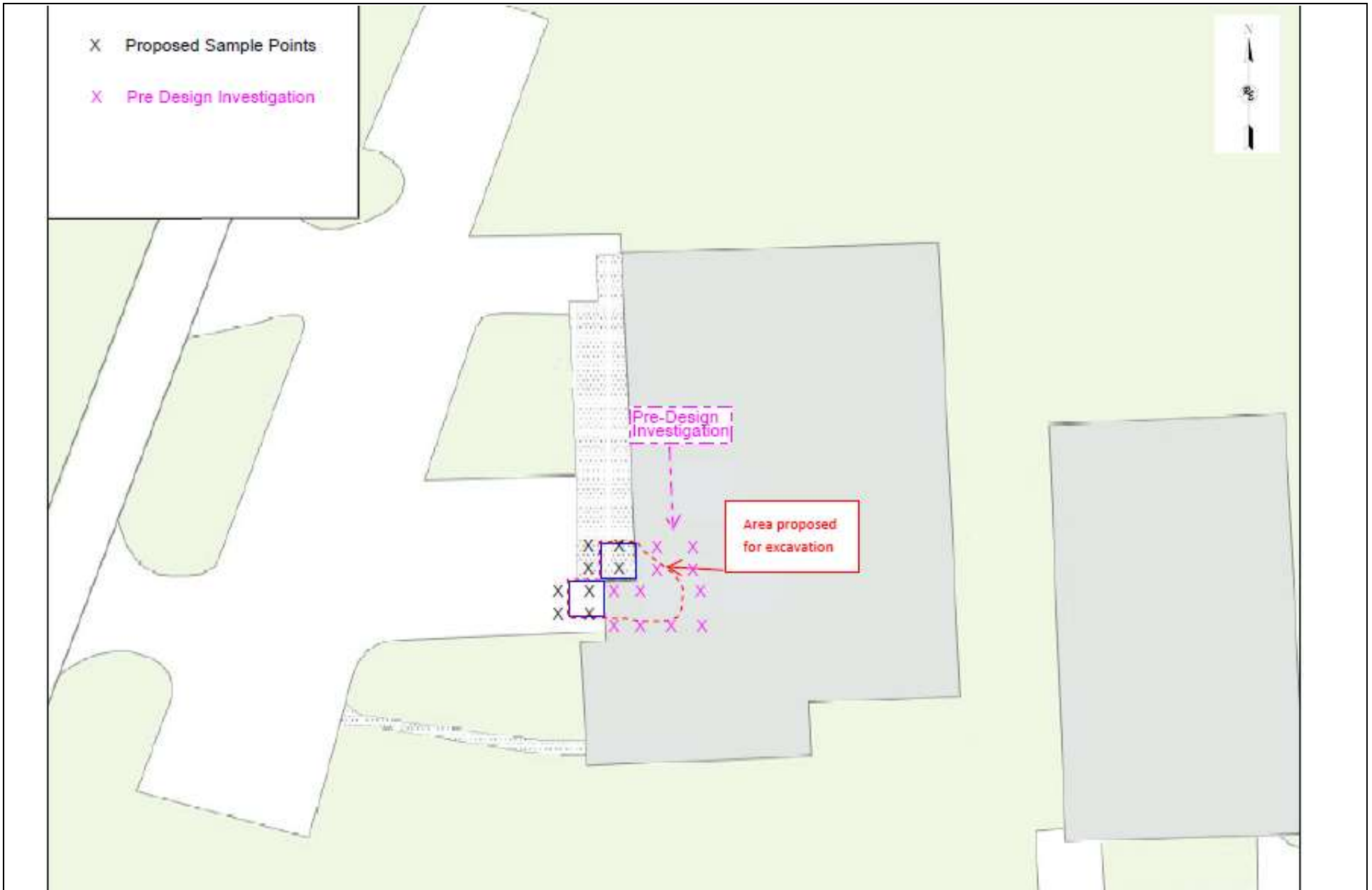
P.C.

Figure 1: Sample Location Map

Attachment 1: Health & Safety Plan

Timothy F. Wade, P.E.
Structural Department Manager
Ravi Engineering & Land Surveying,






**RAVI ENGINEERING
& LAND SURVEYING, P.C.**
 2110 S. CLINTON AVENUE, SUITE 1
 ROCHESTER, NEW YORK 14618
 TL: (585) 223-3660 FX (585) 697-1764

Sample Location Map
300 Commerce Drive
Town of Henrietta, Rochester, New York 14623

PROJECT NO.
 45-19-005-B

DATE:
 June 2023

Scale:
 NTS

Figure 1

ATTACHMENT 1
HEALTH & SAFETY PLAN

HEALTH AND SAFETY PLAN

Pre-Design Investigation

**300 Commerce Drive
Town of Henrietta
Rochester, NY 14623**

Prepared for:

Yaro Enterprises, Inc.
228 Rosemont Drive
Rochester, NY 14617

Prepared By:

Ravi Engineering & Land Surveying
2110 S. Clinton Avenue, Suite 1
Rochester, New York 14526

June 2023

Project No. 45-19-005-B

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SITE HEALTH AND SAFETY PLAN

Project Title: 300 Commerce Drive, Interim Remedial Measures (IRM)

Project Number: 45-19-005-B

Project Location: 300 Commerce Drive, Town of Henrietta, New York

Environmental Director: Nancy S. Van Dussen, P.E.

Project Manager: Peter S. Morton, P.G., C.P.G.

Date: June 2023

Site Safety Supervisor: Benjamin Reddy

Site Contact: Tony Kirik

Date(s) of Field Activities: To Be Determined

Site Conditions: Generally level and encompassing approximately 2.7 acres

Site Environmental Information Provided By: draft Remedial Investigation Report (RIR)

EMERGENCY CONTACTS

Ambulance:	As Per Emergency Service	911
Hospital Emergency:	Strong Memorial Hospital	585-275-3232
Poison Control Center	Finger Lakes Poison Control	585-275-3232
Police (local, state):	Monroe County Sheriff	911
Fire Department	Henrietta Fire Department	911
Site Contacts:	Tony Kirik (Site owner)	585-290-8330
Agency Contact	NYSDEC – Joshua J. Ramsey NYSDOH – TBD	585-226-5349 212-417-4100
Environmental Director:	Nancy S. Van Dussen	585-697-2075
Project Manager:	Peter S. Morton	585-697-2806
Site Safety Supervisor:	Benjamin Reddy	585-697-2083

MAP AND DIRECTIONS TO THE MEDICAL FACILITY STRONG MEMORIAL HOSPITAL

Total Est. Time: 13 minutes Total Est. Distance: 4.4 miles

1. North on West Henrietta Road/Rt. 15. 3.2 miles
2. Turn Left (West) on Elmwood Avenue 0.3 mile
3. Turn Left (South) into Emergency Room entrance (look for signs) <0.1 mile
4. End at **601 Elmwood Ave, Rochester, NY 14642-0001**



1.0 Introduction

Ravi Engineering & Land Surveying, PC (RE&LS) prepared this Health and Safety Plan (HASP) to provide guidelines for responding to potential health and safety issues that may be encountered during the remedial measures at 300 Commerce Drive in the Town of Henrietta, New York (the “Site”). The requirements of this HASP are applicable to all approved personnel at the work site. The project specifications and Community Air Monitoring Plan (CAMP) are to be consulted for guidance in preventing and quickly abating any threat to human safety or the environment. The provisions of the HASP do not replace or supersede regulatory requirements of USEPA, NYSDEC, and/or OSHA

2.0 Responsibilities

This HASP presents guidelines to minimize the risk of injury to project personnel and to provide rapid response in the event of injury. It is only applicable to activities of approved RE&LS personnel and their authorized visitors. It is the responsibility of RE&LS employees and contractors to follow the requirements of this HASP as well as applicable company safety procedures.

3.0 Activities Covered

The activities covered under this HASP are as follows:

- Drilling and soil sample collection during Pre-Design Investigation (PDI).
- Management of study derived waste.

4.0 Work Area Access and Site Control

The contractor(s) will have primary responsibility for work area access and site control.

5.0 Potential Health and Safety Hazards

This section lists some potential health and safety hazards that project personnel may encounter at the Site and actions to be implemented to control and reduce the associated risks. It is not intended to be a complete listing of any and all potential health and safety hazards. New or different hazards may be encountered as site environmental and site work conditions change. The Site Safety Officer has responsibility for implementation of the HASP.

5.1 Hazards Due to Heavy Machinery

Potential Hazards:

Heavy machinery including a truck or track-mounted Geoprobe drill rig will be in operation at the Site. The presence of such equipment presents the danger of being struck or crushed; use caution when working near heavy machinery.

Protective Action:

Make sure that operators are aware of your activities, and heed their instructions and warnings. Wear bright colored clothing and walk safe distances from heavy equipment. A hard hat, safety glasses, and steel toe shoes are required.

5.2 Excavation Hazards

Potential Hazards:

Excavations and trenches can collapse, causing injury or death. Edges of excavations can be unstable and collapse. Toxic vapors can accumulate in confined spaces and trenches. Excavations that require working within excavations (if applicable) will require air monitoring in the breathing zone (refer to Section 9.0).

Protective Action:

No excavation is proposed for the Pre-Design Investigation phase. However, excavation will be performed during the subsequent “source removal” phase. The following precautions will be taken during source removal:

- Personnel must receive approval from the Project Manager to enter an excavation for any reason. Approved personnel are not to enter excavations over 4 feet in depth unless excavations are adequately sloped.
- Personnel should exercise caution near all excavations at the Site.
- Fencing and/or barriers accompanied by “no trespassing” signs should be placed around all excavations when let open for any period of time when work is not being conducted.

5.3 Cuts, Punctures and Other Injuries

Potential Hazards:

There is the potential for the presence of sharp or jagged edges on rock, metal materials, and other sharp objects. Cuts and punctures can result in loss of blood and infection.

Protective Action

The Project Manager is responsible for making First Aid supplies available to treat minor injuries. The Site Safety Officer is responsible for arranging the transportation to medical facilities when First Aid treatment is not sufficient. Seriously injured workers should not be moved. Injuries requiring treatment are to be reported to the Project Manager. Serious injuries are to be reported to the Site Safety Officer.

5.4 Injury Due to Exposure to Chemical Hazards

Potential Hazards:

Volatile organic vapors from petroleum products, chlorinated solvents, or other chemicals may be encountered during drilling activities. Inhalation of volatile organic compounds (VOCs) can cause headache, stupor, drowsiness, confusion, and other health effects. Skin contact can cause irritation, chemical burn, or dermatitis

Protective Action

The presence of VOCs may be detected by their odor and by organic vapor monitoring (OVM) instrumentation. Employees will not work in environments where hazardous concentrations of VOCs are present. Air monitoring (refer to Section 9.0) will be performed using a Photoionization Detector (PID). Personnel are to leave the work area whenever PID measurements of breathing space air exceed 25 ppm consistently for a 5 minute period. In the event that sustained VOC readings of 25 ppm are encountered, personnel should upgrade personal protective equipment (PPE) to level C (refer to Section 8.0) and an Exclusion Zone should be established to limit and monitor access to this area (refer to Section 6.0).

5.5 Injury Due to Extreme Hot or Cold Weather

Potential Hazards:

Hot temperatures can cause heat exhaustion, heat stress, and heat stroke; cold weather can cause hypothermia.

Protective Action

Precautionary measures should be taken (i.e. dress appropriately) for the weather conditions and maintain hydration. If personnel suffer from any of the above conditions, techniques should be taken to cool down or heat up the body and affected personnel should be taken to the nearest hospital, if warranted.

6.0 Potential Health and Safety Hazards

In the event that conditions warrant establishing various work zones, the following work zones should be established.

Exclusion Zone (EZ):

The EZ will be established in the immediate vicinity and downwind perimeter of Site activities. These activities include soil excavation and sampling activities. If access to the Site is required to accommodate non-project related personnel, then an EZ will be established by constructing a barrier around the work area (yellow caution tape and/or construction fencing). The EZ barrier will encompass the work area and any equipment staging/soil staging areas necessary to perform the associated work. The contractor(s) will be responsible for establishing the EZ and limiting access to approved personnel. Depending on the condition for establishing the EZ, access to the EZ may require adequate PPE (e.g. Level C).

Contaminant Reduction Zone (CRZ):

The CRZ will be the area where personnel entering the EZ will don proper PPE prior to entering the EZ and the area where PPE may be removed. The CRZ will also be the area where decontamination of equipment and personnel will be conducted, as necessary.

7.0 Decontamination Procedures

Upon leaving the work area, approved personnel shall decontaminate footwear as needed. Under normal work conditions, detailed personal decontamination procedures will not be necessary. Work clothing may become contaminated in the event of an unexpected splash or spill or contact with a contaminated substance. Minor splashes on clothing and footwear can be rinsed with clean water. Heavily contaminated clothing should be removed if it cannot be rinsed with water. Personnel assigned to this project should be prepared with a change of clothing whenever on site.

Personnel will use the contractor's disposal container for disposal of PPE.

8.0 Personal Protective Equipment (PPE)

Generally site conditions will require Level D or modified Level D protection. Air monitoring will be conducted to determine if up-grading to Level C PPE is required (refer to Section 9.0). Descriptions of the typical safety equipment associated with Level D and Level C are provided below:

Level D:

Hard hat, safety glasses, surgical sampling gloves, and steel toe construction grade boots.

Level C:

Level D PPE and full or ½-face respirator and Tyvek suit (if necessary). [*Note: Organic vapor cartridges are to be changed after each 8-hours of use or more frequently.*]

9.0 Community Air Monitoring Plan (CAMP)

According to 29 CFR 1910.120(h), air monitoring will be used to identify and quantify VOCs in order to determine the appropriate level of employee protection required. Air monitoring activities are described below. Air monitoring instruments will be calibrated and maintained in accordance with the manufacturer's specifications.

Air monitoring will be conducted with a PID to screen the ambient air in the work areas for total VOCs and CAMP monitoring will be performed with a DustTrak™ Model 8520 aerosol monitor or equivalent for measuring particulates. Air monitoring of the work areas and downwind of the work areas will be performed at least every 60 minutes or more often using a PID and the DustTrak meter.

If sustained PID readings of greater than 25 ppm are recorded in the breathing zone, then wither personnel are to leave the work area until satisfactory readings are obtained, or approved personnel may re-enter the work areas wearing at a minimum a ½-face respirator with organic vapor cartridges for an 8-hour duration (i.e. upgrade to Level C PPE). Organic vapor cartridges are to be changed after each 8-hours of use or more frequently, if necessary. If sustained (PID) readings are measured in the work area at levels above 50 ppm for a 5-minutes average, work will be stopped until safe levels of VOCs are determined.

If downwind PID measurements reach or exceed 25 ppm consistently for a 5-minute period, readings will be taken within the buildings (if occupied) on Site to ensure that the vapors are not penetrating any occupied building. If the PID measurements reach or exceed 25 ppm within the nearby buildings, the personnel will be evacuated via a route in which they would not encounter the work area. The building will be ventilated until the PID measurements are at or below background levels.

10.0 Emergency Action Plan

In the event of an emergency, employees are to turn off and shut down all powered equipment and leave the work areas immediately. Employees are not authorized or trained to provide rescue and medical efforts. Rescue and medical efforts will be provided by local authorities.

11.0 Medical Surveillance

Medical surveillance will be provided to all employees who are injured due to overexposure from an emergency incident involving hazardous substances at the Site.

12.0 Employee Training

Individuals involved with the IRM must be 40-hour OSHA HAZWOPER trained with current 8-hour refresher certification.

Table 1
Exposure Limits and Recognition Qualities

Compound	PEL-TWA (ppm)(b)(d)	TLV-TWA (ppm)(c)(d)	STEL (ppm)(b)	LEL (%) (e)	UEL (%) (f)	IDLH (ppm)(g)(d)	Odor
Acetone	750	500	NA	2.15	13.2	20,000	Sweet
Anthracene	.2	.2	NA	NA	NA	NA	Faint aromatic
Benzene	1	0.5	5	1.3	7.9	3000	Pleasant
Benzo (a) pyrene (coal tar pitch volatiles)	0.2	0.1	NA	NA	NA	700	NA
Benzo (a)anthracene	NA	NA	NA	NA	NA	NA	NA
Benzo (b) Fluoranthene	NA	NA	NA	NA	NA	NA	NA
Benzo (g,h,i)perylene	NA	NA	NA	NA	NA	NA	NA
Benzo (k) Fluoranthene	NA	NA	NA	NA	NA	NA	NA
Bromodichloromethane	NA	NA	NA	NA	NA	NA	NA
Carbon Disulfide	20	1	NA	1.3	50	500	Odorless or slightly garlic type
Chlorobenzene	75	10	NA	1.3	9.6	2,400	Faint almond
Chloroform	50	2	NA	NA	NA	1,000	ethereal odor
Chrysene	NA	NA	NA	NA	NA	NA	NA
1,2-Dichloroethylene	200	200	NA	9.7	12.8	400	Acrid
1,2-Dichlorobenzene	50	25	NA	2.2	9.2		Pleasant
Ethylbenzene	100	100	NA	1.0	6.7	2,000	Ether
Fluoranthene	NA	NA	NA	NA	NA	NA	NA
Fluorene	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	NA	NA	NA	NA	NA	NA	NA
Methylene Chloride	500	50	NA	12	23	5,000	Chloroform-like
Naphthalene	10, Skin	10	NA	0.9	5.9	250	Moth Balls
n-propylbenzene	NA	NA	NA	NA	NA	NA	NA
Phenanthrene	NA	NA	NA	NA	NA	NA	NA
Pyrene	NA	NA	NA	NA	NA	NA	NA
p-Isopropylbenzene	NA	NA	NA	NA	NA	NA	NA
sec-Butylbenzene	NA	NA	NA	NA	NA	NA	NA
Tetrachloroethane	NA	NA	NA	NA	NA	NA	Sweet
Toluene	100	100	NA	0.9	9.5	2,000	Sweet
Trichloroethylene	100	50	NA	8	12.5	1,000	Chloroform
1,2,4-Trimethylbenzene	NA	25	NA	0.9	6.4	NA	Distinct
1,3,5-Trimethylbenzene	NA	25	NA	NA	NA	NA	Distinct
Vinyl Chloride	1	1	NA	NA	NA	NA	NA
Xylenes (o,m,p)	100	100	NA	1	7	1,000	Sweet
Metals							
Arsenic	0.01	0.2	NA	NA	NA	100, Ca	Almond
Cadmium	0.2	0.5	NA	NA	NA		
Chromium	1	0.5	NA	NA	NA		
Lead	0.05	0.15	NA	NA	NA	700	
Mercury	0.05	0.05	NA	NA	NA	28	Odorless
Selenium	0.2	0.02	NA	NA	NA	Unknown	

All values are given in parts per million (PPM) unless otherwise indicated.

CA=Possible Human Carcinogen, no IDLH information.