

Stage 1 Abatement Plan

ABQ Cleaners Laundry Facility

Albuquerque, New Mexico

Prepared for
New Mexico Environment Department
On behalf of
Fetherolf, LLC and
West Mesa Real Estate Holdings, LLC

Prepared by



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1. Introduction

At the direction of the New Mexico Environment Department (NMED), Daniel B. Stephens & Associates, Inc. (DBS&A) has prepared this Stage 1 Abatement Plan (S1AP) on behalf of Fetherolf, LLC (Fetherolf) and West Mesa Real Estate Holdings, LLC (West Mesa) for the ABQ Cleaners Laundry facility (ABQ Cleaners) located at 3002 Monte Vista Boulevard in Albuquerque, New Mexico (the site) (Figure 1).

This document has been prepared using information pertaining to the site history and conditions provided by Fetherolf, West Mesa, and NMED, as well as previous site investigations and published materials. The S1AP is consistent with current NMED guidance and previous agency directives regarding site activities, and includes a description of the project objectives pursuant to the applicable regulations (20.6.2.4106 NMAC), proposed project tasks, project reporting and documentation, and a project schedule.

2. Site Background

The following summary of site background information is based on materials provided by Fetherolf and NMED detailing the site history and finding of recent characterization efforts conducted by DBS&A.

2.1 Site Description

The site is located on a 0.109-acre parcel in the Nob Hill neighborhood of central Albuquerque, and is developed with an approximately 3,400-square-foot building that is currently used for a dry-cleaning operation (ABQ Cleaners). The entirety of the property and surrounding parcels are covered by structures or asphalt and concrete paving.

2.2 Site History

Details of the site history are summarized in a Phase I Environmental site assessment (ESA) for the property completed by DBS&A in April 2023 (DBS&A, 2023a). The building has housed numerous shops and businesses since its construction in approximately 1938, and is currently leased to ABQ Cleaners, a dry cleaning, laundry, and home and business cleaning facility. The property was previously occupied by a variety of retail businesses, including grocery stores, retail

shops, and a realty office. Information provided by Fetherolf, (DBS&A, 2023a) indicates that the facility operated as a dry cleaner prior to acquisition of the property in 1987.

2.3 Physical Setting

According to the U.S. Geological Survey (USGS) 7.5-minute topographic map for the area, the land surface in the site vicinity generally slopes to the north, with a surface elevation of approximately 5,195 feet above mean sea level (feet msl). Surface water runoff is largely directed toward Monte Vista Blvd north of the site.

2.4 Geology and Hydrogeology

ABQ Cleaners is located in the Albuquerque Basin, also known as the Middle Rio Grande Basin, within the Rio Grande Rift System. The rift valley runs in a north-south orientation from Colorado through New Mexico and into Texas and Mexico. The Albuquerque Basin is about 100 miles long and 25 to 40 miles wide, and is defined as the portion of the Rio Grande Rift between San Acacia to the south and Cochiti Lake to the north. The western boundary of the Albuquerque Basin corresponds roughly with the surface water divide between the Rio Puerco and Rio Grande watersheds, and the eastern side is bounded by the Sandia and Manzano Mountains. The Rio Grande Rift comprises a series of fault-bounded basins, of which the Albuquerque Basin is the largest and oldest. These basins have been filled with consolidated and unconsolidated alluvial sediments of Tertiary and Quaternary age collectively known as the Santa Fe Group, which exceed 20,000 feet in thickness in parts of the Albuquerque Basin (Bartolino and Cole, 2002).

The Rio Grande River flows southerly down the axis of the rift valley, approximately 3.5 miles west of the ABQ Cleaners site. Groundwater within the Albuquerque Basin is hosted within the sediments of the Santa Fe Group and locally within recent fluvial sediments along the river valley. The Santa Fe Group aquifer system supplies groundwater resources for the Albuquerque metropolitan area and surrounding communities. Due to increasing withdrawals of groundwater, the Santa Fe Group aquifer experienced significant drawdown between the 1980s and 2008, when the Albuquerque Bernalillo County Water Utility Authority (the Water Authority) began treatment and distribution of surface water from the Rio Grande through the San Juan-Chama Drinking Water Project. Water levels in the aquifer have experienced significant and widespread rebound since that time due to decreased reliance on groundwater withdrawals (Gallanter and Curry, 2019).

The site is located on an elevated fluvial terrace underlain by unconsolidated sediments of the Sierra Ladrones Formation, the uppermost member of the Santa Fe Group within the Albuquerque Basin. Aquifer materials are composed of primarily sand and silty sand, with minor clay and gravel. Based on regional data published in 2019, groundwater in the site vicinity most likely flows to the southeast, toward a regional groundwater depression under southeastern Albuquerque (Rawling, 2023).

There are no known wells with recent water level data within 1 mile of the site. Data from historical environmental investigations in the site vicinity indicating a depth to water just over 200 feet were cited in the Phase I ESA report for the site (DBS&A, 2023a), but these observations pre-dated the more recent periods of drawdown and rebound. 2007 water level measurements from monitor wells on the University of New Mexico campus, approximately 0.3 mile from the site, indicated depths to water of approximately 295 feet before the post-2008 regional rebound. Prior to the site investigation, depth to water at the site was therefore uncertain. Groundwater was encountered at approximately 305 feet below ground surface (bgs) during well drilling, deeper than initially estimated due to locally muted groundwater rebound and the site's elevated position relative to the nearest historical monitoring points.

2.5 Contaminants of Concern

The contaminants of concern (COCs) are determined based on the site history. COCs associated with the site are chlorinated solvents including tetrachloroethene (PCE), associated with dry cleaning operations, and PCE degradation products TCE, cis-1,2-dichloroethene (DCE), trans-1,2-DCE, and vinyl chloride.

2.6 Previous Investigations

NMED conducted a passive soil gas sampling event in the public right-of-way (ROW) adjacent to the site in June 2022 (NMED, 2022). Results indicated that a release or releases of chlorinated volatile organic compounds (CVOCs) has occurred in the site vicinity in sufficient quantities to endanger human health, property, and the environment per the New Mexico Ground and Surface Water Protection Regulations (20.6.2 NMAC). NMED identified the site as a potential source of the CVOC release (NMED, 2022).

Three indoor air samples collected at the site in November 2022 indicated elevated concentrations of PCE and TCE above the applicable indoor air screening levels for industrial facilities. Two sub-slab soil vapor samples collected from beneath the structure's basement

indicated concentrations of PCE and TCE above the NMED vapor intrusion screening levels (VISLs) (SMA, 2023). Based on these sample results and those from NMED's June 2022 sampling event, NMED stipulated in the February 10, 2023 letter that West Mesa shall conduct corrective actions at the facility.

A groundwater monitoring well, MW-1, was installed in September 2023 to determine potential impacts to the groundwater from the PCE plume (Figure 3). Concentrations of all COCs in the groundwater were below the New Mexico Water Quality Control Commission (NMWQCC) standards, indicating that groundwater has not been significantly impacted by the PCE release. In addition, three nested vapor sampling ports were installed at depths of 78, 153, and 228 feet bgs. PCE concentrations in soil vapor exceeded the NMED industrial VISL only at the 153 feet bgs interval and decreased sharply with depth (DBS&A, 2023b).

In November 2023, an interim investigation was conducted to help delineate the extent of the PCE plume. Passive soil gas, indoor air, and sub-slab samples were collected and results summarized in Figures 4 and 5. PCE concentrations in the Buffalo Exchange basement exceeded both NMED industrial VISLs and indoor air screen levels. The investigation concluded that PCE concentrations in shallow soil gas above the NMED VISL for industrial properties do not extend significantly beyond the footprint of the ABQ Cleaners facility and the adjacent building occupied by Buffalo Exchange (DBS&A, 2023b).

2.7 Data Gaps Assessment

Previous investigations confirmed that a PCE soil gas plume is present in the subsurface, and provided substantial delineation of the horizontal and vertical extent of actionable soil vapor concentrations. Remaining data gaps are identified in this subsection.

The horizontal extent of PCE in shallow soil gas above the NMED Industrial VISL of 6,550 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) is well delineated by the existing sample data, with only limited data gaps remaining. Due to sample loss during the previous site investigations, PCE concentrations in shallow soil under the ABQ Cleaner's basement and the adjacent Sukoon Coffeehouse remain unknown (Figure 4). These locations are therefore identified for follow-up sampling.

Vertical profile sampling indicated that PCE concentrations decrease markedly between 158 feet and 228 feet bgs. However, the sample point at 78 feet bgs is not considered viable and the distribution of PCE in soil gas between the shallow subsurface and 158 feet bgs remains

undefined. To address this data gap, DBS&A proposes vertical profile sampling of the soil column as described in Section 3.2.3.

3. Proposed Investigation

DBS&A proposes that additional passive soil gas and sub-slab samples be collected and a new nested vapor well be installed. The scope of work proposed for this field investigation includes the following:

- Preparing this S1AP
- Developing site-specific documents including a sampling and analysis plan (SAP), consisting of a combined field sampling plan (FSP) and quality assurance project plan (QAPP), as well as a health and safety plan (HASP)
- Conducting a field investigation to address the identified data gaps, including acquisition of data followed by data review and validation, as described in the approved SAP
- Preparing a summary report that presents the results of the field investigation, in accordance with 20.6.2.4106 NMAC

Implementation of interim mitigation actions originally proposed in September 2025 is included under the S1AP scope of work.

3.1 Site-Specific Documents

Following acceptance of this S1AP and prior to initiation of the field program, a project SAP will be developed to address the proposed field activities. The SAP will comprise a combined FSP and QAPP following NMED guidelines, and includes project-specific data quality objectives (DQOs) that ensure the collected data and the applied analytical methods are appropriate and adequate to address the project performance standards.

DBS&A will update the project HASP in accordance with 29 CFR 1910.120. It will include a discussion of the tasks to be performed, likely hazards to be encountered, mitigation measures, and appropriate personal protective equipment to be used. Information regarding key contacts will also be included.

3.2 Field Investigation Data Acquisition

Following receipt of comments on the SAP and after receiving final approval, DBS&A will perform the field investigation activities in accordance with the procedures set forth in the FSP/QAPP. The anticipated activities to be conducted under this task consist of collected and analyzing passive soil gas, sub-slab vapor, and soil vapor samples, and installation of a new nested vapor well as described in the following subsections.

3.2.1 Shallow Soil Vapor and Sub-slab Sampling

DBS&A proposes to collect the following shallow soil vapor characterization samples to address data gaps related to sample loss during the previous site investigation:

- Exterior passive soil vapor sample location PSG-4 (Figure 4)
- Sub-slab samples from the basement of ABQ Cleaners (SS-02), and from Sukoon Coffeehouse (SS-03) (Figure 4)

Existing analytical data adequately define the extent of PCE concentrations in soil vapor above the NMED VISL for industrial properties of $6,550 \mu\text{g}/\text{m}^3$; these sample results will serve to further characterize soil vapor conditions in proximity to the presumed release area. Additional sub-slab characterization will be conducted in conjunction with the implementation of interim corrective measures at the site (Section 4).

Samples will be collected using a passive sampling methodology consistent with previous characterization sampling activities conducted at the site, and following the procedures and protocols to be set forth in the project SAP.

3.2.2 Vertical Vapor Profile Sampling

DBS&A proposes installing a new soil vapor monitoring well to a depth of 100 feet, with nested vapor ports every 20 feet to provide additional vertical delineation of the PCE plume in soil vapor. The proposed location is shown on Figure 6. A well diagram is provided in Figure 7. All vapor ports will be sampled and analyzed per the approved SAP. Deeper soil vapor sample ports installed with groundwater monitor well MW-1 will also be sampled during this event.

4. Interim Corrective Measures

PCE vapor intrusion is likely impacting indoor air in both the basements of ABQ Cleaners and Buffalo Exchange. Pending acceptance and implementation of the S1AP, Fetherolf and West Mesa propose to implement immediate mitigation actions with respect to indoor air quality in the two affected basements. Interim actions will focus on short-term mitigation of the indoor air impacts in the basements, with a secondary goal of affecting limited cleanup of impacted shallow soil immediately underlying the structures. Indoor air mitigation will include three corrective action elements:

- Sub-slab depressurization systems (SSDSs) will be installed in each affected basement.
- Active fresh air ventilation will be installed in the ABQ Cleaners basement.
- The concrete slab and sidewalls at the ABQ Cleaners basement will be sealed.

Additional details of the interim corrective actions are provided in Appendix A. Deliverables for the interim corrective measures will include the following documents and will be submitted to NMED for review and acceptance:

- DBS&A will document SSDS installation in a letter report that will be provided to NMED. The report will provide, at a minimum, the layout of the installed SSDS in each basement, technical specifications of the installed equipment, documentation of the installation process, photographic documentation of each element of the interim corrective measures, results of pressure testing during startup, and results of baseline sampling.
- DBS&A will submit an operation and maintenance (O&M) plan to NMED. This document will provide details of the SSDS system layout, sampling points and methodologies, laboratory analytical methods and required reporting limits, monitoring frequencies, O&M field forms, criteria for cessation of SSDS operation, and post-mitigation monitoring plans.
- O&M and site activities reports will be prepared periodically as specified in the O&M plan, and will provide system O&M and sampling results, changes in site conditions or other site activities, an assessment of the effectiveness of the corrective measures, and recommendations.

5. Data Review, Validation, and Reporting

5.1.1 Data Review and Validation

DBS&A will review, verify, and validate field and laboratory data, which will be sufficient to meet the DQOs and measurement quality objectives for the project. The specific data validation responsibilities and procedures will be included in the SAP, updated as specified under Section 3.2.

5.1.2 Reporting

Upon receipt of the analytical data, DBS&A will prepare a report that presents results and summarizes the findings of the site characterization activities described in this S1AP. Included in the summary report will be a narrative description of the site investigation(s), field notes, site maps, laboratory analytical reports, summary of field quality control procedures and data, and discussion of any discrepancies or data quality issues. Available site analytical data will be summarized in tables and figures, as applicable.

5.1.3 Recommendations

DBS&A recognizes that abatement planning and feasibility assessment is an iterative process. If additional site characterization or pilot testing is required to determine an appropriate remedial approach, recommendations for such will be provided in the site investigation report(s). Details of any additional proposed site characterization or pilot testing will be described in an amendment to the S1AP, and will be submitted to NMED for approval prior to implementation.

6. Schedule

DBS&A and West Mesa recognize that NMED is interested in completing this investigation in a timely fashion. West Mesa and DBS&A will adhere to the following submittal schedule:

- Upon acceptance of this S1AP by NMED, DBS&A will submit an amended SAP (combined FSP and QAPP) and other site-specific documents to NMED within 30 calendar days for review. After receipt of NMED's comments to the draft documents, a final SAP will be submitted within 14 calendar days.
- Implementation of interim corrective measures will begin immediately upon acceptance of this S1AP by NMED.

- DBS&A anticipates that the field investigation program can be initiated immediately following NMED approval of the SAP.
- A site characterization report in accordance with the specifications outlined in this S1AP will be completed within 120 calendar days of SAP acceptance and submitted to NMED for review. After receipt of NMED's final comments to the draft report and planning documents, the final report and planning documents will be submitted within 15 working days.
- Deliverables associated with the subsequent field activities conducted under S1AP amendments will be submitted on a timetable presented in the amendments and approved by NMED.

7. Stage 1 Completion Report

Following completion of all proposed and approved activities conducted under the S1AP and subsequent amendments, a Stage 1 Completion Report will be submitted to NMED for acceptance and approval. The completion report will include a summary of site geology, all completed work and activities, conclusions and recommendations, and an environmental professional statement. Site characterization data will support refinement of the conceptual site model (CSM) describing known and potential contaminant sources, migration pathways, and receptors, and will identify potential exposure pathways, consistent with the requirements of 20.6.2.4106.C(1)(a) NMAC. Specific and detailed recommendations for appropriate remedial actions will be provided in the S1AP Completion Report.

Following acceptance of the S1AP Completion Report, DBS&A anticipates that the site and surrounding properties will be sufficiently characterized to move forward with a Stage 2 Abatement Plan in accordance with Sections 20.6.2.4106.D and 20.6.2.4106.E NMAC.

References

- Bartolino, J.R. and J.C. Cole. 2002. *Ground-water resources of the middle Rio Grande basin, New Mexico*. U.S. Geological Survey (USGS) Water Resources Circular 1222.
- Daniel B. Stephens & Associates, Inc. (DBS&A). 2023a. *Phase I environmental site assessment, 3002 Monte Vista Boulevard NE, Albuquerque, New Mexico*. Prepared for West Mesa Real Estate Holding Company, LLC, Albuquerque, New Mexico. April 25, 2023.

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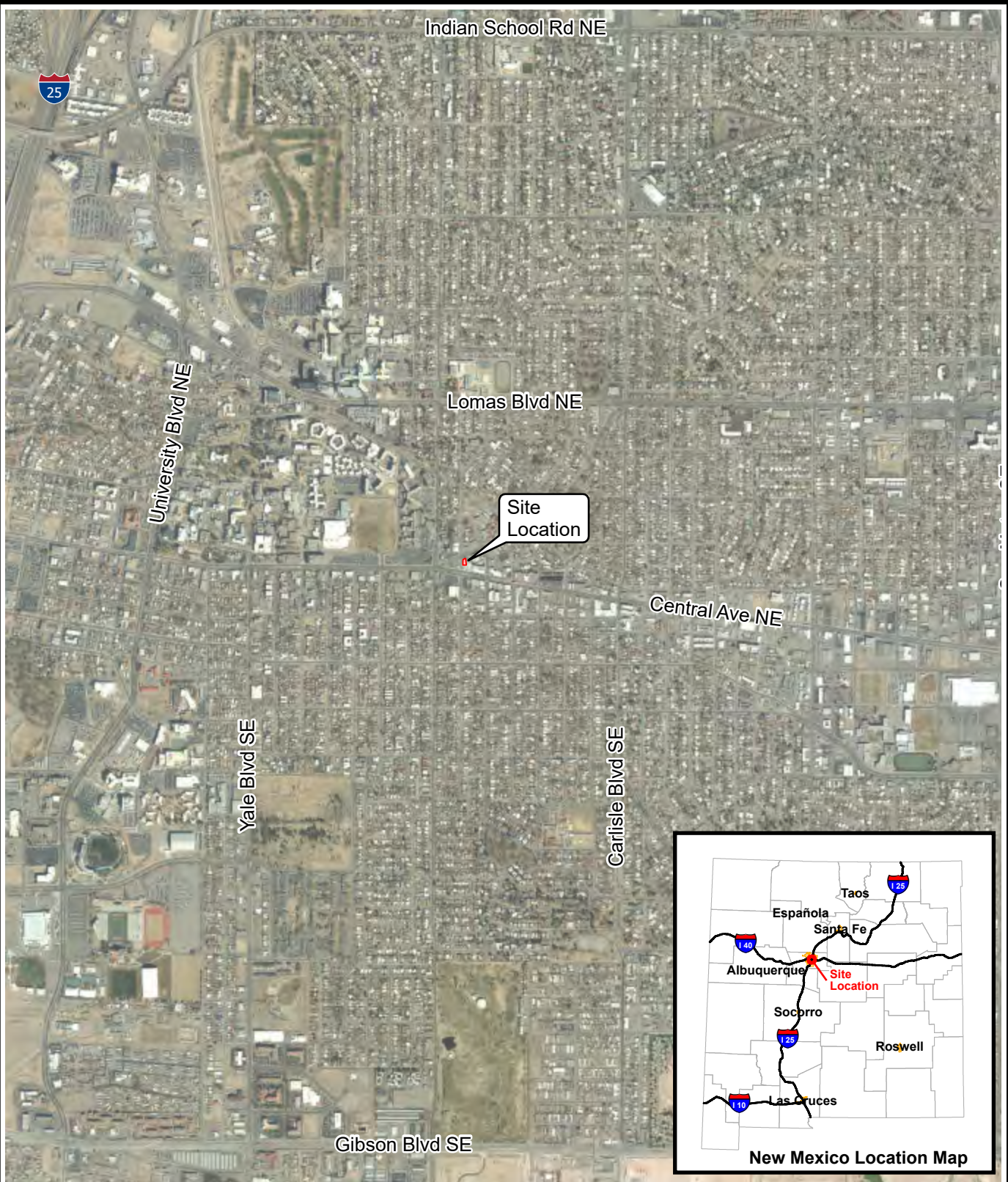
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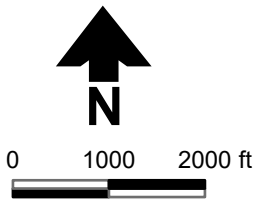
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Figures

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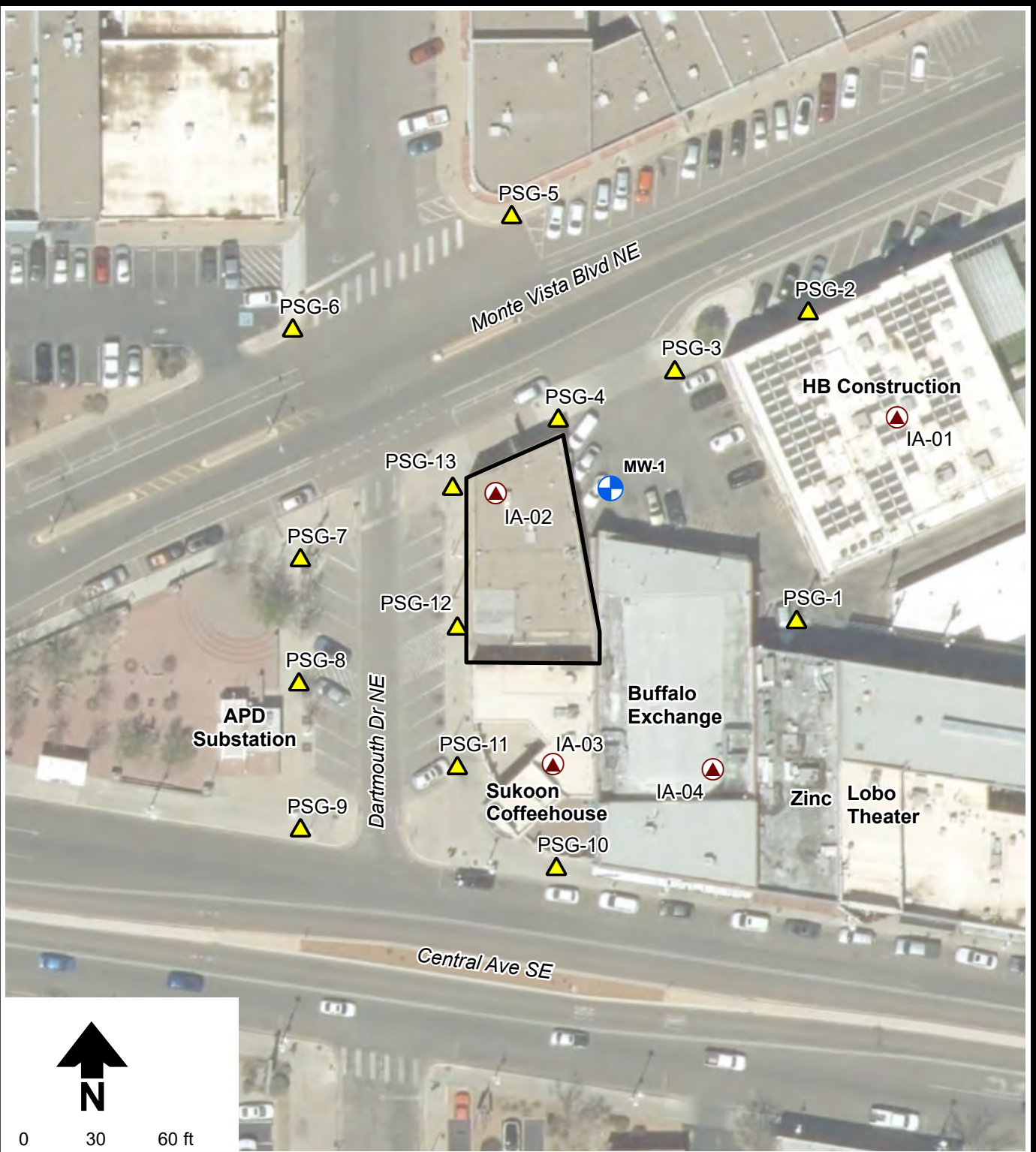


Aerial Photograph: World Imagery, MRCOG-NM, Bohannon Huston, Maxar

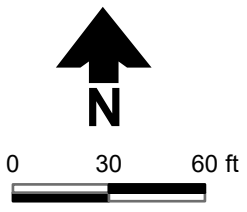


WEST MESA PROPERTIES
 3002 MONTE VISTA BLVD NE
 ALBUQUERQUE, NEW MEXICO
Area Map





Figure 1



Aerial Photograph: Bernalillo County 2022, MRCOG-NM, Bohannon Huston

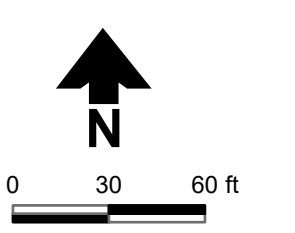
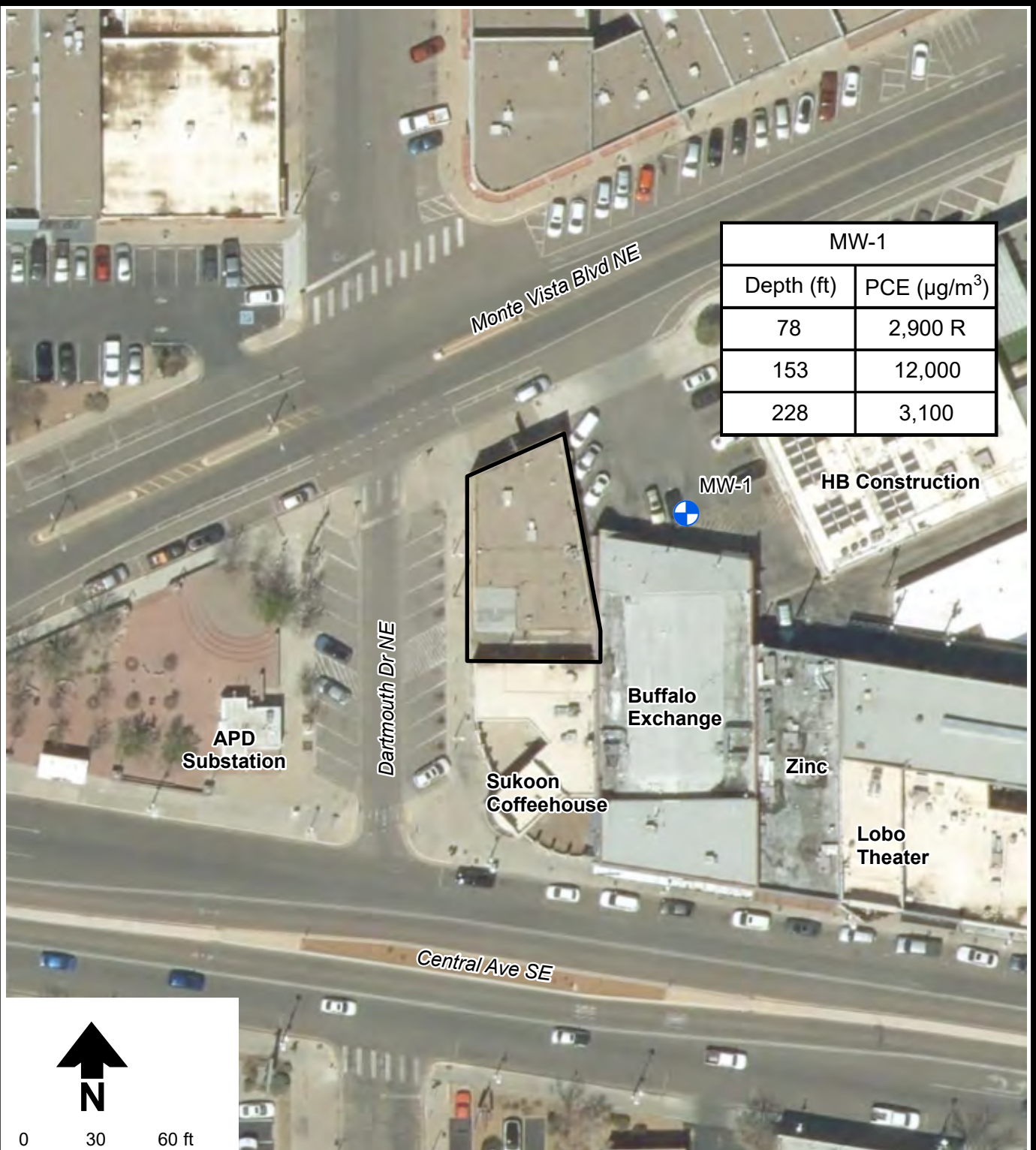


Explanation

-  Monitor well with vapor probes
-  Passive soil gas sample location
-  Indoor air sample location
-  ABQ Cleaners facility



WEST MESA PROPERTIES
 3002 MONTE VISTA BLVD NE
 ALBUQUERQUE, NEW MEXICO
Site Map

Figure 2



Aerial Photograph: Bernalillo County 2022, MRCOG-NM, Bohannon Huston

Explanation

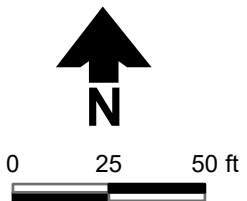
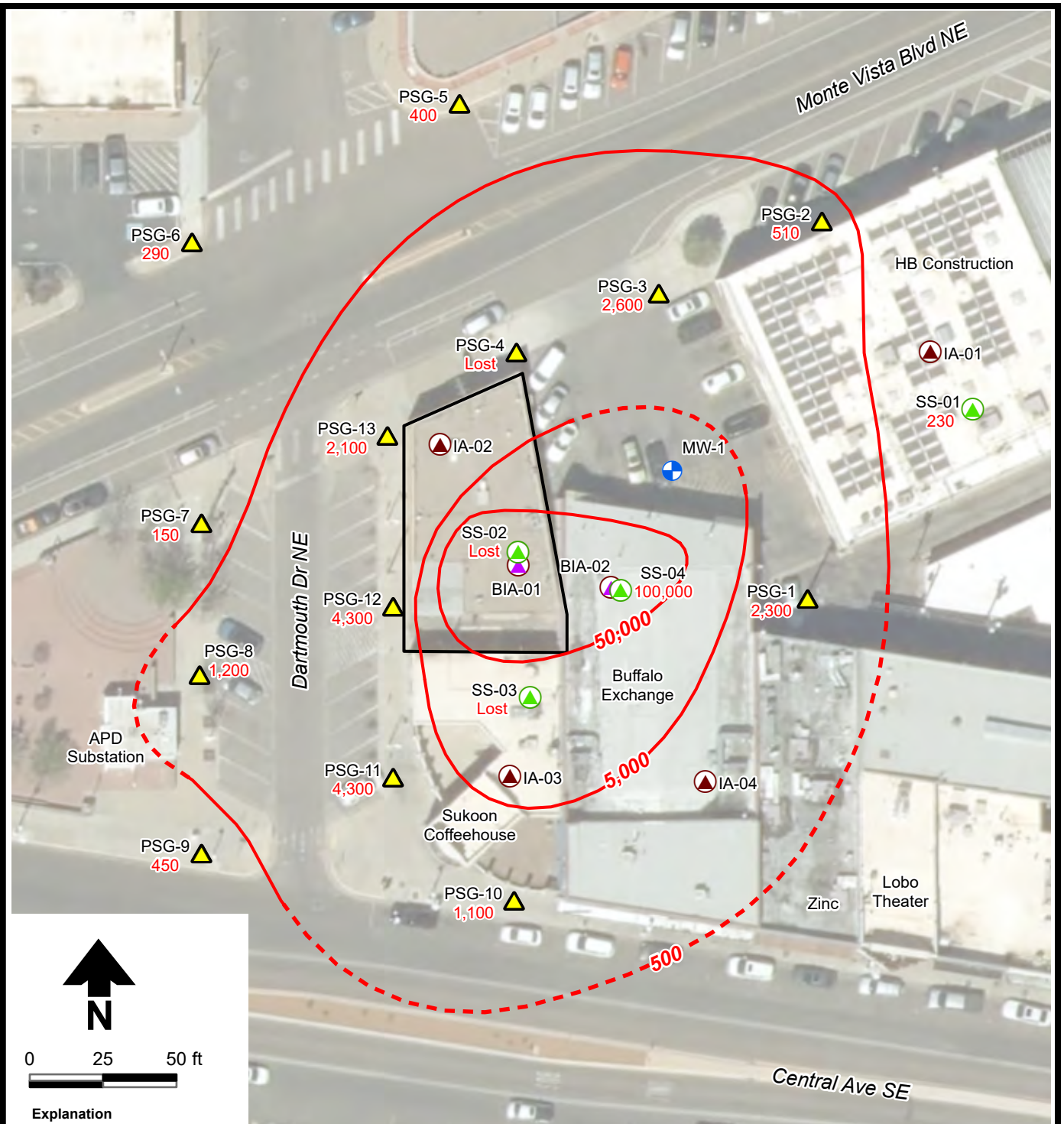
-  Monitor well with vapor probes
-  ABQ Cleaners facility

Notes:

1. PCE = Tetrachloroethene
2. All concentrations reported in micrograms per cubic meter ($\mu\text{g}/\text{m}^3$)
3. R = Suspect result. See text for discussion.

WEST MESA PROPERTIES
 3002 MONTE VISTA BLVD NE
 ALBUQUERQUE, NEW MEXICO
PCE Analytical Results
Vertical Profile Soil Vapor Well
November 24, 2023

Figure 3



Explanation

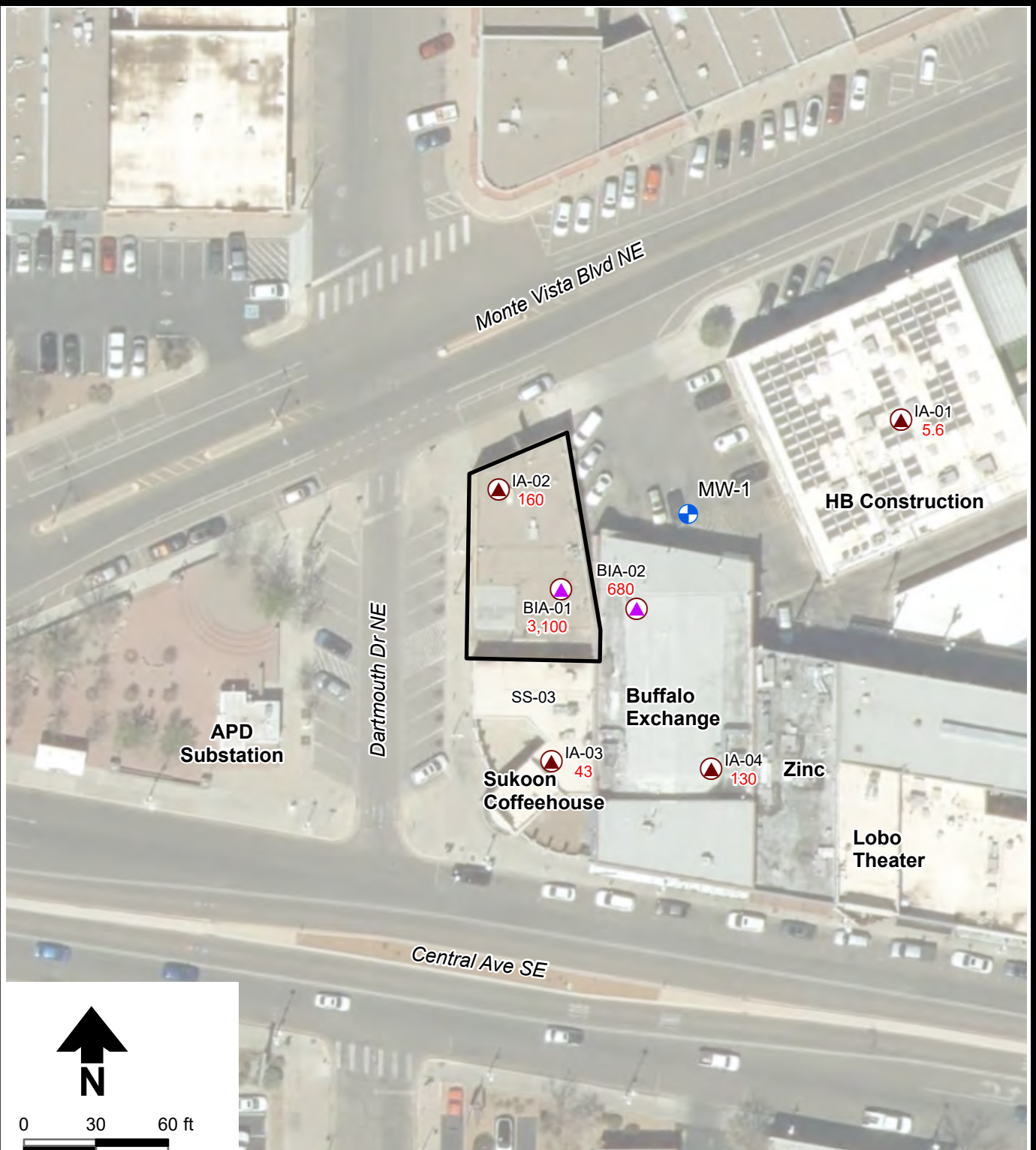
- Monitor well with vapor probes
- Passive soil gas sample location
- Indoor air sample location
- Basement indoor air sample location
- Sub-slab sample location
- ABQ Cleaners facility
- PCE isoconcentration contour (dashed where inferred)

PSG-01 Passive soil gas sample
 2,300 PCE concentration
 SS-01 Sub-slab gas sample
 230 PCE concentration





Aerial Photograph: Bernalillo County 2022, MRCOG-NM, Bohannon Huston

Notes:
 1. All concentrations in micrograms per cubic meter ($\mu\text{g}/\text{m}^3$)
 2. PCE = Tetrachloroethene

**WEST MESA PROPERTIES
 3002 MONTE VISTA BLVD NE
 ALBUQUERQUE, NEW MEXICO
 PCE Isoconcentration in
 Shallow Soil Vapor
 November 2023**



Explanation

-  Monitor well with vapor probes
-  Basement indoor air sample location
-  ABQ Cleaners facility
-  Indoor air sample location

IA-01	Indoor air sample
5.6	PCE concentration
BIA-01	Basement indoor air sample
3,100	PCE concentration

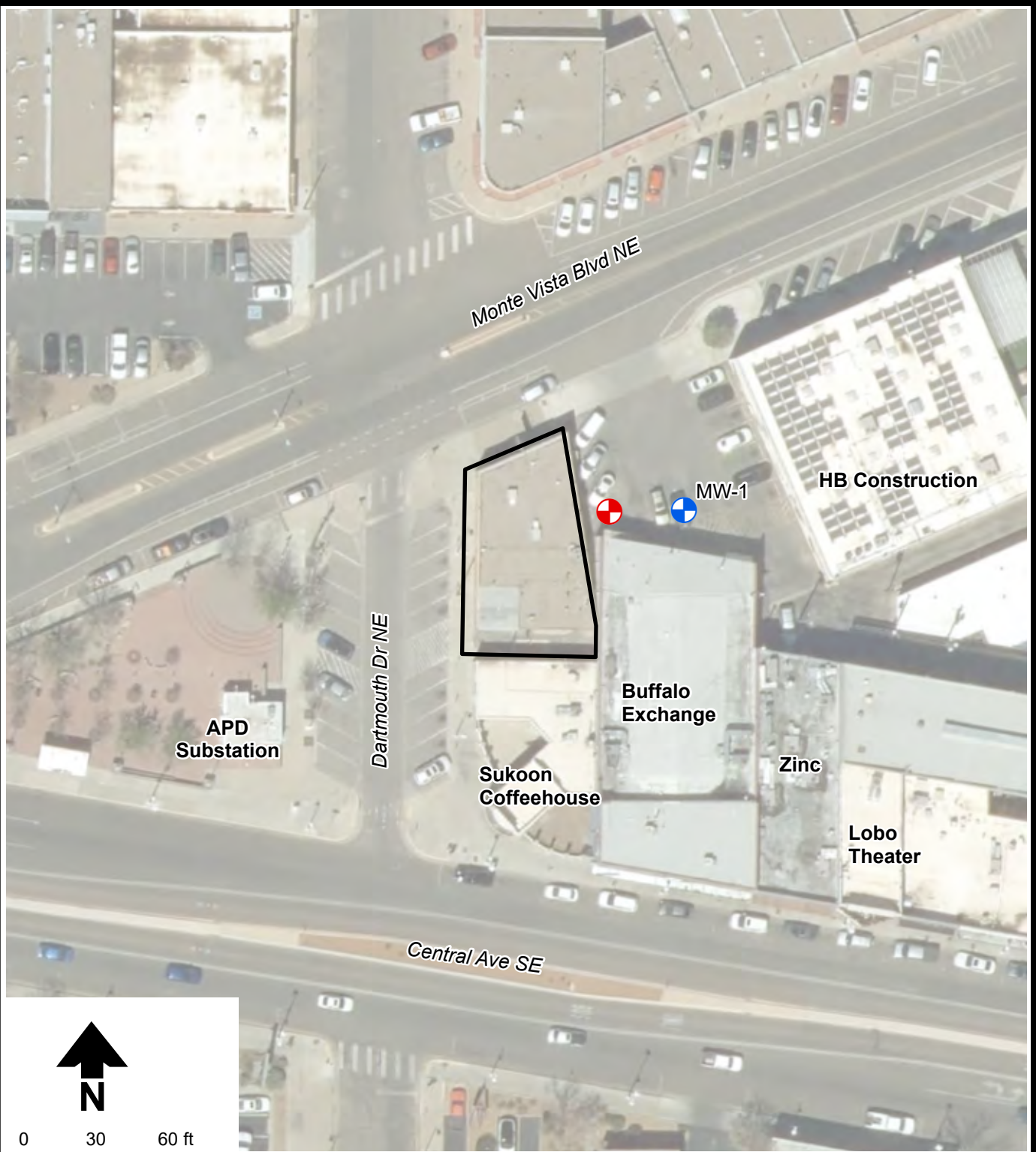
Notes:

1. All concentrations in micrograms per cubic meter ($\mu\text{g}/\text{m}^3$)
2. PCE = Tetrachloroethene

Aerial Photograph: Bernalillo County 2022, MRCOG-NM, Bohannon Huston




WEST MESA PROPERTIES
3002 MONTE VISTA BLVD NE
ALBUQUERQUE, NEW MEXICO
PCE Results in Indoor Air
November 29, 2023

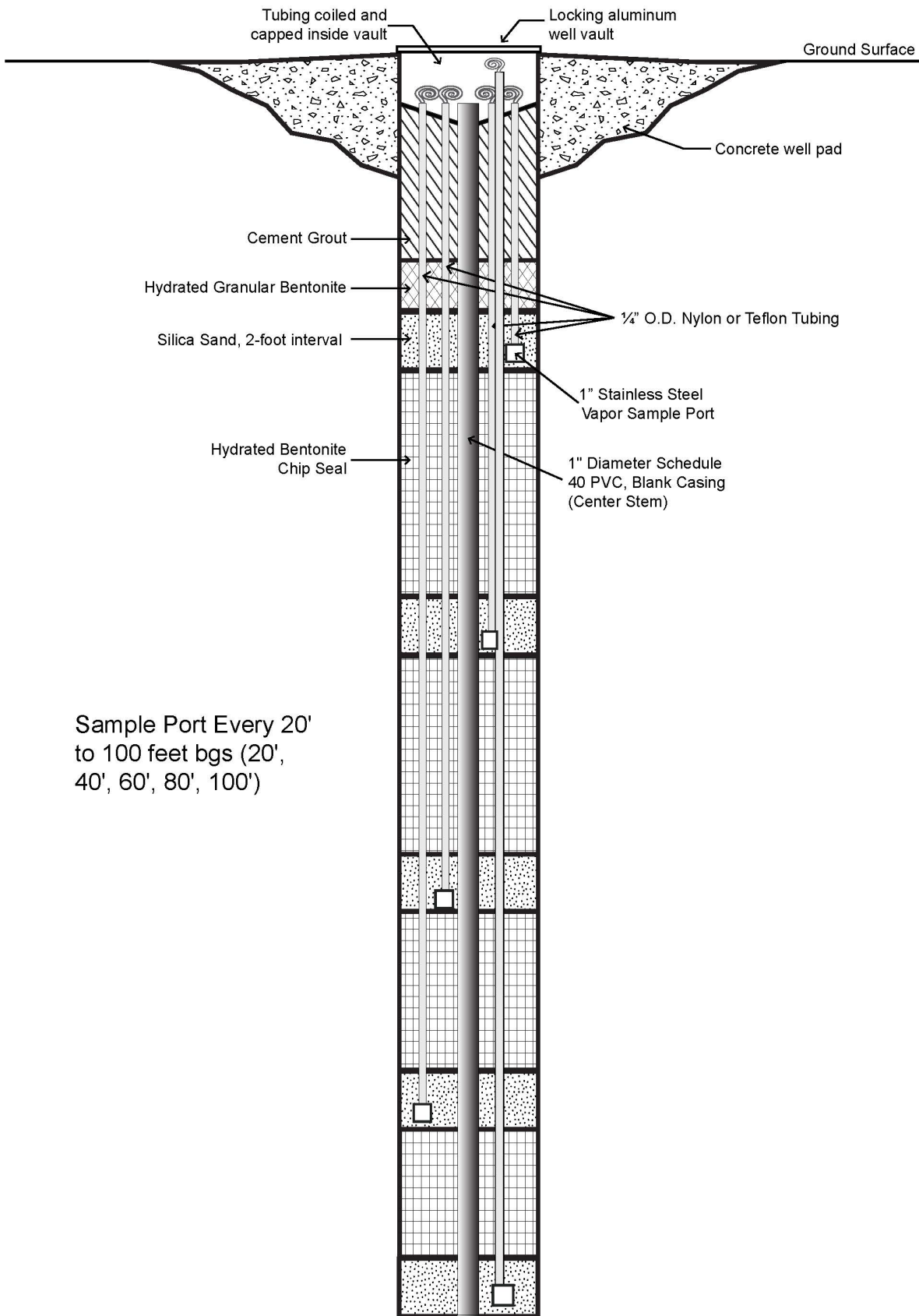
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Aerial Photograph: Bernalillo County 2022, MRCOG-NM, Bohannon Huston

Explanation

-  Monitor well
-  Proposed nested vapor well
-  ABQ Cleaners facility



Sample Port Every 20'
to 100 feet bgs (20',
40', 60', 80', 100')

Note: Not to scale

WEST MESA PROPERTIES
3002 MONTE VISTA BLVD NE
ALBUQUERQUE, NEW MEXICO
Nested Vapor Well (Typical)

Appendix A
Interim Corrective
Measures



September 26, 2025

Ms. Rebecca Cook
Remediation Oversight Section
Ground Water Quality Bureau
New Mexico Environment Department
1190 Saint Francis Drive, PO Box 5469
Santa Fe, NM 87502-5469

Re: Interim Corrective Measures Notification, ABQ Cleaners
3002 Monte Vista Boulevard NE, Albuquerque, New Mexico

Dear Ms. Cook -

On behalf of Fetherolf, LLC (Fetherolf) and West Mesa Properties, LLC (West Mesa), Daniel B. Stephens & Associates, Inc. (DBS&A) is pleased to provide this memorandum describing proposed interim corrective actions at the subject site. These actions will be undertaken voluntarily by Fetherolf and West Mesa to promote the health and safety of site workers and the public. Additional corrective action may be implemented in the future.

Background

The structure at 3002 Monte Vista Boulevard NE has housed numerous shops and businesses since its construction in approximately 1938, and is currently leased to ABQ Cleaners, a dry cleaning, laundry, and home and business cleaning facility. The structure has hosted a number of dry-cleaning operations since prior to 1987.

In August 2022, the New Mexico Environment Department identified the site as a potential source of a chlorinated volatile organic compound (CVOC) release. Based on soil gas, sub-slab and indoor air sampling results, NMED stipulated in a letter dated February 10, 2023 that West Mesa shall conduct corrective actions at the facility and submit a corrective action work plan for additional site characterization.

Pursuant to 20.6.2.1203 of the New Mexico Administrative Code (NMAC), corrective actions were implemented at the site, including improved maintenance and housekeeping, as well as implementation of best management practices with respect to dry cleaning operations at the site. These corrective actions were documented in a letter dated April 18, 2023. The previous solvent-based dry-cleaning plant was removed and replaced with a modern plant employing alternative cleaning agents in summer 2023.

During September through December 2023, characterization activities were conducted at the site, including shallow and deep soil vapor sampling, sub-slab and indoor air sampling, and groundwater sampling. The NMED screening level for PCE in industrial indoor air was

exceeded in the two samples collected from the basements of the ABQ Cleaners facility and the adjacent Buffalo Exchange retail store.

Interim Corrective Action

Based on the results of the site characterization, PCE vapor intrusion is likely impacting indoor air in both building basements. The potential exists for historical contamination of the indoor basement space and building materials at the ABQ Cleaners facility. Pending completion of a comprehensive remediation plan for the site, Fetherolf and West Mesa voluntarily propose immediate mitigation actions with respect to indoor air quality in the two affected basement areas. Interim actions will focus on short-term mitigation of the indoor air impacts in the two basements, with a secondary goal of affecting limited clean-up of impacted shallow soil immediately underlying the structures. Indoor air mitigation will include three corrective action elements:

- 1) Sub-slab depressurization systems (SSDS) will be installed in each affected basement
- 2) Active fresh air ventilation will be installed in the ABQ Cleaners basement
- 3) The concrete slab and sidewalls at the ABQ Cleaners basement will be sealed

Based on the site history and existing site characterization data, the primary source of the PCE release is presumed to be the ABQ Cleaners facility. For purposes of the Interim Corrective Action proposal, the treatment area shall consist of the entire basement of the ABQ Cleaners facility, and that portion of the Buffalo Exchange basement within approximately 40 feet of the ABQ Cleaners building footprint (Figure 1). The elements of the interim corrective action plan are described below.

Sub-Slab Depressurization

The SSDS proposed for the site will consist of two, separate, independently operated vacuum extraction systems, one in each affected building basement. Two sub-slab suction points are proposed in the Buffalo Exchange basement, and three in the ABQ Cleaners basement. Extracted vapor will be conveyed via 2" Schedule 40 PVC pipe to a high vacuum fan (RadonAway HS2750, or similar) and vented to the building exterior above the roof line. Integrated gauges will display system vacuum and vapor flow. Ports with ball valves and barbed fittings will be installed at the fan intake to enable sampling of the extracted vapor stream.

Ventilation

Due to the elevated PCE concentrations detected in the basement air and the potential for historical contamination of the basement interior, enhanced ventilation of the basement air space will be implemented at the ABQ Cleaners facility. Basement air will be vented to the outside using a standard commercial vent fan. Fresh air inlet and basement air discharge will be located at least 10 feet from each other. Fan and vent specifications will be provided in a report documenting implementation of the interim corrective action measures.

Concrete sealant

Contaminated soil and/or soil vapor containing elevated concentrations of PCE may be in contact with the basement slab or sidewalls at the ABQ Cleaners facility. The basement floor and sidewalls are currently exposed, unsealed concrete. As an added precaution against continued vapor intrusion to the indoor air space, the basement floor and sidewalls up to the approximate surface grade will be sealed with a commercial concrete sealant.

Corrective Action Monitoring Program

Pressure field testing

At least 4 Vapor Pin™ sampling ports will be installed in each basement slab, at varying distances from the suction points. Vacuum application will be monitored during initial start-up of the SSDS using a hand-held manometer at each of the sample ports. If pressure field testing indicates that measurable vacuum application does not extend across the treatment area, corrective measures will be taken, which may include installation of additional suction points and/or vacuum pumps.

Baseline sampling

Prior to start-up of the SSDS system, sub-slab vapor samples will be collected from two locations in each basement, and a single indoor air sample will be collected from each basement as well. Samples will be collected and analyzed according to the methods described in the forthcoming site Operation and Monitoring (O&M) Plan.

Operations and Monitoring

Operations and monitoring of the SSDS will be conducted in accordance with the site O&M plan. During system operations, extracted soil vapor will be collected and analyzed for volatile organic compounds (VOCs). System operational parameters (applied vacuum and vapor flow) will be recorded during operation of the SSDS. Sub-slab and indoor air samples will be collected to assess progress of the remedial action. Sampling frequency, methodology and analytical methods for both process samples (extracted vapor) and compliance samples (sub-slab and indoor air) will be defined in the site O&M plan.

Contingency Plans

Extracted soil vapor and the indoor air space will be monitored according to the O&M plan. DBS&A anticipates that the proposed actions will mitigate the indoor air impacts and reduce PCE concentrations to below NMED's industrial indoor air screening level of 197 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).

If corrective actions do not result in achievement of NMED Industrial indoor screening levels for PCE in each basement within 3 months of application, additional corrective actions may be implemented, including: installation of enhanced ventilation, air purifying

filters, and/or expansion of the SSDS. Recommendations for implementation of contingency options, if needed, will be provided by DBS&A to West Mesa and NMED.

Deliverables

DBS&A will produce the following documents related to the Interim Corrective Measures, and submit these documents to NMED for review and acceptance:

- DBS&A will document SSDS installation in a report, which will be provided to NMED. The report will provide, at a minimum, the layout of the installed SSDS in each basement, technical specifications of the installed equipment, documentation of the installation process, photographic documentation of each element of the interim corrective measures, results of pressure testing during startup, and results of baseline sampling.
- DBS&A will submit an O&M Plan to NMED. This document will provide details of the SSDS system layout, sampling points and methodologies, laboratory analytical methods and required reporting limits, monitoring frequencies, O&M field forms, criteria for cessation of SSDS operation, and post-mitigation monitoring plans.
- O&M and site activities reports will be prepared periodically as specified in the O&M plan, and provide a summary of system O&M and sampling results, changes in site conditions or other site activities, an assessment of the effectiveness of the corrective measures, and recommendations.

Please do not hesitate to call me at (505) 514-2435 if you have any questions regarding the proposed interim corrective measures for the ABQ Cleaners facility.

Sincerely,

DANIEL B. STEPHENS & ASSOCIATES, INC.



Jason J. Raucci, P.G.
Project Geologist



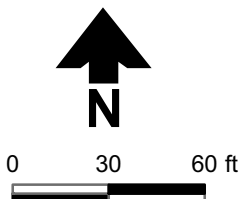
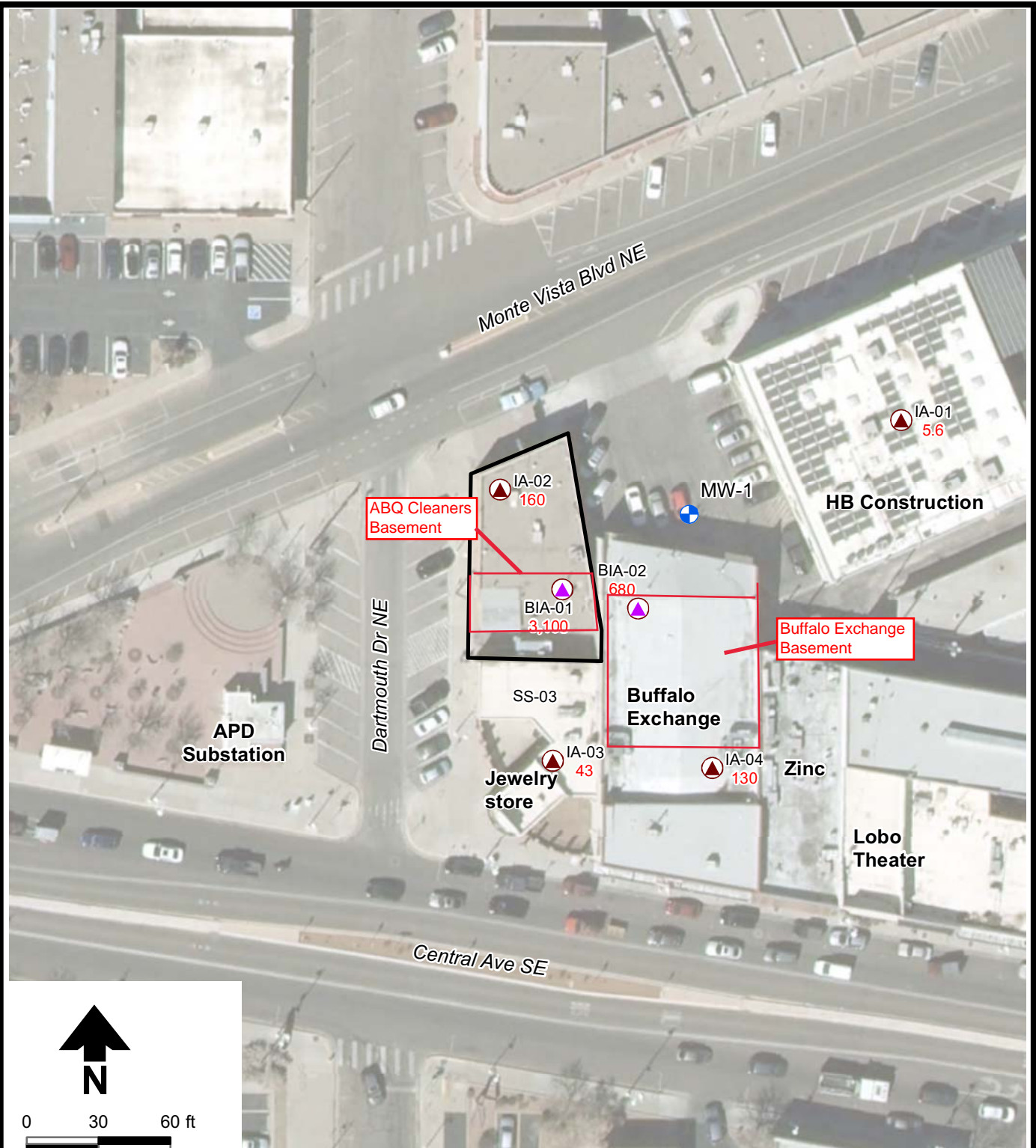
Thomas Golden, P.E., CAPM
Senior Engineer

JJR/rpf

Attachment

cc: Thomas Hnasko, Esq., Hinkle-Shanor LLP
Josela Fetherolf
Richard Rivas, West Mesa Properties

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Explanation

- Monitor well with vapor probes
- Indoor air sample location
- Basement indoor air sample location
- ABQ Cleaners facility
- IA-01 Indoor air sample
- 5.6 PCE concentration
- BIA-01 Basement indoor air sample
- 3,100 PCE concentration

Notes:

1. All concentrations in micrograms per cubic meter ($\mu\text{g}/\text{m}^3$)
2. PCE = Tetrachloroethene

Aerial Photograph: Bernalillo County 2022, MRCOG-NM, Bohannon Huston

WEST MESA PROPERTIES
3002 MONTE VISTA BLVD NE
ALBUQUERQUE, NEW MEXICO
PCE Results in Indoor Air
November 29, 2023



2/19/2024

DB23.1071

Figure 3