

November 11, 1998

Mr. Richard Gardineer, P.E.  
New York State Department of Environmental Conservation  
Division of Environmental Remediation, Region 2  
47-40 21st Street  
Long Island City, NY 11101

**RECEIVED**  
N.Y.S.D.E.C. — REGION 2

**NOV 10 1998**

**HAZARDOUS WASTE  
REMEDATION**

**Re: Workplan for Remediation  
Milhan Realty Corporation - 2 Ingraham Street, Brooklyn, New York**

Dear Mr. Gardineer:

Please find attached the Workplan for the remediation of the 2 Ingraham Street Site. Based on discussions with the site owner's attorney, the "site" agreed with DEC's attorneys to be subject to the VCP is the quadrant leased to the plater. This is indicated by the solid line in Figure 2.

In response to Mr. Brevdo's letter of October 29 and my November 3 telephone conversation with Mr. Brevdo, the Workplan generally follows the outline contained in my October 14 letter with the following changes/clarifications (the numbering corresponds to that in Mr. Brevdo's letter):

1. The site and trench are shown to scale on Figure 2 as are the locations of the four monitoring wells and all AKRF and previous soil sampling locations. The depths to groundwater in each well are indicated, as well as estimated elevation contours and flow direction. The direction indicated is approximately 25 degrees west of north. The westernmost portion of English Kills is due north of the site (see Figure 1). As such MW-4, MW-3, MW-1 and MW-2 represent upgradient, upgradient, source area/downgradient and downgradient conditions, respectively. Therefore, no new wells will be installed, but all 4 wells will be resampled for TCL VOCs, TAL metals and cyanide.
2. Seven initial grab soil samples (0 to 2 inches) are proposed in the area of the former trench. All seven will be analyzed for total and TCLP metals (and cyanide) in accordance with the NYSDEC ASP. Based on the site history and the lack of detected VOCs, 2 initial samples (one from each initial excavation) will be submitted for VOCs and SVOCs.
3. It is my understanding from the owner's attorneys that deed restrictions/disclosure provisions or similar instruments will be incorporated into the Voluntary Cleanup Agreement.
4. All samples will be grab samples. I do not believe the STARS Memo #1 indicates the recommended frequency of post-excavation samples. However, excavations will be sampled at a frequency of one grab sample per 10 linear feet of sidewall and 10 x 10 feet of bottom.
5. Existing dust on the floors and walls will be collected and stockpiled for characterization.
6. The locations and dimensions of the initial excavations are shown in the detail of Figure 2.
7. The monitoring wells are all 25 feet deep. The depth to water in each is shown on Figure 2.

8. The Health and Safety Plan is Attachment A to the Workplan. All activities will take place within the (closed) building.
9. AKRF does not have any knowledge of hazardous substance spills relating to the plating operations (or any other operations at the site). A prior report (Section 2.1.5 of ERD's Limited Phase II Investigation, February 1997) indicated that the trench was connected to the city sewer system and tested monthly in accordance with an 'EPA permit' (in reality, probably an NYCDEP pretreatment permit).

There were no spills relating to the former on site aboveground petroleum tanks (PBS# 2-603519). These tanks were removed in March 1998 in accordance with NYSDEC procedures. The current NYSDEC PBS Facility Information Report, showing the removal of the four tanks, is attached.

10. The revised property plan is shown in Figure 2.

AKRF's December 1997 *Site Investigation Report* included all Form I's from NYTEST Environmental, a NYSDOH-approved laboratory (ID# 10195). I have attached one copy of the complete laboratory reports for your review.

Please call me at (212) 340-9790 with any questions or comments.

Sincerely,  
**AKRF, Inc.**



Marcus Simons  
Technical Director

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cc: Mr. Vadim Brevdo, NYSDEC Region 2  
Ms. Iona Munteanu-Ramnic, NYSDEC Region 2  
Mark Chertok, Esq., Sive, Paget & Riesel, P.C.  
Mr. Carl Savryn, Milhan Realty

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
Petroleum Bulk Storage Program  
Facility Information Report

Printed : 09/10/98

PBS # : 2-603519

Site : MILHAW REALTY CORPORATION  
2 INGRAHAM STREET  
BROOKLYN, NY 11206

County : KINGS Town : NEW YORK CITY  
Latitude : N Longitude : W  
SPDES# : CBSN :  
Site Type : Info Not Given.

Operator : MR. STRAMAN (718) 381-4400  
Emergency : KARL SAKIAN (212) 972-8600

Site status : Under 1101 gal.  
Total Active Tanks : 0  
Active Capacity : 0 gals.

Reg Expires : 06/11/03  
Last Inspection : / /  
Cert Printed : / /

Site Errors : Minor Data Missing  
Owner Error : Complete  
Tank Errors : No Data

Owner : MILHAW REALTY CORPORATION  
2 INGRAHAM STREET  
BROOKLYN, NY 11206

Phone : (212) 972-8600  
Owner Type : Corporate/Commercial

Mail : MILHAW REALTY CORPORATION  
C/O KARL SAKIAN  
330 MADISON AVENUE, 14TH FLOOR  
NEW YORK, NY 10017  
Att : (212) 972-8600

TankNo	TankLoc	Stat	DateIn	Capac (g)	Product	TankType	TankInt	TankExt	PipeLoc	PipeType	PipeInt	PipeExt	SecCont	Leak	Overfil	Disp	LastTest	NextTest	TStat
1ABG	1	3	00/00	3,000	3	1	0	00	1	1	0	00	00	00	00	2		REMOVED : 03/98	
2ABG	1	3	00/00	3,000	3	1	0	00	1	1	0	00	00	00	00	2		REMOVED : 03/98	
3ABG	1	3	00/00	3,000	3	1	0	00	1	1	0	00	00	00	00	2		REMOVED : 03/98	
4ABG	1	3	00/00	3,000	3	1	0	00	1	1	0	00	00	00	00	2		REMOVED : 03/98	