

September 8, 2011

Mr. Henry Willems
New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway, 12th Floor
Albany, New York 12233-7013

Subject: Pre-Design Investigation Work Plan – 254 Maspeth Avenue Property
Modification to Include Test Pits on 252 Maspeth Avenue Property
Equity Former Manufactured Gas Plant (MGP) Site
Brooklyn, New York
NYSDEC Site No.: 224050, Order on Consent Index #: A2-0552-0606

Dear Mr. Willems:

Per our discussion on August 19, 2011, National Grid is requesting modification of the NYSDEC-approved July 2011 Pre-Design Investigation Work Plan - 254 Maspeth Avenue Property. The requested modification is the installation of four test pits on the 252 Maspeth Avenue parcel located adjacent to the 254 Maspeth Avenue parcel. The attached Figure 1 shows the location of the four proposed test pits (TP-18 through TP-21) in relation to the approved test pit locations on the 254 Maspeth Avenue parcel. Proposed sampling related to the test pits is outlined on attached Tables 1 and 2.

All work performed will be in accordance with the approved PDI work plan for the 254 Maspeth Avenue parcel. Please provide approval of the scope modification as discussed in our call.

Geophysical surveying at the proposed test pits at the 252 Maspeth Avenue parcel is scheduled to occur on Monday September 12, 2011. Test pitting work is scheduled to commence later in the AM on September 12, 2011 after completion of the geophysical survey work.

If you have any questions, comments, or require any additional information, please do not hesitate to contact me (718) 963-5453 or via electronic mail (e-mail) at donald.campbell@us.ngrid.com.

Yours sincerely,

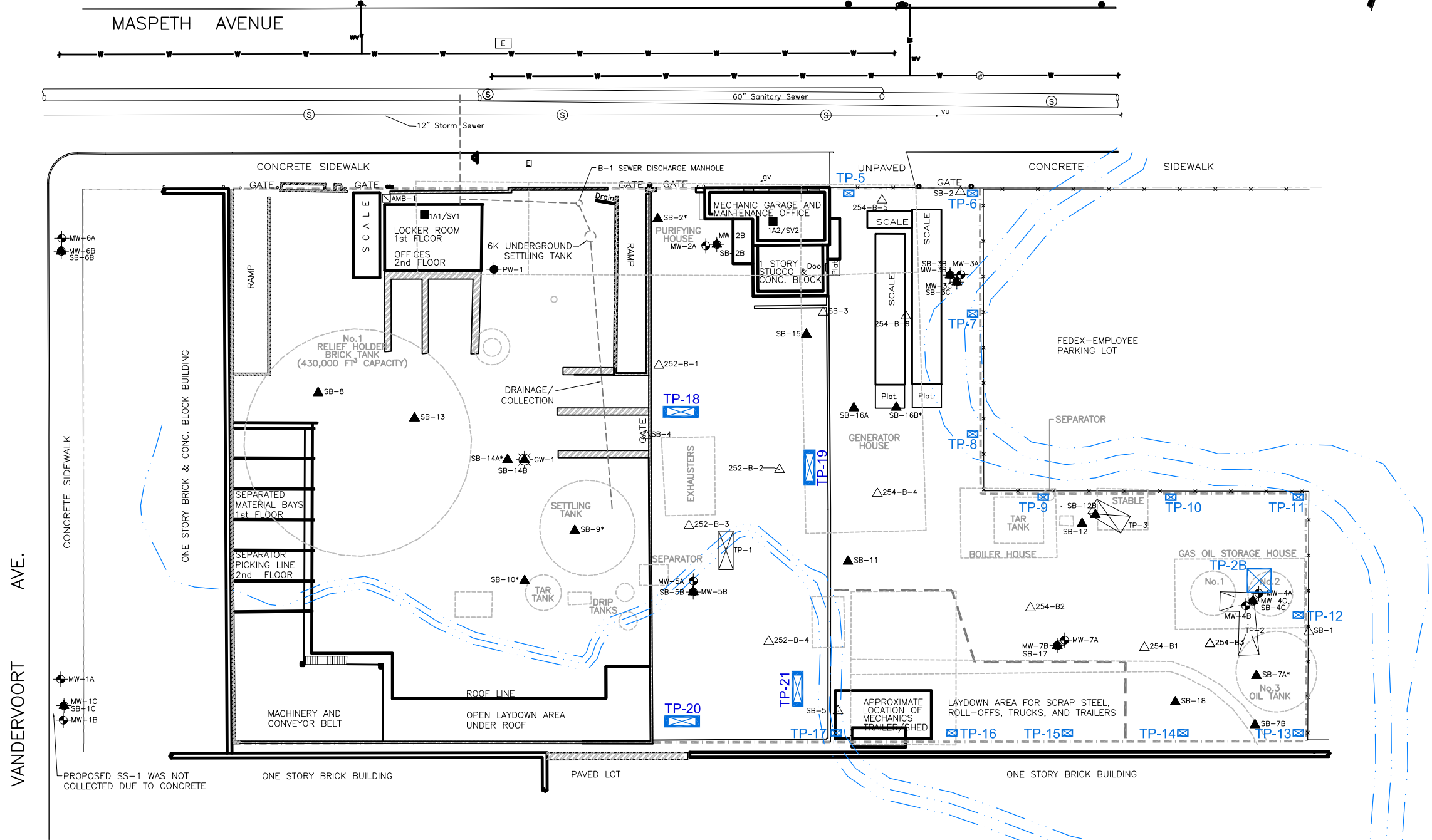
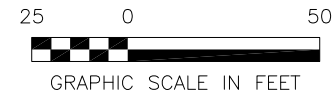


Donald Campbell
Project Manager

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S. Pandya, AECOM (Electronic Copy Only)

Figure

File: J:\Rem_Eng\Project Files\National Grid\1765-076 Equity Former MGP 11.0 CADD\6-2011\60137362-400-C06.dwg Layout: SITE (4) User: vershomb Plotted: Aug 18, 2011 - 4:20pm



NOTES:
 1.) SITE FEATURES (BUILDINGS, WALLS, UTILITIES, ETC.) TAKEN FROM MONTRÖSE SURVEYING CO., LLC. OF RICHMOND HILL, NY. THOSE SURVEYS (MASPETH AVE 222 ON 9/21/04 AND MASPETH AVE 252 & 254 ON 3/10/06) PROVIDED BY COOPER TANK RECYCLING.
 2.) LOCATIONS OF HISTORIC MGP STRUCTURES BASED ON SANBORN FIRE INSURANCE MAPS.
 3.) LOCATION OF HISTORIC INVESTIGATION LOCATIONS BASED ON EEA INC., 2004 REPORT (254 MASPETH AVE) AND GANNETT FLEMING 2005 REPORT (252 MASPETH AVE).
 4.) SITE CHARACTERIZATION INVESTIGATION LOCATIONS SURVEYED BY GEOD CONSULTING ON DECEMBER 11 AND 12, 2009.
 5.) OFFICE BUILDING AND SCALE ON 222 MASPETH AVE. ADJUSTED FROM MONTRÖSE SURVEY BASED ON FIELD OBSERVATIONS.
 * LOCATIONS BASED ON FIELD TIE-INS BY AECOM.

- LEGEND:**
- SITE BOUNDARY
 - - - ROADWAY EASEMENT
 - CURB
 - ▬ BUILDING WALL
 - ▨ CONCRETE WALL
 - *— FENCE
 - +— WATER UTILITY WITH ACCESS WAY
 - v— WATER UTILITY VALVE
 - h— HYDRANT
 - E— UNDERGROUND ELECTRIC UTILITY VAULT
 - (S)— 60" SEWER UTILITY WITH ACCESS WAY
 - (S)— 12" SEWER UTILITY WITH ACCESS WAY
 - BOLLARDS
 - ELECTRIC UTILITY POLE
 - MW-4A— RI MONITORING WELL
 - ▲ SB-4 RI SOIL BORING
 - ▣ TP-3 RI TEST PIT
 - ▣ AMB-1 AMBIENT AIR
 - 1A1/SV1 INDOOR AIR/SOIL VAPOR
 - PW-1— ON-SITE PUMPING WELL
 - GW-1— TEMPORARY MONITORING WELL
 - △ 254-B-6— PREVIOUS INVESTIGATION SAMPLE LOCATION
 - HISTORIC STRUCTURE
 - HISTORIC WATERCOURSE
 - CURRENT FEATURE
 - ▣ TP-15 PROPOSED TEST PIT
 - ▣ TP-20 PROPOSED TEST PIT LOCATIONS 252 MASPETH AVE.

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PROPOSED SS-1 WAS NOT COLLECTED DUE TO CONCRETE



NATIONAL GRID EQUITY FORMER MGP SITE, BROOKLYN NY PRE-DESIGN INVESTIGATION		PROPOSED PRE-DESIGN INVESTIGATION LOCATIONS 252 & 254 MASPETH AVE.
DATE: 08/18/2011	DRWN: BcV/WMA	FIGURE

Tables

Table 1
Summary of Test Pit Locations, Rationale, and Analyses
Pre-Design Investigation
Former Equity Gas Holder Site
Brooklyn, New York

Test Pit ID	Test Pit Location and Rationale	Completion Depth (ft bgs)	Sample Depth Interval	Number of Samples	Soil Sample Proposed Laboratory Analysis
TP-18	Western boundary in central portion of parcel to provide more lateral coverage	7 or Water Table whichever is deeper	Most Visually Impacted	One (1) Sample from visually impacted zone. If no visible impacts, no sample collected	Waste Characterization; See Table 2
TP-19	Eastern boundary in central portion of parcel to provide more lateral coverage	7 or Water Table whichever is deeper	Most Visually Impacted	One (1) Sample from visually impacted zone. If no visible impacts, no sample collected	Waste Characterization; See Table 2
TP-20	Western boundary in southern portion of parcel to provide more lateral coverage	7 or Water Table whichever is deeper	Most Visually Impacted	One (1) Sample from visually impacted zone. If no visible impacts, no sample collected	Waste Characterization; See Table 2
TP-21	Eastern boundary in southern portion of parcel to provide more lateral coverage	7 or Water Table whichever is deeper	Most Visually Impacted	One (1) Sample from visually impacted zone. If no visible impacts, no sample collected	Waste Characterization; See Table 2

Notes:
ft bgs - feet below ground surface.

Table 2
Summary of Pre-characterization Disposal Facility Analytical Sampling Requirements
Pre-Design Investigation Work Plan
Former Equity MGP Site
Brooklyn, New York

Contaminant	EPA Method	Frequency	ESMI NJ ¹	CESP
Total VOCs	8260B	500 CY	X	
Total PAHs	8270C	500 CY	X	
Total PCBs	8082	500 CY	X	X
Total Metals	3050/6010B	500CY	X ²	X ³
TPH	8015M DRO to C-44	250 CY	X	X ⁴
TOX	9020B (9023)	250 CY		X ⁴
Ignitability	1010 (7.1.2)	1000 CY		X
Corrosivity	9040/9045	1000 CY		X
Reactivity (Cyanides & Sulfides)	7.3.3.2 & 7.3.4.1	1000 CY		X
Sulfur	ASTM D3176/4239D	1000 CY	X	
TCLP Metals	1311/6010B	1000 CY		X ⁵
TCLP Hg	1311/7471	1000 CY		X ⁵
TCLP Herbicides	1311/8151A	1000 CY		X
TCLP Pesticides	1311/8081A	1000 CY		X
TCLP VOC	1311/8260	1000 CY		X
TCLP SVOC	1311/8270	1000 CY		X

Notes:

X signifies that the analysis is required

All TCLP levels are represented in mg/L

All totals are in mg/kg

(1) Composite of five samples (100 CY ea). Samples must be repeated for every 500 CY or fraction thereof.

(2) Includes As, Be, Cd, Cr, Ni, Pb, Hg

(3) Includes As, Ba, Cd, Cr+6, Cu, Hg, Ni, Pb, Se, Ag, Zn

(4) One sample for initial 60 CY and second 60 CY, then every 250 CY thereafter.

(5) TCLP analysis required when total concentrations are 20x the RCRA limit [40 CRF 281 Subpart C].