



GENESIS ENGINEERING & REDEVELOPMENT

September 28, 2012

VIA ELECTRONIC MAIL

Mr. Hasan Ahmed
Division of Environmental Remediation
New York State Department of Environmental Conservation
47-40 21st Street
Long Island City, New York 11101

Subject: Work Plan Addendum
Best-DDK Cleaners
38-68 13th Street, Long Island City, New York
Site Number 241126

Dear Mr. Ahmed:

This letter constitutes an Addendum to the December 21, 2011 Site Characterization Work Plan (“Work Plan”). The Work Plan and all associated attachments and appendices are incorporated by reference into this Work Plan Addendum. This Work Plan Addendum was developed based on comments from:

1. The July 9, 2012 New York State Department of Environmental Conservation (“NYSDEC”) letter to Ms. Maryuhn Moon, which provided comments on the March 9, 2012 Site Characterization Report;
2. The July 12 and 13, 2012 telephone conversations between Kenneth Wenz and Hasan Ahmed;
3. The August 30, 2012 Work Plan Addendum; and
4. The September 21, 2012 electronic mail from Hasan Ahmed to Kenneth Wenz.

Work Scope Addendum

The following work scope will has been developed to address the NYSDEC requirements for additional sampling:

1. The collection of sub-slab soil samples at four locations surrounding the dry cleaning equipment (and near the areas of identified with high volatile organic compound (“VOC”) concentrations) within the Site building.

Mr. Hasan Ahmed
September 28, 2012
Page 2

2. Collection of one sub-slab soil vapor sample at each of the two properties on 13th Street immediately adjacent to the Site (assuming that access to these properties can be obtained). If intrusive sub-slab sampling is not permitted or otherwise infeasible, GE&R will try to collect an indoor air sample (again assuming permission can be obtained from the building owner/operator).

All sample collection, sample handling and analysis, data validation, and reporting procedures will be conducted in accordance with the NYSDEC approved December 21, 2011 Site Characterization Work Plan.

The sub-slab soil samples will be collected using hand-operated equipment, because of the restricted access within the crowded work space of the building interior and to minimize the financial burden on the property owner. Two soil samples from each location will be submitted for laboratory analysis of VOC. Samples to be analyzed will be selected from the “worst-case” 6-inch depth horizon (based on field observations and screening results) and the deepest 6-inch depth horizon sampled. If no field indications of soil impacts are identified, then samples from the shallowest and deepest 6-inch depth horizons will be submitted for analysis.

As we discussed during the Site meeting on May 24, 2012, because of the depth limitations of the hand-operated soil sampling equipment and the inability to prevent collapse of the borehole below the water table, if groundwater is encountered, it is unlikely that collection of groundwater samples will be possible. However, a groundwater sample will be collected if feasible. The field conditions will be noted in the field log.

It is assumed that NYSDEC staff will be available for a Site meeting to provide concurrence with the sampling program and selected sample locations, prior to its implementation.

Additional Comments

During our conversation on July 13, you stated that the New York State Department of Health (“NYSDOH”) would not request further investigation if the results from sub-slab soil vapor sampling at the adjacent facilities are “not high”. Since, according to NYSDOH vapor intrusion guidance, the “State of New York does not have any standards, criteria or guidance values for concentrations of volatile chemicals in subsurface vapors (either soil vapor or sub-slab vapor)”, it is requested that the criteria against which the sub-slab soil vapor sample results are to be compared be specified now, so that a conclusion can be made about whether there is a vapor intrusion concern at the adjacent properties prior to submission of the report. In addition, please confirm that indoor air and/or soil vapor samples collected outside of the heating season (beginning November 15) will be acceptable to the NYSDEC and NYSDOH. Although delaying sampling until the end of the year will provide a substantial additional

Mr. Hasan Ahmed
September 28, 2012
Page 3

financial burden for Mr. and Mrs. Moon, the need to duplicate the sampling program during the heating season would be a much greater hardship to them.

Questions and concerns regarding the NYSDOH comments on the March 9, 2012 Site Characterization Report (“Report”) provided in your July 9, 2012 letter were discussed with you by telephone on July 13, 2012, at which time you suggested a conference call to obtain clarification from the NYSDOH. Since no call was ever held (despite numerous follow-up requests from the property owner and GE&R), the following responses are offered to the NYSDOH comments:

1. According to NYSDOH Comment 1, the Report’s “assumption” that shallow soil has not been impacted is not supported by data and is not justified because soil samples were not collected.

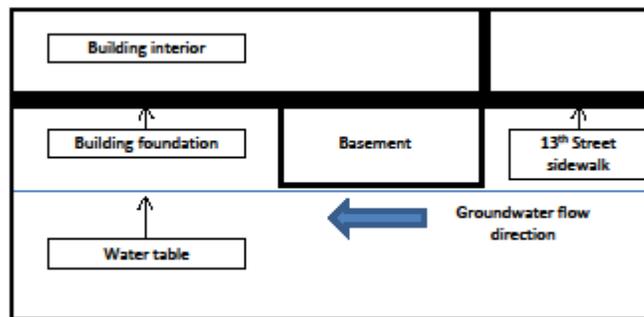
Our conclusion was made based on field observations and field screening data from soil samples that **were** collected, as documented by the soil boring logs and field notes contained in the report’s appendices. Soil samples were not submitted for laboratory analysis because, *in accordance with the approved work plan*, elevated PID readings were not detected in any of the soil samples. However, as noted above, the Work Plan Addendum investigation includes the collection of sub-slab soil samples for laboratory analysis.

2. NYSDOH Comment 2 states that “additional wells should be installed to verify the groundwater flow” direction, as the wells for this investigation were installed in “a very narrow triangulation”.

As we discussed in our July 13, 2012 telephone conversation, it appears that the NYSDOH is unaware of the investigation’s history. The original (i.e., May 2011) version of the site characterization work plan proposed that the two monitoring wells on 13th Street be installed further apart and on the opposite side of the street from the Site. This proposal was rejected by the NYSDEC, which required that the wells be installed in the sidewalk immediately in front of the Site building. However, even with the close well spacing, the accuracies of the land survey and water level measurements (each ± 0.01 foot) were sufficient to allow the difference in groundwater elevation to be determined and the groundwater flow direction in the Site vicinity to be established to the apparent satisfaction of the NYSDEC.

3. NYSDOH Comment 3 suggests that the groundwater contamination in the wells upgradient of the Site building is the result of a sub-slab source “spreading” to impact the groundwater. As noted in the Report, there is a partial basement located in the northeastern portion of the Site building (reference is made to Figures 3 through 6 of the Report) and groundwater was encountered within approximately

eight inches below the bottom of the basement floor slab (the following sketch shows this layout). Since the basement wall would act as a barrier to migration of contamination from beneath the slab, it is highly unlikely that any contaminants from a sub-slab source would be migrating in an upgradient direction through spreading. Further evidence of this is that the least-impacted soil vapor sample (GER-SV5) was collected below the basement floor slab in the front of the Site building and the most highly impacted groundwater sample (GER-2) was collected in the sidewalk near the street in this area (see Report Figures 6 and 7 for these sample locations).



4. NYSDOH Comment 4 "...there appears to be a significant source contributing to soil vapor contamination..." will be addressed by the sub-slab soil sampling program described above.

As we have discussed on several occasions, because of financial limitations, an agreement about when no further soil or air sampling is requested prior to implementation of this phase of investigation. For example, if the sub-slab soil sampling program does not identify dry cleaning-related solvents at concentrations above 6 NYCRR Part 375 criteria (with or without a deed restriction, as necessary), will that be satisfactory, or will there be requirements for sampling at additional locations not required during this follow-up program?

Certification

I, Kenneth P. Wenz, Jr., certify that I am currently a Qualified Environmental Professional as defined in 6 NYCRR Part 375 and that this Site Characterization 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).



GENESIS ENGINEERING & REDEVELOPMENT

Mr. Hasan Ahmed
September 28, 2012
Page 5

If you have any questions or require any additional information, please contact me by telephone at (718) 841-7544 or via email at kwenz@gercorp.com.

Respectfully submitted,
Genesis Engineering & Redevelopment, Inc.

A handwritten signature in black ink that reads "Kenneth P. Wenz, Jr." with a stylized flourish at the end.

Kenneth P. Wenz, Jr., CPG
Senior Project Manager

cc: Jae and Maryuhn Moon
Jane O'Connell, NYSDEC