



January 6, 2005

Mr. Lawrence J. Alden, P.E.
New York State Department of Environmental Conservation
Division of Environmental Remediation
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**RE: 2005 Work Plan for Indoor Air / Soil Gas Sampling
Ward Products LLC Building
Amsterdam, New York
NYSDEC Site ID #429004**

Dear Mr. Alden:

This letter presents a site-specific work plan for an additional Indoor Air / Soil Gas Investigation by New Water Realty Corporation (f/k/a Ward Products Corporation) at the Ward Products building at 61 Edson Street, Amsterdam, New York. The site currently is an industrial assembly plant (automobile antennas and wiring harnesses) operated by the tenant (Ward Products, LLC - a company unrelated to New Water Realty Corporation) who employs several hundred persons working approximately 8-hour shifts. There are no nearby residences, and the area is zoned commercial/industrial.

This work plan was prepared at the verbal request of the NYSDOH during a recent call between the author and representatives of NYSDEC and NYSDOH occurring in response to their review of the draft RRIR submitted by Normandeau Associates. The proposed work is supplemental to the indoor air sampling performed in November 2002. In the recent phone call, contrary to expectations and despite the favorable indoor air sampling results reported to date, NYSDOH insisted that sub-slab vapor sampling and additional indoor air sampling be performed. Our client, New Water Realty Corporation, does not agree with NYSDOH conclusions and concerns, but in the interests of proceeding towards conclusion of this matter has authorized the work outlined in this proposal.

The proposed work will be in accordance with NYSDEC Consent Order No. W4-0762-96-06, and will follow the applicable portions of the NYSDOH guidance document titled "Indoor Air Sampling and Analysis Guide, August 8, 2001". RETEC will also conduct all work in accordance with the site-specific Health and Safety Plan (HASP).

Based on EPA vapor intrusion screening values and the concentrations of volatile organic compounds in onsite groundwater (reported by Normandeau Associates in the Remedial Investigations Report, July 2001), RETEC determined that the following compounds of interest may be present in soil gas beneath the building's concrete floor in concentrations sufficient to induce elevated levels within the building itself:

- Tetrachloroethene (PCE)
- Trichloroethene (TCE)
- 1-1 Dichloroethene

- cis 1,2 Dichloroethene
- Carbon Tetrachloride
- Chloroform

RETEC determined during the November 2002 sampling event that these compounds of interest are not currently used in Ward Products' daily operations. The chemical inventory check performed in November 2002 will be re-evaluated and a new inventory form and building questionnaire (as provided in the 2001 NYSDOH guidance document) will be completed no more than 24 hours prior to sampling.

RETEC has reviewed the available floor plans of the existing building to determine the number of indoor air samples required. While construction details were not available, we assume that the footers of the slab-on-grade foundation encompass three areas: the original building, the new grinding room, and the new warehouse. We therefore propose to collect up to seven air and soil gas samples: one ambient (outside upwind) air, one indoor air and one soil vapor from the main assembly room, one indoor air and one soil vapor from the grinding room, and one indoor air and one soil vapor from the warehouse. Please see the attached Figure 1. The exact locations will be determined after the site walk.

All samples will be collected on the same day during normal business hours while the building is occupied. The outdoor ambient sample will be collected to control against the potential that offsite sources may be contributing to any detections of compounds found in the indoor air. The indoor air samples will be collected from approximately three feet above the floor level to represent breathing zones. The soil gas samples will be collected from immediately below the concrete slab in each location. To avoid cross contamination (potentially caused by the concrete drilling activity and temporary leakage of soil gas into the indoor air during the installation of the soil gas probe), indoor air samples will be collected first, followed by installation of the soil vapor tubing.

All samples will be collected in one-liter "summa" canisters equipped with a flow restrictor. The flow restrictors will be pre-set to collect the samples over a two-hour time period. Prior to sampling, all sample tubing will be purged with a PID.

For soil vapor sampling, 3/8-inch diameter holes will be bored through the building slab. Prior to boring, sub-slab utilities will be located by ground penetrating radar and magnetic resonance. The soil gas probes will be installed through the bore hole and sealed with hydrated bentonite clay. The pressure differential between the sub-slab and the occupied space will be measured with a 0-0.25 (inches of H₂O) Magnahelic differential pressure gage. Following the soil gas sample collection, all bore holes will be sealed and patched with an appropriate Portland cement product to match the existing construction. RETEC will coordinate this effort with the tenant to minimize the effect of this work on tenant personnel, products, and operations.

The air and soil gas samples will be delivered the next day to a NYS ELAP-certified laboratory for TO-15 analysis with a 5-day turnaround time. Analytical detection limits will be 1 ug/m³ or less. All detected TO-15 compounds will be reported, but the laboratory will not be required to perform dilutions or re-analyses for compounds other than the six target analytes.

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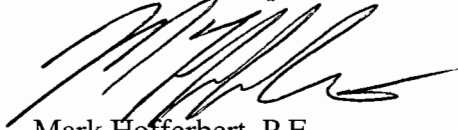
Following receipt of the laboratory results, RETEC will prepare a letter report. The report will include a discussion of the sample locations, the sampling methods, the results of the pre-sampling inspection, the laboratory results, a Data Usability Summary Report, and a discussion of the analyses. The DUSR will include only the six compounds of interest. The report will be prepared for client review within two weeks of receiving the data.

RETEC has received NYSDEC's letter dated January 5, 2005, approving this work. Tentatively, we propose to perform the sampling in late January 2005, following coordination with the tenant and our subcontractors. RETEC will advise NYSDEC of our schedule as soon as possible, and prior to the actual sampling event.

Please feel free to contact me with questions or comments at 607-277-5716.

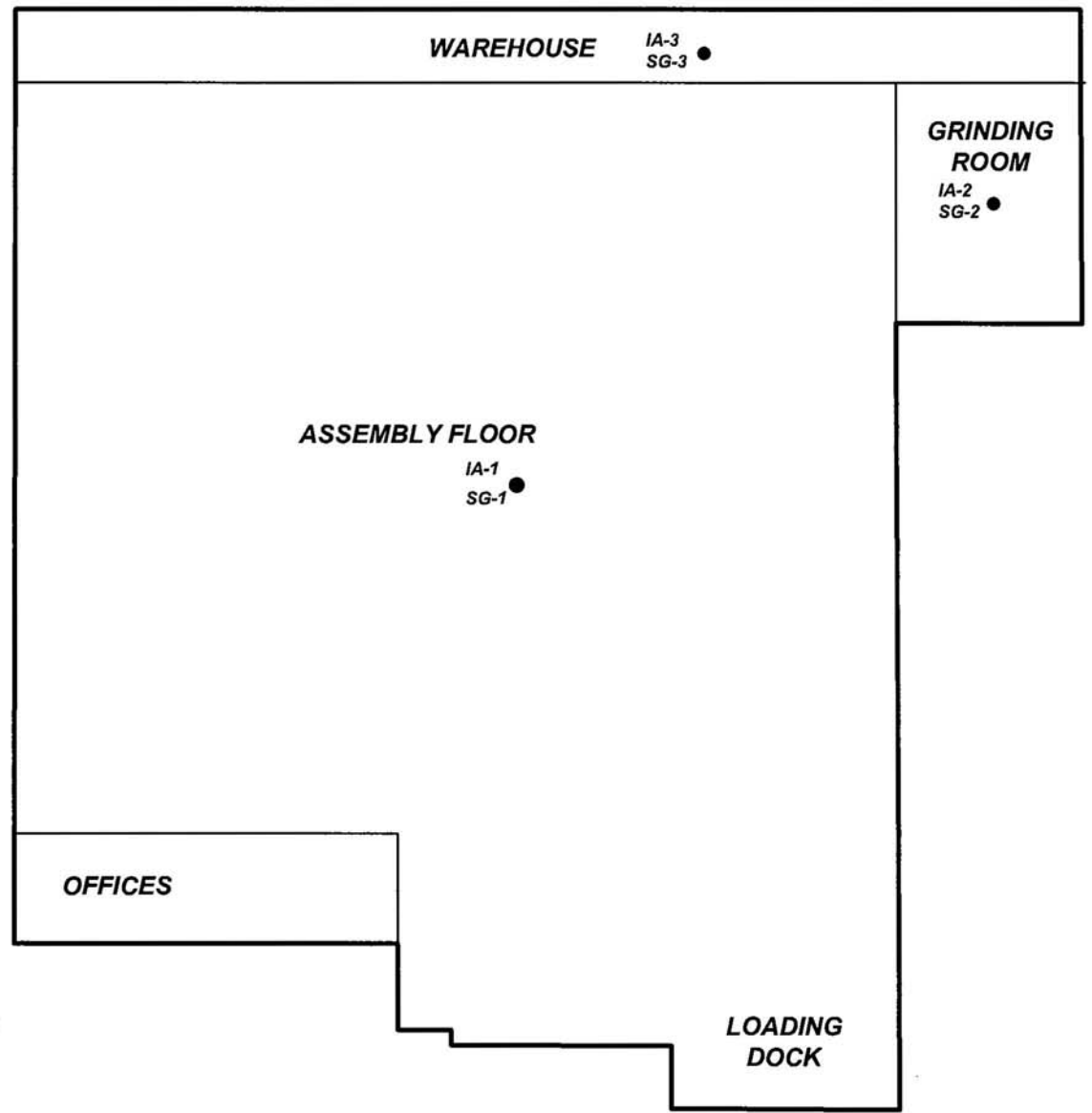
Sincerely,

The RETEC Group, Inc.



Mark Hofferbert, P.E.
Project Manager / Engineer

cc: C. Bethoney - NYSDOH
B. Littleton - New Water Realty
J. Purcell, Esq. - Purcell, Ries, Shannon, Mulcahy & O'Neill
R. Conway, Jr, Esq. - Schenck, Price, Smith & King
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L. Colangelo - MidMark Investments
A Darmofal - Ward Products LLC
A. Larson - Normandeau
J. Finn - RETEC
File: NWR01-15852



- SAMPLE LOCATION
- AA AMBIENT AIR SAMPLE
- IA INDOOR AIR SAMPLE
- SG SOIL GAS SAMPLE



AA-1 ●

PREDOMINANT WIND
(To Be Verified in Field)



Ward Products Site Amsterdam, NY NWR0-15852-300			INDOOR AIR AND SOIL GAS SAMPLING LOCATIONS (PROPOSED)	
DATE: 12/01/04	DRWN: MRH	FILE:	LAYOUT:	FIGURE 1