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June 2, 2014

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

Re: Supplemental RI Work Plan Kristal Auto Mall C224140 5200 Kings Highway Brooklyn NY

Dear Mr. Ahmed:

As discussed during our meeting on May 6, 2014, the RI sampling at the Kristal Auto Mall was completed in accordance with the approved Remedial Investigation Work Plan (RIWP). After reviewing the environmental sampling results, it was agreed that additional sampling and delineation was needed prior to the preparation of the RIR. Specifically, the additional sampling that is needed is as follows:

- Delineation of free phase hydrocarbons found in new wells MW-4S and MW-5 which are both located in the auto service area:
- Delineation of chlorinated VOCs (CVOCs) and benzene, toluene, ethyl benzene and xylene (BTEX) detected in soil at RSB-2 including groundwater and soil vapor; and
- Resampling of soil vapor points SV-4 and SV-5 and collection of indoor air sample in the auto service area.

This letter is a supplement to the approved Kristal Auto Mall RIWP and all investigation and sampling will be conducted consistent with all specified procedures in the Field Sampling Plan (FSP), Quality Assurance Project Plan (QAPP), and the Health and Safety Plan (HASP). A detailed description of the proposed supplemental RI tasks is presented below.

PROPOSED RI TASKS

Task 1 - Delineation of Free Phase Hydrocarbons/Product Monitoring and Testing

Following development of the wells MW-4S and MW-5 (see Figure 1 for locations), 0.27 feet and 0.5 feet of motor oil respectively was detected. Both of those wells are each located next to trench drains in the auto service area. Leakage from the unlined trench drains is the source of the detected free phase product. To delineate the extent of the free product, the installation of five shallow wells, MW-8 through MW-12 as shown on Figure

1, are proposed. The two inch diameter wells will be installed with 10 foot long screens set with three feet above the water table and seven feet below. The wells will be developed following installation and allowed to equilibrate for a week before collecting measuring the depth to product and/or water. All well installation/construction procedures will in accord with the Section 4.1.2 of the Field Sampling Plan in the RIWP.

Following installation and development, the wells will be monitored for free phase hydrocarbons two weeks and four weeks after installation. Product thickness will also be checked in wells MW-4A and 5. Product from well 4A has already been analytically typed and determined to be motor oil. Product from Well MW-5 and any other wells containing product will be analyzed and typed. Product bail-down tests will also be conducted on all wells containing product to evaluate product volume and recoverability. These data will be used to evaluate and select a product recovery remedy.

Task 2 - Delineation of CVOCs in All Media Surrounding RSB-2

BTEX and the CVOCs: dichloroethene (DCE); trichloroethene (TCE); and tetrachloroethene (PCE) that were detected in soil in RSB-2 are to be delineated in all environmental media. Four soil borings, RSB-14 to RSB-17, will be installed surrounding RSB-2 as shown on Figure 1. Soil samples will be collected from the same intervals as in RSB-2: 1.0 to 3.0 ft., 5.0 to 7.0 ft. and the two foot interval directly above the water table approximately 11 ft. to 13 ft. Additional samples will be collected from horizons exhibiting significant impacts based on sensory evaluation and PID readings. Soil sample analysis will be for VOCs and SVOCs.

Each soil boring will be converted into a monitoring well (Wells MW-14 to MW-17). Wells will be constructed of two inch PVC with 10 ft. screens set eight feet below the water table. Wells will be developed and allowed to equilibrate for a week or more prior to sampling. Groundwater samples will be analyzed for VOCs.

To evaluate soil vapor adjacent to RSB-2, a new soil vapor point, SV-6, will be installed. Construction of SV-6 will be identical to the other soil vapor sampling points. A sample will be collected for TO-15 VOC analysis.

All results from the new sampling points surrounding RSB-2 will be evaluated to determine whether the delineation of VOCs is complete in each media.

Task 3 - Auto Service Area Vapor Intrusion Sampling

To evaluate the elevated PCE concentration found in the SV-4 soil vapor sample, soil vapor points SV-4 and SV-5, both located in the auto service area, will be resampled. An indoor air sample will also be collected in the auto service area. The summa canister will be placed roughly between SV-4 and SV-5. The sample will be collected in accordance with NYDOH vapor sampling protocols.

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Project Schedule

Sammy Bical of the Kristal Auto Mall requested that the supplemental RI field work be conducted the first week in September to coincide with the business slow down he experiences right after Labor Day. Based on this request, implementation of the work described herein will be started September 8, 2014. It is expected that the work will take approximately 5 days to complete. Groundwater sampling will be conducted the week of September 22, 2014. The RI report will be finalized incorporating the new data and submitted to NYSDEC by November 3, 2014.

If you have any questions concerning the tasks described above, please contact me.

Sincerely,

Craig A. Werle, P.G.

Principal Hydrogeologist

Cc: Jane O'Connell, NYSDEC

Peter Pollack, Irma C. Pollack, LLC.

Jon Schuyler Brooks, Phillips Nizer, LLC

