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February 9, 2005

Mr. William S. Ottaway
New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, New York 12233-7017

Re: Niagara Mohawk, a National Grid Company
Albany (Grand Street) Non-Owned Former MGP Site
Albany, New York
Site Characterization Investigation
Work Plan for Supplemental Investigation Activities

Dear Mr. Ottaway:

This letter presents a description of proposed supplemental investigation activities to be conducted as part of the Site Characterization Investigation for the Niagara Mohawk, a National Grid Company (Niagara Mohawk) Albany (Grand Street) non-owned former manufactured gas plant (MGP) site in Albany, New York. The supplemental investigation activities are proposed to address data gaps and further evaluate environmental issues identified by the results obtained for previous Site Characterization Investigation activities conducted during June and July 2004. The results for the previous Site Characterization Investigation activities were discussed during a December 2, 2004 meeting between Niagara Mohawk, the New York State Department of Environmental Conservation (NYSDEC), the New York State Department of Health (NYSDOH), and Blasland, Bouck & Lee, Inc. (BBL). A summary of field investigation activities and results obtained for the Site Characterization Investigation activities conducted to date is presented below, followed by a description of the proposed supplemental investigation activities.

PREVIOUS SITE CHARACTERIZATION INVESTIGATION ACTIVITIES

Figures and tables presenting the data generated for the previous Site Characterization Investigation activities conducted during June and July 2004 were transmitted to the NYSDEC in an October 25, 2004 letter from Niagara Mohawk. A summary of the previous field investigation activities is presented below, followed by a summary of the investigation results.

Previous Field Investigation Activities

During June and July 2004, BBL implemented the following Site Characterization Investigation field activities:

- Five surface soil samples (SS-4, SS-5, SS-7, SS-8, and SS-9) were collected at the Niagara Mohawk Trinity Substation and five surface soil samples (SS-1, SS-2, SS-3, SS-6, and SS-10) were collected at offsite, non-owned properties for laboratory analysis.
- Five soil borings (SB-1, SB-2, SB-3, SB-7, and SB-10) were completed at the Trinity Substation and five soil borings (SB-4, SB-5, SB-6, SB-8, and SB-9) were completed at offsite, non-owned properties. Subsurface soil samples were collected from the soil borings for laboratory analysis.
- Two groundwater monitoring wells (MW-6 and MW-7) were installed at the Trinity Substation and six groundwater monitoring wells (MW-1 through MW-5 and MW-8) were installed at offsite, non-owned properties. Subsurface soil samples were collected for laboratory analysis from soil borings completed at the monitoring well locations. In addition, groundwater samples were also collected from each monitoring well and submitted for laboratory analysis.
- One test pit (TP-4) was excavated at the Trinity Substation and three test pits (TP-1 through TP-3) were excavated at offsite, non-owned properties. Subsurface soil samples were collected from test pit TP-2 for laboratory analysis. Subsurface soil samples were not collected for laboratory analysis from the remaining test pits.

The locations of the surface soil samples, soil borings, monitoring wells, and test pits completed as part of the Site Characterization Investigation are shown on Figure 1.

Previous Site Characterization Investigation Results

The results for the Site Characterization Investigation activities conducted during June and July 2004 are summarized below.

Subsurface Conditions Encountered

Subsurface conditions encountered during the investigation generally consisted of various fill deposits (including silt and clay, sand, concrete, brick, wood, cinders, ash, coal, etc.) overlying lacustrine clay/silt deposits (with occasional interbedded silt/fine sand) and till (sandy silt/clay, with some gravel). Bedrock was not encountered during the field activities. Literature sources indicate that the bedrock beneath the site is the Snake Hill Shale and that overburden thickness is variable, ranging from approximately 100 feet thick at the Park Avenue properties to bedrock outcrops at the northwest side of Lincoln Park (Fickies and Regan, 1982). Former gas holder floors were encountered in soil borings SB-6 and SB-8 (located at 17 Park Avenue) at approximately 25 feet below ground surface (bgs); SB-9 (located at 30 Park Avenue) at approximately 15 feet bgs; and SB-1 and SB-2 (located at the Trinity Substation) at approximately 16 feet bgs. Yellow non-aqueous phase liquid (NAPL) was observed in soil samples recovered at a depth of approximately 15 feet bgs at monitoring well MW-6. NAPL and/or coal tar were not observed in soil samples from other locations (including the former gas holder locations). Elevated photoionization detector (PID) headspace readings and petroleum-type odors were encountered in soil samples collected from soil borings completed at monitoring wells MW-2 (4-6') and MW-8 (11-14').

The NYSDEC Spill Hotline was contacted to establish Spill Numbers to document the suspected petroleum impacts encountered at monitoring wells MW-2 and MW-8 (Spill No. 04-03550 for monitoring well MW-8 and Spill No. 04-03551 for monitoring well MW-2).

Hydrogeology

Based on groundwater measurements obtained on July 20, 2004, shallow groundwater flows generally to the south/southeast. Local groundwater flow variations were observed that included a slight southwestern flow component between Park Avenue and Warren Street and a southeastern flow component at the 17 Park Avenue property and the Trinity Substation. Ground surface elevations vary across the site from 91 feet above mean sea level (ft AMSL) at MW-1 to 26 ft AMSL at MW-8. Groundwater was encountered at depths between approximately 29 feet bgs at MW-2 and 8 feet bgs at MW-6. Groundwater elevations ranged from 70 ft AMSL at MW-1 to 12.6 ft AMSL at MW-8. A slight pressure gradient was observed at monitoring wells MW-2, MW-3, MW-4, and MW-7 during groundwater sampling, indicating that the water levels may not represent static conditions (particularly at MW-3 and MW-7). Approximately 0.1 inch of light NAPL (LNAPL) was encountered during well development at MW-8. In addition, sheens were encountered on groundwater removed during well development at monitoring wells MW-2 and MW-6. NAPL was not observed in any of the monitoring wells during groundwater sampling.

Surface Soil Sampling Results

The analytical results for surface soil samples collected at the Trinity Substation and off-site, non-owned properties are summarized below. For the purposes of evaluating the surface soil sampling results, the analytical results have been compared to the NYSDEC-recommended soil cleanup objectives presented in the NYSDEC document entitled, "Technical and Administrative Guidance Memorandum (TAGM): Determination of Soil Cleanup Objectives and Cleanup Levels," (TAGM 4046, dated January 24, 1994).

Trinity Substation

The analytical results for surface soil samples collected at the Trinity Substation indicate the following:

- Polychlorinated biphenyls (PCBs) were not detected above laboratory detection limits.
- Select polynuclear aromatic hydrocarbons (PAHs) were detected in surface soil sample SS-4 at concentrations exceeding the NYSDEC-recommended soil cleanup objectives presented in TAGM 4046.
- Select inorganic constituents were detected in surface soil samples SS-4, SS-5, SS-7, SS-8, and SS-9 at concentrations exceeding the NYSDEC-recommended soil cleanup objectives. However, the analytical results may be consistent with typical background concentrations for inorganic constituents within urban soil in the vicinity of the site. Background concentrations for inorganic constituents in soil have not been established for the site.

The analytical results for the surface soil samples collected from the Trinity Substation do not appear to represent a significant issue.

Offsite, Non-Owned Properties

The analytical results for surface soil samples collected from offsite, non-owned properties indicate the following:

- PAHs were detected at concentrations exceeding NYSDEC-recommended soil cleanup objectives at each of the surface soil sample locations.
- Select inorganic constituents were detected at concentrations exceeding NYSDEC-recommended soil cleanup objectives. However, the analytical results may be consistent with typical background concentrations for inorganic constituents within urban soil in the vicinity of the site.

The analytical results for PAHs and inorganic constituents detected in the surface soil samples collected from offsite, non-owned properties do not appear to be related to historical MGP operations.

Subsurface Soil Sampling Results

The analytical results for subsurface soil samples collected from the Trinity Substation and off-site, non-owned properties are summarized below.

Trinity Substation

The analytical results for subsurface soil samples collected from the Trinity Substation indicate the following:

- PCBs were not detected at concentrations exceeding the NYSDEC-recommended subsurface soil cleanup objective presented in TAGM 4046.
- Benzene was detected at concentrations exceeding NYSDEC-recommended soil cleanup objectives in subsurface soil samples SB-3 (22-24'), SB-10 (28-32'), and MW-6 (14.6-15.3') [at 25 parts per million (ppm), 24 ppm, and 0.51 ppm, respectively]. Benzene was not detected in subsurface soil samples collected at shallower depths at these locations. Toluene was the only other VOC detected at concentrations exceeding NYSDEC-recommended soil cleanup objectives [for sample SB-10 (28-32')].
- PAHs were detected at concentrations exceeding NYSDEC-recommended soil cleanup objectives in subsurface soil samples collected from MW-6. In addition, select PAHs were detected at concentrations slightly exceeding NYSDEC-recommended soil cleanup objectives in samples collected from soil borings SB-1, SB-2, SB-7, and SB-10.
- Select inorganic constituents were detected at concentrations exceeding NYSDEC-recommended soil cleanup objectives. Total cyanide was detected at concentrations up to 3.2 ppm. The analytical results may be consistent with typical background concentrations for inorganic constituents within urban soil in the vicinity of the site. Background values for inorganic constituents have not been established for the site.

Offsite, Non-Owned Properties

The analytical results for subsurface soil samples collected from offsite, non-owned properties indicate the following:

- Benzene, toluene, and xylenes were detected at concentrations exceeding NYSDEC-recommended soil cleanup objectives in subsurface soil samples collected from soil borings SB-6 and MW-5. Benzene was also detected at concentrations exceeding NYSDEC-recommended soil cleanup objectives in sample MW-3A (24-26'). Benzene was not detected in subsurface samples collected at shallower depths at monitoring wells MW-5 and MW-3A.
- Acetone and methylene chloride were detected at concentrations exceeding NYSDEC-recommended cleanup objectives in sample MW-2 (4.7-5.7'), and 2-butanone was detected at concentrations exceeding NYSDEC-recommended soil cleanup objectives in sample MW-3A (24-26').
- Select PAHs were detected at concentrations exceeding NYSDEC-recommended soil cleanup objectives in sample SB-8 (25-26.6'). PAHs were not detected in a shallower subsurface soil sample collected from soil boring SB-8. PAHs were also detected at concentrations slightly exceeding NYSDEC-recommended soil cleanup objectives in samples collected from soil borings SB-5, SB-9, and MW-5.
- Select inorganic constituents were detected at concentrations exceeding NYSDEC-recommended soil cleanup objectives in each of the subsurface soil samples. Total cyanide was detected at concentrations up to 6.1 ppm. The analytical results may be consistent with typical background concentrations for inorganic constituents within urban soil in the vicinity of the site. Background values for inorganic constituents have not been established.

Groundwater Sampling Results

The analytical results for groundwater samples collected from monitoring wells at the Trinity Substation and off-site, non-owned properties are summarized below. For the purposes of evaluating analytical results obtained for the groundwater samples, the results have been compared to groundwater standards and guidance values presented in the NYSDEC Division of Water Technical and Operational Guidance Series (TOGS 1.1.1) document entitled, "Ambient Water Quality Standards and Guidance Values and Groundwater Effluent Limitations" (reissued June 1998, addended April 2000).

Trinity Substation

The analytical results for groundwater samples collected from monitoring wells at the Trinity Substation indicate the following:

- Benzene was detected in the groundwater sample collected from MW-6 at a concentration of 310 parts per billion (ppb), which exceeds the NYSDEC groundwater quality standard presented in TOGS 1.1.1.
- Phenol was the only SVOC detected at concentrations exceeding the NYSDEC groundwater quality standards presented in TOGS 1.1.1.

- Select inorganic constituents were detected at concentrations exceeding the NYSDEC groundwater quality standards and/or guidance values. However, the analytical results may be consistent with typical background concentrations for inorganic constituents in shallow groundwater in the vicinity of the site.

Offsite, Non-Owned Properties

The analytical results for groundwater samples collected from monitoring wells at offsite, non-owned properties indicate the following:

- Benzene, ethylbenzene, styrene, toluene, and xylenes were detected in the groundwater sample collected from monitoring well MW-5 at concentrations exceeding the NYSDEC groundwater quality standards and/or guidance values. Benzene, 1,1-dichloroethane, 1,1-dichloroethene, ethylbenzene, toluene, and xylenes were detected in the groundwater sample collected from monitoring well MW-8 at concentrations exceeding the NYSDEC groundwater quality standards and/or guidance values. VOCs were not detected in samples collected from the remaining monitoring wells at the offsite, non-owned properties at concentrations exceeding the NYSDEC groundwater quality standards and/or guidance values.
- SVOCs were not detected in groundwater samples at concentrations exceeding NYSDEC groundwater quality standards and/or guidance values.
- Select inorganic constituents were detected in groundwater samples at concentrations exceeding the NYSDEC groundwater quality standards and/or guidance values. However, the analytical results may be consistent with typical background concentrations for inorganic constituents in shallow groundwater in the vicinity of the site.

A summary of proposed supplemental Site Characterization Investigation activities is presented below.

PROPOSED SUPPLEMENTAL SITE CHARACTERIZATION INVESTIGATION ACTIVITIES

As previously discussed, supplemental investigation activities are proposed to address data gaps and further evaluate the extent of environmental issues identified by the previous Site Characterization Investigation activities. The overall goal of the supplemental investigation activities is to provide data to evaluate and select potential remedial alternatives for the site (if any). The proposed supplemental investigation activities include:

- Trinity Substation:
 - One soil boring (SB-11) will be completed to depths extending beneath the floor of the former onsite gas holder to characterize subsurface soil conditions beneath the former gas holder.
 - Two groundwater monitoring wells (MW-9 and MW-10) will be installed in the southern portion of the substation to characterize soil and groundwater hydraulically downgradient of soil borings SB-3 and SB-10 and monitoring wells MW-5 and MW-6.

- Offsite, Non-Owned Properties:
 - Two soil borings (SB-12 and SB-13) will be completed inside the vacant building at 127 Arch Street to characterize subsurface soil conditions at the location of the former gas holder.
 - One groundwater monitoring well (MW-11) will be installed at the non-owned property at 15 Warren Street (south of the former gas holder at 30 Park Avenue) to characterize subsurface soil and groundwater downgradient of the former gas holder.
 - One groundwater monitoring well (MW-12) will be installed along Park Avenue to characterize subsurface soil and groundwater downgradient of the former gas holder located at the 17 Park Avenue property. If impacts are encountered at monitoring well MW-12, a contingency monitoring well (MW-15) may be installed along Warren Street farther downgradient of monitoring well MW-12.
 - Two groundwater monitoring wells (MW-13 and MW-14) will be installed north and northwest of the Trinity Substation to characterize groundwater quality upgradient of monitoring well MW-5.

The locations of the proposed soil borings and monitoring wells are shown on Figure 1. The actual locations of the soil borings and monitoring wells may be adjusted in the field based on the presence of underground and overhead utilities, site access, and the findings of groundwater level measurements obtained prior to implementing the supplemental investigation activities (described below). The proposed supplemental investigation activities are presented below.

Round of Groundwater Level Measurements

Prior to the implementing additional drilling activities for the supplemental investigation activities, one round of groundwater level measurements will be conducted at the eight existing groundwater monitoring wells (MW-1 through MW-8). The groundwater level measurements will be reviewed to confirm the groundwater flow direction and gradients and determine if it may be useful to relocate any of the proposed soil borings and/or monitoring wells.

Completion of Soil Borings

The supplemental investigation activities will include the completion of nine soil borings at the locations described above and as shown on Figure 1 (including at proposed groundwater monitoring well locations). The soil borings to be completed as part of the supplemental investigation include:

- Soil boring SB-11 will be completed to a depth approximately 15 feet beneath the floor of the former onsite gas holder at the Trinity Substation (which was encountered at a depth approximately 16 feet below ground surface [bgs]). If NAPL is encountered in soil above the floor of the former gas holder, a temporary casing will be set at the floor of the former gas holder to mitigate potential vertical NAPL migration during subsequent drilling activities beneath the holder.
- Soil borings SB-12 and SB-13 will be completed to the depth of the floor of the former gas holder beneath the vacant building located at 127 Arch Street, or to refusal, whichever is encountered first.

- Soil borings at the proposed monitoring wells (MW-7 through MW-15) will be advanced to depths necessary to facilitate installation of the monitoring wells as described below.

Soil borings will be completed at the above-referenced locations using hollow-stem auger drilling methods in accordance with the *Generic Field Sampling Plan* (Foster Wheeler Environmental Corporation, November 2002). The drilling activities will be performed by BBL's subcontractor, Parratt Wolff, Inc. Soil samples will be collected continuously from each soil boring using a standard spilt-barrel sampling device. Soil samples recovered from the soil borings will be visually examined by BBL's field geologist (for color, texture, grain size, and the presence of any visual indication of MGP-related impacts). A portion of each recovered soil sample will be placed in a sample container for headspace screening using a PID. Up to two samples collected from each boring location will be submitted for laboratory analysis, including the sample exhibiting the highest PID measurement and/or the most visually-impacted material (if encountered) and the sample collected from the interval immediately above the groundwater table. If elevated PID measurements or visually impacted material are not encountered at a soil boring location, then only the sample from the interval immediately above the groundwater table will be submitted for laboratory analysis. The soil samples selected for laboratory analysis will be submitted to CompuChem Laboratories (CompuChem). The samples will be analyzed for Target Compound List (TCL) VOCs, TCL SVOCs, and Target Analyte List (TAL) inorganic constituents (including cyanide) using USEPA SW-846 Methods as referenced in the NYSDEC 2000 Analytical Service Protocol (ASP). Quality assurance/quality control (QA/QC) samples will be collected from the soil borings as required in accordance with the NYSDEC 2000 ASP.

Soil borings that are not completed at designated groundwater monitoring well locations will be grouted to grade using cement grout. Drill cuttings from the soil borings will be consolidated in a roll-off waste container or drums to be staged at the Trinity Substation prior to offsite transportation and disposal in accordance with applicable regulations. One waste characterization sample of the soil cuttings will be collected and submitted for laboratory analysis for toxic characteristic leaching procedure (TCLP) VOCs, TCLP SVOCs, TCLP metals, reactivity, corrosivity, and ignitability.

Installation of Groundwater Monitoring Wells

Two-inch-diameter, schedule 40 polyvinyl chloride (PVC) wells will be constructed at the proposed monitoring well locations. The wells will be constructed with a 10-foot-long PVC well screen set to straddle the groundwater table (i.e., extending approximately 5 feet above and below the groundwater table). Each monitoring well will be equipped with an approximately 2-foot long sump grouted in place if NAPL is encountered and/or suspected.

Based on information obtained during the initial phase of the Site Characterization Investigation, the anticipated depths of the monitoring wells are summarized below.

Monitoring Well ID	Anticipated Depth to Groundwater (ft bgs)*	Anticipated Depth of Well (ft bgs)	Anticipated Depth of Well Sump, If Required (ft bgs)
MW-9	10	15	17
MW-10	17	22	24
MW-11	35	40	42
MW-12	15	20	22
MW-13	15	20	22

Monitoring Well ID	Anticipated Depth to Groundwater (ft bgs)*	Anticipated Depth of Well (ft bgs)	Anticipated Depth of Well Sump, If Required (ft bgs)
MW-14	15	20	22
MW-15**	30	35	37

Notes:

- * - Anticipated depths to groundwater based on conditions encountered in June/July 2004 during the Site Characterization Investigation. Actual depths will be dependent on conditions encountered during the supplemental investigation.
- ** - Monitoring well MW-15 is a contingency well that will be installed if impacts are encountered at monitoring well MW-12.
- ft bgs – feet below ground surface.

The new monitoring wells will be developed a minimum of 24 hours following installation in accordance with the procedures presented in the Generic Field Sampling Plan. Where feasible, the hydraulic conductivity of the formation surrounding the screened interval of each well will be estimated using specific capacity testing completed during the collection of groundwater samples (as opposed to performing slug testing following development).

Site-Wide Groundwater Monitoring

At least one week following development of the new groundwater monitoring wells, one round of groundwater samples (including required QA/QC samples as per the NYSDEC 2000 ASP) will be collected from the new and existing monitoring wells (MW-1 through MW-14, and MW-15 if installed) using low-flow sampling methods and submitted to CompuChem for laboratory analysis for TCL VOCs and TCL SVOCs. A complete round of groundwater level measurements from each well will be obtained prior to initiating sampling. Groundwater samples will not be collected for laboratory analysis from any monitoring well where LNAPL or DNAPL is encountered.

Monitoring well development and purge water will be placed in a polyethylene storage tank or drums that will be staged at the Trinity Substation property for subsequent offsite transport and disposal in accordance with applicable regulations.

Survey Activities

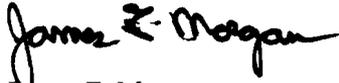
Following completion of the supplemental investigation activities described above, Niagara Mohawk's Survey Department will survey the location of each new soil boring. The location, ground elevation, and top-of-casing elevation for each new groundwater monitoring well will also be surveyed.

Schedule

Niagara Mohawk is currently coordinating with property owners to obtain site access to complete the supplemental investigation activities that are proposed for non-owned properties. Following NYSDEC approval of the supplemental investigation activities and execution of required property access agreements, Niagara Mohawk anticipates that the proposed supplemental investigation activities will be initiated during March 2005.

Niagara Mohawk will contact you during the week of February 14, 2005 to discuss any NYSDEC comments on the proposed investigation activities. In the meantime, please do not hesitate to contact me at (315) 428-3101 if you have any questions or require additional information.

Sincerely,



James F. Morgan
Senior Environmental Engineer

LRZ/mbg
Enclosure

cc: Ms. Maureen E. Schuck, New York State Department of Health
William J. Holzhauer, Esq., Niagara Mohawk, a National Grid Company
Mr. Charles Willard, Niagara Mohawk, a National Grid Company
Mr. Terry W. Young, P.E., Niagara Mohawk, a National Grid Company
Mr. James M. Nuss, P.E., Blasland, Bouck, & Lee, Inc.
Mr. Michael C. Jones, Blasland, Bouck, & Lee, Inc.
Mr. Charles E. Guest, P.E., Blasland, Bouck, & Lee, Inc.
Ms. Lynette B. Mokry, Blasland, Bouck, & Lee, Inc.

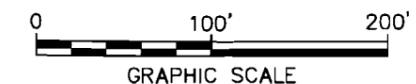


LEGEND:

- MW-7 MONITORING WELL LOCATION
- SS-8 SURFACE SOIL SAMPLE LOCATION
- SB-10 SOIL BORING LOCATION
- TP-4 TEST PIT LOCATION
- BUILDING/STRUCTURE
- x-x- FENCE
- - - APPROXIMATE PROPERTY LINE
- APPROXIMATE LOCATION OF HISTORICAL MGP STRUCTURES
- PROPOSED ADDITIONAL MONITORING WELL LOCATION
- PROPOSED ADDITIONAL SOIL BORING LOCATION

NOTES:

1. BASE MAP (INCLUDING BUILDING, UTILITY, AND SAMPLING LOCATIONS) DEVELOPED FROM ELECTRONIC FILE OF NIAGARA MOHAWK POWER CORPORATION (NMPC) DRAWING NO. C-5259-E, DATED SEPTEMBER 17, 2004, ENTITLED TRINITY SUBSTATION TOPOGRAPHIC MAP. THE MAP IS BASED ON A SURVEY CONDUCTED BY NMPC DURING JULY/AUGUST 2004.
2. BASE MAP ALSO DEVELOPED FROM CITY OF ALBANY TAX MAPS NO. 76.14, 76.49, AND 76.57. THE MAP IS BASED ON NEW YORK STATE PLANE NAD 1983 (EASTERN ZONE) AND THE VERTICAL DATUM USED WAS NGVD 88.

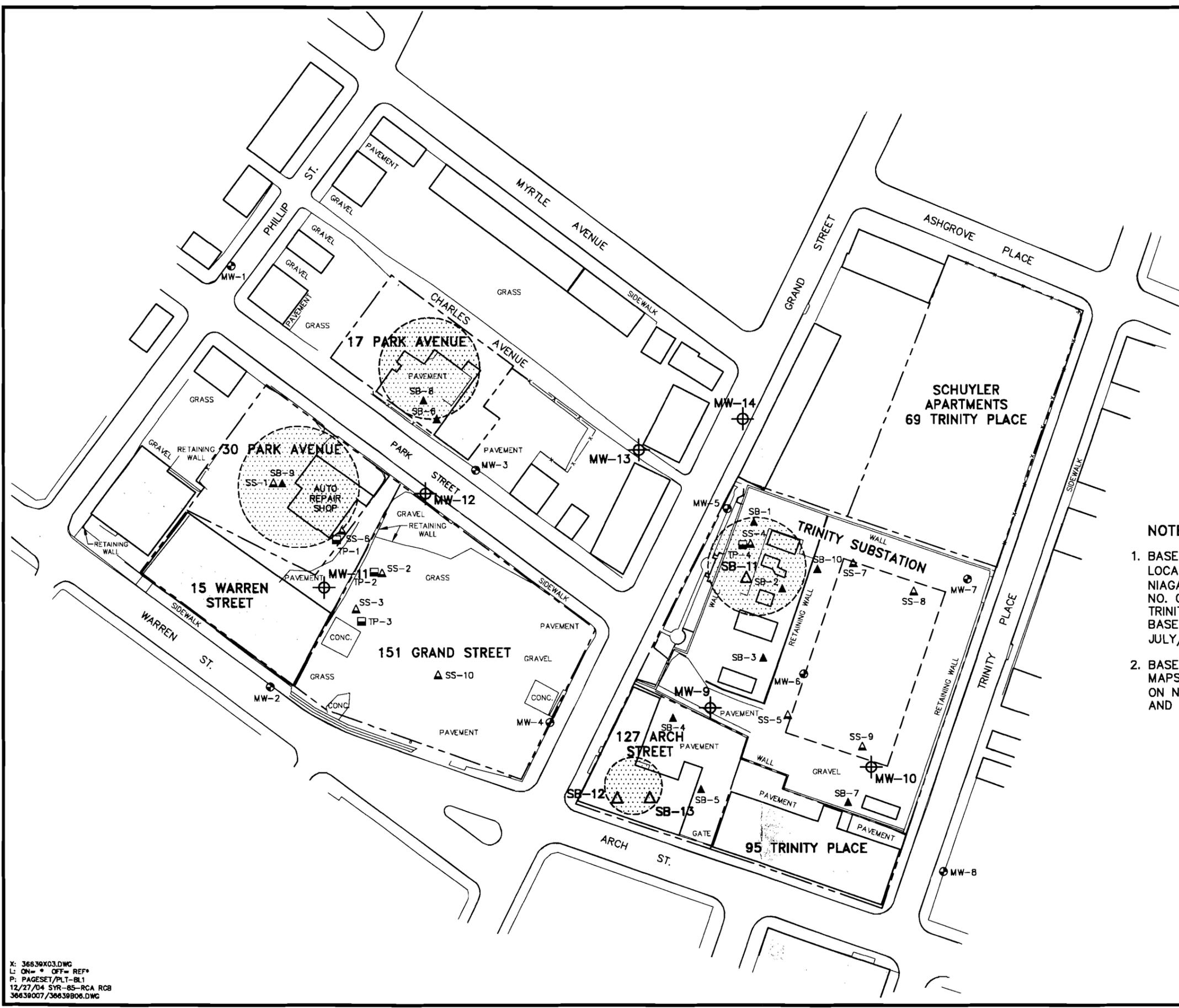


NIAGARA MOHAWK, A NATIONAL GRID COMPANY
ALBANY (GRAND STREET) NON-OWNED FORMER MGP SITE
SITE CHARACTERIZATION INVESTIGATION

PROPOSED ADDITIONAL SAMPLING LOCATIONS



FIGURE
1



X: 36839X03.DWG
L: ON= * OFF= REF*
P: PAGESET/PLT-BL1
12/27/04 SYR-85-RCA RCB
36839007/36839806.DWG

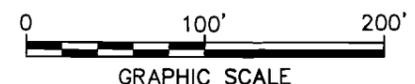


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NIAGARA MOHAWK, A NATIONAL GRID COMPANY
ALBANY (GRAND STREET) NON-OWNED FORMER MGP SITE
SITE CHARACTERIZATION INVESTIGATION

PROPOSED ADDITIONAL SAMPLING LOCATIONS



X: 36638X03.DWG
L: ON= * OFF= REF*
P: PAGESET/PLY-BL1
12/1/04 SYR-85-RCA RCB
36638007/36638005.DWG

