



March 5, 2010

NYSDEC
Division of Hazardous Waste Remediation
625 Broadway
Albany, New York 12233-7015

Attention: Ronnie Lee

Re: **Post Remediation Soil Vapor Investigation Work Plan for
Bon Ton Cleaners Voluntary Cleanup Program (VCP) Site
Addendum No. 1
1932 Ralph Avenue, Brooklyn, NY
VCP Index No. W2-0916-02-03
Site ID No.: V-00512-2**

Dear Mr. Lee:

The following Work Plan Addendum for the performance of post remediation indoor air and sub-slab vapor testing was prepared by CA RICH Consultants, Inc. (CA RICH) for the Bon Ton Cleaners VCP Site (the "Site") located at 1932 Ralph Avenue, Brooklyn, NY. A Site location map is included as Figure 1. This Work Plan Addendum was prepared as a follow up to our 2009 Annual Inspection and addresses the collection of indoor air and sub-slab soil vapor from to locations in the northern portion of the shopping center.

Sub-Slab Soil Vapor and Indoor Air Testing Procedures

In accordance with the New York State Department of Health (NYSDOH) Guidance Document dated October 2006, the following will be performed.

- 1) The NYSDEC will be notified of the planned sampling date one week in advance which be occur during the winter heating season which extends till the end of March. A map of the proposed sampling locations is included on Figure 2.
- 2) CA RICH will inspect the accessible spaces of the structures in the immediate area to be tested and prepare an inventory of the products stored at the facilities as outlined in the NYSDOH October 2006 Guidance document. This inventory will be included in our final report.
- 3) At each location, a hole will be drilled into the concrete floor using a hammer drill with a carbide drill bit. A section of ¼ O.D. stainless steel tubing will be set not more than two inches below the slab. The placement of the tubing will be followed by either a bentonite or bees wax seal.
- 4) A clean plastic bucket will be placed over the top of the probe point. Helium will then be allowed to fill the bucket.
- 5) After the introduction of Helium, the tubing will be purged of at least three volumes of air using a vacuum pump. A Tedlar bag will be used to contain the purged soil vapor. The soil vapor will then be monitored with a portable Helium meter to confirm there is an adequate surface seal. If there is a detection of more than 20%, more bentonite or bees wax will be placed around the top of the tubing, and the process will be repeated.

CA RICH Environmental Specialists

- 6) The tubing will then be connected to a laboratory cleaned SUMMA canister. The regulator will be set by the laboratory to fill over a 2-hour time period. This setting results in a fill rate that does not exceed the DOH required 0.2 liter per minute sampling rate. The canisters will be checked periodically to ensure they are working properly and that vacuum is being achieved.
- 7) The canister will be delivered to a NYS ELAP certified laboratory for the analysis of Volatile Organic Compounds (VOCs) including perchloroethane (PCE) using EPA method TO-15. A slight vacuum will remain in the canisters to confirm that they did not leak during transit.
- 8) Indoor air samples will be collected concurrently with the sub-slab soil vapor samples.
- 9) The indoor air samples will be collected using laboratory cleaned SUMMA canisters placed approximately three feet above the floor. The canisters will be placed in a safe location in the basements away from contact with workers. Because of the varied hours of operation at the shopping center, the regulator will be set by the laboratory to fill over a 4-hour time period. A slight vacuum will remain in the canisters to confirm that they did not leak during transit.
- 10) The sub-slab points will be removed after the sample is collected, and the hole sealed with sand followed by a concrete cap.
- 11) One duplicate Summa canister sample will be collected for QA/QC purposes. A Data Usability Summary Report (DUSR) will be prepared to accompany the report.

Reporting

The procedures employed and the laboratory results will be provided to the NYSDEC in a report. The report will include a sample location map, laboratory data and a discussion of the results.

If there are any questions regarding this work plan, please do not hesitate to call our office.

Sincerely,

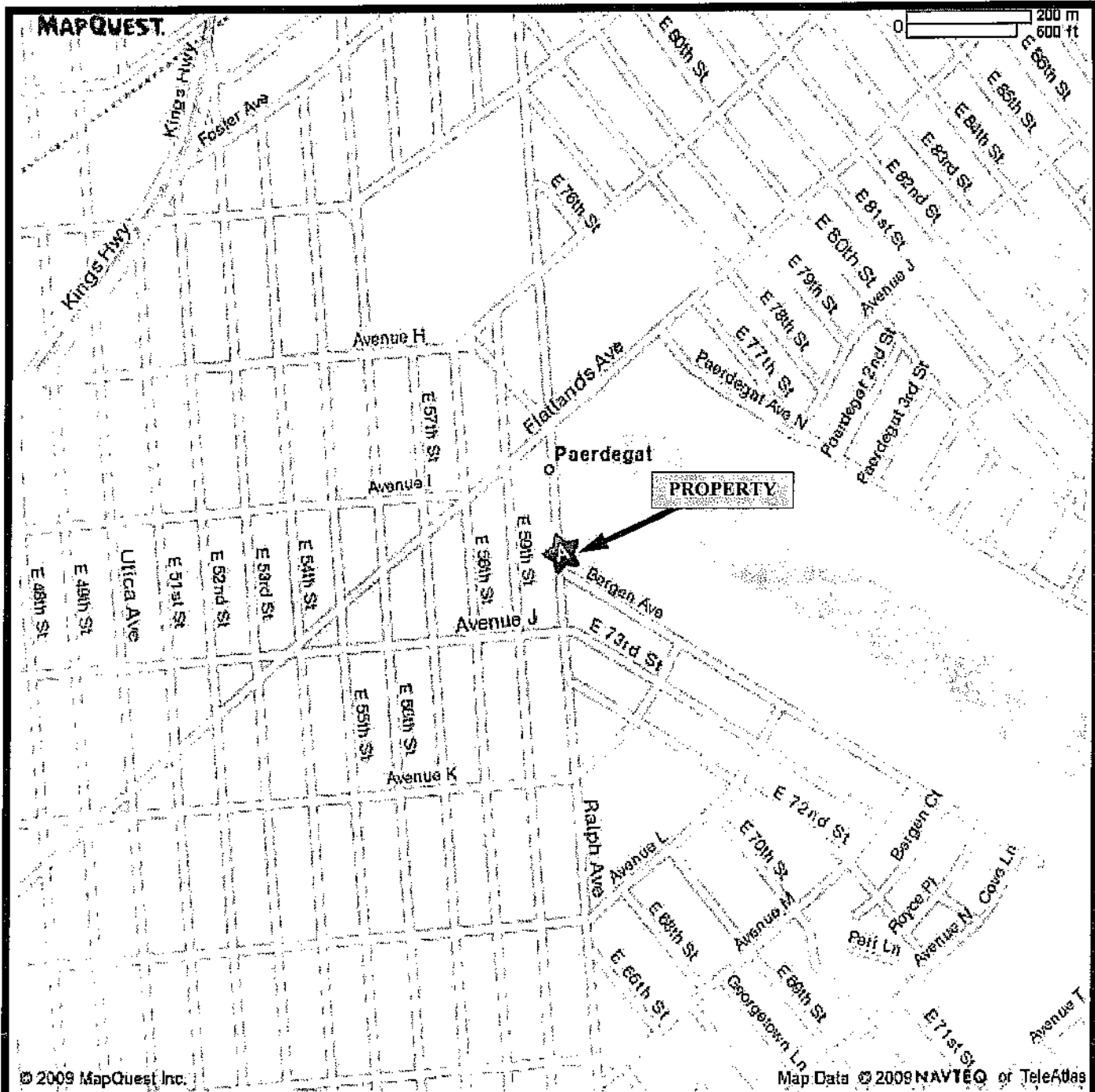
CA RICH CONSULTANTS, INC.



Eric A. Weinstock
Vice President

cc: Burt Lewis
Miriam Villani, Esq. (e-mail only)
Rosalie Rusinko, Esq. (e-mail only)
Albert DeMarco, NYSDOH (e-mail only)

Figures



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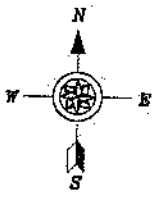


Adapted from MapQuest, Inc 2009



CA RICH CONSULTANTS, INC.
17 Dupont Street,
Plainview, NY 11803

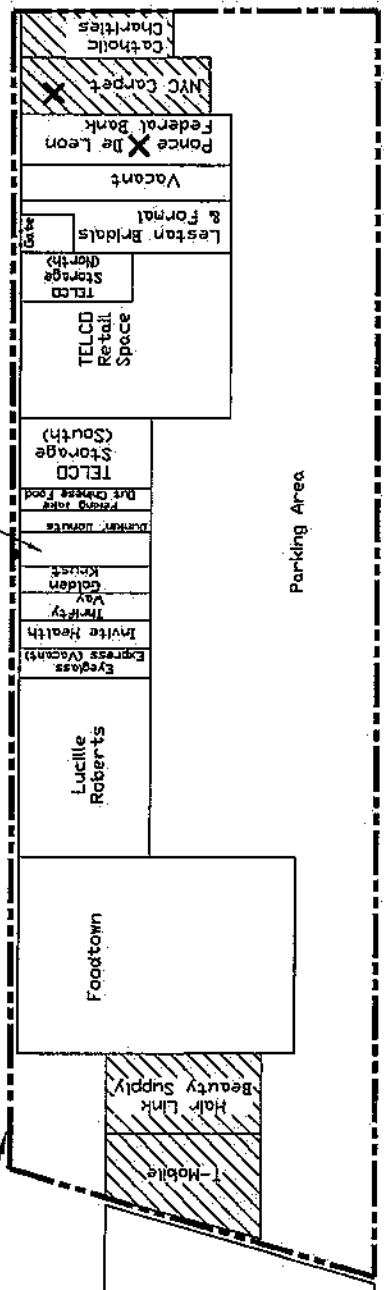
TITLE: PROPERTY LOCATION MAP		DATE: 11/19/09
FIGURE: 1		SCALE: AS SHOWN
DRAWING:	Bon Ton Cleaners 1932 Ralph Avenue Brooklyn, New York	DRAWN BY: JTC
		APPR. BY: EAW



EAST 59TH STREET

Property Boundary

Bon Ton Dry Cleaners




Not Part of Property

RALPH AVENUE

Legend

X Proposed Temporary Sub-Slab Soil Vapor Point

 Unit Has No Basement

Notes:

- Map adapted from Property survey by Montrase Surveying Co, LLP dated May 2, 2001 and USGS Brooklyn Quadrangle 1979.



Graphic Scale in Feet

CA RICH CONSULTANTS, INC.	
Certified Groundwater and Environmental Specialists 17 Dupont Street, Plainville, New York 11803	
TITLE: Proposed Temporary Sub-Slab Soil Vapor Point Locations	DATE: 3/5/2010
SCALE: As Shown	
FIGURE: 2	DRAWN BY: J.T.C.
DWG. NO.: 2010-5	APPR. BY: E.A.W.
BON TON CLEANERS 1932 RALPH AVENUE BROOKLYN, NEW YORK	