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GEI Consultants

Geotechnical
Environmental and
Water Resources
Engineering

October 27, 2008

Mr. Herb Chaves, Esq.
116 John Street
New York, New York 10038

Re: Former Conklin Brass Property Interim Data Results
270 Nevins Street
Fulton Municipal Works Manufactured Gas Plant (MGP) Site
Brooklyn, New York 11217
Index No. A2-055-0606
Site No. 224051

Dear Mr. Chaves:

On behalf of National Grid, GEI Consultants, Inc. (GEI) has prepared this interim data deliverable to provide you with the soil vapor and air testing results for the warehouse at the Conklin Brass Property at 270 Nevins Street in Brooklyn, New York. The data was collected in July as part of remedial investigations that National Grid is completing under the New York State Department of Conservation (NYSDEC)/New York State Department of Health (NYSDOH)-approved *Final Remedial Investigation Work Plan for the Fulton Municipal Works Former MGP Site* dated March 2008. The interim data deliverable includes this summary letter, laboratory analytical testing results and a figure that summarizes the sample locations. Based on our preliminary review of the data, air in the warehouse building is not adversely affected by soil vapor during the summer conditions.

The remainder of the letter provides a brief summary of the sampling activities, an evaluation of the air sampling data, and conclusions/recommendations. GEI is currently preparing a separate report for the soil sampling that was conducted at the property in August 2008. The validation of the data process has recently been completed and is currently be evaluated.

Summary of Sampling Activities

On July 31, 2008, GEI installed four temporary soil vapor points (FW-SV-01 through SV-04) through the foundation slab of the building and collected soil vapor samples. Two indoor air samples (FW-IA-01 and FW-IA-02) and an outdoor air samples (FW-OA-1) were also collected. The locations of the samples are show on Figure 1. Each sample was collected into laboratory certified Summa® canisters. In accordance with NYSDOH guidance, each soil vapor sample point location was sampled beneath a bucket enclosure that was enriched with helium gas to evaluate potential infiltration of ambient air during

GEI Consultants, Inc.
455 Winding Brook Drive, Suite 201, Glastonbury, Connecticut 06033
860.368.5300 fax: 860.368.5307

the collection of the soil vapor sample. The samples were shipped to TestAmerica in Knoxville, Tennessee, a NYSDOH-approved laboratory, for analysis of volatile organic compounds (VOCs) and helium. Once analyzed, the air testing results were reviewed by a data validator to assure that analysis was completed according to regulatory guidelines. Table 1 provides a summary of compounds detected in the soil vapor and air samples.

Data Evaluation

In accordance with NYSDOH guidance, the air testing results were compared against concentrations of VOCs collected by the Environmental Protection Agency (EPA) as part of the Building Assessment Survey Evaluation (BASE) database in 2001. The EPA BASE database study was conducted to assess VOC within indoor air in public and commercial office buildings to provide context to the sample results. The attached table summarizes the detected results and screens the results as follows:

- The sub-slab soil vapor and indoor air analytical results were screened against the 90th percentile of the EPA BASE values. Values above the screening criteria highlighted in gray in the table.

- The outdoor air analytical data was screened against the 90th percentile for EPA BASE database. There were no compounds above the screening criteria.

All VOC concentrations were below levels found in indoor air in public and commercial office building settings with the exception of 2-Butanone, which is not an MGP-related compound. A similar suite of compounds were noted within the outdoor air sample and the indoor air samples which is likely a result of the practice of utilizing the garage doors for ventilation and cooling in the building during the summer. The warehouse is not equipped with a central air conditioning system.

In soil vapor, compounds that are common to MGP operations and petroleum products (including the benzene, toluene, ethylbenzene and xylene compounds [BTEX], and naphthalene) were detected in three of the four sub-slab soil vapor samples at concentrations above the 90th percentile of the indoor air VOC levels in commercial buildings. Laboratory testing also revealed elevated concentrations of helium in two soil vapor samples (FW-SV-01 and FW-SV-03) which is caused by ambient air leakage around the sub-slab soil vapor points. As a result, the soil vapor data at these two locations is not representative of sub-slab conditions at the locations and re-sampling of the points is required.

Conclusions/Recommendations

Concentrations of VOCs that are common to MGP materials and petroleum products were detected beneath the slab of the building. Laboratory testing has shown that concentrations of VOCs in indoor air within the former Conklin Brass Property warehouse are within ranges found by the EPA within commercial and public office buildings. As a result, indoor air is not adversely affected by sub-slab soil vapor concentrations of VOCs.

GEI recommends that a second round of soil vapor, indoor air, and outdoor air samples be collected to evaluate potential soil vapor intrusion during the upcoming heating season (November 15 to March 31) in accordance with NYSDOH guidance and as indicated in the NYSDEC/NYSDOH–approved Work Plan.

Please contact Tracey Bell at National Grid if you have questions regarding this interim data transmittal. She can be contacted at 718-963-5645 or via e-mail at tracey.bell@us.ngrid.com.

Best regards,

Lynn Willey
Project Geologist

c: T. Bell-National Grid
F. Murphy-National Grid
H. Willems-NYSDEC
C. Doroski-NYSDOH
D. Terry-GEI
L. Liebs-GEI
R. Dehate-GEI
M. Felter-GEI

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