NORTHEASTERN
ENVIRONMENTAL
TECHNOLOGIES CORP.

1476 Route 50 - P.O. Box 2167 Ballston Spa, NY 12020
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March 19, 2019 **(*Revised Date March 29, 2019*)**

NYS Department of Environmental Conservation
Division of Environmental Remediation, Region 4
Attn.: Mr. Drew Hoffert Engineer Trainee
1130 N. Westcott Rd.
Schenectady, NY 12306-2014

Email: drew.hoffert@dec.ny.gov

RE: NYSDEC Spill No. 01-04315 Havill Auto Body Center Albany County

Dear Drew:

Havill's Automotive Collision Repair LLC has authorized Northeastern Environmental Technologies Corporation (NETC) to undertake the following supplemental site characterization next steps at its 694 Delaware Ave. Albany, NY 12209 facility (hereinafter termed the Property). The objective of this work is to address the NYS Department of Environmental Conservation (Department) regulatory directives for Spill No. 01-04315 dated November 6, 2018 and March 28, 2019. The SI work objective is to confirm or refute the presence of chlorinated solvent impacts documented in 2001 at a proposed cell tower site (see Attached Schematic). A more detailed accounting of the services proposed are listed below for your review and consideration.

Soil Boring Program

Soil borings will be completed in a manner to provide baseline hydrogeologic information for the Property as well as supplemental soil and groundwater quality data for the 2001 cell tower area of concern (AOC). The soil borings will be advanced using direct push (DP) sampling methods. Each soil boring will be advanced a minimum of 5 feet below the upper surface of the groundwater table. It is expected the soil boring will be terminated at a maximum depth of 20 feet. An experienced NETC geologist will supervise all aspects of the drilling program and be responsible for detailed logging of all samples. As part of the subsurface drilling program, NETC will perform periodic examinations of the ambient air space surrounding the work zone, and the open bore hole to evaluate the presence of volatile organic compounds (VOC). A MiniRae 3000 photoionization detector (PID) or equivalent instrument will be used to facilitate the testing requirements. The information acquired will be used to determine the level of health and safety equipment necessary to accomplish the proposed work. At this time, level "D" conditions are assumed for all drilling services. Each soil boring will be completed with a 1.0 inch PVC monitoring well constructed with a ± 10 foot well screen positioned to straddle the surface of the groundwater table.

Soil Sampling Services

Continuous soil samples will be collected using 60 inch long (2-inch O.D.) barrel samplers consisting of a drive head, soil barrel and drive shoe. All samples will be logged on site as they are extracted, labeled and retained for additional VOC soil gas screening. All sampling equipment will be pre-cleaned prior to use.

All soil samples will be examined and described using the Modified Burmister and Unified Soil Classification Systems. In compliance with ASTM methods, the sample will be labeled with the following information: job designation, boring number, sample number, depth of sample, depth penetration record and length of recovery.

Volatile Organic Soil Gas Screening

As part of the invasive testing program, NETC will perform examinations for VOCs on all soil samples collected at the Property. A MiniRae 3000 PID or equivalent will be used for the screening work. Photoionization uses ultraviolet light to ionize many trace compounds (especially organic) and the PID employs this principal to measure the concentration of trace gasses. In the PID, a chamber adjacent to the ultraviolet light source contains a pair of electrodes. When a positive potential is applied to one electrode, the field created drives any ions in the chamber to the collector electrode where current is measured. Measured current is proportional to the concentration of organic sampled by the instrument's probe. Useful range of the instrument is from 0.l to 3,000 ppm. The headspace of each sample will be tested with the PID. The VOC soil screening results will be used to identify VOC chemical impacts in the unconsolidated deposits, estimate the vertical extent of the soil impacts (if any,) as well as a means to short soil samples for additional laboratory analysis. Laboratory testing methods that will be used for this matter will include the full Volatiles Target Compound List (TCL) by USEPA Methods 8260. Soil samples will be short listed for chemical laboratory analysis from the 2001 cell tower AOC soil boring site based on visual, olfactory and VOCs conditions documented in the field. Samples will be biased towards horizons found to contain impacts. A minimum of (1) soil sample will be collected from the upper surface of the groundwater table from the soil boring advanced at the 2001 cell tower AOC, in the event no impacts are identified in the field. The need / frequency to undertake laboratory analysis of soil samples at the other soil boring sites will be determined in consultation with the Department based on the presence of impacts and / or laboratory data to be obtained from the 2001 cell tower AOC. All laboratory testing work will be performed by Phoenix Environmental Laboratories (PEL) or other NYSDOH ELAP Certified laboratory.

Decontamination Procedures

All equipment which is to come in contact with the soil or groundwater will undergo a cleaning procedure. While working at the site, the drilling equipment will be decontaminated between soil borings to prevent cross-contamination. Uncontaminated water, collected at the site, will be used for all decontamination procedures. All decontamination activities will be performed within a designated area established at the site. Soil and / or groundwater generated from soil borings which exhibit visible or olfactory contamination or PID level above 5 ppm will be containerized using 55 gallon 17H salvage drums.

Groundwater Sampling

Groundwater samples will be collected using low flow sampling techniques to pursue a 50 Nephelometric Turbidity Units (NTU). All sample containers and preservatives will be provided by a NYS approved laboratory. All samples will be maintained at a temperature of 4°C by commercially available (pre-frozen) "ice-packs" and appropriate holding and transportation times will be followed. All samples will be collected in such a manner as to minimize agitation and other disturbing conditions that may cause

physiochemical changes and bring about losses due to volatilization, adsorption, redox changes or degradation. Unless otherwise directed groundwater samples collected from the 2001 cell tower AOC will be analyzed for the full Volatile TCL by USEPA Methods 8260. The need / frequency to undertake laboratory analysis of the remaining groundwater samples will be will be determined in consultation with the Department based on the presence of impacts and / or laboratory data to be obtained from the 2001 cell tower AOC.

All laboratory testing work will be performed by PEL or other NYSDOH ELAP Certified laboratory. Formal chain of custody documentation will be maintained throughout the shipment of the NETC samples to the laboratory. Observations will be made and recorded regarding weather and surrounding air/water/soil conditions, non-aqueous components of well water (e.g. "floaters," surface sheens) and any other pertinent field conditions.

Soil Vapor Intrusion (SVI) Risk Assessment Survey

Simultaneous interior air, sub slab vapor and background air samples will be obtained from the Havill's Automotive Collision repair garage located at the northeast corner of the property pursuant to the methods advocated by the NYS Department of Health (NYSDOH) Center for Environmental Health Bureau of Environmental Exposure Investigation - Guidance for Evaluating Soil Vapor Intrusion in the State of New York dated October 2006, hereinafter termed the *Guidance Document*.

Sub Slab Vapor Probe Installation Services

To assess the extent that chlorinated volatile organic compounds (cVOC) impacts exist below the structure, a sub slab vapor probe implant will be installed. Rotary methods will be used to create a 1.0 inch penetration through the floor slab. The sub slab vapor probe will be installed in the soil or aggregate immediately below the slab (i.e., <2.0 inches). The vapor probe proposed for this evaluation will consist of a stainless steel vapor pin fitting. All sub slab vapor probe implant equipment will be purchased new for this matter. All installation equipment will be decontaminated prior to use on site.

Sampling Services

Following the sub slab implant installation services, one to three volumes of soil vapor at the sampling locations will be removed and transferred into a 1 liter glass sample bulb prior to sampling. Soil vapor purge rates of < 0.2 liters per minute will be maintained. Each soil vapor probe will be screened (in areas other than the implant site) using a hand held photoionization meter for the presence of VOCs. Soil vapor samples will be obtained from the sampling locations over a 24 hour sampling period using Summa canister sampling methods. Pursuant to the *Guidance Documents*, a trace gas (i.e., Isobutylene) will be used as a quality assurance / quality control measure to verify the integrity of the sub slab implant. A simultaneous indoor air sample will be collected from the same spaces that the sub slab sampling is occurring. One simultaneous outdoor air sample will also be collected at an upwind location (free of obstructions) adjacent to the structure. Each indoor and outdoor air sample will be obtained from a 3 foot elevated platform via 1L Summa canisters equipped with the same 24 hour sample regulator. All Summa canisters will be certified as clean by the laboratory. A sampling log will be maintained for the sampling event which will document sample ID, date and time of the sample collection, sample height, the names of

NETC staff, pertinent weather conditions, sampling methods and devices used, volume of air sampled, applicable pre and post sample vacuum and ambient air temperature data and chain of custody information. Samples will be shipped to the laboratory for chemical analysis.

The need to undertake laboratory analysis of the samples will be determined in consultation with the Department based on the presence of impacts and / or laboratory data to be obtained from the 2001 cell tower AOC. All laboratory testing work will be performed by PEL. All samples selected for laboratory testing will be analyzed via Method TO-15. All data sets will be reported in micrograms per cubic meter (ug/m3) using selective ionization measuring services (SIMS) with minimum sample reporting limits of 1 ug/m^3.

PRODUCT INVENTORY SURVEY

A product inventory survey will be made (as outlined in Appendix B of the *Guidance Document*) to consider other potential contributing sources for VOCs in the structure.

BASE MAP

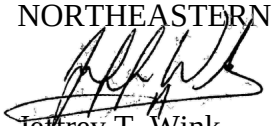
To accurately locate all investigative activities with respect to site features, a base map will be prepared. The map will depict on site features pertinent to the work.

STATUS REPORT

Data collected using the methodologies described herein will be utilized to confirm or refute the presence of a cVOC impacts related to Spill No. 01-04315 at the Property. Presentation of data will be clear and concise, providing an understanding of site conditions, risk to human health and the environment. Sample results will be compared to the applicable soil and groundwater quality standards. Unless otherwise directed, the report will be prepared and submitted to Havill's Automotive Collision Repair LLC and the NYS Department of Environmental Conservation Division of Environmental Remediation, Region 4 for formal consideration. The report will document all investigatory activities, discuss the rationale and methods selected, including any deviations from this work plan, as well as pertinent recommendations for the Property and Spill No. 01-04315.

In accordance with our initial work plan notice provided on March 21, 2019 and subsequent updates provided at the site on March 27 & 28, 2019; NETC will continue to provide the Department with advance notice of work that is to occur at the site during the week of April 1, 2019. The NETC organization and I remain available to assist you and the Department with its ongoing review and administration of Spill No. 01-04315.

Sincerely,
NORTHEASTERN ENVIRONMENTAL TECHNOLOGIES CORPORATION



Jeffrey T. Wink
President

Attachments

NOTES: All site features are approximate.
This site plan is intended for illustration purpose
associated with a proposed site investiagtion work plan
to be performed on behalf of Havill's Automotive Collision Repair, exclusively.

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Proposed Site Investigation Areas - Spill No. 01-04315

PROJECT: Havill's Automotive Collision Repair
694 Delaware Ave.
Albany, New York

Project # 19.0102014	Scale: Not to Scale	Date: 03/07/19