



Ms. Alicia Barraza
New York State Department of Environmental Conservation
Division of Solid & Hazardous Materials
Bureau of Solid Waste and Corrective Action
625 Broadway
Albany, New York 12233-7258

Subject:

Bayer MaterialScience LLC
125 New South Road
Hicksville, New York
USEPA ID#: NYD002920312
Phase IV Soil Vapor Investigation

Dear Ms. Barraza:

On behalf of Bayer MaterialScience LLC (Bayer), this letter presents a work plan for implementing the Phase IV soil vapor investigation at the above-referenced site. The Phase IV soil vapor investigation will be performed to evaluate the extent to which volatile organic compounds (VOCs) in onsite soil vapor have changed following completion of the soil excavation and load-out activities currently being performed in accordance with the New York State Department of Environmental Conservation (NYSDEC) approved *Interim Corrective Measure Additional PCB Soil Removal Work Plan* (ARCADIS, November 2008) and related correspondence.

A description of the proposed soil vapor investigation is presented below, followed by the schedule for implementing the activities.

Proposed Phase IV Soil Vapor Investigation Activities

The proposed Phase IV soil vapor investigation field activities will be implemented by ARCADIS. Soil vapor samples will be collected from 10 onsite sampling locations, 9 of which will be "re-visited" locations from the previous soil vapor investigations, and 1 of which is a new location midway between two previous sampling locations. The proposed sampling locations are shown on the attached figure and summarized in the attached table. The proposed sampling locations have been selected to provide additional data in areas where VOCs were previously identified at elevated

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ENVIRONMENT

Date:
July 2, 2009

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Our ref:
B0032305.0001 #5

concentrations. The proposed “re-visited” sampling locations will be positioned within approximately 5 feet from the original sampling locations.

The proposed sampling locations will be identified in the field based on land survey activities and use of coordinates obtained from the attached figure. At each proposed sampling location, a soil vapor sample will be collected from the 5.0 to 5.5 foot depth interval, which will provide data for evaluating conditions below a future building with a shallow foundation and slab-on-grade construction. One blind duplicate soil vapor sample will be collected as part of the sampling activities. Two upwind ambient air samples will also be collected in support of the soil vapor sampling, including one on the first day of sampling and one mid-way through the sampling program.

The sampling will be performed in accordance with the protocols presented in the NYSDEC-approved Soil Vapor Investigation Work Plan contained in a July 26, 2007 letter from ARCADIS (“the SVI Work Plan”). The samples will be submitted to TestAmerica of Burlington, Vermont for laboratory analysis for VOCs in accordance with the analytical method, constituent list, and reporting limits presented in the SVI Work Plan. Analysis of the samples will be performed on a standard turnaround (2 to 3 weeks) for reporting of results. The results will be validated by ARCADIS.

The need for follow-up actions (if any) will be determined with the NYSDEC and New York State Department of Health (NYSDOH) following review of the results.

Schedule

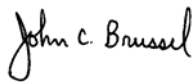
The sampling will be performed approximately one week after all impacted soils scheduled to be removed as part of the current interim corrective measure have been excavated and transported for offsite disposal. Based on current progress at the site, the ICM soil excavation and load-out activities are currently anticipated to be completed by July 10, 2009. Based on this timeframe, the Phase IV soil vapor investigation field activities are tentatively scheduled for the week of July 20, 2009 and will take approximately 1 to 1½ weeks to complete. Laboratory analytical results are anticipated to be available by August 20, 2009.

The laboratory analytical data report will be provided to the NYSDEC and NYSDOH following receipt. Validation is anticipated to be completed within approximately one month following receipt of the laboratory analytical data package. The validation report will be provided to the NYSDEC.

We await NYSDEC approval of the proposed Phase IV soil vapor sampling activities described above. Please do not hesitate to contact Ramon Simon of Bayer at 281.383.6149 or the undersigned at 315.671.9441 if you have any questions or require additional information.

Sincerely,

ARCADIS



John C. Brussel, PE
Principal Engineer

Copies:

Ms. Katy Murphy, New York State Department of Environmental Conservation
Ms. Renata Ockerby, New State Department of Health
Mr. Rober Weitzman, Nassau County Department of Health
Mr. Wayne Baldwin, Bayer MaterialScience LLC
Mr. Ramon Simon, Bayer MaterialScience LLC
Mr. Glenn Sabadosa, Bayer MaterialScience LLC

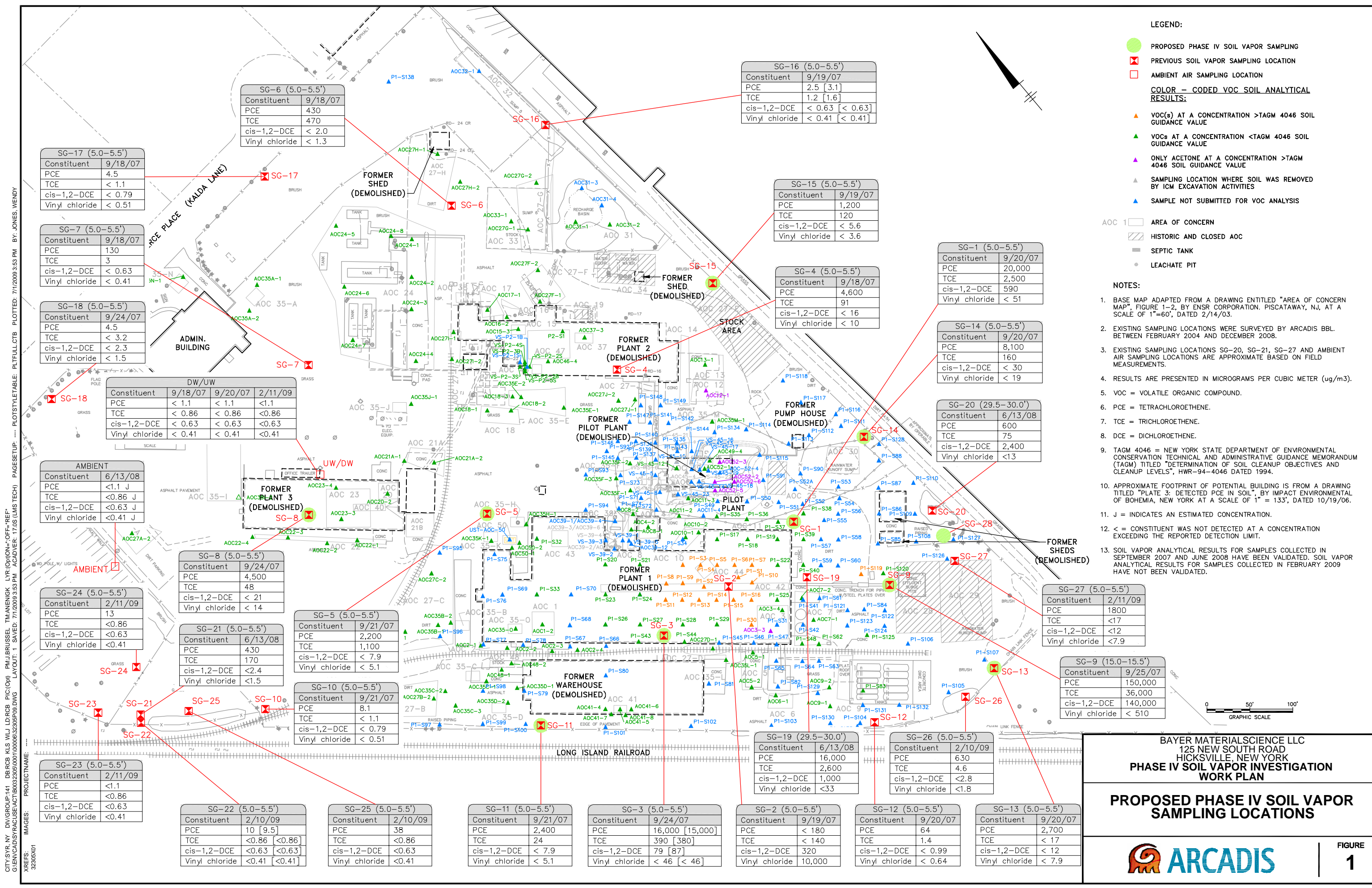
TABLE 1
PROPOSED SOIL VAPOR SAMPLING LOCATIONS & INTERVALS

PHASE IV SOIL VAPOR INVESTIGATION WORK PLAN
BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK

Sample ID	Sampling Location	Sample Depth (feet bgs)
SG-1	Northeast of Plant 1 footprint (adjacent to former VOC-impacted soil area)	5 - 5.5
SG-3	Southern end of Plant 1 footprint (adjacent to former VOC-impacted soil area)	5 - 5.5
SG-5	North of Plant 1 footprint	5 - 5.5
SG-8	In Plant 3 footprint	5 - 5.5
SG-9	Near sumps identified as AOC Nos. 28 and 29	5 - 5.5
SG-11	Southern property boundary (between former Warehouse and Long Island Railroad)	5 - 5.5
SG-13	Southern tip of property (south/southeast of AOC Nos. 28 and 29 and Plant 1 footprint)	5 - 5.5
SG-14	Eastern property boundary (east of SG-1)	5 - 5.5
SG-15	Eastern property boundary (east of Plant 2 footprint)	5 - 5.5
SG-28	Eastern property boundary (halfway between SG-20 and SG-27)	5 - 5.5

Notes:

1. bgs = below ground surface.
2. VOC = volatile organic compound.
3. AOC = area of concern.
4. The sample ID for each proposed "re-visited" sampling location will be followed by a **-N**, **-S**, **-E**, or **-W** to indicate the offset direction from the original sampling location.



LEGEND:

- PROPOSED PHASE IV SOIL VAPOR SAMPLING
- PREVIOUS SOIL VAPOR SAMPLING LOCATION
- AMBIENT AIR SAMPLING LOCATION
- COLOR - CODED VOC SOIL ANALYTICAL RESULTS:
- VOC(s) AT A CONCENTRATION >TAGM 4046 SOIL GUIDANCE VALUE
- VOCs AT A CONCENTRATION <TAGM 4046 SOIL GUIDANCE VALUE
- ONLY ACETONE AT A CONCENTRATION >TAGM 4046 SOIL GUIDANCE VALUE
- SAMPLING LOCATION WHERE SOIL WAS REMOVED BY ICM EXCAVATION ACTIVITIES
- SAMPLE NOT SUBMITTED FOR VOC ANALYSIS
- AOC 1 AREA OF CONCERN
- HISTORIC AND CLOSED AOC
- SEPTIC TANK
- LEACHATE PIT

NOTES:

- BASE MAP ADAPTED FROM A DRAWING ENTITLED "AREA OF CONCERN MAP", FIGURE 1-2, BY ENSR CORPORATION, PISCATAWAY, NJ, AT A SCALE OF 1"=60', DATED 2/14/03.
- EXISTING SAMPLING LOCATIONS WERE SURVEYED BY ARCADIS BBL BETWEEN FEBRUARY 2004 AND DECEMBER 2008.
- EXISTING SAMPLING LOCATIONS SG-20, SG-21, SG-27 AND AMBIENT AIR SAMPLING LOCATIONS ARE APPROXIMATE BASED ON FIELD MEASUREMENTS.
- RESULTS ARE PRESENTED IN MICROGRAMS PER CUBIC METER (ug/m3).
- VOC = VOLATILE ORGANIC COMPOUND.
- PCE = TETRACHLOROETHENE.
- TCE = TRICHLOROETHENE.
- DCE = DICHLOROETHENE.
- TAGM 4046 = NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION TECHNICAL AND ADMINISTRATIVE GUIDANCE MEMORANDUM (TAGM) TITLED "DETERMINATION OF SOIL CLEANUP OBJECTIVES AND CLEANUP LEVELS", HWR-94-4046 DATED 1994.
- APPROXIMATE FOOTPRINT OF POTENTIAL BUILDING IS FROM A DRAWING TITLED "PLATE 3: DETECTED PCE IN SOIL", BY IMPACT ENVIRONMENTAL OF BOHEMIA, NEW YORK AT A SCALE OF 1" = 133', DATED 10/19/06.
- J = INDICATES AN ESTIMATED CONCENTRATION.
- < = CONSTITUENT WAS NOT DETECTED AT A CONCENTRATION EXCEEDING THE REPORTED DETECTION LIMIT.
- SOIL VAPOR ANALYTICAL RESULTS FOR SAMPLES COLLECTED IN SEPTEMBER 2007 AND JUNE 2008 HAVE BEEN VALIDATED. SOIL VAPOR ANALYTICAL RESULTS FOR SAMPLES COLLECTED IN FEBRUARY 2009 HAVE NOT BEEN VALIDATED.

BAYER MATERIALSCIENCE LLC
125 NEW SOUTH ROAD
HICKSVILLE, NEW YORK
PHASE IV SOIL VAPOR INVESTIGATION
WORK PLAN

PROPOSED PHASE IV SOIL VAPOR
SAMPLING LOCATIONS

