



August 17, 2012

Geotechnical
Environmental
Water Resources
Ecological

Ms. Elizabeth B. Lukowski
Division of Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway, 11th Floor
Albany, NY 12233-7014

**RE: Supplemental Soil and Soil Vapor Sampling Work Plan
Hornell Former MGP Site
Site # 8-51-032 / ACO # A8-0634-02-10**

Dear Ms. Lukowski:

On behalf of National Fuel Gas Distribution Corporation, Inc. (National Fuel Gas), GEI Consultants, Inc. has prepared this Work Plan in response to your August 15, 2012 request for additional site investigation sampling as part of the Remedial Investigation (RI) of the former manufactured gas plant (MGP) site on Franklin Street in Hornell, New York.

Scope of Work

The scope of work for this Supplemental Site Investigation is described below. All activities will be performed according to the approved Work Plan dated September 2010 for the Site Characterization Investigation (SCI). Prior to mobilization, the site-specific Health and Safety Plan (HASP) will be reviewed and updated as needed.

Surface Soil Sampling. The New York State Department of Environmental Conservation (NYSDEC) requested that additional surface soil samples be obtained in order to delineate the impacts observed at locations SS2 and SS4. Four samples will be obtained surrounding each location, as shown on the attached figure, for a total of eight additional surface soil samples. The soil samples will be obtained from 0 to 2 inches bgs (with the vegetation removed).

Each sample will be analyzed for polycyclic aromatic hydrocarbons (PAHs) and Target Analyte List (TAL) metals, according to the methods specified in the SCI Work Plan. Benzene, toluene, ethylbenzene, xylene (BTEX) compounds were not detected during the previous surface soil sampling, therefore they will not be analyzed during this sampling event.

Soil Vapor Sampling. As requested by the NYSDEC, three soil vapor samples will be collected as part of this supplemental sampling event. Existing soil vapor points SV2 and SV5 will be resampled. A new soil vapor sampling point, SV9, will be installed near the north side of the residence at 15 Albion Street. The screen for SV9 will be installed just below the bottom of the clay/silt unit which is present across the site. Based on the logs for MW7 and SV2, the base of this unit was observed to be at approximately 6.6 – 6.7 feet bgs.

All three soil vapor samples will be obtained on the day following the installation of SV9. The samples will be collected in accordance with New York State Department of Health (NYSDOH) guidance and GEI's Standard Operating Procedure SG-002 (provided in the SCI Work Plan), with the following exceptions:

- Samples will be collected using 6-liter SUMMA canisters.
- The flow controllers will be set for a two hour collection time.

Soil vapor samples will be analyzed by EPA Method TO-15, with six additional MGP indicator compounds.

Surveying. The locations of all new sampling points will be established using tape measurements to nearby fixed features which have been previously surveyed and are included in the basemap for the site. An updated base map will be produced which will be used for mapping the results of the investigation.

Reporting. The laboratory results of the soil and soil vapor analysis will be reviewed and a Data Usability Summary Report prepared. The field observations and laboratory results will be incorporated into a revised final RI report.

Schedule

Upon approval of this Work Plan, we will schedule the sampling event and notify the property owner (Maple City Lodging) that additional sampling will be performed. We will notify you of the scheduled date for the field investigation.

If you have any questions regarding this Work Plan, please contact me at (607) 216-8959.

Sincerely yours,

GEI CONSULTANTS, INC.

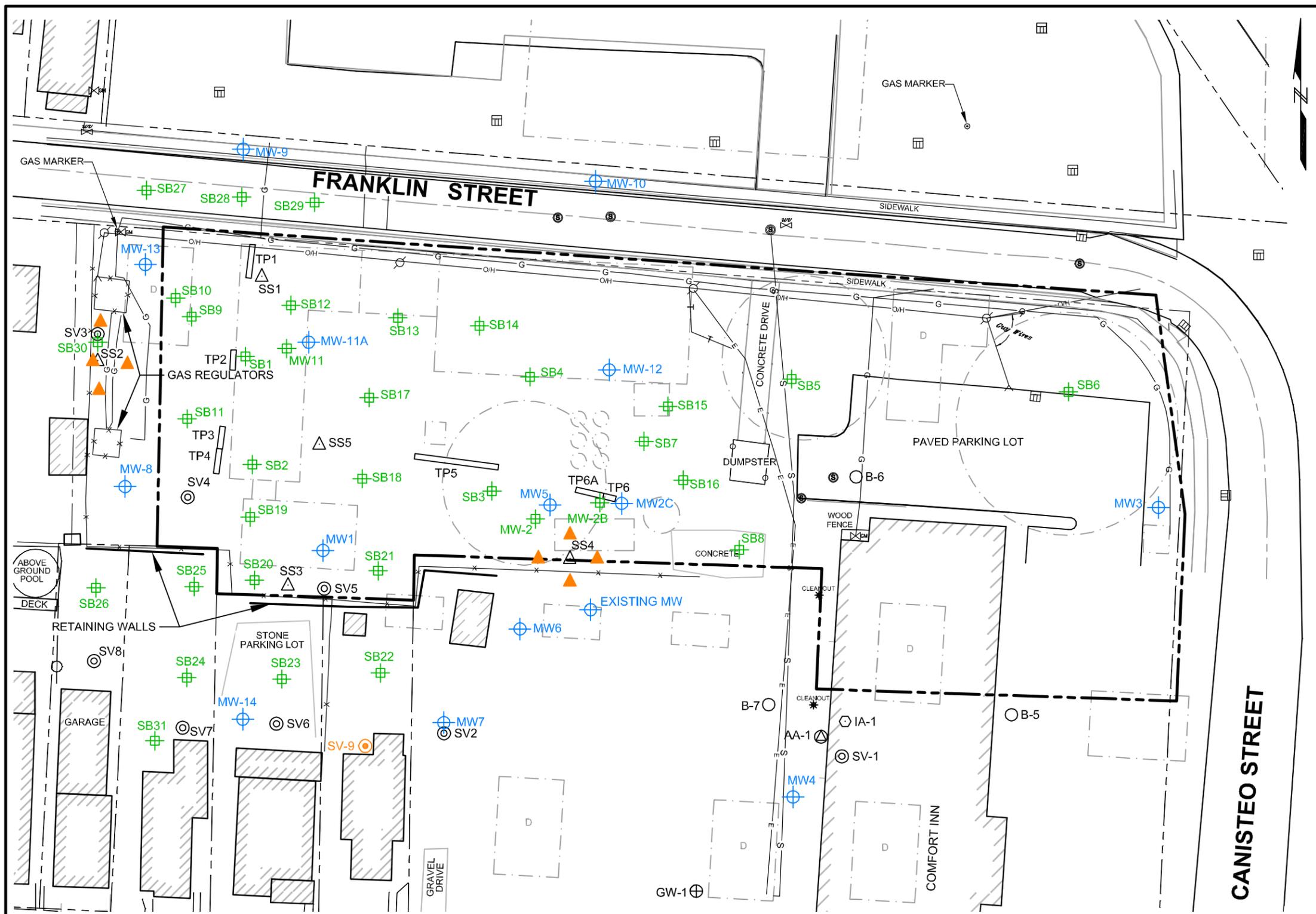


Bruce Coulombe, P.G.
Senior Geologist

BC:mlr

Attachment: Figure 1 – Proposed Surface Soil and Soil Vapor Sample Locations

cc: Tanya Alexander – National Fuel Gas Distribution Corporation
John Greenthal – Nixon Peabody
Deborah McNaughton – NYSDOH
Dave Terry – GEI



LEGEND

- APPROXIMATE SITE BOUNDARY (FROM NYSDEC)
- - - APPROXIMATE PROPERTY BOUNDARIES
- x CHAIN-LINK FENCE
- [Hatched Box] EXISTING STRUCTURE
- [Dashed Box] APPROXIMATE LOCATION OF HISTORICAL STRUCTURES
- [Square with D] INDICATES DWELLING
- [Square with X] CATCH BASIN

PROPOSED SAMPLE LOCATIONS

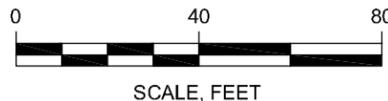
- [Orange Triangle] PROPOSED SURFACE SOIL SAMPLE
- [Orange Circle with SV-9] PROPOSED SOIL VAPOR SAMPLE

REMEDIAL INVESTIGATION SAMPLE LOCATIONS

- [Blue Circle with MW1] MONITORING WELL
- [Green Cross with B1] SOIL BORING
- [Rectangle with TP1] TEST PIT
- [Hexagon with IA-1] INDOOR AIR SAMPLE
- [Circle with AA-1] AMBIENT AIR SAMPLE
- [Circle with SV-1] SOIL VAPOR SAMPLE
- [Triangle with SS1] SURFACE SOIL SAMPLE
- [Circle with Cross and GW-1] FORMER MONITORING WELL (NOT FOUND)
- [Circle with B-1] FORMER SOIL BORING

SOURCES:

1. Survey prepared for GEI Consultants, Inc. by William J Tucker, II PLS #50369, Clear Creek Land Surveying, L.L.C., Springville, N.Y. dated February 11, 2011.
2. City of Hornell, Steuben County, NY Tax Map No. 166.06 dated Oct. 18, 2008.
3. Modification to Order on Consent and Administrative Settlement, Attachment 1 between New York State Department of Environmental Conservation, Office of General Counsel, and National Fuel Gas dated Oct. 21, 2010.
4. Sanborn Fire Insurance Maps from 1888 to 1961.



SUPPLEMENTAL REMEDIAL INVESTIGATION
 HORNELL FORMER MGP SITE
 HORNELL, NEW YORK

NATIONAL FUEL GAS DISTRIBUTION COMPANY



**PROPOSED SURFACE SOIL
 AND SOIL VAPOR SAMPLE
 LOCATIONS**

Project 102260-1008 August 2012 Figure 1