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May 8, 2012
File # 47743

Mr. Kevin Sarnowicz
New York State Department of Environmental Conservation (NYSDEC)
Division of Environmental Remediation
Remedial Bureau B, 12th Floor
625 Broadway
Albany, New York 12233-7016

Subject: Revised Bulkhead Environmental Investigation Work Plan
Frito-Lay - 202-218 Morgan Avenue, Brooklyn, New York
BCP Site #C224133

Dear Mr. Sarnowicz:

On behalf of the Frito-Lay, Gannett Fleming Engineers, P.C. (GF) is submitting to the New York State Department of Environmental Conservation (NYSDEC) a Revised Bulkhead Environmental Investigation (EI) Work Plan (WP) for 202-218 Morgan Avenue (Site) located in Brooklyn, New York for your review and acceptance. The Revised Bulkhead EI WP was prepared in response to NYSDEC's comment letters dated April 12, April 16, and May 3, 2012.

In accordance with NYSDEC's Conditional Approval letter dated December 27, 2011, GF has prepared this Bulkhead EI WP to characterize the surface and subsurface soil beyond the existing fence line to the existing bulkhead along the eastern side of the English Kills and on the southern side of the English Kills basin. The soil borings will be installed and soil samples will be collected to characterize potential surface and subsurface soil impacts in these areas of the Site.

Frito-Lay intends to repair approximately 220 feet along the eastern portion of the bulkhead and an additional 40 feet from the southeastern corner along the southern portion of the bulkhead. The bulkhead construction drawings have not been finalized, and are subject to Region 2 Bureau of Marine Resources review and approval, and are not provided in this work plan.

In order to characterize the soils that may require management during bulkhead repair, GF generally proposed to extend the existing 50' x 50' sampling grid into the area between the fence line and the bulkhead to maintain consistency with the sampling approach that was established and approved by NYSDEC for the RI sampling program. GF has not proposed soil boring locations for 50' x 50' sampling grid areas that have an existing sample location, but has

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proposed soil boring locations in areas where no data has been collected from an a specific 50' x 50' sampling grid area or in areas adjacent to "hot spot" areas scheduled for remedial excavation along the southern bulkhead line and the southeastern corner of the site. On April 16, 2012, NYSDEC requested that additional sample be collected from Cells F5 and H5 which were added to the revised Bulkhead EI WP (See Figure 1). Sediment and erosion control has been proposed for each boring location consistent with NYSDEC's Conditional Approval letter dated December 27, 2011 and with Paulus, Sokolowski, and Sator (PS&S) Erosion and Sediment Control Plan (Silt Fence Detail) prepared for the site, dated June 25, 2010 (Sheet C04).

GF proposes to use the endpoint sample results that will be collected from the southern sides of Cells B5, C5 and D5 to characterize the soils between the fence line and bulkhead to the south of these respective cells. All of the southern endpoint samples from B5, C5, and D5 will be collected outside the shoring which will likely be just south of the chain link fence. GF will also install a soil boring east of Cell J1 (SB-58), and south of Cells F5 (SB-59) and H5 (SB-60) to characterize the soils between the fence line and bulkhead in this portion of the Site.

In addition, the endpoint sample results collected on the east side of cell H3D has not provided PCB results less than 25 milligrams per kilogram (mg/kg) up to the eastern fence line which is approximately 65 feet east of the eastern sidewall of H3D. GF proposes to collect a sample from the shallow depth interval (12-14 inches) on the eastern side of the fence line for PCB, arsenic, lead, and mercury analysis. GF does not intend to collect the deeper depth interval (60-62 inches) since the initial sidewall endpoint sample result was less than 10 mg/kg and the concrete slab on the east side of cell H3D is located approximately 14 inches below grade and extends to the fence line.

Endpoint samples B5-S1, B5-S2, C5-S1, C5-S2, D5-S1, and D5-S2 will be collected for PCB, arsenic, lead, and mercury analyses. The endpoint sample for H3D (H3D-E1-7) will be collected for PCB, arsenic, lead, and mercury analysis on the eastern side of the fence line. The proposed soil boring east of cell J1 (SB-58) and south of Cells F5 (SB-59) and H5 (SB-60) will also be collected for PCB, arsenic, lead, and mercury analyses (See Table 1).

For SB-58, SB-59, and SB-60, the boring will be advanced using a hand auger to the approximate sample collection depth. Due to the potential location of bulkhead tie-backs, boring advancement will be terminated at the first sign of refusal to avoid damaging subsurface supporting anchors, and will be relocated, if necessary.

The first soil sample will be collected from 0 to 2 ft-bgs and the second soil sample will be collected from 2 to 4 ft-bgs to just above the water table. Soil samples will be collected from the 0 to 2 ft-bgs and from 2 to 4 ft-bgs depth intervals using stainless steel spilt spoons.

GF personnel will document soil lithology and field screen soil vapor headspace in sealable plastic bags using a PID calibrated to a 100 parts per million (ppm) isobutylene standard. Sample depths may be altered due to field limitations and the actual depth of groundwater at the time of sampling. Soil samples will be placed into laboratory-supplied glassware, immediately stored in an ice-filled cooler, and shipped with chain-of-custody documentation to Con-Test of East Longmeadow, Massachusetts, a NYSDOH-certified laboratory. Soil samples will be analyzed for arsenic, lead, and mercury by EPA Method 6010B/7471A for the appropriate excavation/remediation cells and PCBs by EPA Method 8082 for all cells in conformance with Category B protocol (Table 1-1). The data package provided by the laboratory will meet the specifications of a full Analytical Services Protocol (ASP) Category B deliverable package. The methods and data packages provided by the laboratory will be consistent with the specifications of the most current version of the ASP. A Data Usability Summary Report (DUSR) will be prepared for inclusion in the Final Engineering Report (FER).

All work will be performed in accordance with NYSDEC Brownfield Cleanup Program (BCP), DER-10 Technical Guidance for Site Investigation and Remediation, the signed Brownfield Cleanup Agreement (BCA) with Frito-Lay dated August 21, 2009, and the NYSDEC approved RI Work Plan dated September 2009. Project-specific Health and Safety Plan (HASP) and Quality Assurance Project Plan (QAPP) was prepared and submitted as part of the approved RI Work Plan. The HASP and QAPP will be followed to provide safe procedures, practices, and quality assurance criteria for GF employees and their subcontractor personnel engaged in performing RI activities at the Site.

The HASP and QAPP were included in Appendix A and in Section 5.0, respectively, in the September 2009 RI Work Plan. A Community Air Monitoring Program (CAMP) was prepared as part of the approved RI Work Plan and will be followed to provide air quality monitoring procedures to protect the downwind community (i.e., off-site receptors, including residents and off-site outside workers) from potential airborne contaminant releases that may be a direct result of the sampling activities.

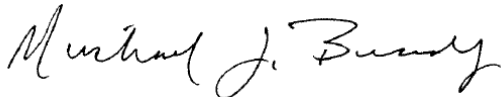
Mr. Kevin Sarnowicz
NYSDEC
May 8, 2012

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Should you have any questions or comments concerning the Bulkhead EI Sampling Plan, please do not hesitate to contact me at (908) 755-0040, ext. 3033.

Sincerely,

GANNETT FLEMING ENGINEERS, P.C.

A handwritten signature in black ink, reading "Michael J. Brady". The signature is fluid and cursive, with the first name "Michael" and last name "Brady" clearly legible.

Michael J. Brady, P.E.
Senior Environmental Engineer

(Attachments)

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V. Frisina vfrisina@gfnet.com

TABLE 1



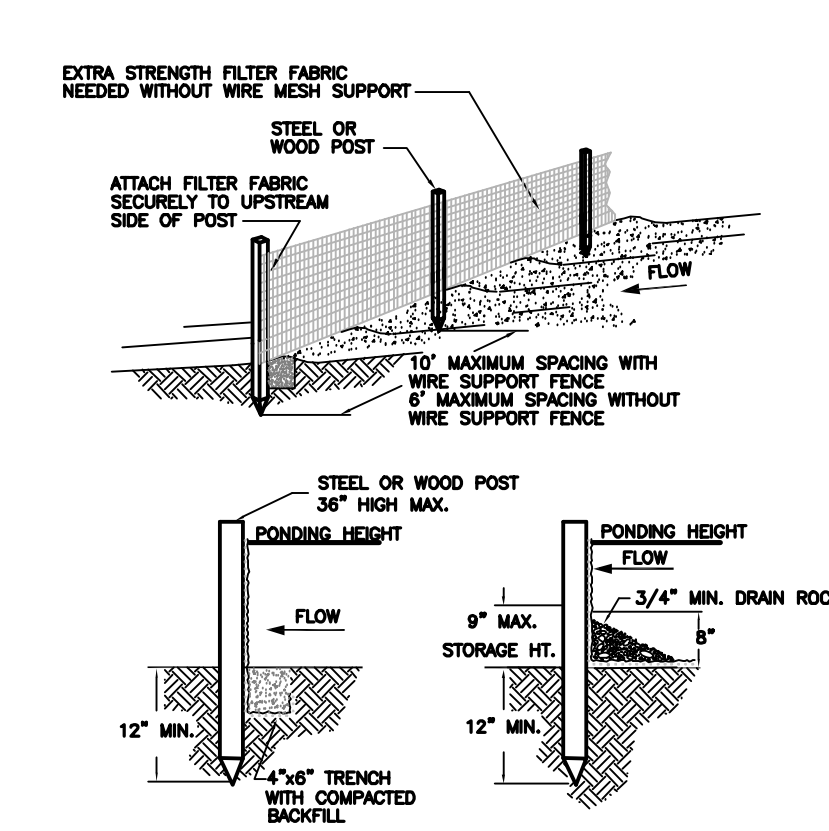
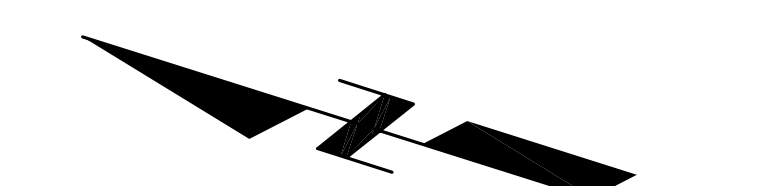
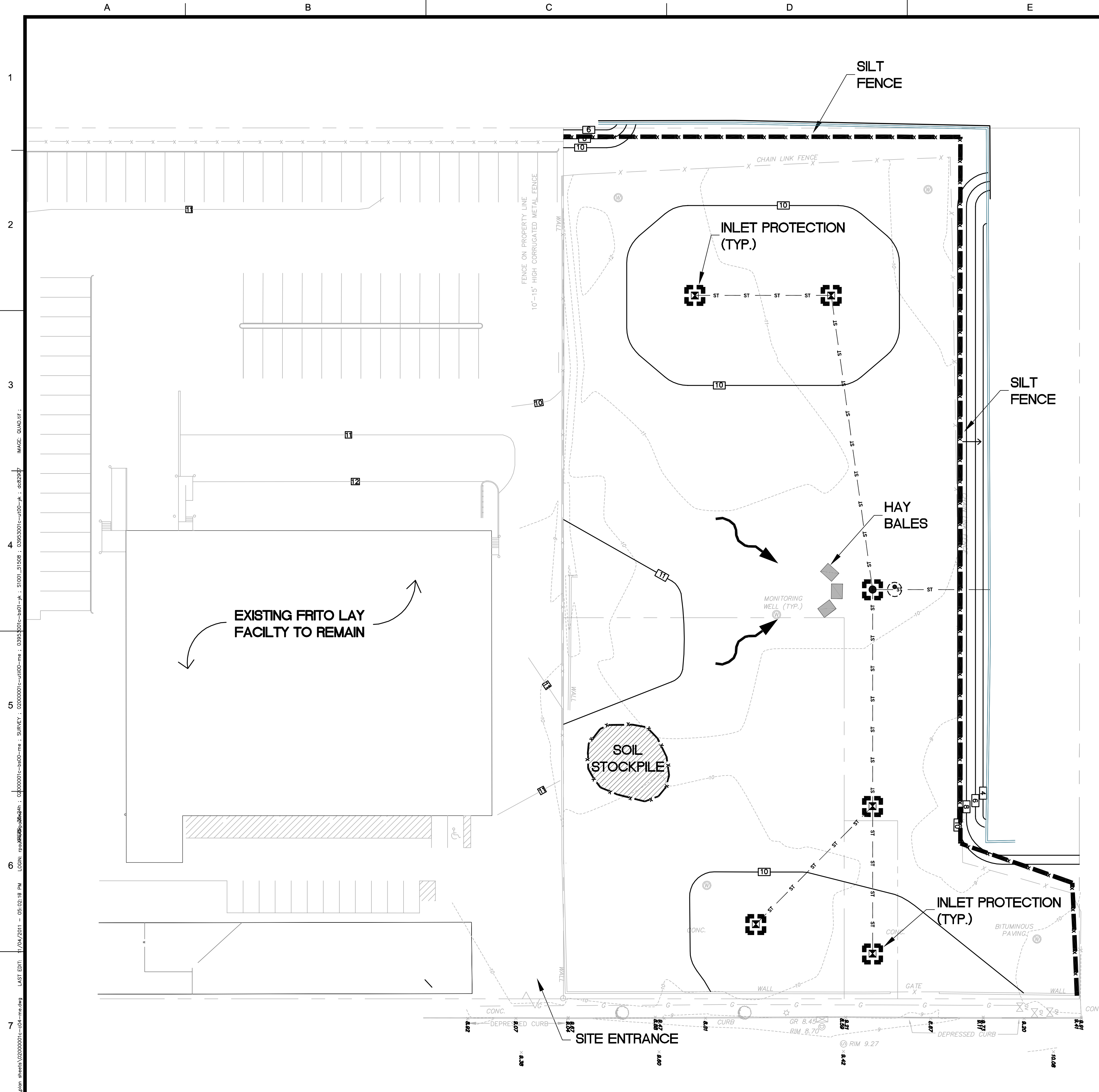
**FRITO-LAY
202-218 MORGAN AVENUE, BROOKLYN, NEW YORK
NYSDEC #C224133**

**BULKHEAD ENVIRONMENTAL INVESTIGATION SAMPLING PROGRAM
SAMPLING DESIGNATION AND LABORATORY SAMPLING AND ANALYSIS**

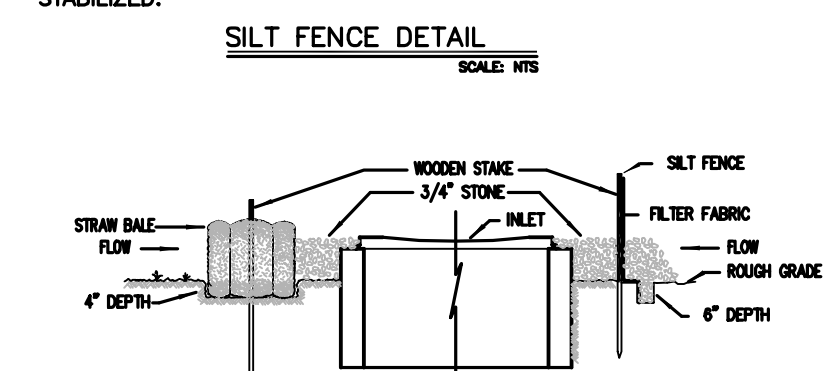
Sample Cell/Designation	Sample Designation	Proposed Sampling Depths	Soil Sample Analysis			
			PCBs	Arsenic	Lead	Mercury
B5	B5-S1 (12-14)	12 to 14 inches	x	x	x	x
	B5-S2 (84-86)	84-86 inches	x	x	x	x
C5	C5-S1 (12-14)	12 to 14 inches	x	x	x	x
	C5-S2 (60-62)	60-62 inches	x	x	x	x
D5	D5-S1 (12-14)	12 to 14 inches	x	x	x	x
	D5-S2 (54-56)	54-56 inches	x	x	x	x
H3D-E1-7	H3D-E1-7 (12-14)	12 to 14 inches	x	x	x	x
SB-58*	SB-58 (0-2)	0 to 2 feet	x	x	x	x
	SB-58 (2-4)	2 to 4 feet	x	x	x	x
SB-59*	SB-59 (0-2)	0 to 2 feet	x	x	x	x
	SB-59 (2-4)	2 to 4 feet	x	x	x	x
SB-60*	SB-60 (0-2)	0 to 2 feet	x	x	x	x
	SB-60 (2-4)	2 to 4 feet	x	x	x	x

Notes:

- * The first soil sample will be collected from the 0 to 2-foot depth interval.
The second soil sample will be collected from the 2 to 4-foot depth interval.

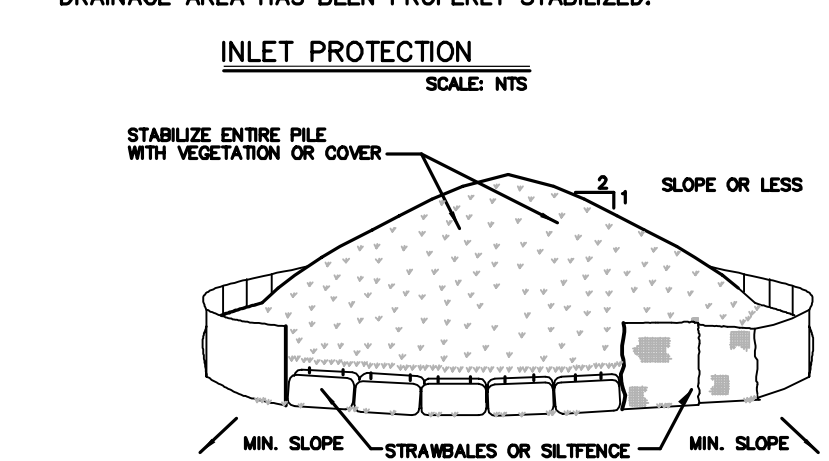


NOTES:
1. SILT FENCE SHALL BE PLACED ON SLOPE CONTOURS TO MAXIMIZE PONDING EFFICIENCY.
2. INSPECT AND REPAIR FENCE AFTER EACH STORM EVENT AND REMOVE SEDIMENT WHEN NECESSARY. 9" MAXIMUM RECOMMENDED STORAGE HEIGHT.
3. REMOVED SEDIMENT SHALL BE DEPOSITED TO AN AREA THAT WILL NOT CONTRIBUTE SEDIMENT OFF-SITE AND CAN BE PERMANENTLY STABILIZED.

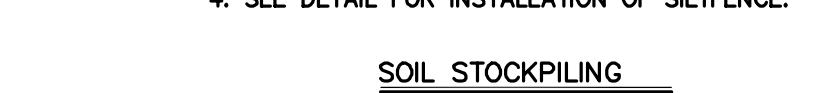


INSTALLATION NOTES
1. EXCAVATE A 6 INCH x 6 INCH TRENCH, OFFSET APPROXIMATELY 2 FEET FROM THE INLET PERIMETER.
2. UNROLL A SECTION AT A TIME AND POSITION THE POSTS AGAINST THE BACK (DOWNSTREAM) WALL OF THE TRENCH (NET SIDE AWAY FROM DIRECTION OF FLOW).
3. DRIVE THE POST INTO THE GROUND UNTIL THE NETTING IS APPROXIMATELY 2 INCHES FROM THE TRENCH BOTTOM.
4. LAY THE TOE-IN FLAP OF FABRIC ONTO THE UNDISTURBED BOTTOM OF THE TRENCH, BACKFILL THE TRENCH AND TAMP THE SOIL.
5. JOIN SECTIONS AS SHOWN ABOVE. SUPPLEMENT WITH GRAVEL, PILED AGAINST THE FENCE.

STRAW BALES
1. PLACE BALES OF STRAW WITH ENDS TIGHTLY ABUTTING OTHER BALES TO SURROUND THE INLET. WHERE SLOPE AND SPACE PERMIT, ESTABLISH THE LINE OF BALES 2 TO 10 FEET AWAY FROM THE INLET. ANCHOR BALES IN PLACE BY DRIVING REBARS OR 2" x 2" STAKES THROUGH THE BALES. SUPPLEMENT WITH GRAVEL, PILED AGAINST THE BALES.
2. SEDIMENT SHALL BE REMOVED AND THE TRAP RESTORED TO ITS ORIGINAL DIMENSIONS WHEN THE SEDIMENT HAS ACCUMULATED TO 1/2 THE DESIGN DEPTH OF THE TRAP. REMOVED SEDIMENT SHALL BE DEPOSITED IN A SUITABLE AREA AND IN SUCH A MANNER THAT IT WILL NOT ERODE.
3. THE STRUCTURE SHALL BE INSPECTED AFTER EACH RAIN AND REPAIRS MADE AS NEEDED
4. CONSTRUCTION OPERATIONS SHALL BE CARRIED OUT IN SUCH A MANNER THAT EROSION AND WATER POLLUTION SHALL BE MINIMIZED.
5. THE SEDIMENT TRAP SHALL BE REMOVED AND THE AREA STABILIZED WHEN THE REMAINING DRAINAGE AREA HAS BEEN PROPERLY STABILIZED.

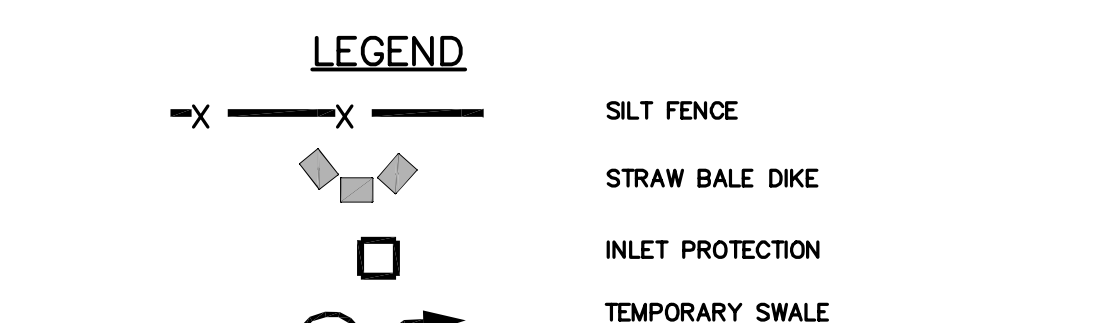


INSTALLATION NOTES
1. AREA CHOSEN FOR STOCKPILING OPERATIONS SHALL BE DRY AND STABLE.
2. MAXIMUM SLOPE OF STOCKPILE SHALL BE 1:2.
3. UPON COMPLETION OF SOIL STOCKPILING, EACH PILE SHALL BE SURROUNDED WITH EITHER SILT FENCING OR STRAWBALES, THEN STABILIZED WITH VEGETATION OR COVERED.
4. SEE DETAIL FOR INSTALLATION OF SILT FENCE.

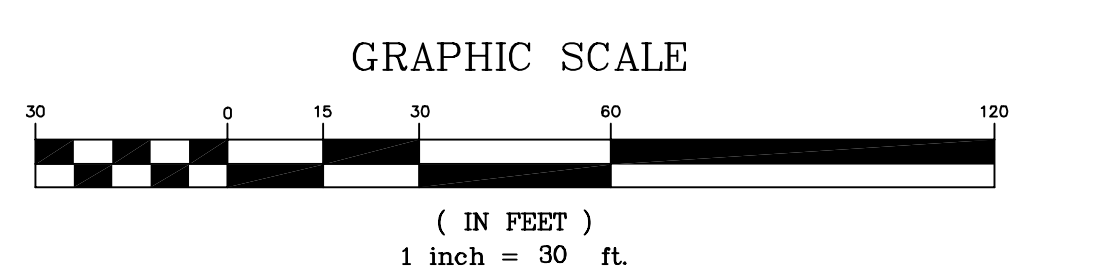


EROSION CONTROL MEASURES

- THE PROPOSED EROSION CONTROL MEASURES SHOWN ON THIS PLAN SHALL BE INSTALLED PRIOR TO THE START OF CONSTRUCTION. ADDITIONAL EROSION CONTROL MAY BE NECESSARY, BASED UPON FIELD CONDITIONS THAT MAY DEVELOP AS CONSTRUCTION PROGRESSES AND AS MAY BE REQUIRED BY THE CITY OF NEW YORK. THE FOLLOWING GENERAL CONDITIONS SHALL BE OBSERVED.
 - EXISTING VEGETATION TO REMAIN SHALL BE PROTECTED AND REMAIN UNDISTURBED.
 - CLEARING AND GRADING SHALL BE SCHEDULED SO AS TO MINIMIZE THE SIZE OF EXPOSED AREAS AND THE LENGTH OF TIME THAT AREAS ARE EXPOSED.
 - THE LENGTH AND STEEPNESS OF CLEARED SLOPES SHALL BE MINIMIZED TO REDUCE RUNOFF VELOCITIES AND QUANTITIES.
 - RUNOFF SHALL BE DIVERTED AWAY FROM CLEARED SLOPES.
 - SEDIMENT SHALL BE TRAPPED ON THE SITE.SPECIFIC METHODS AND MATERIALS EMPLOYED IN THE INSTALLATION AND MAINTENANCE OF EROSION CONTROL MEASURES SHALL CONFORM TO THE "NEW YORK GUIDELINES FOR URBAN EROSION AND SEDIMENT CONTROL".
- SEDIMENT BARRIERS (SILT FENCE, HAY BALES OR APPROVED EQUIVALENT) SHALL BE INSTALLED PRIOR TO THE START OF CONSTRUCTION AND SHALL BE MAINTAINED FOR THE DURATION OF THE WORK. NO SEDIMENT FROM THE SITE SHALL BE PERMITTED TO WASH ONTO ADJACENT PROPERTIES, WETLANDS OR ROADS.
- GRADED AND STRIPPED AREAS AND STOCKPILES SHALL BE KEPT STABILIZED THROUGH THE USE OF TEMPORARY SEEDING AS REQUIRED. SEED MIXTURES SHALL BE IN ACCORDANCE WITH SOIL CONSERVATION SERVICE RECOMMENDATIONS.
- DRAINAGE INLETS INSTALLED AS PART OF THE PROJECT SHALL BE PROTECTED FROM SEDIMENT BUILDUP THROUGH THE USE OF SEDIMENT BARRIERS, SEDIMENT TRAPS, ETC., AS REQUIRED.
- PROPER MAINTENANCE OF EROSION CONTROL MEASURES IS TO BE PERFORMED AS INDICATED BY PERIODIC INSPECTION AND AFTER HEAVY OR PROLONGED STORMS. MAINTENANCE MEASURES INCLUDE, BUT ARE NOT LIMITED TO, CLEANING OF SEDIMENT BASINS OR TRAPS, CLEANING OR REPAIR OF SEDIMENT BARRIERS, CLEANING AND REPAIR OF BERMS AND DIVERSIONS AND CLEANING AND REPAIR OF INLET PROTECTION.
- APPROPRIATE MEANS SHALL BE USED TO CONTROL DUST DURING CONSTRUCTION. ON CONSTRUCTION ROADS, ACCESS PONTS, AND OTHER DISTURBED AREAS SUBJECT TO SURFACE DUST MOVEMENT AND DUST BLOWING WHERE OFF-SITE DAMAGE MAY OCCUR IF DUST IS NOT CONTROLLED. WATER QUALITY SHOULD BE CONSIDERED WHEN MATERIALS ARE SELECTED FOR DUST CONTROL. SPRINKLING - THE SITE MAY BE SPRAYED UNTIL THE SURFACE IS WET. THIS IS EFFECTIVE ON HAUL ROADS, ACCESS ROUTES AND SOIL STOCKPILES.
- A STABILIZED CONSTRUCTION ENTRANCE SHALL BE MAINTAINED TO PREVENT SOIL AND LOOSE DEBRIS FROM BEING TRACKED ONTO LOCAL ROADS. THE CONSTRUCTION ENTRANCE SHALL BE MAINTAINED UNTIL THE SITE IS PERMANENTLY STABILIZED.
- SEDIMENT BARRIERS AND OTHER EROSION CONTROL MEASURES SHALL REMAIN IN PLACE UNTIL UPLAND DISTURBED AREAS ARE PERMANENTLY STABILIZED (SEE GRADING NOTE NUMBER 1). AFTER PERMANENT STABILIZATION, PAVED AREAS SHALL BE CLEANED AND DRAINAGE SYSTEMS CLEANED AND FLUSHED AS NECESSARY.
- ALL 1:2 & 1:3 SLOPE AREAS WILL BE PROTECTED AGAINST EROSION DURING CONSTRUCTION AND PERMANENT GROUND COVER SHALL BE SUCH THAT EROSION WILL BE PREVENTED. NECESSARY MEASURES SHALL INCLUDE, BUT NOT BE LIMITED TO, HAY BALES, SILT FENCE, SILT TRAPS/BASINS, JUTE MESH, HYDROSEEDING, ETC. AND SHALL BE MAINTAINED FOR THE DURATION OF CONSTRUCTION AS WELL AS FOLLOWING THE COMPLETION OF CONSTRUCTION UNTIL SUCH TIME THAT THE PROPOSED PLANTINGS HAVE BECOME ACCUMULATED/ESTABLISHED AS DETERMINED BY THE CITY OF NEW YORK.



THIS PLAN TO BE USED FOR EROSION CONTROL PURPOSES ONLY.



KINGS COUNTY-BOROUGH OF BROOKLYN TAX MAP - BLOCK 2942 LOT 105.

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REVISIONS/ISSUES										APPLICANT										PROJECT TITLE										SHEET TITLE										DATE		JOB NO.	
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