



101 Walnut Avenue, Suite 202
Clark, New Jersey 07066
Telephone: (732) 850-4009
Facsimile: (262) 953-5876
frank.j.messina@exxonmobil.com

Frank J. Messina
Project Manager

November 21, 2008

Mr. Brian Davidson
New York State Department of Environmental Conservation
Remedial Bureau B
Division of Environmental Remediation
625 Broadway, 12th Floor
Albany, New York 12233-7016

Re: Site Characterization Work Plan Addendum
Former Pratt Oil Works
Inland Parcels, Queens, New York

Dear Mr. Davidson:

Exxon Mobil Corporation ("ExxonMobil") is in receipt of your letter dated October 16, 2008 requesting additional information associated with the subject work plan. Enclosed is a response to items 1 through 3 of your letter. Also provided are revisions to proposed sample locations that were made based on field observations by Kleinfelder and ExxonMobil during a Site visit on October 19, 2008, and a Site visit with yourself on November 5, 2008. These revisions are required to either perform the work safely or to coordinate more effectively with third parties.

This response has been prepared by Kleinfelder on behalf of ExxonMobil. Three hard copies and an electronic copy are provided per Section VIII of the Consent Order (D2-1002-12-07AM) executed between ExxonMobil and NYSDEC.

Regarding your comments relative to full site characterization, ExxonMobil again recognizes the need for potential additional site characterization work and will be prepared to address those concerns during subsequent phases of investigation.

Please do not hesitate to contact me at (732) 850-4009 if you wish to discuss further.

Very truly yours,

A handwritten signature in black ink, appearing to read "Frank J. Messina".

Frank J. Messina
Project Manager

Enclosure
Via FEDEX Overnight

cc: A, Michaels (NYSDEC – electronic copy only)
J. Wolf (Kleinfelder)



One Corporate Drive, Suite 201
Bohemia, NY
11716

p| 631.218.0612
f| 631.218.0787

kleinfelder.com

DELIVERED VIA HAND DELIVERY

November 21, 2008

Mr. Frank J. Messina
ExxonMobil Environmental Services Company
100 Walnut Avenue
Suite 202, Room 18
Clark, New Jersey 07066

Re: Site Characterization Work Plan Addendum
Former Pratt Oil Works Site
The Inland Parcels (Tract I)
Long Island City, New York
NYSDEC Case Nos. 07-07417 and 07-07418
Consent Order Case No. D2-1002-12-07AM

Dear Mr. Messina:

Kleinfelder East, Inc. (Kleinfelder) was retained by ExxonMobil Environmental Services Company (ExxonMobil) to prepare this Site Characterization Work Plan Addendum (Addendum) for the above-referenced former Pratt Oil Works Site, Inland Parcels (Tract I), herein identified as the Site. This Addendum supplements a *Site Characterization Work Plan*, dated August 2008, and addresses comments presented by the New York State Department of Environmental Conservation (NYSDEC) in a letter dated October 16, 2008 (Appendix A). In addition, the Addendum proposes to revise several sample locations as discussed during a case review meeting with the NYSDEC on November 5, 2008.

NYSDEC Comments and Responses

The NYSDEC comments and associated responses are as follows:

Comment No. 1: "Section 4.1 – Organization and Staffing – The key members of the project team have changed and should be updated accordingly. The Quality Assurance Officer (QAO) for this Project and the associated responsibilities of the QAO should be included in this Section."

Response No. 1: Kleinfelder will implement the site characterization documented in the *Site Characterization Work Plan*, dated August 2008. The following is an updated summary of the key members of the project team and their responsibilities:

Key Position	Contact Name	Responsibilities
ExxonMobil		
Project Manager	Frank J. Messina Telephone: (732) 850-4009 E-mail: frank.j.messina@exxonmobil.com	ExxonMobil's Project Manager is responsible for managing the project within ExxonMobil and for ensuring that the consultant completes the work in accordance with the Work Plan.

Key Position	Contact Name	Responsibilities
ExxonMobil's Consultant (Kleinfelder)		
Project Manager	John E. Wolf Telephone: (631) 218-0612 E-mail: jwolf@kleinfelder.com	The Kleinfelder Project Manager (KPM) is responsible for project execution and will be the primary contact with ExxonMobil on technical and scheduling issues.
Field Supervisor	Michael Meyerhoefer Telephone: (631) 218-0612 E-mail: mmeyerhoefer@kleinfelder.com	The Field Supervisor will be responsible for working with the KPM to coordinate, oversee, and ensure that requirements are followed with regard to field activities.
Technical Director	Daniel Canavan Telephone: (631) 218-0612 E-mail: dcanavan@kleinfelder.com	The Technical Director will provide technical support and overall quality assurance for the project. The primary objective of the Technical Director is to ensure compliance with regulatory guidance and regulations.
Quality Assurance Officer (QAO)	Lori A. Beyer L.A.B. Validation Corp. Telephone: (516) 523-7891 E-mail: LABValidation@aol.com	The QAO will perform the data validation, prepare the Data Usability Summary Report (DUSR), and ensure that the Quality Assurance Project Plan (QAPP) is implemented.
Health and Safety Officer (HSO)	Raymond Fitzpatrick Telephone: (631) 218-0612 E-mail: rfitzpatrick@kleinfelder.com	The HSO will prepare the health and safety plan (HASP), ensure that the HASP is properly implemented, and ensure that personnel and subcontractor Site personnel are trained in accordance with the Site-specific project health and safety requirements, as well as those of ExxonMobil. In addition, the HSO will act as a field liaison to the QAO to inspect that procedures outlined in the QAPP and Field Sampling Plan (FSP) are implemented.

Subcontractors		
Test Pit Excavator	To be determined	Test pit excavations
Driller	To be determined	Drilling of soil borings and installation of monitoring wells
Surveyor	To be determined	Survey sampling locations
Analytical Laboratory	Accutest Laboratories Dayton, New Jersey NYSDOH Lab ID No.: 10983	Conduct laboratory analysis of soil and water samples in accordance with the QAPP
Forensics Laboratory	Newfields Rockland, Massachusetts NYSDOH Lab ID No.: 11672	Conduct laboratory analysis of free product samples in accordance with the QAPP

Comment No. 2: *"Section 8.3 – Data Validation – A current resume outlining education and experience of the individual preparing the Data Usability Summary Report (DUSR) should be submitted to DER [Department of Environmental Remediation] for approval in advance of the DUSR preparation. DER DUSR guidance is located in Appendix 2B of 'Draft DER-10 Technical Guidance for Site Investigation and Remediation, December 2002.'"*

Response No. 2: Data validation and DUSR preparation will be conducted by the QAO. The QAO position will be outsourced to Lori A. Beyer of L.A.B. Validation Corp. of East Northport, New York. A copy of her resume, supportive documentation, and certificates are provided as Appendix B.

INLAND WORK PLAN REVISIONS

Revisions to proposed sample locations are based on field observations by Kleinfelder and ExxonMobil during a Site visit on October 19, 2008 and a case review meeting and Site visit with the NYSDEC on November 5, 2008. These revisions are required to either perform the work safely or to coordinate more effectively with third parties. The proposed revisions are as follows:

- Omit test pit TP-4 due to access limitations. The test pit was proposed on 38-98 Review Avenue in a fenced-in area where the current property owner stores construction materials on steel supports over a newly-installed concrete pad. Therefore, the area is inaccessible.
- Relocate test pit TP-1 from 38-20 Review Avenue to the east side of the alley on 38-84 Railroad Avenue to facilitate access. The revised location consolidates the number of access agreements required and aligns the sample locations with test pit TP-2.
- Relocate soil boring SB-6 and monitoring well MW-11 from 38-20 Review Avenue to the east side of the alley on 38-50 Review Avenue to facilitate access. Monitoring well MW-11 is proposed to be combined with the drilling of soil boring SB-7. The revised location

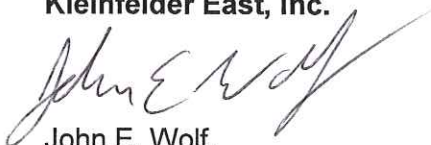
- consolidates the number of access agreements required and aligns the sample locations with test pits TP-1 and TP-2.
- Soil boring SB-8/MW-15 may be relocated to the Long Island Railroad easement contingent upon access with 38-54 Railroad Avenue and space constraints.
 - Relocate monitoring well MW-13 approximately 70 feet east in alignment with test pits TP-1 and TP-2 and soil borings SB-6 and SB-7/MW-11.
 - Relocate monitoring well MW-14 from 38-60 Review Avenue to 38-54 Railroad Avenue due to access limitations. The revised location consolidates the number of access agreements that will be required.
 - Relocate monitoring well MW-18 from 39-30 Review Avenue to the right-of-way of Review Avenue to facilitate access by obtaining a sidewalk opening permit from the New York City Department of Transportation (NYCDOT).

The revised sample locations are illustrated on Figure 1.

Kleinfelder proposes to initiate the drilling of soil borings and monitoring wells prior to conducting test pitting to gain a better understanding of soil quality beneath each property. This will facilitate potential waste minimization, segregation, and characterization during test pitting and allow for better estimates of the amount of clean fill that may be needed for test pit restoration.

If you have questions or require additional information about this project or Addendum, please contact the undersigned at (631) 218-0612.

Very truly yours,
Kleinfelder East, Inc.



John E. Wolf.
Senior Project Manager



Michael Meyerhoefer
Project Manager

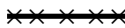















Attachments

Copy: Dennis G. Shin, P.E., Kleinfelder
File

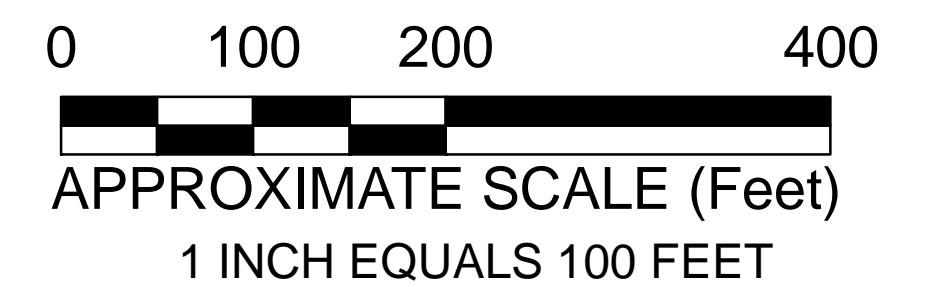
FIGURE



LEGEND

- | | |
|---|--|
|  | FENCE |
|  | APPROXIMATE FORMER TEST PIT LOCATION |
|  | APPROXIMATE THIRD PARTY MONITORING WELL LOCATION |
|  | APPROXIMATE FORMER SOIL BORING LOCATION |
|  | APPROXIMATE OUTFALL LOCATION |
|  | PROPOSED MONITORING WELL LOCATION |
|  | PROPOSED SOIL BORING LOCATION |
|  | PROPOSED TEST PIT LOCATION (NOT TO SCALE) |
|  | OMITTED TEST PIT LOCATION |
|  | OMITTED MONITORING WELL LOCATION |
|  | OMITTED SOIL BORING LOCATION |
|  | INLANDS PARCEL |
|  | RAILROAD |
|  | PARCELS |
|  | PARCEL A |
|  | PARCEL B |

312-315: BLOCK - LOT



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IMAGE SOURCE: MICROSOFT IMAGERY 2006



PROJECT NO. 98245

DRAWN: 11/12/2008

DRAWN BY: JR

CHECKED BY:

FILE NAME:

SITE PLAN WITH REVISED SAMPLE LOCATIONS

<p align="center">FORMER PRATT OIL WORKS SITE INLAND PARCELS (TRACT I)</p> <p>37-88, 38-20, 39-30, 38-98, 38-70, 38-78, 38-60, 38-50 REVIEW AVENUE 38-54, 38-84 AND 38-40 RAILROAD AVENUE LONG ISLAND CITY, NEW YORK</p>
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FIGURE

1

APPENDIX A
NYSDEC Letter

New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau B, Section C
625 Broadway, Albany, New York 12233-7016
Phone: (518) 402-9775 • FAX: (518) 402-9773
Website: www.dec.state.ny.us

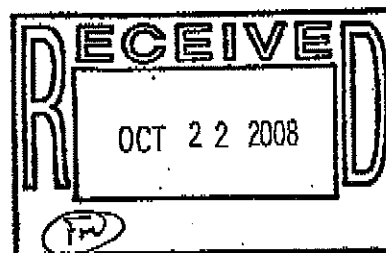


Alexander B. Grannis
Commissioner

October 16, 2008

Mr. Frank J. Messina
ExxonMobil
100 Walnut Avenue
Suite 202
Clark, New Jersey 07066

Re: Site Characterization Work Plan (Inland Parcels)
Former Pratt Oil Works
Long Island City, New York



FILE

Dear Mr. Messina:

The Site Characterization Work Plan for the Inland Parcels, Former Pratt Oil Works Site, dated August 2008 has been reviewed by the Department.

The Department has the following comments on the Site Characterization Work Plan:

1. Section 4.1 - Organization and Staffing - The key members of the project team have changed and should be updated accordingly. The Quality Assurance Officer (QAO) for this Project and the associated responsibilities of the QAO should be included in this Section.
2. Section 8.3 - Data Validation - A current resume outlining education and experience of the individual preparing the Data Usability Summary Report (DUSR) should be submitted to DER for approval in advance of the DUSR preparation. DER DUSR guidance is located in Appendix 2B of "DRAFT DER-10 Technical Guidance for Site Investigation and Remediation, December 2002". This guidance can be downloaded from our public website at: <http://www.dec.ny.gov/regulations/2393.html>

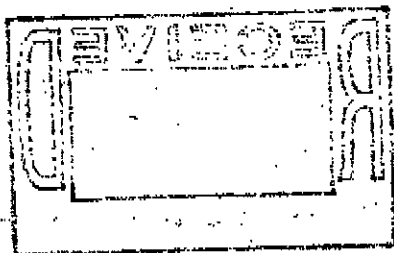
As was done for the Waterfront Parcels, the above comments could perhaps be best addressed through a Work Plan addendum letter.

Consistent with our comment on the Waterfront Parcels Site Characterization Work Plan, a subsequent phase of investigation is necessary to fully characterize this portion of the site. The fact that the majority of this portion of the site is covered by building in active use makes investigation of the subsurface difficult. However a subsequent phase of investigation with additional borings would likely be necessary to evaluate and characterize LNAPL if it exists under the upland parcels. Evaluation of the soil vapor pathway in a subsequent phase of investigation is particularly important in the upland parcels as the site is covered by buildings.

Mr. Frank J. Messina

Page 2

Please keep me informed of your progress in obtaining access to investigate the upland parcels, and do not hesitate to contact me to discuss any other issues related to this site.



Sincerely,

Brian H. Davidson
Project Manager

APPENDIX B
QAO Qualifications

L.A.B. Validation Corp., 14 West Point Drive, East Northport, New York 11731

Lori A. Beyer

SUMMARY:

General Manager/Laboratory Director with a solid technical background combined with Management experience in environmental testing industry. Outstanding organizational, leadership, communication and technical skills. Customer focused, quality oriented professional with consistently high marks in customer/employee satisfaction.

EXPERIENCE:

1998-Present L.A.B. Validation Corporation, 14 West Point Drive, East Northport, NY

President

- Perform Data Validation activities relating to laboratory generated Organic and Inorganic Environmental Data.

1998-Present American Analytical Laboratories, Inc. 56 Toledo Street, Farmingdale, NY

Laboratory Director/Technical Director

- To plan, direct and control the operation, development and implementation of programs for the entire laboratory in order to meet AAL's financial and operational performance standards.
- Ensures that all operations are in compliance with AAL's QA manual and other appropriate regulatory requirements.
- Actively maintains a safe and healthy working environment that is demanded by local laws/regulations.
- Monitors and manages group's performance with respect to data quality, on time delivery, safety, analyst development/goal achievement and any other key performance indices.
- Reviews work for accuracy and completeness prior to release of results to customers.

1996-1998 Nytest Environmental, Inc. (NEI) Port Washington, New York

General Manager

- Responsible for controlling the operation of an 18,000 square foot facility to meet NEI's financial and operational performance standards.
- Management of 65 FTEs including Sales and Operations
- Ensure that all operations are in compliance with NEI's QA procedures
- Ensures that productivity indicators, staffing levels and other cost factors are held within established guidelines
- Maintains a quantified model of laboratory's capacity and uses this model as the basis for controlling the flow of work into and through the lab so as to ensure that customer requirements and lab's revenue and contribution targets are achieved.

1994-1996 Nytest Environmental, Inc. (NEI) Port Washington, New York

Technical Project Manager

- Responsible for the coordination and implementation of environmental testing programs requirements between NEI and their customers
- Supervise Customer Service Department
- Assist in the development of major proposals
- Complete management of all Federal and State Contracts and assigned commercial contracts
- Provide technical assistance to the customer, including data validation and interpretation
- Review and implement Project specific QAPP's.

1995-1996 Nytest Environmental, Inc. (NEI) Port Washington, New York

Corporate QA/QC Officer

- Responsible for the implementation of QA practices as required in the NJDEP X26174 and X22651 Contract
- Primary contact for NJDEP QA/QC issues including SOP preparation, review and approval
- Responsible for review, verification and adherence to the Contract requirements and NEI QA Plan

1992-1994 Nytest Environmental, Inc. (NEI) Port Washington, New York

Data Review Manager

- Responsible for the accurate compilation, review and delivery of analytical data to the company's customers. Directly and effectively supervised a department of 22 personnel.
- Managed activities of the data processing software including method development, form creation, and production
- Implement new protocol requirements for report and data management formats
- Maintained control of data storage/archival areas as EPA/CLP document control officer

1987-1991 Nytest Environmental, Inc. (NEI) Port Washington, New York

Data Review Specialist

- Responsible for the review of GC, GC/MS, Metals and Wet Chemistry data in accordance with regulatory requirements
- Proficient with USEPA, NYSDEC, NJDEP and NEESA requirements
- Review data generated in accordance with SW846, NYSDEC ASP, EPA/CLP and 40 CFR Methodologies

1986-1987 Nytest Environmental, Inc. (NEI) Port Washington, New York

GC/MS VOA Analyst

EDUCATION:

1982-1985 State University of New York at Stony Brook, New York; BS Biology/Biochemistry

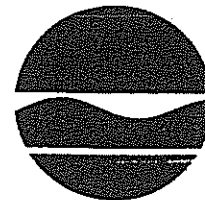
1981-1982 University of Delaware; Biology/Chemistry

5/91 Rutgers University; Mass Spectral Data Interpretation Course, GC/MS Training

8/92 Westchester Community College; Organic Data Validation Course

9/93 Westchester Community College; Inorganic Data Validation Course

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233



Thomas C. Jorling
Commissioner

July 8, 1992

Ms. Elaine Sall
Program Coordinator
Westchester Community College
Valhalla, NY 10595-1698

Dear Elaine,

Thank you for your letter of June 29, 1992. I have reviewed the course outline for organic data validation, qualifications for teachers and qualifications for students. The course that you propose to offer would be deemed equivalent to that which is offered by EPA. The individuals who successfully complete the course and pass the final written exam would be acceptable to perform the task of organic data validation for the Department of Environmental Conservation, Division of Hazardous Waste Remediation.

As we have discussed in our conversation of July 7, 1992, you will forward to me prior to the August course deadline, the differences between the EPA SOW/90 and the NYSDEC ASP 12/91. You stated these differences will be compiled by Mr. John Samulian.

I strongly encourage you to offer an inorganic data validation course. I anticipate the same list of candidates would be interested in an inorganic validation course as well, since most of the data to be validated consists of both organic and inorganic data.

Thank you for your efforts and please contact me if I can be of any further assistance.

Sincerely,

Maureen P. Serafini

Maureen P. Serafini
Environmental Chemist II
Division of Hazardous Waste
Remediation



The Professional
Development Center
AT
WESTCHESTER COMMUNITY COLLEGE

914 285-6619

October 2, 1992

Ms. Lori Beyer
3 sparkill Drive
East Northport, NY 11731

Dear Ms. Beyer:

Congratulations upon successful completion of the Organic Data Validation course held August 17 - 21, 1992, through Westchester Community College, Professional Development Center. This course has been deemed by New York State Department of Environmental Conservation as equivalent to EPA's Organic Data Validation Course.

Enclosed is your Certificate. Holders of this Certificate are deemed competent to perform organic data validation for the New York State DEC Division of Hazardous Waste Remediation.

The Professional Development Center at Westchester Community College plans to continue to offer courses and seminars which will be valuable to environmental engineers, chemists and related personnel. Current plans include a TCLP seminar on November 17th and a conference on Environmental Monitoring Regulations on November 18th.

We look forward to seeing you again soon at another environmental program or event. Again, congratulations.

Very truly yours,

Passing Grade is 70%
Your Grade is 99%

Elaine Sall
Program Coordinator

ES/bf



June 21, 1993

Dear Ms. Beyer:

Enclosed is your graded final examination in the Inorganic Data Validation course you completed this past March. A score of 70% was required in order to receive a certificate of satisfactory completion. Persons holding this certificate are deemed acceptable to perform Inorganic Data Validation for the New York State Department of Environmental Conservation, Division of Hazardous Waste Remediation.

I am also enclosing a course evaluation for you to complete if you have not already done so. The information you provide will greatly aid us in structuring further courses. We wish to make these course offerings as relevant, targeted and comprehensive as possible. Your evaluation is vital to that end.

Congratulations on your achievement. I look forward to seeing you again at another professional conference or course. We will be co-sponsoring an environmental monitoring conference on October 21, 1993 with the New York Water Pollution Control Association, Lower Hudson Chapter, at IBM's Yorktown Heights, NY site. Information regarding this event will be going out in August.

Very truly yours,

Elaine Sall
Program Coordinator

ES/bf

Enclosures



Westchester Community College

Professional Development Center

Awards this Certificate of Achievement To

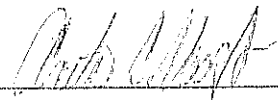
LORI BEYER

for Successfully Completing

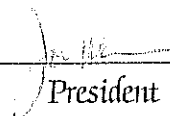
ORGANIC DATA VALIDATION COURSE (35 HOURS)

Dr. John Samuelian

Date AUGUST 1992



Assistant Dean
Professional Development Center



President



The Professional
Development Center



SUNY
WESTCHESTER COMMUNITY COLLEGE
Valhalla, New York 10595

Westchester Community College

Professional Development Center

Awards this Certificate of Achievement To

LORI BEYER

for Successfully Completing


INORGANIC DATA VALIDATION

Instructor: Dale Boshart

Date MARCH 1993



Assistant Dean
Professional Development Center



President



The Professional
Development Center



SUNY
WESTCHESTER COMMUNITY COLLEGE
Valhalla, New York 10595

State University of New York

State University at Stony Brook

On the Recommendation of the Faculty and by Virtue of the Authority
vested in them the Trustees of the University have conferred on

Lori Ann Isenberg

the Degree of

Bachelor of Science

and have granted this Diploma as evidence thereof

Given at Stony Brook, in the State of New York, in the United States
of America on the twentieth day of December one thousand nine
hundred and eighty-five.

H. M. Dickinson

Chairman of the Board of Trustees

Arthur Anderson

Chairman of the Council,

State University at Stony Brook



E. R. Brown

Chancellor of the State University of New York

John H. Marburger, Jr.

President,

State University at Stony Brook