SUPPLEMENTAL WORKPLAN

FOR THE FORMER "SAKMANN" PROPERTY

LOCATED AT U.S. ROUTE 9W
TOWN OF HIGHLANDS
ORANGE COUNTY, NEW YORK

Voluntary Cleanup Site Number: V-00083-3
Index Number: W3-0962-03-07

December 2005

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ESI File: SF01123.40

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1.0 Introduction

1.1 Purpose

The purpose of this Supplemental Workplan is to provide guidance on the manner in which additional site investigation and remediation services are provided to address known environmental conditions on the former "Sakmann" property, located on U.S. Route 9W in the Town of Highlands, Orange County, New York (hereafter referred to as the "Site"). Environmental investigative and remedial activities conducted at the Site have been conducted in accordance with the New York State Department of Environmental Conservation (NYSDEC) approved Remedial Action Workplan (RAWP, dated January 2005), and all activities proposed in this Supplemental Workplan are intended to be conducted in accordance with the approved RAWP.

This Supplemental Workplan has been submitted for review to the NYSDEC the NYSDOH, and has incorporated specific comments made by these agencies.

1.2 Site Location and Description

The Site is the approximately 1.5-acre former Sakmann Restaurant Corporation property located at U.S. Route 9W, Hamlet of Fort Montgomery, Town of Highlands, Orange County, New York. A Site Location Map and a Proposed Fieldwork Map are provided in Appendix A.

Six bedrock groundwater monitoring wells (installed by Envirotrac, LTD. in April and May, 2002) are located on the Site, to the west, north, and east of the former garage. Based on static groundwater elevations recorded from 2003 to 2005, general groundwater flow is predicted to be in an easterly to northeasterly direction, toward the Hudson River (the most recent [December 2005] Groundwater Flow Map is provided in Appendix A).

1.3 Current Status of Environmental Conditions

Previous environmental investigations are summarized in the RAWP and the Interim Status Report of Remedial Activities (October 2005). Data from the first round of post-remediation groundwater sampling, presented in the Letter Report of Groundwater Sampling (December 2005), document a continuing absence of significant VOC concentrations in on-site groundwater.

The following services, as detailed in the approved RAWP, have been accomplished: pre-remediation soil gas survey; demolition of the former garage structure; closure of the fuel-oil underground storage tank (UST) at the former restaurant building; soil sampling in the vicinity of the garage septic system; excavation of contaminated soils at the former garage and UST; post-excavation confirmatory endpoint sampling; restoration of the site to original grade; and the first round of post-remediation groundwater sampling.

The following conditions have been identified by the NYSDEC and NYSDOH as potential areas of concern, which warrant additional investigation and/or modification of remedial measures:

- Low concentrations of PCE have been identified in soil gas, and in groundwater (June 2005 sampling event only), located in the vicinity of monitoring well MW-1Ss;
- Low-level PAH contamination has been identified in the area of the former septic system and near the northern end of the former fuel oil UST; and,
- Concentrations of VOCs have been identified in soil gas beneath the vacant restaurant building.

2.0 Proposed Additional Investigation and Remediation Services

This section of the Supplemental Workplan details additional activities which are proposed to be conducted to address the potential areas of concern identified in Section 1.3, above. A Proposed Fieldwork Map is provided in Appendix A. All proposed work will be conducted according to a previously approved site specific Health and Safety Plan (HASP), provided as Appendix C of the RAWP.

All site preparation and supervision services (including NYSDEC notification, equipment calibration, coordination of subcontractors, site monitoring, and implementation of the HASP), fieldwork methodology, and laboratory analysis of material samples, will be conducted according to the specifications of the approved RAWP.

2.1 Indoor Air Quality Survey

Indoor air-quality sampling will be conducted at the former Trading Post restaurant, following a NYSDEC/NYSDOH approved protocol. One air sample will be collected from an area located inside the basement and one sample will be collected from an outside location, which will serve as a background sample. Prior to sampling, a preliminary inspection and instrument screening of the building will be conducted to inventory any potential sources of VOCs. Samples will be collected into Summa canisters equipped with 1-hour flow controllers, in order to prevent sample interference cause by the momentary presence of sampling personnel or other persons in the vicinity of the canisters. Samples will be submitted for laboratory analysis of VOCs (USEPA Method TO-15, detection limit 1 mcg/m^3).

2.2 Additional Soils Investigation

Four test pits and/or trenches will be extended in the vicinity of monitoring well MW-1S (maximum depth 12'), and four manual soil borings will be extended near the northeastern corner of the former restaurant UST (maximum depth 8'). The exact locations of the test pits and borings will be determined in the field based on visual observations and consultation with NYSDEC personnel. All exposed subsurface materials will be screened for evidence of contamination, which will be used by the field technician (in consultation with NYSDEC personnel, as necessary) to determine the need for any additional test pits/borings. Fieldwork and sampling methods will follow protocols presented in the approved RAWP.

It is anticipated that a minimum of one soil sample from each test pit in the area of MW-1S will be collected and submitted for laboratory analysis, with collection biased toward areas of overtly contaminated materials. If encountered, samples will also be collected from the groundwater interface. All samples will be analyzed for total VOCs (USEPA Method 8260).

A minimum of one sample will be collected from each soil boring in the vicinity of the former UST. Samples will be collected from areas of overtly impacted soil and/or at a depth corresponding to the tank invert, and will be analyzed for VOCs (USEPA Method 8260 STARS List) and PAHs (USEPA Method 8270). The need for additional analyses will be based on encountered field conditions and consultation with NYSDEC personnel.

2.3 Excavation of Contaminated Soils

Any significantly contaminated soils (i.e. analyte concentrations above NYSDEC guidance levels) encountered in the vicinity of the former restaurant UST or MW-1S will be excavated and removed from the Site following protocols presented in the approved RAWP.

2.4 Site Restoration in Soil Removal Area

The Site will be regraded to approximate original grade at the conclusion of all soil investigation (and, if warranted, soil removal) services. To the extent possible, on-site non-contaminated soils will be used for site regrading. In the event that soil importation is necessary, only certified clean soil material will be utilized.

2.5 Additional Areas to be Covered by Barrier Layer

The cover of clean soil (or equivalent), as described in the approved RAWP, will be extended to areas located to the east of the former Garage structure where low-grade PAH and metals contamination has been documented.

2.6 Post-Remediation Groundwater Sampling

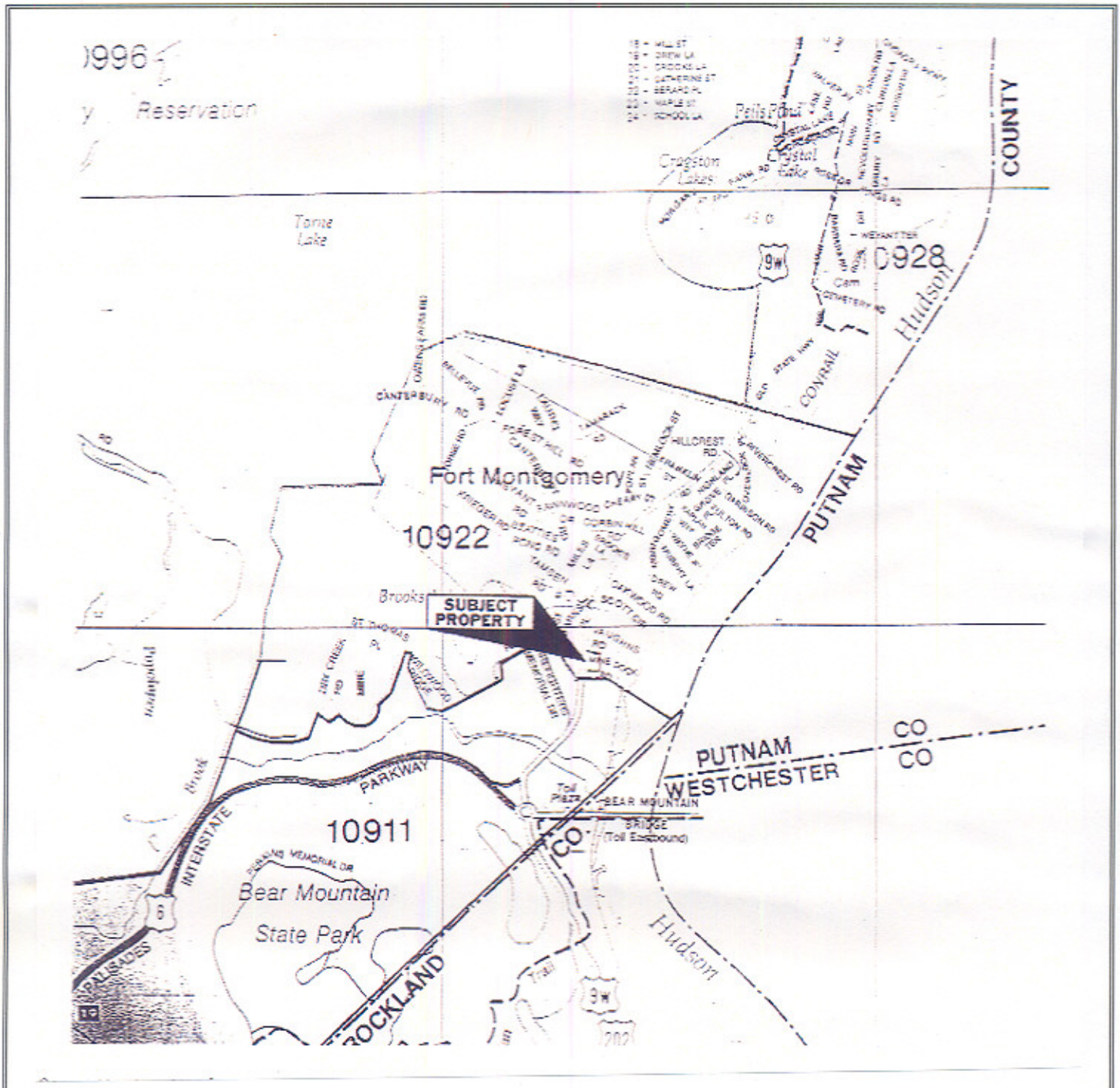
The first round of post-remediation groundwater sampling was completed in December 2005. Current laboratory data are consistent with results from the 2004 and later pre-remediation sampling events, which show a significant reduction from VOC concentrations documented in 2002 and 2003. PCE, which had been detected for the first time in MW-1S during the June 2005 sampling round (1 ppb), was not detected at that location in December 2005, supporting the conclusion that no significant source of PCE is present upgradient of MW-1S. The next round of sampling is scheduled for March 2006. The need for a change in the approved sampling scheduled will be determined by the NYSDEC as appropriate.

2.7 Time Schedule

The schedule for additional fieldwork services will be based on subcontractor availability, but is anticipated to be completed by mid-January, 2006. Timely notification of scheduled fieldwork dates will be provided to the NYSDEC.

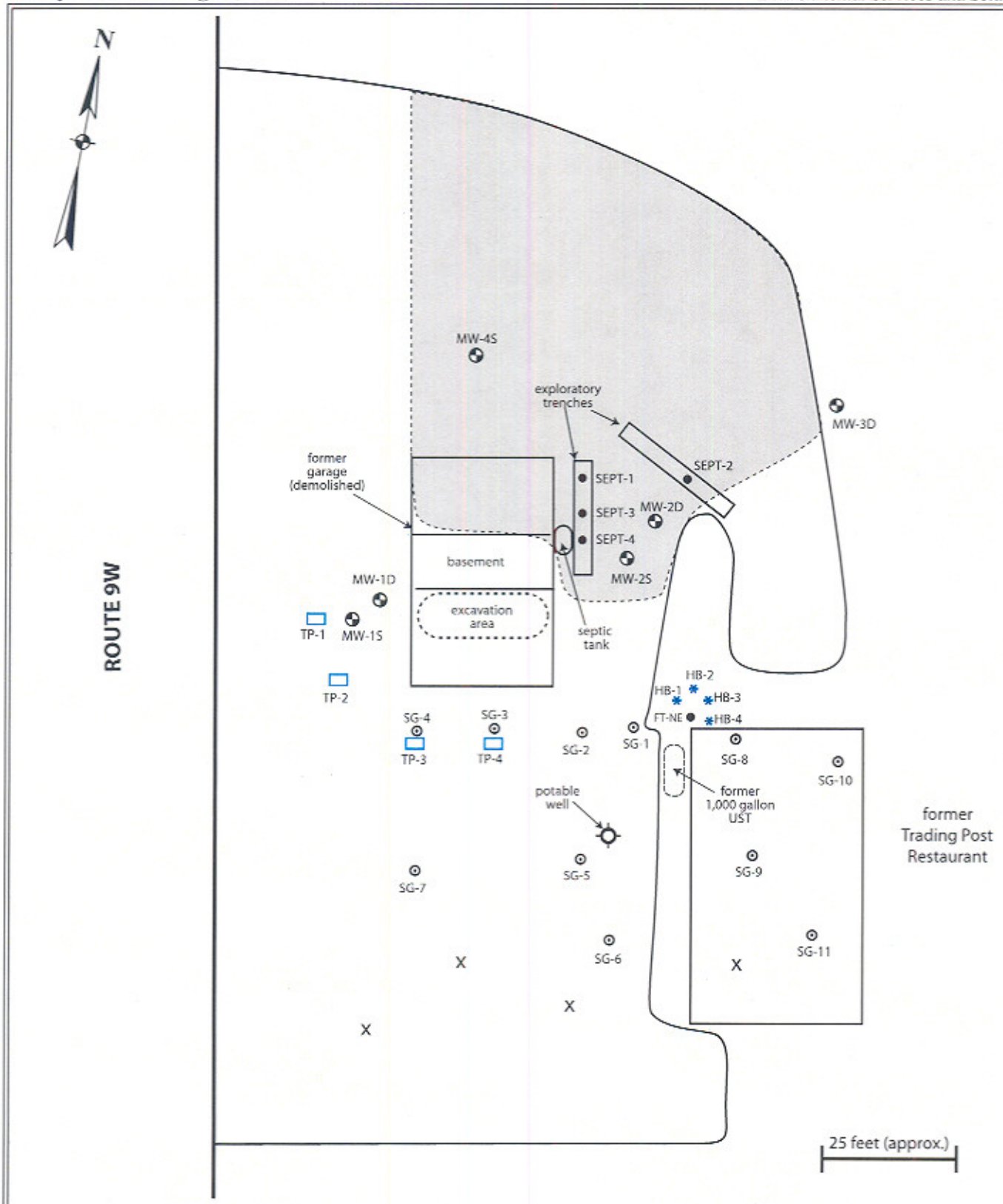
APPENDIX A

Maps



Source: Hagstrom Map Company, dated 1997

Site Location Map Former Sakmann Property U.S. Route 9W Town of Highlands Orange County, New York	N	ESI File: SF01123.40 Date: December 2005 Appendix A



All feature locations are approximate. This map is intended as a schematic to be used in conjunction with the associated report, and it should not be relied upon as a survey for planning or other activities.

Proposed Fieldwork Map

Former Sakmann Property
U.S. Route 9W
Town of Highlands
Orange County, New York

Legend:
- monitoring well
- soil gas sample
- X refusal point
- soil sample
- * proposed hand boring
- proposed test pit
- proposed barrier layer

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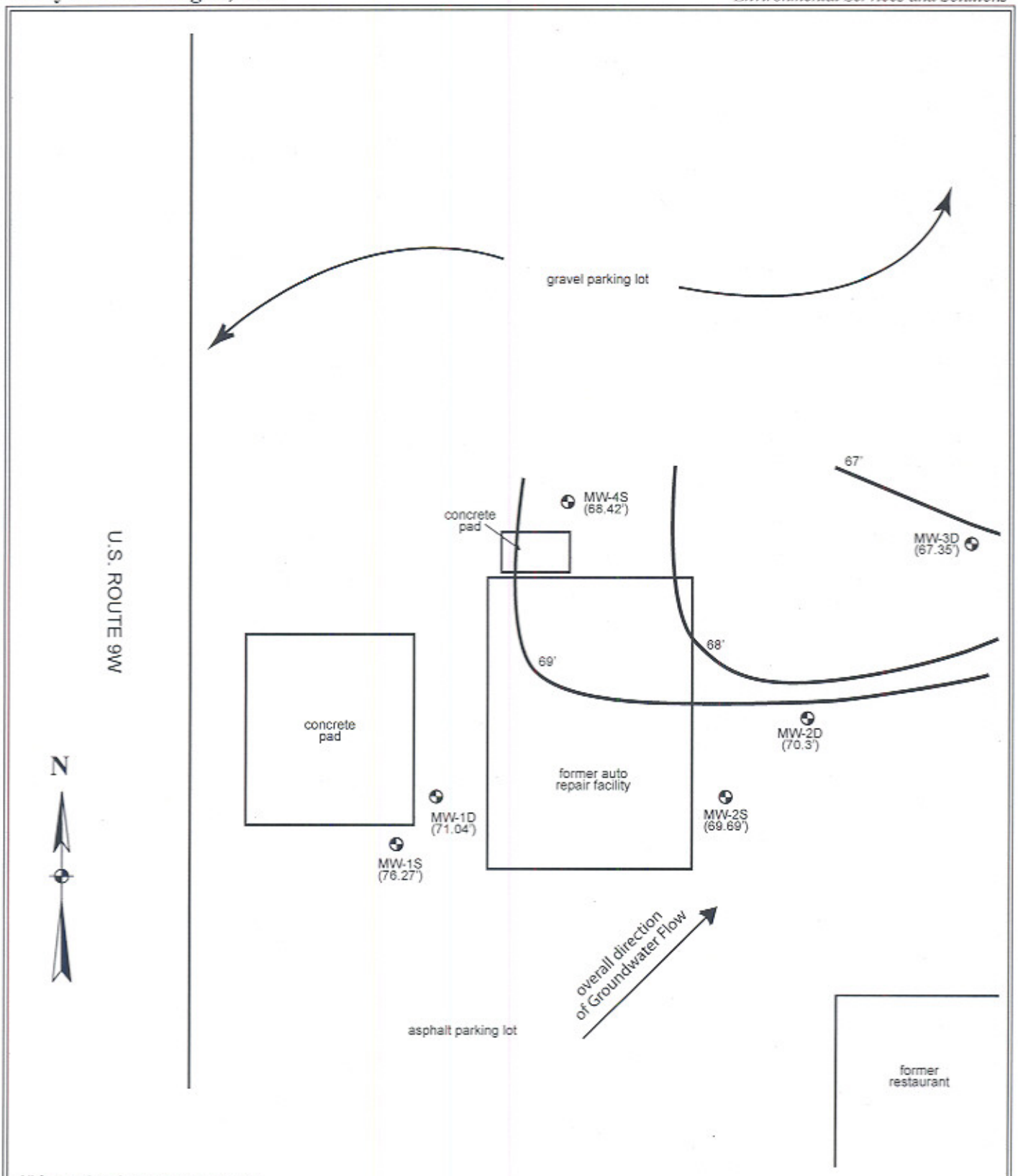
December 2005
Scale as shown
Appendix A



All feature locations are approximate.
Map based on field measurements. All elevations are relative to an arbitrary benchmark of 100 feet.

Groundwater Flow Map
December 2005

Former Sakmann Property
U.S. Route 9W
Town of Highlands
Orange County, New York

Legend:

MW-1S monitoring well with groundwater elevation noted parenthetically

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Not to Scale
Appendix A