

FPM Group, Ltd.
FPM Engineering Group, P.C.
formerly Fanning, Phillips and Molnar

CORPORATE HEADQUARTERS
909 Marconi Avenue
Ronkonkoma, NY 11779
631/737-6200
Fax 631/737-2410

VIA EMAIL

May 3, 2006

Mr. Vadim Brevdo, P.E.
New York State Department of Environmental Conservation
Division of Environmental Remediation
47-40 21st Street
Long Island City, NY 11101-5407

Re: **Addendum to Remedial Action Work Plan**
90-30 Metropolitan Avenue, Rego Park, Queens, NY
NYSDEC Site V00253-2
FPM File No. 788-05-07

Dear Vadim:

In accordance with our discussions, FPM Group (FPM) is hereby submitting this Addendum to the Remedial Action Work Plan (RAWP) for the above-referenced site for your review. This Addendum addresses issues raised by Julia M. Guastella of the New York State Department of Health (NYSDOH) in the attached correspondence, an issue regarding the NYSDEC Air Guide I interpretation contained in the RAWP as discussed by Joe O'Connell in his February 15, 2006 email, and your comment regarding the PE certification page. Each of these issues is addressed below.

Exposure Assessment Issues (January 10, 2006 NYSDOH correspondence)

As noted in the attached correspondence, the NYSDOH comments that the site vicinity is serviced by public water and, therefore, exposure to contaminated groundwater is unlikely. We agree that this issue should have been directly addressed in the exposure assessment for the site and we agree with the NYSDOH comment.

Also as noted in the attached correspondence, the NYSDOH comments that the Community Air Monitoring Plan (CAMP) should be referenced when discussing site activities. We agree that community air monitoring will be performed in accordance with the NYSDOH comment during all ground-intrusive activities until it is demonstrated that neither volatile organic compounds nor particulates are present at levels that would cause a public health or site worker concern. A CAMP is included in the Health and Safety Plan (HASP) for the site, which is in the RAWP. The CAMP includes provisions for performing volatile organic compound and particulate monitoring in accordance with NYSDOH requirements to protect community and site worker health and safety.

Groundwater Monitoring Network (December 6, 2005 NYSDOH Correspondence)

The NYSDOH offered no comments on the proposed groundwater monitoring network for the site.

RAWP Issues (December 7, 2005 NYSDOH Correspondence, February 15, 2006 Joe O'Connell email, and May 1, 2006 email)

The NYSDOH requested that pressure testing be conducted in conjunction with indoor air quality monitoring to demonstrate that a vacuum is being created beneath the slab during operation of the soil vapor extraction (SVE) system. We propose to co-locate sub-slab soil vapor probes, constructed in accordance with NYSDOH guidance (February 2005 NYSDOH publication "Guidance for Evaluating Soil Vapor Intrusion in New York State"), within the well boxes for groundwater monitoring wells A-02, A-06/A-07/A-08, A-05 and A-09/A-10. These wells are located within the onsite building and are included in the groundwater monitoring well network. This will provide for monitoring of sub-slab pressures at three locations within the southern portion of the building, where the groundwater plume is present and also at one central location in the northern portion of the building upgradient of the plume. Monitoring would be performed either by using the smoke method described in both the NYSDOH correspondence and in the NYSDOH guidance document or by directly measuring the vacuum in each soil vapor implant, in a similar manner as during the pilot test for the remediation system. The test method selected will depend on feasibility issues and potential impacts to tenants. Monitoring of sub-slab pressures shall be performed following remediation system startup and again following changes in operating conditions that could affect subsurface airflow. The resulting data shall be provided in the Engineering Report and subsequent documents, if necessary.

The NYSDEC commented on the evaluation of the remediation system effluent and our use of the AGC to determine whether treatment would be needed. It was pointed out that in areas with large numbers of sources and elevated receptors located in small geographic areas, such as New York City, that the screening comparison value used should be the AGC/200, in accordance with Appendix B, Section IV.G of Air Guide 1. If this screening guidance is followed, the emissions from the system, based on the results of the pilot test, were 0.0082 pounds per hour and very slightly exceed the AGC/200, which is 0.005. As discussed on page 4-12 of the RAWP, SVE effluent monitoring will be performed during the startup of the remediation systems to confirm that emissions are within acceptable limits. Carbon treatment of the effluent will be used if emissions exceed acceptable limits. The effluent concentrations will be evaluated with respect to the AGC/200.

On May 1, 2006, you requested that we revise the PE certification page of the RAWP to include the name of the PE providing certification. This page has been revised and is attached for inclusion in your copy of the RAWP.

Discussion

The above responses address each of the outstanding comments from the NYSDEC and/or NYSDOH concerning the RAWP, exposure assessment and proposed groundwater monitoring program for this site.

Please contact me at (631) 737-6200, ext. 228 or via email if you have any further comments. If you have no further comments, please provide written confirmation of your approval of the RAWP, exposure assessment, and proposed groundwater monitoring network, as modified by this Addendum.

Very truly yours,



Stephanie O. Davis
Senior Hydrogeologist
Department Manager

SOD:tac
Attachments

cc: Julia Guastella w/attachments
David Schore w/attachments
Joseph F. Battiato w/attachments

\\Lifs\clients\Mark Holdings\90-30 Metropolitan Avenue\NYSDEC\15.doc



STATE OF NEW YORK DEPARTMENT OF HEALTH

Flanigan Square, 547 River Street, Troy, New York 12180-2216

Antonia C. Novello, M.D., M.P.H., Dr.P.H.
Commissioner

Dennis P. Whalen
Executive Deputy Commissioner

January 10, 2006

Mr. Joseph M. O'Connell
NYS Department of Environmental Conservation
Division of Environmental Remediation, Region 2
47-40 21st Street
Long Island City, NY 11101-5407

Re: **Exposure Assessment for RAWP**
90-30 Metropolitan Avenue
Site V00253-2
Forest Hills, Queens County

Dear Mr. O'Connell:

I have reviewed the November 2005 *Exposure Assessment* for the above-referenced site and offer the following comments:

- Please note that the area is served by public water, therefore exposure to contaminated groundwater is unlikely. This issue should be included in the exposure assessment; and
- Page 4 states, "...activities will be conducted using a HASP..." Please include reference to the Community Air Monitoring Plan. Community air monitoring will be conducted continuously for all ground-intrusive activities until it is demonstrated that neither volatile organics nor particulates are at levels that may cause a public health concern, which will protect the workers as well as the community.

Thank you for the opportunity to comment on this document. If you have any questions, please contact me at (518) 402-7860.

Sincerely,

Julia M. Guastella
Public Health Specialist
Bureau of Environmental Exposure Investigation

cc: Mr. G. Litwin/Mr. G. Laccetti/File
Mr. B. Devine – NYSDOH MARO
Ms. J. Prudhomme – NYCDOH
Mr. D. Greeley – NYCDEP
Mr. D. Walsh – NYSDEC, Reg. 2



STATE OF NEW YORK DEPARTMENT OF HEALTH

Flanigan Square, 547 River Street, Troy, New York 12180-2216

Antonia C. Novello, M.D., M.P.H., Dr.P.H.
Commissioner

Dennis P. Whalen
Executive Deputy Commissioner

December 6, 2005

Mr. Joseph M. O'Connell
NYS Department of Environmental Conservation
Division of Environmental Remediation, Region 2
47-40 21st Street
Long Island City, NY 11101-5407

Re: **Groundwater Monitoring Network**
90-30 Metropolitan Avenue
Site V00253-2
Forest Hills, Queens County

Dear Mr. O'Connell:

I have reviewed the November 2005 *Groundwater Monitoring Network* for the above-referenced site and offer no comments at this time.

Thank you for the opportunity to comment on this document. If you have any questions, please contact me at (518) 402-7860.

Sincerely,

Julia M. Guastella
Public Health Specialist
Bureau of Environmental Exposure Investigation

cc: Mr. G. Litwin/Mr. G. Laccetti/File
Mr. B. Devine – NYSDOH MARO
Ms. J. Prudhomme – NYCDOH
Mr. D. Greeley – NYCDEP
Mr. D. Walsh – NYSDEC, Reg. 2



STATE OF NEW YORK DEPARTMENT OF HEALTH

Flanigan Square, 547 River Street, Troy, New York 12180-2216

Antonia C. Novello, M.D., M.P.H., Dr.P.H.
Commissioner

Dennis P. Whalen
Executive Deputy Commissioner

December 7, 2005

Mr. Joseph M. O'Connell
NYS Department of Environmental Conservation
Division of Environmental Remediation, Region 2
47-40 21st Street
Long Island City, NY 11101-5407

Re: **Remedial Action Work Plan**
90-30 Metropolitan Avenue
Site V00253-2
Forest Hills, Queens County

Dear Mr. O'Connell:

I have reviewed the November 2005 *Remedial Action Work Plan* for the above-referenced site and offer the following comments:

- Along with indoor air quality monitoring, stated on page 4-12, pressure testing should be conducted. This may be done by operating the SVE system and simultaneously observing the movement of smoke downward into small holes (i.e. 3/8 inch) drilled through the building's slab at sufficient locations to demonstrate that a vacuum is being created beneath the entire slab.

Please forward an addendum to the remedial action workplan for review and approval by Bureau Management. Thank you for the opportunity to comment on this document. If you have any questions, please contact me at (518) 402-7860.

Sincerely,

Julia M. Guastella
Public Health Specialist
Bureau of Environmental Exposure Investigation

cc: Mr. G. Litwin/Mr. G. Laccetti/File
Mr. B. Devine – NYSDOH MARO
Ms. J. Prudhomme – NYCDOH
Mr. D. Greeley – NYCDEP
Mr. D. Walsh – NYSDEC, Reg. 2

REMEDIAL ACTION WORK PLAN

Prepared for

Facility: 90-30 Metropolitan Avenue
Rego Park, New York
NYSDEC VCP # V00253-2

FPM File No: 788-05-07

I hereby certify that the remediation activities described herein have been developed in accordance with the New York State Department of Environmental Conservation Voluntary Cleanup Agreement #V00253-2 concerning this site and that the proposed remedy meets each of the evaluation factors listed in 6 NYCRR 375-1.10(c), as further described in this work plan.



Kevin F. Loyst, PE

New York State Professional Engineer # 76321

A handwritten signature in black ink, appearing to be "K. Loyst", written over a horizontal line.

Signature

It is a violation of Article 130 of the New York State Education Law for any person to alter this document in any way without the express written verification or adoption by a New York State licensed land surveyor or engineer in accordance with Section 7209(2), Article 130, New York State Education Law.

Prepared by

FPM Group
909 Marconi Avenue
Ronkonkoma, NY 11779
(Tel) 631-737-6200
(Fax) 631-737-2410