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ENVIRONMENTAL CONSULTING & MANAGEMENT

ROUX ASSOCIATES INC

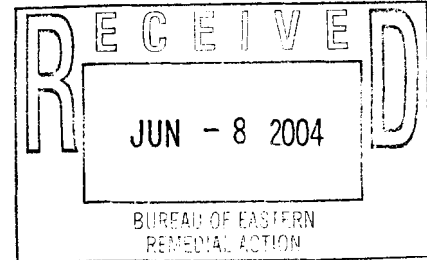


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ISLANDIA, NEW YORK 11749-5074 TEL: 631-232-2600 FAX: 631-232-9898

June 4, 2004

Ms. Nancy Garry
Environmental Engineer
New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway - 11th Floor
Albany, New York 12233-7015



Re: Revised Scope of Work – Proposed Investigation Activities
Busy Bee Cleaners Facility, Merrick, New York
Voluntary Cleanup Agreement Number V00376-1

Dear Ms. Garry:

This revised Scope of Work summarizes proposed investigation activities that will be performed by Busy Bee Cleaners (Busy Bee) as requested by the New York State Department of Environmental Conservation (NYSDEC), and the New York State Department of Health (NYSDOH). These proposed investigation activities were developed following a review of Remedial Investigation data collected by Roux Associates, Inc. (Roux Associates) in December 2003 and January 2004, and are based on a meeting between Busy Bee, Roux Associates, the NYSDEC, and the NYSDOH on February 13, 2004; a March 31, 2004 letter to Roux Associates from the NYSDEC; an April 21, 2004 telephone conversation between Roux Associates, the NYSDEC, and the NYSDOH; and a May 25, 2004 letter to Roux Associates from the NYSDEC. Busy Bee believes that conducting the proposed tasks prior to preparation and agency review of a Remedial Investigation Report would allow for the project to move towards completion at a faster pace and in a more cost effective manner.

Proposed Investigation Tasks

Based on an evaluation of the Remedial Investigation analytical results, several data requirements were identified that Busy Bee proposes to address prior to recommendation of remedial action. These data requirements include on-site and off-site soil gas quality, determination of off-Site groundwater quality, and determination of local groundwater flow direction. As discussed during the February 13, 2004 meeting, Busy Bee proposes to perform the additional tasks described below to address the data requirements prior to preparation of a Remedial Investigation Report. The sequence of sampling will be as follows: four off-site soil gas samples will be collected, following receipt and evaluation of the results, the need for additional off-site soil gas sampling will be determined. Groundwater profiling and flow direction evaluation will be completed after the soil gas results have been reviewed by the project team. All additional activities will follow the procedures and requirements set forth in the October 7, 2003 Remedial Investigation Work Plan with the exception that no field duplicates or field blanks will be collected as

part of the soil gas sampling task. Locations of the proposed sampling and monitoring locations described below are shown on Figure 1 (attached).

Soil Gas Sampling

Based on the analytical results from the Remedial Investigation soil vapor monitoring and groundwater sampling tasks, the collection of soil gas samples for laboratory analysis is proposed from four locations (SG-1 through SG-4). Soil gas sampling location SG-1 will be placed west of the Remedial Investigation soil gas monitoring point SV-1. Soil gas sampling locations SG-2 through SG-4 will be placed in the backyards of three residential homes on Alice Street, including the residence directly behind the southwest corner of the Busy Bee Facility and the two homes to the west. Each point will be placed at least 10 feet away from the residence at the portion of the residence that is closest to the Busy Bee Facility.

Soil gas sampling points will be installed via Geoprobe® and will consist of a Geoprobe® Screen Point 15 Sampler. The Screen Point Sampler is threaded onto the leading end of a Geoprobe® rod and advanced with a Geoprobe® direct-push machine. As described above, the Screen Point Sampler will be advanced to a depth of approximately 2.0 to 2.5 feet below the foundation slab or basement of the adjacent building. Once at the desired depth, extension rods are sent down the center of the Sampler until the leading rod contacts the bottom of the Sampler screen. The tool string is then retracted approximately 12 inches while the screen is held in place with the extension rods. This will expose approximately 12-inches of screen in the unsaturated zone. An O-ring maintains a seal at the top of the screen.

At each sampling location, one end of a Teflon sampling tube will be placed into the Geoprobe® rods and set to the center of the exposed screen zone. Tubing installed in the Soil Gas Sampler will be sealed from the atmosphere with a one-hole silicon rubber stopper inserted into the top of the Sampler sheath. The sampling tube will be connected to a 'T' connector. One end of the 'T' connector will lead to a vacuum pump and the other end of the 'T' connector will lead to a pre-evacuated 6 Liter Summa canister supplied by the laboratory. Valves will isolate both the pump and the Summa canister. Initially, the valve leading to the Summa canister will be closed, and the valve leading to the vacuum pump will be open. The Soil Gas Samplers will be purged of approximately two volumes of the Geoprobe® rods and sample tubing (assumed to be approximately two liters) using the vacuum pump set at a rate equal to, or less than, 0.2 liters per minute. Following purging, the valve leading to the pump will be closed, the pump will be turned off, and the valve leading to the Summa canister will be opened. The Summa canister will be filled at a rate not to exceed 0.2 liters per minute using a laboratory calibrated regulator. Once the Summa canister has been filled, the valve on the canister will be closed, and the canister disconnected from the sampling tubing.

All soil gas samples will be analyzed using USEPA Method TO-15 and analytical results will be reported in micrograms per cubic meter (ug/m³) with detection limits of one ug/m³ or less.

Groundwater Sampling

Groundwater analytical results from samples collected at the property line during the Remedial Investigation indicated concentrations of VOCs that exceeded the NYSDEC AWQSGVs. To determine the nature of groundwater quality offsite, three additional Geoprobe groundwater-sampling points (TW-104 to TW-106) will be advanced along Alice Street south of the site. In addition, one upgradient groundwater sampling point (TW-107) will be advanced on Busy Bee property, and north of the Busy Bee building. The exact location of this groundwater sampling point may need to be moved slightly following a review of subsurface utilities in the proposed area. Advancement of groundwater sampling points, groundwater sampling, and analysis will be conducted in the same manner as described in Section 3.2 of the Remedial Investigation Work Plan (Task 2: Geoprobe Groundwater Sampling) with the exception of confirmation of the underlying clay layer. Because the existence of the clay layer has previously been confirmed, this component of the work plan does not need to be redone. To allow for a direct comparison of analytical results from all groundwater-sampling locations, groundwater samples will be collected from the same intervals as were collected during the Remedial Investigation.

Water-Level Measurement

To evaluate groundwater flow south of the Site, a minimum of six temporary piezometers (PZ-101 to PZ-106) will be installed onsite and along Alice Street. At each proposed piezometer location a pilot borehole will be advanced from land surface to two feet below the water table using a Geoprobe. A piezometer consisting of a one-inch diameter polyvinyl chloride screen will be installed in the borehole. The top of the temporary piezometer will be surveyed to the nearest 0.01 foot relative to a Site datum. Following installation of all piezometers a round of water levels measured to the nearest 0.01 foot with an electronic water level indicator will be collected from all piezometers.

In addition, a pressure transducer will be installed in one of the on-Site piezometers and programmed to record water-level measurements at least once every five minutes. The pressure transducer will be left in the piezometer for a period of approximately 24 hours. At that time a second round of water levels will be collected, the pressure transducer will be removed, the temporary piezometers will be removed, the soil borings will be backfilled with bentonite and sand, and the surface restored.

Proposed Schedule

Busy Bee has been preparing an offsite access agreement to collect soil gas samples on the adjacent properties described above. Following completion of this agreement, adjacent property owners will be contacted by Busy Bee to present the access agreement and obtain access. This task will be conducted prior to NYSDEC's approval of the revised work plan if necessary. Busy Bee will initiate the enclosed scope of work approximately three to four weeks following NYSDEC approval of the revised work plan. It is assumed that work will not begin prior to July 6, 2004. This time frame is required to schedule subcontractors, obtain street opening permits, contact offsite property owners, and obtain access agreements. As described above, the sequence of sampling will begin with off-site soil gas sampling. Presented below is the proposed sequence of tasks and the anticipated time required to complete each task.

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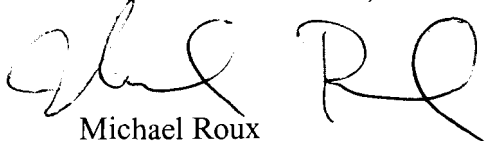
- Complete scheduling contractors, contacting offsite property owners, obtaining access agreements, and obtaining offsite street opening permits: three to four weeks following NYSDEC approval of the revised work plan;
- Soil gas sampling: two days;
- Soil gas sample analysis: three weeks;
- Busy Bee, NYSDEC, and NYSDOH evaluation of soil gas results: approximately three weeks;
- Installation of piezometers, water-level measurement, groundwater profile sampling: one week;
- Groundwater sample analysis: three weeks; and
- Preparation of Summary Report: approximately four weeks.

Based on the proposed schedule, if the soil gas samples are collected during the week of July 6, 2004, the summary report documenting the results of soil gas and groundwater sampling will be submitted the week of October 11, 2004.

If you have any questions concerning the proposed scope of work, please do not hesitate to contact us.

Sincerely,

ROUX ASSOCIATES, INC.



Michael Roux
Senior Hydrogeologist






Craig A. Werle, P.G.
Principal Hydrogeologist

Attachment

cc: Guy T. Bobersky, P.E., NYSDEC
Jacqueline Nealon, NYSDOH
Lani D. Rafferty, NYSDOH
Robert Bernstein, Busy Bee Cleaners
Michael White, Esq., Jaspan Schlesinger Hoffman LLP



EXPLANATION

- TW-106 / PZ-105  LOCATION AND DESIGNATION OF PROPOSED PIEZOMETER AND GEOPROBE SAMPLING LOCATION
- PZ-101  LOCATION AND DESIGNATION OF PROPOSED PIEZOMETER
- SG-1  LOCATION AND DESIGNATION OF PROPOSED SOIL GAS SAMPLING POINT

Title

PROPOSED SAMPLING
LOCATIONS

NYSDEC VCP # V00376-1

Prepared For

BUSY BEE CLEANERS



ROUX ASSOCIATES INC
Environmental Consulting
& Management

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Prepared by: MFR Scale: AS SHOWN

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FIGURE

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