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Environmental Asset Management
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August 25, 2005

Shaminder Chawla
New York State Department of Environmental Conservation
Region 2
1 Hunters Point Plaza
47-40 21st Street
Long Island City, New York 11101-5407

**Re: Supplemental Site Investigation Activities at
78-11 57th Ave. [aka Verizon Property]
Newtown Station/Elmhurst Holder Tank Site
Elmhurst, Queens County, New York
Site: V00406**

Dear Mr. Chawla:

KeySpan Corporation (KeySpan) is submitting this work plan to conduct a supplemental site investigation (SSI) at 78-01 57th Street [also referred to as the Verizon Property] in Elmhurst, Queens County, New York. The Verizon Property is currently owned by a private individual, Joyce Kjellgren, and is leased by Verizon for vehicle parking.

KeySpan has prepared this SSI work plan to evaluate elevated lead concentrations in shallow soils at the eastern boundary of Newtown Station/Elmhurst Tank site [Site]. The previous site investigation attributed elevated lead concentrations within soil at the site to the lead paint chips from the former Newtown Station gas holders and to fill used during the Site development. During the Interim Response Measure (IRM) in 2001, elevated lead concentrations were identified in soils at the Verizon property boundary that were unable to be remediated because of access issues to the Verizon Property. Plate 1 shows the location of the Site, the Verizon Property, previous analytical sample locations and unremediated lead concentrations along the eastern Site boundary. In addition, Plate 1 shows and the proposed sample locations. KeySpan is submitting this SSI work plan to the New York State Department of Environmental Conservation (NYSDEC) and the New York State Department of Health (NYSDOH) for review and approval.

The remainder of this document presents the proposed work plan for the SSI. Following your review of this work plan, please contact me with your approval or if you have any questions regarding the proposed scope of work.

Background

A site investigation and an IRM have been completed at the Newtown Station/Elmhurst Holder Tank Site. The site investigation results are presented in the *Site Investigation Report, Newtown Station Elmhurst Holder Tank Site Elmhurst, Queens County, New York, March 2001*. The IRM activities conducted in 2001 are summarized in the *Voluntary Cleanup Agreement / Interim Response Measure Completion Report, Newtown Station/ Elmhurst Holder Tank Site, Elmhurst, Queens County, New York, February 2003*. Summary information is discussed below.

In 2001, an IRM was completed at the Site, which involved the excavation and off-site disposal of soil containing elevated concentrations of lead and semi-volatile organic compounds (SVOCs). A site cleanup goal of 400 parts per million (ppm) for lead was established for the IRM. Based upon this cleanup goal, approximately 18,692 tons of soil was removed during the IRM. Soils were excavated to as deep as 12 feet below ground surface (bgs) from the Site. Soil was not excavated on the Verizon Property because of access issues encountered during the IRM implementation. Consequently, soils exceeding the site cleanup goal were not remediated on the Verizon Property line. Lead concentrations along the Verizon Property line ranged from 499 to 1,700 ppm of lead from below the pavement to approximately 12 feet bgs. Elevated lead concentrations appeared to be coincident with fill used in the development of the site.

In 2002, five test pit excavations (VZ-TP-1 through VZ-TP-5) were completed on site at the Verizon Property boundary at the request of the NYSDEC to evaluate leachable lead within soils. Five samples were submitted for leachable lead by toxicity characteristic leaching procedure (TCLP). TCLP concentrations ranged from 0.98 milligrams per liter (mg/L) within VZ-TP-1 at 2 feet bgs to 6.17 mg/L within VZ-TP-2 at 2 feet bgs. The sample from test pit VZ-TP-2 exceeded the 5.0 mg/L standard established by the United States Environmental Protection Agency. Soils were excavated from VZ-TP-2 and disposed at an off-site disposal facility. Following the removal action, a confirmation sample indicated that the TCLP concentration within VZ-TP-2 was 0.14 mg/L and no further removal actions were required.

Scope of Work

The supplemental IRM activities will include:

- Collection and analysis of subsurface soils for lead on the Verizon Property
- Collection of background surface soils in the vicinity of the Verizon Property
- Preparation of a SSI report

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The proposed scope of work described herein will be conducted in accordance with the procedures specified in the *Draft KeySpan Corporation Field Sampling Plan for Site Investigations at Manufactured Gas Plants, March 2004* and the *Draft KeySpan Corporation Quality Assurance / Quality Control Program Plan, March 2004*. These documents are contained on a CD and are attached to this letter work plan.

All field activities will comply with the health and safety procedures specified in the site-specific Health and Safety Plan, which will be submitted to the NYSDEC under separate cover.

Proposed Supplemental Site Investigation Activities

Soil Boring Installation and Subsurface Soil Lead Analysis

To evaluate the potential lateral and vertical extent of lead-impacted soils on the Verizon Property, soils will be sampled at locations “stepping-out” from the previously identified lead hot spots on the property line between the Site and the Verizon parcel. Nine soil borings (VZ-SB-01 through VZ-SB-09) will be initially drilled at these step-out locations. If lead is not detected above 400 ppm, then no additional borings will be drilled. However if lead is detected at an initial boring, then additional step-out borings will be drilled and sampled. Up to an additional nine boreholes (VZ-SB-10 through VZ-SB-18) will be drilled and sampled for lead analysis. The boreholes will be completed using a direct push Geoprobe[®] sampling rig (Plate 1). Soil samples will be collected continuously from each boring using a 4-foot long MacroCore[®] sampler equipped with a discrete sampler device.

Each 4-foot long MacroCore[®] sample interval will be split into 2-foot samples and screened for lead utilizing an X-Ray Florescence Analyzer (XRF). The lead screening values provided by the XRF will be compared against the 400 ppm level that was established for the IRM at the Site. Based upon lead impacts at the site boundary, soil samples will be collected continuously up to approximately 12 feet bgs. If the screened values for lead exceed the 400 ppm screening criteria at the termination of the soil boring, then the boring will be continued until the screened values are below 400 ppm. Table 1 summarizes the proposed sample identifications and analysis.

Up to two soil samples from each boring will be submitted to Severn-Trent Laboratories (STL) in Shelton, Connecticut and analyzed for lead by EPA Method 6010. The sample with the highest XRF lead reading and a sample at the completion of the boring will be submitted for laboratory analysis. Quality assurance/quality control (QA/QC) samples submitted to STL will include two blind duplicate soil samples, two matrix spike/matrix spike duplicate (MS/MSD) soil samples, and two soil sampling equipment rinsate blanks. Each of the quality assurance samples collected will be analyzed for lead by EPA Method

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6010. STL is a NYSDEC–approved laboratory that will provide Category B data deliverable for soil analysis.

Each boring will be abandoned with bentonite pellets that will be tremied from the bottom of the boring to the top of the boring. The boring will be completed with asphalt patch at ground surface within the paved parking lot.

Drilling equipment (rods and MacroCore[®] sampler) will be decontaminated on a temporary decontamination pad located near the sampling rig. Soil cuttings, decontamination fluids, and personal protective equipment will be collected and stored within 55-gallon United States Department of Transportation (USDOT)-approved drums that will be staged at the Site. KeySpan will dispose of the investigation-derived waste at a properly permitted waste handling facility.

The locations and elevations of completed soil borings will be surveyed by a New York State licensed surveyor.

Background Surface Soil Sampling

Ten background surface-soil samples will be collected from publicly accessible areas (such as parks) nearby the site that would be reflective of background lead conditions. The proposed background sampling locations will be provided to NYSDEC and NYSDOH following completion of a field reconnaissance, and the final sample locations will be selected in conjunction with NYSDEC and NYSDOH approval. Each background lead sample will be analyzed for lead by EPA Method 6010.

QC/QC samples will include a blind duplicate, MS/MSD and field rinsate blank. Each sample will be collected from a depth of 0 to 2 inches below the vegetative root mat. After the surface soil is collected, the vegetative mat cover will be replaced over the sample location. Sample location will be photo documented and field measured relative to current features.

SSI Report

The findings from this supplemental investigation will be summarized in a SSI report for the Verizon Property. The report will provide information regarding the nature and extent of lead impacts within soil, soil boring logs, analytical summary tables presenting XRF screening data and validated laboratory lead data, and an evaluation of potentially complete exposure pathways at the Verizon property. The report will also include a data usability summary report detailing the analytical samples collected as part of the SSI.

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Schedule

Field activities can commence following NYSDEC approval of this work scope. The field program is tentatively scheduled to start in early September and drilling activities will last for up to five days. Issues affecting the start date include obtaining on-site access, utility clearance for the borings, potential utility conflicts based upon the utility mark-outs, and NYSDEC review and approval of this work plan letter.

If you have any questions or require any additional information, please contact me at 718-403-3053 or by email at tbell@keyspanenergy.com.

Sincerely,

KeySpan Corporation

Tracey Bell
Manager
Environmental Asset Management

TB:LEW:amm

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Enclosures

c: D. Walsh (NYSDEC)
B. Callaghan (NYSDOH)
L. Liebs (KeySpan)
F. Murphy (KeySpan)
P. VanRossem (KeySpan)
D. Terry (GEI)
J. Collins (GEI)

**Table 1
Proposed Sample Summary
Verizon Property
78-11 57th Ave.
Elmhurst, Queens County, New York**

Sample ID	XRF analysis ¹	Laboratory Analysis Total Lead by EPA Method 6010 ²	Notes
VZ-SB-01	Screen soils every 2 feet up to 12 feet bgs	2 samples	
VZ-SB-02	Screen soils every 2 feet up to 12 feet bgs	2 samples	
VZ-SB-03	Screen soils every 2 feet up to 12 feet bgs	2 samples	
VZ-SB-04	Screen soils every 2 feet up to 12 feet bgs	2 samples	
VZ-SB-05	Screen soils every 2 feet up to 12 feet bgs	2 samples	
VZ-SB-06	Screen soils every 2 feet up to 12 feet bgs	2 samples	
VZ-SB-07	Screen soils every 2 feet up to 12 feet bgs	2 samples	
VZ-SB-08	Screen soils every 2 feet up to 12 feet bgs	2 samples	
VZ-SB-09	Screen soils every 2 feet up to 12 feet bgs	2 samples	
VZ-SB-10	Screen soils every 2 feet up to 12 feet bgs	2 samples	Contingent upon lead concentrations at VZ-SB-01
VZ-SB-11	Screen soils every 2 feet up to 12 feet bgs	2 samples	Contingent upon lead concentrations at VZ-SB-02
VZ-SB-12	Screen soils every 2 feet up to 12 feet bgs	2 samples	Contingent upon lead concentrations at VZ-SB-03
VZ-SB-13	Screen soils every 2 feet up to 12 feet bgs	2 samples	Contingent upon lead concentrations at VZ-SB-04
VZ-SB-14	Screen soils every 2 feet up to 12 feet bgs	2 samples	Contingent upon lead concentrations at VZ-SB-05
VZ-SB-15	Screen soils every 2 feet up to 12 feet bgs	2 samples	Contingent upon lead concentrations at VZ-SB-06
VZ-SB-16	Screen soils every 2 feet up to 12 feet bgs	2 samples	Contingent upon lead concentrations at VZ-SB-07
VZ-SB-17	Screen soils every 2 feet up to 12 feet bgs	2 samples	contingent upon lead concentrations at VZ-SB-08
VZ-SB-18	Screen soils every 2 feet up to 12 feet bgs	2 samples	contingent upon lead concentrations at VZ-SB-09

Notes:

¹. Soils will be screened with an XRF at 2-foot intervals until screening levels are below 400 parts per million.

². Two analytical samples will generally include the soil sample with highest XRF reading and at the termination of the boring.

SOURCES:

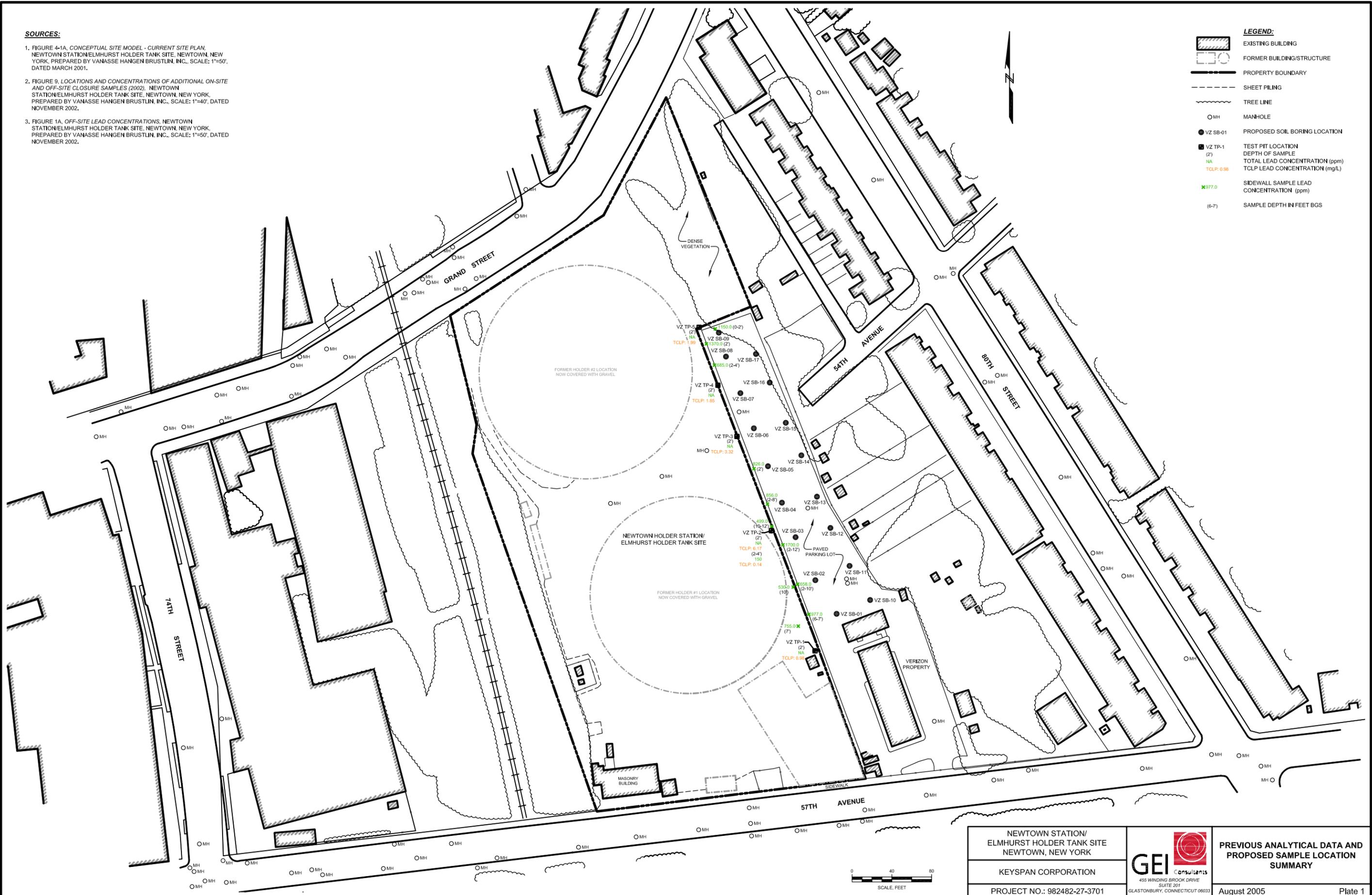
1. FIGURE 4-1A, CONCEPTUAL SITE MODEL - CURRENT SITE PLAN, NEWTOWN STATION/ELMHURST HOLDER TANK SITE, NEWTOWN, NEW YORK, PREPARED BY VANASSE HANGEN BRUSTLIN, INC., SCALE: 1"=50', DATED MARCH 2001.

2. FIGURE 9, LOCATIONS AND CONCENTRATIONS OF ADDITIONAL ON-SITE AND OFF-SITE CLOSURE SAMPLES (2002), NEWTOWN STATION/ELMHURST HOLDER TANK SITE, NEWTOWN, NEW YORK, PREPARED BY VANASSE HANGEN BRUSTLIN, INC., SCALE: 1"=40', DATED NOVEMBER 2002.

3. FIGURE 1A, OFF-SITE LEAD CONCENTRATIONS, NEWTOWN STATION/ELMHURST HOLDER TANK SITE, NEWTOWN, NEW YORK, PREPARED BY VANASSE HANGEN BRUSTLIN, INC., SCALE: 1"=50', DATED NOVEMBER 2002.

LEGEND:

-  EXISTING BUILDING
-  FORMER BUILDING/STRUCTURE
-  PROPERTY BOUNDARY
-  SHEET PILING
-  TREE LINE
-  MANHOLE
-  PROPOSED SOIL BORING LOCATION
-  TEST PIT LOCATION
-  DEPTH OF SAMPLE
-  TOTAL LEAD CONCENTRATION (ppm)
-  TCLP LEAD CONCENTRATION (mg/L)
-  SIDEWALL SAMPLE LEAD CONCENTRATION (ppm)
-  SAMPLE DEPTH IN FEET BGS



NEWTOWN STATION/ ELMHURST HOLDER TANK SITE NEWTOWN, NEW YORK		 GEI Consultants 455 WINDING BROOK DRIVE SUITE 201 GLASTONBURY, CONNECTICUT 06033	PREVIOUS ANALYTICAL DATA AND PROPOSED SAMPLE LOCATION SUMMARY
KEYSpan CORPORATION			
PROJECT NO.: 982482-27-3701			
		August 2005	Plate 1