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August 25, 2008

Mr. Bernard Franklin
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Remedial Bureau C, 11th Floor
Division of Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233-7014

Re: Ogdensburg (King St.) Non-Owned Former MGP Site
Site #V00479-6
Phase 3 Remedial Investigation Work Plan

Dear Mr. Franklin:

This letter transmits National Grid's final version of the Phase 3 Remedial Investigation (RI) Work Plan for the referenced site. This version of the work plan incorporates changes agreed to by National Grid as documented in our July 31, 2008 response letter to the New York State Department of Environmental Conservation (NYSDEC) and the NYSDEC's August 4, 2008 letter approving National Grid's responses. The field work detailed in this work plan will be conducted this fall. National Grid will notify the NYSDEC of the actual start date at least one week prior to mobilization.

Please feel free to contact me at (315) 428-5652 if you have any questions.

Sincerely,

for

Steven P. Stucker
Environmental Department

cc: Cathy Geraci, National Grid
William Holzhauer, Esq., National Grid
George W. Heitzman, P.E., NYSDEC
Ian Ushe, NYSDOH
Wendy Kuehner, NYSDOH
Scott Powlin, ARCADIS
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TABLE 1
ADDITIONAL REMEDIAL INVESTIGATIONS

NATIONAL GRID
OGDENSBURG FORMER MGP SITE
OGDENSBURG, NEW YORK

RI Data Gap	Proposed Work
Soil Vapor on Primo Foods Property	***Soil Vapor Sampling Investigation (PSV-1, PSV-2, and PSV-3)*** In accordance with National Grid's phased approach for evaluating soil vapor intrusion, sample soil vapor from three temporary soil vapor probes located near the southern end of the Primo Foods property, in the area between King St. and the Primo Foods building. Approximate locations are shown on Figure 1. It should be noted that the final location and number soil vapor sampling points on Primo Foods property will be determined based on the results of the soil borings completed along King Street (as discussed below). Final locations will be agreed upon in the field based on discussions with NYSDEC/NYSDOH. The installation of soil vapor probes and the collection of samples will be conducted in conformance with the New York State Department of Health (NYSDOH) document entitled Guidance for Evaluating Soil Vapor Intrusion in the State of New York, Final, October 2006 (Guidance), and National Grid's SOP. A tracer gas (helium) will be used in connection with the soil vapor sampling to evaluate the integrity of the seals around the soil vapor probe (provide a means to evaluate whether the samples are diluted by surface air). The tracer gas will be implemented in accordance with National Grid's SOP. As detailed in National Grid's SOP, each vapor sample will be collected using a 6-liter SUMMA® canister with an attached, pre-set flow regulator. The laboratory will provide batch-certified-clean canisters with and initial vacuum of approximately 29 inches of mercury (in. of Hg) for sample collection. Flow regulators will be pre-set by the laboratory to provide uniform sample collection over an approximate 8-hour sampling period. An upwind ambient air sample will be collected in support of the soil vapor sampling. Consistent with the soil vapor sampling approach, the proposed air sampling will also involve use of a pre-cleaned 6-liter SUMMA® canister with an attached flow regulator, which has been pre-set to collect sample over an 8-hour interval. Samples will be submitted for laboratory analysis to a NYSDEC ELAP certified laboratory in accordance with the United States Environmental Protection Agency (USEPA) Compendium Method TO-15, titled "Determination of VOCs in Air Collected in Specially-Prepared Canisters and Analyzed by Gas Chromatography/Mass Spectrometry (GC/MS)". Samples will be analyzed for the standard TO-15 Target Analyte List, including n-alkanes as presented in Table 2. Laboratory analysis will be performed on a standard turnaround for reporting of analytical results (i.e., three to four weeks following sample collection). Within 48 hours after receiving initial, unvalidated data from the laboratory, a preliminary analytical report and figure will be prepared and transmitted to the NYSDEC and NYSDOH.

TABLE 1
ADDITIONAL REMEDIAL INVESTIGATIONS

NATIONAL GRID
OGDENSBURG FORMER MGP SITE
OGDENSBURG, NEW YORK

RI Data Gap	Proposed Work
Overburden and shallow bedrock groundwater quality northwest of site	***MW-17 /MW-17R*** One new shallow bedrock monitoring well (MW-17R) on the northwest corner of King and Canal Streets. The purpose of this well will be to evaluate shallow bedrock groundwater quality and NAPL extent downgradient of the site and near a NAPL impacted area (i.e., MW-7R). An overburden monitoring well (MW-17) is also proposed to be installed if sufficient saturated overburden is encountered.
Overburden groundwater quality north of MW-9	***MW-18*** Elevated MGP-related constituents were detected in groundwater at MW-9. One new overburden groundwater well (MW-18) is proposed to be installed as close as practicable to the west side of the Primo Foods building, near the area of MW-14R. The purpose will be to define the downgradient extent of MGP-related constituents detected at MW-9.
Shallow bedrock groundwater quality north of MW-14R and MW-15R	***MW-19R and MW-20R*** Two new shallow bedrock monitoring wells are proposed to be installed downgradient from MW-14R and MW-15R. The monitoring well screens will be installed based on packer test sampling results. If packer testing results are non-detect, the well screen will be installed to monitor groundwater at approximately the same bedrock interval that exhibited the highest levels of dissolved-phase constituents at MW-14R and MW-15R. Packer testing will be performed using the same methods used during the investigations conducted in 2007.
Utility Corridors along King Street	***Obtain utility drawings from City and Conduct Sewer Inspections*** This task will be performed prior to drilling the soil borings along King Street (as described below). Information learned from this work may be useful for guiding the scope/location of borings along King Street. Available utility drawings will be reviewed to determine invert elevations of utilities located along King Street. Manholes and/or catch basins will be visually inspected should these structures be present and accessible north of the site, along King Street. This information will be useful to assess whether potential MGP related materials could be preferentially migrating along utility corridors.

TABLE 1
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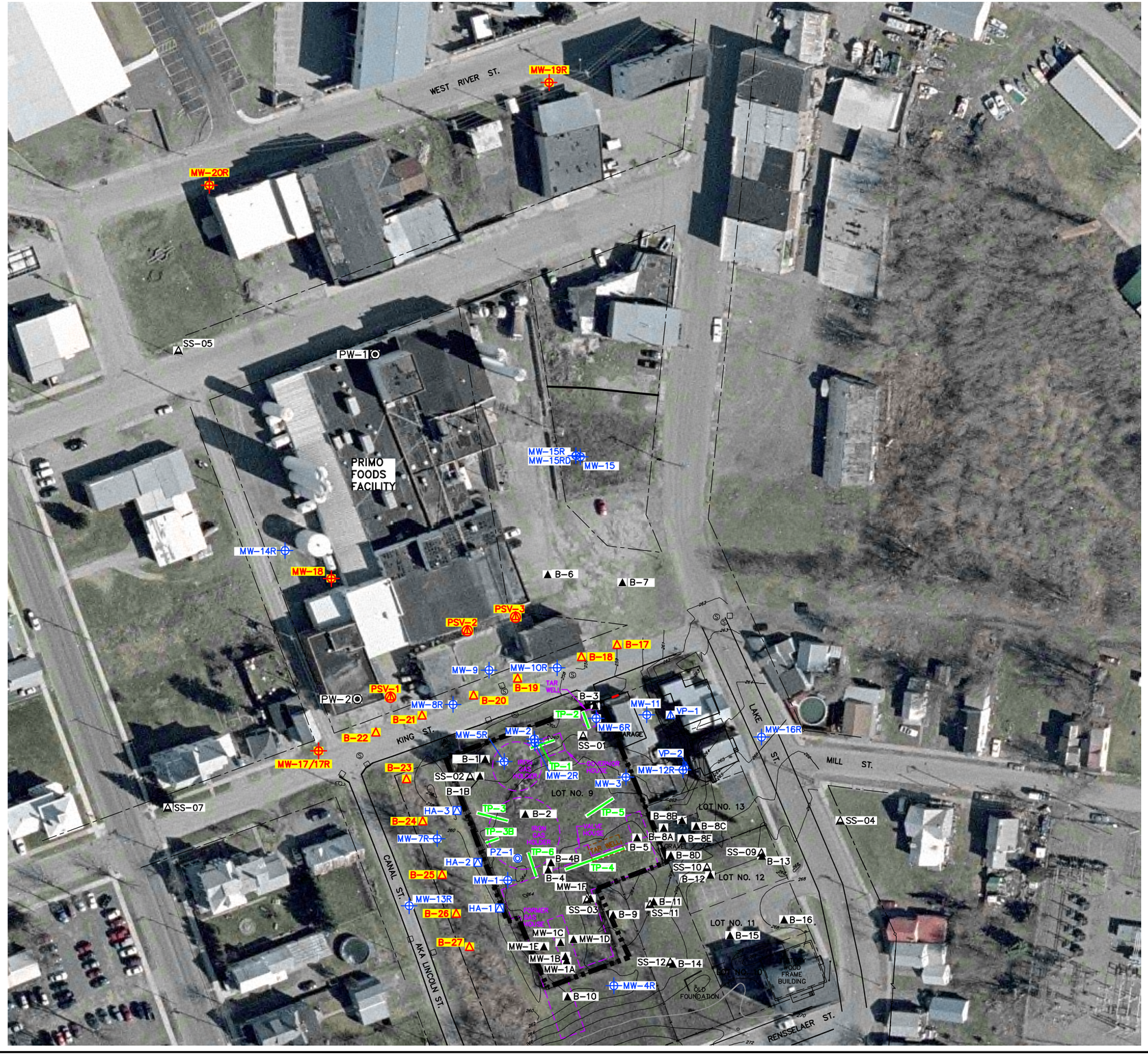
NATIONAL GRID
OGDENSBURG FORMER MGP SITE
OGDENSBURG, NEW YORK

RI Data Gap	Proposed Work
Lateral extent of NAPL and Soil Quality on bedrock surface north of the site	***B-17 through B-22 (plus MW-17R)*** Six soil borings are proposed to be drilled to the top of bedrock along the north side of King Street. Soil borings are proposed to be drilled every approximately 40 feet on center along a stretch of King Street extending from the King Street/Canal Street intersection east to approximately 60 feet east of MW-10R. Borings will be positioned to supplement existing borings at MW-8R, MW-9, and MW-10R. The purpose of these borings will be to assess the potential extent of NAPL that may be present north of the site on the bedrock surface and to evaluate off-site soil quality. If NAPL is observed in one or more of these borings, an additional boring or borings would be installed in a northerly direction (to the extent practicable), outward from the original borings where NAPL is observed. Soil samples will be continuously collected, screened with a PID, and described by a geologist. Soil samples will be collected at each location for laboratory analysis from the interval above the bedrock surface. Samples will be analyzed for TCL VOCs, TCL SVOCs, total cyanide, and free cyanide.
Lateral extent of NAPL and Soil Quality on bedrock surface near MW-7R	***B-23 through B-27*** Five soil borings are proposed to be drilled to the top of bedrock in the wooded area west of the site (near MW-7R). The purpose of these borings will be to assess the extent of NAPL previously observed on the bedrock surface at MW-7R. Soil samples will be continuously collected, screened with a PID, and described by a geologist. Soil samples will be collected at each location for laboratory analysis from the interval above the bedrock surface. Samples will be analyzed for TCL VOCs, TCL SVOCs, total cyanide, and free cyanide.
Groundwater quality at new wells	***Monitoring Wells MW-17, MW-17R, MW-18, MW-19R, and MW-20R*** Conduct two rounds of groundwater sampling from the newly installed monitoring wells. Groundwater samples will also be collected from existing monitoring wells MW-14R, MW-15RS, and MW-15RD during the first sampling event for comparative purposes, Groundwater samples will be collected using low-flow sampling techniques and samples will analyzed for TCL VOCs, TCL SVOCs, and total cyanide. If possible, one sampling event will be conducted during a relatively dry period (late summer 2008) and the other event will be conducted during a relatively wet period (late fall 2008). A synoptic, comprehensive round of water levels will be measured at all site wells during each sampling round. During the water-level measurement rounds, each well will be checked for the presence/absence of NAPL. Specific capacity test data will be measured during the groundwater sampling events. These data will be used to estimate the hydraulic conductivity of the wetted screened interval.

TABLE 1
ADDITIONAL REMEDIAL INVESTIGATIONS

NATIONAL GRID
OGDENSBURG FORMER MGP SITE
OGDENSBURG, NEW YORK

Field Methods and Quality Assurance for Soil and Groundwater Investigations
The additional RI field and sampling activities will be conducted in general accordance with the NYSDEC-approved *Generic Site Characterization/IRM Work Plan for Site Investigations at Non-Owned Former MGP Sites* and supporting appendices (Field Sampling Plan [FSP] and Quality Assurance Project Plan [QAPP]), dated November 2002. As described in the QAPP, soil and groundwater samples will be submitted for laboratory analysis using United States Environmental Protection Agency (USEPA) SW-846 Methods as referenced in the most recent edition of the NYSDEC Analytical Services Protocol (ASP), with Category B analytical laboratory reports. Soil and groundwater samples will be analyzed for TCL VOCs, TCL SVOCs, and total cyanide. Soil samples will also be analyzed for free cyanide. Free cyanide analyses will be performed using the micro-diffusion method (ASTM-4285-95). A Data Usability Summary Report (DUSR) of the laboratory data packages will be prepared and the results of the DUSR will be incorporated into data tables which will be provided in the RI Report. The soil and groundwater sample(s) (including quality assurance/quality control [QA/QC] samples) will be collected, packaged, handled, and shipped in general accordance with the QA/QC protocols and the soil and groundwater sampling protocols presented in the FSP and QAPP.



LEGEND:

B-20	PROPOSED SOIL BORING
MW-18	PROPOSED MONITORING WELL
PSV-1	PROPOSED SOIL VAPOR SAMPLE POINT
MW-10	MONITORING WELL
VP-1	SOIL VAPOR SAMPLING POINT
PZ-1	PIEZOMETER
HA-1	HAND-AUGER BORING
TP-1	TEST PIT
B-1	SOIL BORING
SS-01	SURFACE SOIL SAMPLE
PW-1	APPROXIMATE LOCATION OF PRODUCTION WELL LOCATED INSIDE PRIMO FOODS FACILITY
TAR WELL	FEATURE FROM 1909 SANBORN MAP
TAR WELL	FEATURE FROM SEPTEMBER 1925 SANBORN MAP
	APPROXIMATE SITE BOUNDARY
	APPROXIMATE ROAD RIGHT-OF WAY
	CHAINLINK FENCE
	UTILITY POLE
	CATCH BASIN
	MANHOLE
258	TOPOGRAPHIC CONTOUR (2 FT. CONTOUR INTERVAL)

NOTES:

1. BASE MAP FROM SURVEY BY WCT SURVEYORS, P.C., ON 11/21/2003, 12/22/2003 AND 4/7/2004. ELEVATIONS ARE BASED ON THE NAVD 88 DATUM. BASE MAP UPDATED BY C.T. MALE SURVEYORS ON SEPTEMBER 7, 2006.
2. HISTORICAL FEATURE LOCATIONS AND SCALE ARE APPROXIMATE.

0 100' 200'

GRAPHIC SCALE

NATIONAL GRID
OGDENSBURG (KING STREET) NON-OWNED FORMER MGP SITE
OGDENSBURG, NEW YORK
REMEDIAL INVESTIGATION

PROPOSED INVESTIGATION LOCATIONS

ARCADIS

FIGURE 1

CITY:SYRACUSE DIV/GROUP-141 DB:RCB AMS RCA LD:(Opt) PIC:(Opt) PM:(Reqd) TM:(Opt) LYR:ON=*;OFF=*REF* ACADVER: 17.0S (LMS TECH) PAGESETUP: ---- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 8/19/2008 9:53 AM BY: ALLEN, ROYCE
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