



Ms. Lisa A. Gorton
Environmental Engineer
New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau C
625 Broadway
Albany, NY 12233-7014

Subject:

Site Characterization Work Plan Addendum – Vapor Intrusion Investigation
Former Dangman Park Manufactured Gas Plant Site
Brooklyn, New York
Site No. 224047
Index # A2-0552-0606

Dear Ms. Gorton:

On behalf of National Grid USA (National Grid), ARCADIS has prepared this Site Characterization (SC) Work Plan Addendum to outline the proposed vapor intrusion (VI) investigation activities for the former Dangman Park Manufactured Gas Plant (MGP) site (Site) located at 486 Neptune Avenue, Brooklyn, New York. The Site consists of two parcels located along Neptune Avenue and W. 5th Street. This SC Work Plan Addendum has been prepared in accordance with the requirements of a Multi-Site Order on Consent (ACO) and Administrative Settlement (Index # A2-0552-0606) that was entered into by KeySpan and the New York State Department of Environmental Conservation (NYSDEC) in February 2007. The correspondence between the NYSDEC and National Grid regarding this SC Work Plan Addendum are provided in Attachment A.

The VI investigation will include the installation of temporary sub-slab soil vapor points and characterization of sub-slab soil vapor and indoor air quality. As discussed in the Final SC Work Plan (ARCADIS, 2009) dated April 7, 2009, the VI investigation will be conducted in general accordance with the New York State Department of Health's (NYSDOH) *"Final Guidance for Evaluating Soil Vapor Intrusion in the State of New York"* (VI Guidance), dated October 2006, and National Grid's *"Draft Standard Operating Procedures for Soil Vapor Intrusion Evaluation at National Grid MGP Sites in New York State"*, dated September 2006. However, the U.S. Environmental Protection Agency (EPA) risk-based soil vapor concentrations

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Date:
February 22, 2010

Contact:
Steven M. Feldman

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(631) 391-5244

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Our ref:
B0036704.0000.00005

Imagine the result

will not be used as a screening tool or as a basis for decision making. The sub-slab soil vapor data will be evaluated in conjunction with the ambient air quality and indoor air quality data (“as a whole”) to determine if the VI exposure pathway is complete and if any further actions are required. The indoor air quality data will be compared to the background indoor air concentrations (90th percentile values) that are presented in Table C2 of Appendix C of the NYSDOH VI Guidance. The values in Table C2 are based on a study of indoor air quality (Building Assessment and Survey Evaluation [BASE]) that was conducted by the EPA from 1994 through 1996 (BASE '94-'96). The VI investigation will be conducted during the 2009-2010 winter heating season. In New York State, heating systems operate routinely from November 15 through March 31.

The target reporting limits for the chlorinated volatile organic compounds (CVOCs) associated with the NYSDOH VI Guidance matrices are appropriate for effectively comparing the potential site-related CVOC (non-MGP-related constituents) results to the indoor air concentrations specified in the matrices. Specifically, the target reporting limit for tetrachloroethene (1.36 micrograms per cubic meter) is lower than the lowest indoor air concentration (<3 micrograms per cubic meter) specified in Matrix 2. PCE is the primary potential site-related CVOC because of the presence of a dry cleaner in the shopping center. It should be noted that the groundwater quality data collected from monitoring wells MW-1 through MW-5 in December 2009 indicate that the CVOCs associated with the NYSDOH VI Guidance matrices were not detected above the laboratory reporting limits. Table 1 outlines the potential MGP-related and non-MGP-related constituents.

VI Investigation

The SC VI investigation objectives and general procedures for obtaining and analyzing sub-slab soil vapor, indoor air quality, and ambient air quality samples are detailed in Sections 3.4.1 through 3.4.3 of the Final SC Work Plan, the Field Sampling Plan (Appendix A of the SC Work Plan), the Quality Assurance Project Plan (Appendix B of the SC Work Plan), and the QAPP Addendum.

Sample Locations

Sub-Slab Soil Vapor Samples

The SC VI investigation will consist of advancing temporary sub-slab soil vapor points through the floor slab in select tenant spaces in the strip mall that overlie the

former MGP structures. The proposed locations of the temporary sub-slab soil vapor points are shown on Figure 1. The locations of the former MGP structures relative to the individual tenant spaces is the primary element that was used to design the sub-slab soil vapor sampling program. Data collected during the soil and groundwater investigation (i.e., distribution of impacts observed during the soil boring and monitoring well drilling activities) were also used as an aid in determining the number and locations of sub-slab soil vapor points. The final locations of the temporary sub-slab soil vapor points may be modified in the field based on Site constraints within the tenant spaces.

To assess the potential presence of MGP-related and/or non-MGP-related chemical constituents in sub-slab soil vapor at the Site, one round of sub-slab soil vapor sampling will be conducted. The sub-slab soil vapor sampling event will consist of collecting one soil vapor sample from each temporary sub-slab soil vapor sampling point using the methods described in the FSP.

Indoor Air Quality and Ambient Air Quality Samples

The SC VI investigation will consist of collecting indoor air quality samples in select tenant spaces in the strip mall that overlie the former MGP structures and one ambient air sample at a location upwind of the strip mall. The SC Work Plan indicated that the indoor air quality samples would be co-located with the sub-slab soil vapor samples. In lieu of this approach, one (1) indoor air quality sample will be collected in each of the seven (7) tenant spaces (assuming that access is obtained) that are estimated to overlie the former MGP structures. One (1) indoor air quality sample per tenant space is expected to be representative of each space. The proposed locations of the indoor air quality samples are shown on Figure 1. The final locations of the indoor air quality samples may be modified in the field based on Site constraints within the tenant spaces.

Prior to collecting the indoor air quality samples, a building survey and chemical inventory will be conducted to assess potential indoor air sources that may contain the same compounds as MGP-related volatile constituents. The NYSDOH Indoor Air Quality Questionnaire and Building Inventory Field Form will be completed for each tenant space where an indoor air quality sample is collected.

To assess the potential presence of MGP-related and/or non-MGP-related chemical constituents in indoor air at the Site, one round of indoor air quality sampling will be

conducted. The indoor air quality sampling event will consist of collecting one indoor air quality sample from each location using the methods described in the FSP.

The sub-slab soil vapor, indoor air quality, and ambient air quality data will be discussed in the SC Report. It is anticipated that the duration of the VI investigation field activities will be one to two weeks.

Please contact Andrew Prophete of National Grid at (718) 963-5412 if you have any questions.

Sincerely,

ARCADIS



Christopher D. Keen
Senior Scientist



Steven M. Feldman
Principal Scientist

Copies:

Albert DeMarco, NYSDOH
Andrew Prophete, National Grid
Donald Campbell, National Grid
Tracey Bell, National Grid
Linda Sullivan, National Grid

Table 1. Compound List and RLs for Soil Vapor and Indoor Air Analysis, Site Characterization Work Plan Addendum, Vapor Intrusion Investigation, Former Dangman Park Manufactured Gas Plant Site, Brooklyn, New York.

Compound	Target Reporting Limits	
	(ppbv)	(ug/m ³)
Potential MGP-Related Constituents or Other Sources		
Benzene	0.2	0.64
Carbon disulfide	0.2	0.62
2-Chlorotoluene (o-Chlorotoluene)	0.2	1.03
Cyclohexane	0.2	0.69
Ethylbenzene	0.2	0.87
4-Ethyltoluene (p-Ethyltoluene)	0.2	0.98
n-Heptane	0.2	0.82
n-Hexane	0.2	0.7
Styrene	0.2	0.85
Toluene	0.2	0.75
1,2,4-Trimethylbenzene	0.2	0.98
1,3,5-Trimethylbenzene	0.2	0.98
2,2,4-Trimethylpentane	0.2	0.93
m&p-Xylenes	0.4	1.72
o-Xylene	0.2	0.87
1,2,3-Trimethylbenzene	0.2	0.98
Naphthalene	0.2	1.05
1-Methylnaphthalene	2.5	14.5
2-Methylnaphthalene	2.5	14.5
1,2,4,5-Tetramethylbenzene	2.5	13.7
Indene	0.2	0.95
Indane	0.2	0.97
Thiopene	0.2	0.69
Non-MGP-Related Constituents		
Acetone	0.5	1.18
Bromodichloromethane	0.2	1.34
Vinyl bromide (Bromoethene)	0.2	0.87
Bromoform	0.2	2.07
Bromomethane (Methyl bromide)	0.2	0.78
1,3-Butadiene	0.2	0.44
2-Butanone (Methyl ethyl ketone)	0.2	0.59
Carbon tetrachloride	0.2	1.26
Chlorobenzene	0.2	0.92
Chloroethane	0.2	0.53
Chloroform	0.2	0.98

See footnotes on last page.

Table 1. Compound List and RLs for Soil Vapor and Indoor Air Analysis, Site Characterization Work Plan Addendum, Vapor Intrusion Investigation, Former Dangman Park Manufactured Gas Plant Site, Brooklyn, New York.

Compound	Target Reporting Limits	
	(ppbv)	(ug/m ³)
Non-MGP-Related Constituents (Continued)		
Chloromethane (Methyl chloride)	0.2	0.41
3-Chloropropene (allyl chloride)	0.2	0.63
Dibromochloromethane	0.2	1.7
1,2-Dibromoethane	0.2	1.54
1,2-Dichlorobenzene	0.2	1.2
1,3-Dichlorobenzene	0.2	1.2
1,4-Dichlorobenzene	0.2	1.2
Dichlorodifluoromethane (Freon 12)	0.2	0.99
1,1-Dichloroethane	0.2	0.81
1,2-Dichloroethane	0.2	0.81
1,1-Dichloroethene	0.2	0.79
cis-1,2-Dichloroethene	0.2	0.79
trans-1,2-Dichloroethene	0.2	0.79
1,2-Dichloropropane	0.2	0.92
cis-1,3-Dichloropropene	0.2	0.91
trans-1,3-Dichloropropene	0.2	0.91
1,2-Dichlorotetrafluoroethane (Freon 114)	0.2	1.4
1,4-Dioxane	0.2	0.72
Hexachlorobutadiene	0.2	2.13
2-Hexanone (Methyl Butyl Ketone)	0.2	0.82
Isopropyl Alcohol	0.5	1.23
Methylene chloride	0.5	1.73
4-Methyl-2-pentanone (MIBK)	0.2	0.82
Methyl tert-butyl ether (MTBE)	0.2	0.72
Tertiary butyl alcohol (TBA)	0.2	0.61
1,1,2,2-Tetrachloroethane	0.2	1.37
Tetrachloroethene (PCE)	0.2	1.36
1,2,4-Trichlorobenzene	0.2	1.48
1,1,1-Trichloroethane	0.2	1.09
1,1,2-Trichloroethane	0.2	1.09
1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)	0.2	1.53
Trichloroethene (TCE)	0.2	1.07
Trichlorofluoromethane (Freon 11)	0.2	1.12
Vinyl Chloride	0.2	0.51

RLs Reporting Limits.
 ppbv Parts per billion by volume.
 ug/m³ Micrograms per cubic meter.

ATTACHMENT A

Correspondence

New York State Department of Environmental Conservation

Division of Environmental Remediation

Remedial Bureau C, 11th Floor

625 Broadway, Albany, New York 12233-7014

Phone: (518) 402-9662 • Fax: (518) 402-9679

Website: www.dec.ny.gov



Alexander B. Grannis
Commissioner

Mr. Donald Campbell/Andrew Prophette
National Grid

DRAFT: for discussion purposes

Re: Former Dangman Park MGP

Site No. 224047

Brooklyn, Kings County

Site Characterization Plan Work Plan Addendum-

Vapor Intrusion Investigation and QAPP Addendum (Arcadis, January 15, 2010)

Dear Mr. Campbell,

The New York State Department of Environmental Conservation (Department) and New York State Department of Health (NYSDOH) have completed the review of the reference document and offer the following comments:

1. Page 1, regarding the use “Draft Standard Operating Procedures for Soil Vapor Intrusion Evaluation at the National Grid MGP Sites in New York State”. The Department does not accept the use of USEPA’s risk-based soil vapor concentrations as a screening tool or basis for decision making, please remove reference to these screening values from any future data deliverable.
2. Figure 1, proposed sampling locations. The Department requests an additional sample located within Tenant Space 7 (Capitol One Bank) overlying the former gas holder.

NYSDOH (DeMarco, January 29, 2010) comments are included as a separate attachment.



STATE OF NEW YORK DEPARTMENT OF HEALTH

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

Richard F. Daines, M.D.
Commissioner

James W. Clyne, Jr.
Executive Deputy Commissioner

January 29, 2010

Ms. Lisa Gorton
Division of Environmental Remediation
NYS Department of Environmental Conservation
625 Broadway – 12th Floor
Albany, NY 12233-7016

RE: **Site Characterization Work Plan addendum-
Vapor Intrusion Investigation and QAPP
Addendum**
Former Dangman Park MGP
486 Neptune Avenue
Site No. 224047
Brooklyn, Kings County

Dear Ms. Gorton,

Although the work plan states that sample collection will be completed in accordance with the NYS Department of Health Guidance for evaluating soil vapor intrusion, the work plan should contain a description of the site-specific sampling protocol that will be used. In addition, I recommend that the work plan also include, but not be limited to the following criteria:

1. Method detection limits for chlorinated solvents should be used that enable the results to be compared to the NYSDOH indoor air matrices effectively.
2. The air samples must be analyzed by a NYS ELAP approved laboratory for the TO-15 method.

If you have any questions please contact me at (518) 402-7860.

Sincerely,

Albert DeMarco
Public Health Specialist
Bureau of Environmental Exposure Investigation



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Division of Environmental Remediation
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Albany, NY 12233-7014

ENVIRONMENT

Subject:
Response to Draft Comments Letter
Site Characterization Work Plan Addendum – Vapor Intrusion Investigation
Former Dangman Park Manufactured Gas Plant Site
Brooklyn, New York
Site No. 224047
Index # A2-0552-0606

Date:
February 8, 2010

Contact:
Steven M. Feldman

Phone:
(631) 391-5244

Email:
Steven.Feldman@arcadis-us.com

Our ref:
B0036704.0000.00001

Dear Ms. Gorton:

On behalf of National Grid USA (National Grid), ARCADIS has prepared this Response to Draft Comments letter to address the Draft New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) comments that were provided to National Grid on January 29, 2010 regarding the Site Characterization (SC) Work Plan Addendum – Vapor Intrusion (VI) Investigation for the former Dangman Park Manufactured Gas Plant (MGP) site (Site) located at 486 Neptune Avenue, Brooklyn, New York.

NYSDEC Comments

Comment 1 – Page 1, regarding the use "Draft Standard Operating Procedures for Soil Vapor Intrusion Evaluation at the National Grid MGP Sites in New York State". The Department does not accept the use of USEPA's risk-based soil vapor concentrations as a screening tool or basis for decision making, please remove reference to these screening values from any future data deliverable.

Response

The U.S. Environmental Protection Agency (EPA) risk-based soil vapor concentrations will not be used as a screening tool or as a basis for decision making. The sub-slab soil vapor data will be evaluated in conjunction with the ambient air quality and indoor air quality data ("as a whole") to determine if the VI exposure pathway is complete and if any further actions are required. The indoor air quality data will be compared to the background indoor air concentrations (90th percentile

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values) that are presented in Table C2 of Appendix C of the NYSDOH VI Guidance. The values in Table C2 are based on a study of indoor air quality (Building Assessment and Survey Evaluation [BASE]) that was conducted by the EPA from 1994 through 1996 (BASE '94-'96).

Comment 2 – Figure 1, proposed sampling locations. The Department requests an additional sample located within Tenant Space 7 (Capital One Bank) overlying the former gas holder.

Response

National Grid believes that the current sub-slab soil vapor sampling program is comprehensive enough to determine if MGP-related constituents are present due to release from the former gas holder. If the NYSDEC feels that this sampling plan is not responsive enough to your VI investigation requirements, National Grid can attempt to relocate SSSV-5 to within the footprint of the holder as depicted on Figure 1.

NYSDOH Comments

Comment 1 – The work plan should contain a description of the site-specific sampling protocol that will be used.

Response

The VI Investigation Work Plan references the SC Work Plan sections that describe the sampling protocols that will be used. The SC VI investigation objectives and general procedures for obtaining and analyzing sub-slab soil vapor, indoor air quality, and ambient air quality samples are detailed in Sections 3.4.1 through 3.4.3 of the Final SC Work Plan, the Field Sampling Plan (Appendix A of the SC Work Plan), the Quality Assurance Project Plan (Appendix B of the SC Work Plan), and the QAPP Addendum.

Comment 2 – Method detection limits for chlorinated solvents should be used that enable the results to be compared to the NYSDOH indoor air matrices effectively.

Response

The target reporting limits for the chlorinated volatile organic compounds (CVOCs) associated with the NYSDOH VI Guidance matrices are appropriate for effectively comparing the potential site-related CVOc (non-MGP-related constituents) results to the indoor air concentrations specified in the matrices. Specifically, the target

reporting limit for tetrachloroethene (1.36 micrograms per cubic meter) is lower than the lowest indoor air concentration (<3 micrograms per cubic meter) specified in Matrix 2. PCE is the primary potential site-related CVOC because of the presence of a dry cleaner in the shopping center. It should be noted that the groundwater quality data collected from monitoring wells MW-1 through MW-5 in December 2009 indicate that the CVOCs associated with the NYSDOH VI Guidance matrices were not detected above the laboratory reporting limits. Table 1 of the revised VI Investigation Work Plan outlines the potential MGP-related and non-MGP-related constituents.

Comment 3 – The air samples must be analyzed by a NYS ELAP approved laboratory for the TO-15 method.

Response

Section 11.2 of the QAPP specifies that all soil, groundwater, and air samples will be analyzed by a NYSDOH-approved laboratory. Alpha Analytical is a New York State Environmental Laboratory Accreditation Program (ELAP) approved laboratory for EPA Method TO-15.

We trust that this letter is responsive to the NYSDEC and NYSDOH draft comments. If there are any questions, please do not hesitate to contact Andrew Prophete of National Grid at 718-963-5412.

Sincerely,

ARCADIS of New York, Inc.



Christopher D. Keen
Senior Scientist



Steven M. Feldman
Principal Scientist

Copies:

Albert DeMarco, NYSDOH
Andrew Prophete, National Grid
Donald Campbell, National Grid
Tracey Bell, National Grid
Linda Sullivan, National Grid

From: Lisa Gorton [lagorton@gw.dec.state.ny.us]
Sent: Tuesday, February 09, 2010 8:31 AM
To: Feldman, Steven
Cc: Keen, Christopher; Albert J DeMarco; Andrew A. Prophete; Donald Campbell
Subject: Re: Site Characterization Work Plan Addendum - VI Investigation, Former Dangman Park MGP Site
Attachments: Lisa Gorton.vcf

The Department and DOH have reviewed the referenced response to comments. We concur with the responses with the exception of the following:

'Regarding the MDL for cVOCs. The PCE response is acceptable, however the MDL for TCE should be less than or equal to 0.25 ug/m³ for comparison to SV/IA Matix 1 if the NYSDOH SVI guidance.'

Please provide justification for the use of this MDL or otherwise adjust to meet SVI guidance.

Lisa A. Gorton
Remedial Project Manager
NYSDEC-Remedial Bureau C
Albany, NY 12233-7014
Tel. (518) 402-9564

>>> "Feldman, Steven" <Steven.Feldman@arcadis-us.com> 2/8/2010 5:40 PM >>>
Lisa—

Attached are two documents concerning the above-reference subject matter. The first document is a response letter that addresses the NYSDEC and NYSDOH draft comments that were provided to National Grid. In addition, Andrew Prophete has conveyed to me your mutual agreement that the proposed sub-slab soil vapor sampling point locations are acceptable. The second document is the revised Work Plan Addendum that is consistent with the information provided in our responses.

Steven M. Feldman | Principal Scientist | steven.feldman@arcadis-us.com

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New York State Department of Environmental Conservation
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ENVIRONMENT

Subject:

Follow Up Response to Comments Letter
Site Characterization Work Plan Addendum – Vapor Intrusion Investigation
Former Dangman Park Manufactured Gas Plant Site
Brooklyn, New York
Site No. 224047
Index # A2-0552-0606

Date:
February 11, 2010

Contact:
Steven M. Feldman

Phone:
(631) 391-5244

Email:
Steven.Feldman@arcadis-us.com

Our ref:
B0036704.0000.00005

Dear Ms. Gorton:

On behalf of National Grid USA (National Grid), ARCADIS has prepared this follow up Response to Comments letter to address the New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) comment e-mail that was provided to National Grid on February 9, 2010 regarding the Site Characterization (SC) Work Plan Addendum – Vapor Intrusion (VI) Investigation for the former Dangman Park Manufactured Gas Plant (MGP) site (Site) located at 486 Neptune Avenue, Brooklyn, New York.

NYSDEC Comment

Regarding the MDL for cVOCs. The PCE response is acceptable, however the MDL for TCE should be less than or equal to 0.25 ug/m³ for comparison to SV/IA Matrix 1 in the NYSDOH SVI guidance.

Response

For TCE, the laboratory reporting limit (RL) is 1.07 µg/m³. However, the method detection limit (MDL) is half the RL, or 0.54 µg/m³; therefore, detections of TCE between the RL and MDL will be reported as an estimated value. In the context of an MGP investigation that is also screening for cVOCs, an RL of 1.07 µg/m³ and an MDL of 0.54 µg/m³ for TCE for indoor air samples, in conjunction with the sub-slab soil vapor results, will provide the basis for the NYSDEC to review the data and determine the appropriate next steps as recommended by the SVI guidance.

[Imagine the result](#)

We trust that this letter is responsive to the NYSDEC and NYSDOH comment. If there are any questions, please do not hesitate to contact Andrew Prophete of National Grid at 718-963-5412.

Sincerely,

ARCADIS of New York, Inc.



Christopher D. Keen
Senior Scientist



Steven M. Feldman
Principal Scientist

Copies:

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Andrew Prophete, National Grid
Donald Campbell, National Grid
Tracey Bell, National Grid
Linda Sullivan, National Grid

New York State Department of Environmental Conservation

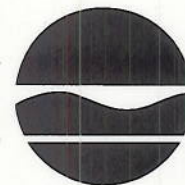
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Pete Grannis
Commissioner

February 19, 2010

Mr. Andrew Prophete
National Grid
One MetroTech Center
Brooklyn, NY 11201

Dear Mr. Prophete:

Re: Dangman Park Former MGP Site
Kings County, Site ID: 224047
Revised Site Characterization Work Plan Addendum - Vapor Intrusion Investigation (ARCADIS, January, 2010); Response to Comments (Arcadis, February 9 and 11, 2010)

The New York State Department of Environmental Conservation (Department) and New York State Department of Health have completed the review of referenced work plan and response to comments and find these acceptable.

Based on the findings of potential MGP-impacts during the initial site characterization phase, it is the Department's understanding that the referenced Site will move forward into a Remedial Investigation phase. In the interest of moving this forward, please provide a deliverable schedule for the Site Characterization Data Summary for the soils/groundwater sampling data collected in November/December 2009. The soil vapor intrusion data should be submitted as an letter report addendum to the soils/groundwater sampling data.

Feel free to contact me directly at (518) 402-9662 should you have any further comments or questions.

Sincerely,

Lisa A. Gorton

Lisa A. Gorton
Environmental Engineer
Remedial Action Bureau C
Division of Environmental Remediation

ec: G. Cross, NYSDEC
L. Gorton, NYSDEC
A. DeMarco, NYSDOH -BEEI
D. Campbell, National Grid