

**Response to NDEP Comments Dated March 4, 2008 on the Supplemental Background
Shallow Soil Sampling and Analysis Plan Dated March 3, 2008**

1. Background and Objectives, Page 2, BRC states "It is anticipated that these data will be used for comparison purposes for the Mohawk and portions of the Parcel 4B sub-areas only." NDEP notes that the application of the data will be determined after the analytical results are received. NDEP also notes that NDEP may choose to incorporate these data into the overall background data set (depending on the analytical data). No response is necessary for this comment.

Response: BRC only noted in the SAP that this would likely be the case, but agrees that application of the data will depend on the analytical results.

2. Scope of Work, Sampling Locations and Depths, pages 2 and 3, it is NDEP's understanding and expectation that the sampling depths are consistent with the previous shallow soils background data. Please confirm.

Response: BRC confirms that these are the same sample depth intervals that were collected from during the previous background shallow soil investigation.

3. Scope of Work, Analytical Program, the NDEP has the following comments regarding the physical analyses proposed:
 - a. NDEP is not certain that the TOC analysis for the shallow soil sample so close to a highway will be meaningful. The subsurface samples may be more appropriate for this analysis

Response: Agreed. TOC analyses will only be performed for the subsurface samples.

- b. By soil texture, NDEP assumes that BRC means grain size distribution (sand/silt/clay) by ASTM methods; the analysis must include the silt and clay fraction for a meaningful soil classification

Response: BRC confirms that ASTM Method D422 includes identification of the silt and clay fractions

- c. NDEP is not certain that a soil moisture analysis for a surface sample (0 to 0.5 ft) would be meaningful

Response: Agreed. Soil moisture analyses will only be performed for the subsurface samples.

- d. NDEP presumes that the soil samples will be logged in the field by using ASTM D2488-00 (Visual-Manual Procedure) and classified by laboratory methods using ASTM D2487-00 (USCS).

Response: As indicated in the SAP, field activities will be conducted in accordance with FSSOPs, of which SOP-17 is based on the USCS and ASTM Standard D2488-00.

4. Table 1, it is the NDEP's understanding and expectation that the preparatory methods and analytical methods presented in this table are consistent with the previous shallow soils background data. Please confirm.

Response: BRC confirms that these are the same sample preparatory and analytical methods that were used during the previous background shallow soil investigation.

TABLE 1
PROJECT LIST OF ANALYTES
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Parameter of Interest	Preparation Method	Analytical Method	Compound List	CAS Number	Laboratory Limits		Sample Depths
Metals	EPA 3050M	EPA 6020/6010B	Aluminum	7429-90-5	5	mg/kg	0, 5, 10
			Antimony	7440-36-0	0.5	mg/kg	0, 5, 10
			Arsenic	7440-38-2	1	mg/kg	0, 5, 10
			Barium	7440-39-3	2	mg/kg	0, 5, 10
			Beryllium	7440-41-7	0.1	mg/kg	0, 5, 10
			Boron	7440-42-8	10	mg/kg	0, 5, 10
			Cadmium	7440-43-9	0.05	mg/kg	0, 5, 10
			Calcium	7440-70-2	50	mg/kg	0, 5, 10
			Chromium	7440-47-3	1	mg/kg	0, 5, 10
			Cobalt	7440-48-4	0.2	mg/kg	0, 5, 10
			Copper	7440-50-8	1	mg/kg	0, 5, 10
			Iron	7439-89-6	5	mg/kg	0, 5, 10
			Lead	7439-92-1	0.3	mg/kg	0, 5, 10
			Lithium	1313-13-9	5	mg/kg	0, 5, 10
			Magnesium	7439-95-4	50	mg/kg	0, 5, 10
			Manganese	7439-96-5	0	mg/kg	0, 5, 10
			Molybdenum	7439-98-7	1	mg/kg	0, 5, 10
			Nickel	7440-02-0	1	mg/kg	0, 5, 10
			Niobium	7440-03-1	3	mg/kg	0, 5, 10
			Palladium	7440-05-3	0.1	mg/kg	0, 5, 10
			Phosphorus	7723-14-0	50	mg/kg	0, 5, 10
			Platinum	7440-06-4	0.1	mg/kg	0, 5, 10
			Potassium	7440-09-7	10	mg/kg	0, 5, 10
			Selenium	7782-49-2	0.5	mg/kg	0, 5, 10
			Silicon	7440-21-3	25	mg/kg	0, 5, 10
			Silver	7440-22-4	0.2	mg/kg	0, 5, 10
			Sodium	7440-23-5	20	mg/kg	0, 5, 10
			Strontium	7440-24-6	0.5	mg/kg	0, 5, 10
			Sulfur	7704-34-9	500	mg/kg	0, 5, 10
			Thallium	7440-28-0	0.2	mg/kg	0, 5, 10
			Tin	7440-31-5	0.2	mg/kg	0, 5, 10
			Titanium	7440-32-6	0.5	mg/kg	0, 5, 10
			Tungsten	7440-33-7	0.5	mg/kg	0, 5, 10
			Uranium	7440-61-1	0.1	mg/kg	0, 5, 10
			Vanadium	7440-62-2	1.0	mg/kg	0, 5, 10
			Zinc	7440-66-6	2	mg/kg	0, 5, 10
			Zirconium	7440-67-7	10	mg/kg	0, 5, 10
Radionuclides	EPA 3060A	EPA 7196A	Chromium (VI)	18540-29-9	0.4	mg/kg	0, 5, 10
	EPA 7471A	EPA 7471A	Mercury	7439-97-6	0.0333	mg/kg	0, 5, 10
	HASL 300	HASL A-01-R	Thorium-232	7440-29-1	1.0	pCi/g	0, 5, 10
	RC5013/5032 ¹ (Total Dissolution)		Thorium-228	14274-82-9	1.0	pCi/g	0, 5, 10
	HASL 300		Thorium-230	14269-63-7	1.0	pCi/g	0, 5, 10
	RC5013/5032/5086 ¹ (Total Dissolution)		Uranium-233/234	13966-29-5	1.0	pCi/g	0, 5, 10
			Uranium 235/236	15117-96-1	1.0	pCi/g	0, 5, 10
			Uranium-238	7440-61-1	1.0	pCi/g	0, 5, 10
Misc. Soil Characteristics	HASL 300	EPA 903.1	Radium-226	13982-63-3	1.0	pCi/g	0, 5, 10
	RC-5013/RC-5032 ¹	EPA 904.0	Radium-228	15262-20-1	1.0	pCi/g	0, 5, 10
	EPA 9060		Total organic carbon (TOC)	7440-44-0	25	mg/kg	5, 10
	ASTM D2216-98		Percent moisture	%MOISTURE		percent	5, 10
	EPA 9045C		pH in soil	pH	NA	pHunits	0, 5, 10
Semivolatile Organic Compounds	EPA 9080 or 9081		Cation exchange capacity	NA	NA	meq/100g	0, 5, 10
	ASTM D422		Soil Texture Class	NA	NA	% of total	0, 5, 10
	EPA 3550B	EPA 8270C	1,2,4,5-Tetrachlorobenzene	95-94-3	330	µg/kg	0
			1,2-Diphenylhydrazine	122-66-7	330	µg/kg	0
			1,4-Dioxane	123-91-1	330	µg/kg	0
			2,2',4,4'-Dichlorobenzil	3457-46-3	330	µg/kg	0
			2,4,5-Trichlorophenol	95-95-4	330	µg/kg	0

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Parameter of Interest	Preparation Method	Analytical Method	Compound List	CAS Number	Laboratory Limits	Sample Depths
Semivolatile Organic Compounds (continued)	EPA 3550B	EPA 8270C	2,4,6-Trichlorophenol	88-06-2	330 µg/kg	0
			2,4-Dichlorophenol	120-83-2	330 µg/kg	0
			2,4-Dimethylphenol	105-67-9	330 µg/kg	0
			2,4-Dinitrophenol	51-28-5	1600 µg/kg	0
			2,4-Dinitrotoluene	121-14-2	330 µg/kg	0
			2,6-Dinitrotoluene	606-20-2	330 µg/kg	0
			2-Chloronaphthalene	91-58-7	330 µg/kg	0
			2-Chlorophenol	95-57-8	330 µg/kg	0
			2-Methylnaphthalene	91-57-6	330 µg/kg	0
			2-Nitroaniline	88-74-4	1600 µg/kg	0
			2-Nitrophenol	88-75-5	330 µg/kg	0
			3,3-Dichlorobenzidine	91-94-1	1600 µg/kg	0
			3-Nitroaniline	99-09-2	1600 µg/kg	0
			4,4'-Dichlorobenzil	3457-46-3	330 µg/kg	0
			4-Bromophenyl phenyl ether	101-55-3	330 µg/kg	0
			4-Chloro-3-methylphenol	59-50-7	330 µg/kg	0
			4-Chlorophenyl phenyl ether	7005-72-3	330 µg/kg	0
			4-Chlorothiobanisole	123-09-1	1600 µg/kg	0
			4-Chlorothiophenol	106-54-7	330 µg/kg	0
			4-Nitroaniline	100-01-6	1600 µg/kg	0
			4-Nitrophenol	100-02-7	1600 µg/kg	0
			Acenaphthene	83-32-9	330 µg/kg	0
			Acenaphthylene	208-96-8	330 µg/kg	0
			Acetophenone	98-86-2	330 µg/kg	0
			Aniline	62-53-3	330 µg/kg	0
			Anthracene	120-12-7	330 µg/kg	0
			Azobenzene	103-33-3	330 µg/kg	0
			Benzo(a)anthracene	56-55-3	330 µg/kg	0
			Benzo(a)pyrene	50-32-8	330 µg/kg	0
			Benzo(b)fluoranthene	205-99-2	330 µg/kg	0
			Benzo(g,h,i)perylene	191-24-2	330 µg/kg	0
			Benzo(k)fluoranthene	207-08-9	330 µg/kg	0
			Benzoic acid	65-85-0	1600 µg/kg	0
			Benzyl alcohol	100-51-6	330 µg/kg	0
			bis(2-Chloroethoxy)methane	111-91-1	330 µg/kg	0
			bis(2-Chloroethyl) ether	111-44-4	330 µg/kg	0
			bis(2-Chloroisopropyl) ether	108-60-1	330 µg/kg	0
			bis(2-Ethylhexyl) phthalate	117-81-7	330 µg/kg	0
			bis(Chloromethyl) ether	542-88-1	330 µg/kg	0
			bis(p-Chlorophenyl) sulfone	80-07-9	330 µg/kg	0
			bis(p-Chlorophenyl)disulfide	1142-19-4	330 µg/kg	0
			Butylbenzyl phthalate	85-68-7	330 µg/kg	0
			Carbazole	86-74-8	330 µg/kg	0
			Chrysene	218-01-9	330 µg/kg	0
			Dibenzo(a,h)anthracene	53-70-3	330 µg/kg	0
			Dibenzofuran	132-64-9	330 µg/kg	0
			Dichloromethyl ether	542-88-1	330 µg/kg	0
			Diethyl phthalate	84-66-2	330 µg/kg	0
			Dimethyl phthalate	131-11-3	330 µg/kg	0
			Di-n-butyl phthalate	84-74-2	330 µg/kg	0
			Di-n-octyl phthalate	117-84-0	330 µg/kg	0

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Semivolatile Organic Compounds (continued)	EPA 3550B	EPA 8270C	Diphenyl disulfide	882-33-7	330 µg/kg	0
			Diphenyl sulfide	139-66-2	330 µg/kg	0
			Diphenyl sulfone	127-63-9	330 µg/kg	0
			Fluoranthene	206-44-0	330 µg/kg	0
			Fluorene	86-73-7	330 µg/kg	0
			Hexachlorobenzene	118-74-1	330 µg/kg	0
			Hexachlorobutadiene	87-68-3	330 µg/kg	0
			Hexachlorocyclopentadiene	77-47-4	1600 µg/kg	0
			Hexachloroethane	67-72-1	330 µg/kg	0
			Hydroxymethyl phthalimide	118-29-6	330 µg/kg	0
			Indeno(1,2,3-cd)pyrene	193-39-5	330 µg/kg	0
			Isophorone	78-59-1	330 µg/kg	0
			m,p-Cresol	106-44-5	660 µg/kg	0
			Naphthalene	91-20-3	330 µg/kg	0
			Nitrobenzene	98-95-3	330 µg/kg	0
			N-nitrosodi-n-propylamine	621-64-7	330 µg/kg	0
			N-nitrosodiphenylamine	86-30-6	330 µg/kg	0
			o-Cresol	95-48-7	330 µg/kg	0
			Octachlorostyrene	29082-74-4	330 µg/kg	0
			p-Chloroaniline	106-47-8	330 µg/kg	0
			p-Chlorobenzenethiol	106-54-7	330 µg/kg	0
			Pentachlorobenzene	608-93-5	330 µg/kg	0
			Pentachlorophenol	87-86-5	1600 µg/kg	0
			Phenanthrene	85-01-8	330 µg/kg	0
			Phenol	108-95-2	330 µg/kg	0
			Phthalic acid	88-99-3	330 µg/kg	0
			Pyrene	129-00-0	330 µg/kg	0
			Pyridine	110-86-1	660 µg/kg	0
			Thiophenol	108-98-5	330 µg/kg	0
			Tentatively Identified Compounds (TICs)		NA µg/kg	0

Notes:

Reporting Limits - Based on laboratory limits for primary laboratory (TestAmerica).

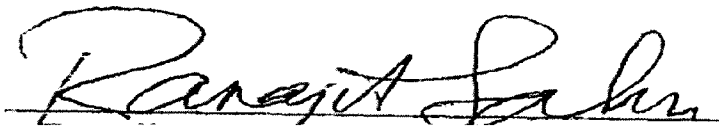
Laboratory limits are subject to matrix interferences and may not always be achieved in all samples.

NA = Not applicable.

Activities for specific radionuclide will be back-quantitated from those analyzed.

¹TestAmerica-Richland, WA method.

I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and to the best of my knowledge comply with all applicable federal, state and local statutes, regulations and ordinances. I hereby certify that all laboratory analytical data was generated by a laboratory certified by the NDEP for each constituent and media presented herein.

A handwritten signature in black ink, reading "Ranajit Sahu". The signature is fluid and cursive, with a large initial "R" and "S".

Dr. Ranajit Sahu, C.E.M. (No. EM-1699, Exp. 10/07/2009)
BRC Project Manager