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Date:	3 May 2023
To:	Ms. Madeleine Babick
From:	Theresa Gabris, Michael Berman, and Kaitlin Ouverson, B&B Engineers and Geologists of New York
CC:	Susan Aldrich, ElderServe Health John Lembo, ElderServe Health William Squires, Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.
Subject:	CHANGES TO INTERIM REMEDIAL MEASURES WORK PLAN ELDERSERVE HEALTH, INC. 673 LIVONIA AVENUE, BROOKLYN, NY NYSDEC SITE #224352

INTRODUCTION

On behalf of ElderServe Health, Inc. (ElderServe), B&B Engineers and Geologists of New York, P.C., a subsidiary of Geosyntec Consultants, Inc., (hereinafter B&B) is submitting this request for changes to the February 2022 Interim Remedial Measures Work Plan (IRMWP) for the 673 Livonia Avenue Site (the Site), which was approved by the New York State Department of Environmental Conservation (NYSDEC) on 19 April 2022.

ElderServe submitted the IRMWP in satisfaction of Section II of the Order on Consent and Administrative Settlement (Index No. R2-20220214-36) (Consent Order). Work proposed under the IRMWP was designed to address volatile organic compounds (VOCs) that may remain at the Site in shallow subsurface soil, soil vapor, and localized shallow groundwater; as well as semi-volatile organic compounds (SVOCs) and metals in shallow subsurface soil in concentrations exceeding Restricted Residential Soil Cleanup Objectives (SCOs).

ElderServe intended to implement the work proposed in the IRMWP at the Site during redevelopment of the Site for use as a Program of All-Inclusive Care for the Elderly (PACE) Center. Due in part to the delays associated with obtaining approval of the redevelopment and IRMWP from the Metropolitan Transit Authority (MTA), ElderServe's plans for redevelopment of the Site into a PACE Center have been put on indefinite hold. Consequently, this submittal describes the modifications to the IRMWP that are necessary to install the proposed Soil Vapor Remediation System (SVRS).

Additionally, B&B performed environmental sampling (indoor and outdoor air, and soil vapor sampling) at the adjacent property to the north of the Site (569 Vermont Street) during September and December 2022, and January 2023. Results of those sampling events indicate that VOCs from the Site have migrated into soil vapor beneath the southeastern portion of 569 Vermont Street.

The proposed changes to the IRMWP described in the remainder of this letter are to (1) decouple Site redevelopment and IRMWP components, (2) reduce off-site migration of VOCs through establishing a reduced pressure zone beneath the site and adjacent 569 Vermont Street property, and (3) achieve on-site VOC mass removal.

PROPOSED CHANGES

The original approved IRMWP contained two IRM components: the SVRS and a soil cover system. Proposed changes to these components and associated rationale are presented in the bullets below and shown on the revised SVRS design drawings which are provided as **Attachment 1**.

- Eliminate the planned soil cover system during IRM implementation. Since Site redevelopment plans are in flux, large-scale excavation and grade changes are not currently proposed at the Site, other than minor excavation work related to the SVRS installation. Additionally, the entire Site is presently unoccupied and covered with building foundation and pavement, preventing human exposure to surface soils. The soil cover system will be implemented (as applicable) during future Site redevelopment activities.

- Adjust the proposed locations of soil vapor extraction (SVE) wells to take advantage of the large influence area for each SVE well observed during pre-design diagnostic testing to reduce offsite migration of VOCs (**Attachment 1**). As shown on the attached drawings, the proposed location of wells SVE-03 and SVE-04 have been moved to the eastern side of the Site, and the proposed location of well SVE-05 has been moved to the north. The planned locations are being shifted to decrease radius of influence overlap thereby increasing the potential for soil vapor VOC mass capture on-Site while reducing the potential for further offsite migration.

- Add one additional SVE well (SVE-06) to the SVRS. Well SVE-06 is proposed in the driveway on the northern area of the Site (**Attachment 1**). This additional SVE well is intended to enhance soil vapor VOC mass capture below the Site and to decrease sub-slab soil vapor VOC concentrations at 569 Vermont Street.

- After obtaining the consent of the property owner, install pressure monitoring points within 569 Vermont Street to document the effectiveness of the SVRS in maintaining a zone of reduced pressure beneath 569 Vermont Street.

- Adjust the proposed locations of soil vapor sampling points SS-10 and SS-11 (**Attachment 1**), based on the adjustment of well SVE-05 and the addition of well SVE-06.

- Install above-ground piping for interior SVE wells and within the existing building layout, where feasible. This change eliminates the needs for interior trenching and will reduce the volume of investigation derived waste (IDW) generated.

ElderServe has received a determination of no impact from the Metropolitan Transit Authority for these revised SVRS plans as reflected in the IRMWP and modified in this submittal. In the event of future Site redevelopment, the SVRS could be retrofitted and incorporated into building plans or, if cleanup goals are met, would be proposed for decommissioning in accordance with the approach described in the approved IRMWP.

CLOSING

If you have any questions or would like to discuss the IRMWP changes proposed herein, please contact Theresa Gabris at (202) 370-4350 or Mike Berman at (202) 370-4348. We appreciate NYSDEC's support throughout this process.

ENCLOSURES

Attachment 1 – Revised Soil Vapor Mitigation System Design Drawing

CERTIFICATION

I, Kaitlin Thell Ouverson, certify that I am currently a Professional Engineer licensed in New York as defined in 6 NYCRR Part 375 and that this document was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

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Kaitlin Thell Ouverson, P.E. (NY) #103910-01
Project Engineer