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September 24, 2026
File No. 0208988

Remedial Bureau B, Section D
Division of Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway, Floor 12
Albany, New York 12233

Corrective Action Section
Land and Redevelopment Programs Branch
Land, Chemicals & Redevelopment Division
U.S. Environmental Protection Agency Region 2
290 Broadway, 25th Floor
New York, New York 10007-1866

Attention: Rafi Alam, Project Manager, NYSDEC
Anna Bachmann, Brownfields and RCRA Project Manager, USEPA

Subject: Addendum No. 2 to the Alternatives Analysis/Remedial Action Work Plan
Operable Unit 1
Site Name: Former Port Mobil Terminal
NYSDEC Site No.: 243016
USEPA ID Number: NYD000824516
NYSDEC Consent Order ID No.: 12-111-A-SBC
USEPA Consent Order ID No.: RCRA-02-2009-7306

Dear Mr. Alam and Ms. Bachmann:

On behalf of NP Staten Island Industrial, LLC, H & A of New York Engineering and Geology, LLP (Haley & Aldrich of New York) is pleased to submit this Addendum No. 2 to the Alternatives Analysis/Remedial Action Work Plan (AA/RAWP) - Operable Unit 1 (OU-1) for the Former Port Mobil Terminal located at 4101 Arthur Kill Road in Staten Island, New York. This Addendum is being submitted to document the expanded treatment area associated with Non-Operational Area B 18. The area will be treated via in-situ solidification, which is an approved technology in the AA/RAWP, as approved on August 19, 2026. In addition, remedial soil from this area will be placed in a designated area for ex-situ solidification to accommodate the approved Site cover requirements.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely yours,
H & A OF NEW YORK ENGINEERING AND GEOLOGY, LLP

Sarah A. Commisso, G.I.T.
Project Manager

Suzanne M. Bell, P.E.
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Scott A. Underhill, P.E.
Principal

James M. Bellew
Principal

Enclosures

c:

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NorthPoint Development; Attn: Clint Strieker (cstrieker@northpointkc.com)
NorthPoint Development; Attn: Eric Ricci (ericci@northpointkc.com)

Certification

I, Scott A. Underhill, certify that I am currently a New York State-registered professional engineer and that this Addendum Number 1 to the Alternatives Analysis/Remedial Action Work Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the Division of Environmental Remediation Technical Guidance for Site Investigation and Remediation (DER-10) and DER Green Remediation (DER-31).

I certify that all information and statements in this certification are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.



New York Professional Engineer #075332 | *September 24, 2026* Date

It is a violation of Article 145 of New York State Education Law for any person to alter this document in any way without the express written verification of adoption by any New York State licensed engineer in accordance with Section 7209(2), Article 145, New York State Education Law.

REMEDIAL ACTION WORK PLAN ADDENDUM
FORMER PORT MOBIL TERMINAL
STATEN ISLAND, NEW YORK

ADDENDUM NUMBER: 02
ADDENDUM TITLE: Expansion of the NOAB18 Treatment Area

Reason for Revision/Change:

☒ Unforeseen or Differing Site Conditions
☒ Design Revision
☐ Other (Describe)

Description of Revision/Change:

The proposed in situ solidification (ISS) treatment of Non-Operational Area B 18 (NOAB18) was defined in the July 2026 Alternatives Analysis/Remedial Action Work Plan (AA/RAWP). Solidification of this area was completed in August 2026. During the implementation of ISS, grossly contaminated material (GCM) was visually observed along the western sidewall of the ISS treatment area. The bounds of GCM were delineated vertically and horizontally in this area by conducting test pits and shake tests. Test pit locations and shake test results are shown on Figure 1. Based on the results of the field delineation, Haley & Aldrich of New York is proposing to treat this additional area of GCM via ISS, connecting to the existing ISS monolith in the NOAB18 area. The depth of the ISS treatment zone will extend through the underlying clay layer. Prior to performing the ISS, the top 4 feet (ft) of soil will be removed and placed for ex situ solidification (ESS) treatment in other areas of the site to accommodate the requirement of 4 ft of cover above GCM-impacted soil. The remaining GCM-impacted soil will be mixed in cells extending to a total depth of 4 ft. The additional treatment volume is approximately 830 cubic yards (cu yd) for ISS and 800 cu yd for ESS to be performed within designated ESS areas at the Site. The ISS and ESS treatment will be performed as described in the AA/RAWP, including the collection of quality control samples and coring/test pitting. A minimum of 4 ft of non-GCM soils, including the 1-ft clean cover, will be installed over this treatment area since the ISS-treated soils contain GCM.

Justification for Revision/Change:

When preparing ISS cells NOAB18-035 and NOAB18-030 for the introduction of grout during ISS treatment, GCM was observed in the western outer sidewall of the ISS cells. On August 26 and August 31, 2026, Haley & Aldrich of New York and Entact conducted test pits and performed shake tests to delineate the extent of the GCM. If the shake test was positive for light non-aqueous phase liquid (LNAPL), lateral step-out trenching was conducted until the shake test was negative for LNAPL. The horizontal extents of the GCM area were considered complete when a shake test of an outer sidewall of a test pit was negative for LNAPL. The vertical bounds of the GCM were determined where a shake test collected at depth was negative for LNAPL, which commonly corresponded to an underlying clay layer. The underlying clay layer ranged from 63.0 ft above mean sea level (amsl) to 60.0 ft amsl, or approximately 1 ft to 5 ft below grade. Figure 1 shows the locations of the trenches, shake test results and respective elevations, the approximate depth and elevation of the confining clay layer, as well as the proposed ISS treatment area. Figure 2 shows the proposed ISS mix cell layout. Table 1 shows the cell design log with reagent quantities. The field work to define the GCM limits was completed in coordination with the on-site New York State Department of Environmental Conservation (NYSDEC) field representative.

Attachments:

Table 1 – Wet Bucket Mixing Grout Log
Figure 1 – NOAB18 GCM Delineation and Proposed Additional ISS Treatment
Figure 2 – NOAB18 Proposed ISS Cell Layout

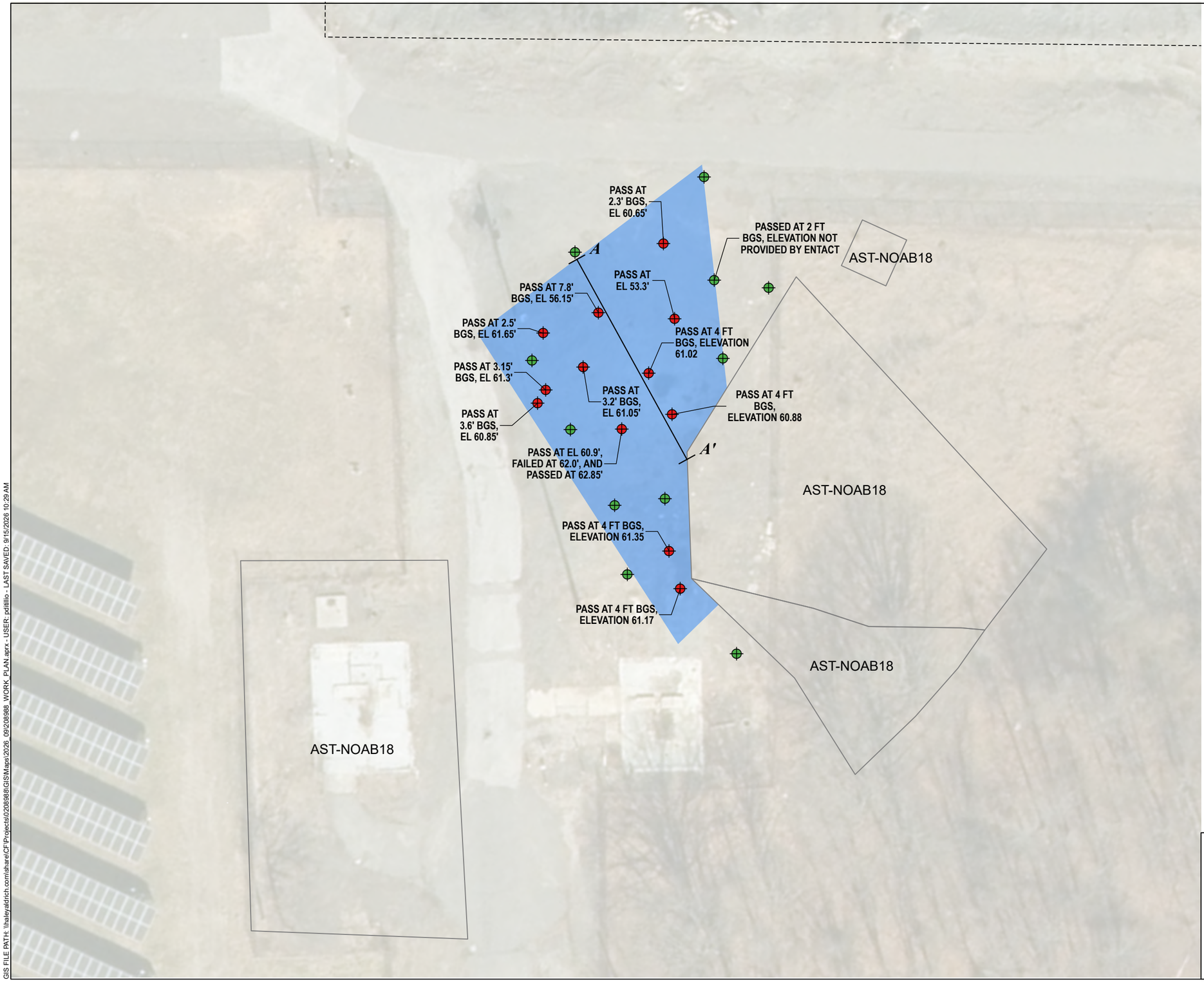
Attachments

In-Situ Stabilization Wet Bucket Mixing Grout Log

Project Name: Former Port Mobil Site - Sitewide Remedy

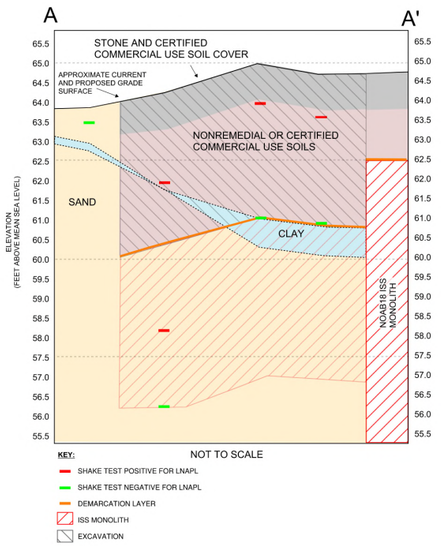
Project Date: 9/23/2026

DESIGN CELL AND VOLUME DESCRIPTION											REAGENT ADDITION					CELL WATER & REAGENT QUANTITIES						
Cell ID	Center Point	Center Point	Existing Grade	Cell Width	Cell Length	Cell Area	Top of ISS	Bottom of ISS	Target Mixing Depth	Cell Volume	Unit Weight	Treatment Weight	Water to Reagent Ratio			Design Cement Addition	Design Slag Addition	Water Addition	Water Addition	Cement Addition	Slag Addition	Grout Addition	Grout Addition	Grout Unit Weight
	Northing	Easting	ELEV	FT	FT	SF	ELEV	ELEV	FT	CY	PCF	LBS				%	%	LBS	GAL	LBS	LBS	GAL	CY	PCF
NOAB18-042	137763.1	918703.5	63.7	N/A	N/A	653.0	59.7	55.7	4.0	96.7	118.5	309,522.0	0.8	:	1.0	5.0%	2.50%	18,571	2,227	15,476	7,738	3,147	15.6	99.3
NOAB18-043	137743.2	918722.4	64.6	N/A	N/A	1,275.0	60.6	56.6	4.0	188.9	118.5	604,350.0	0.8	:	1.0	5.0%	2.50%	36,261	4,348	30,218	15,109	6,145	30.4	99.3
NOAB18-044	137735.7	918689.0	64.2	N/A	N/A	1,312.2	60.2	56.2	4.0	194.4	118.5	621,982.8	0.8	:	1.0	5.0%	2.50%	37,319	4,475	31,099	15,550	6,324	31.3	99.3
NOAB18-045	137770.9	918707.9	63.6	N/A	N/A	1,064.5	59.6	55.6	4.0	157.7	118.5	504,573.0	0.8	:	1.0	5.0%	2.50%	30,274	3,630	25,229	12,614	5,131	25.4	99.3
NOAB18-046	137747.9	918730.1	64.7	N/A	N/A	859.0	60.7	56.7	4.0	127.3	118.5	407,166.0	0.8	:	1.0	5.0%	2.50%	24,430	2,929	20,358	10,179	4,140	20.5	99.3



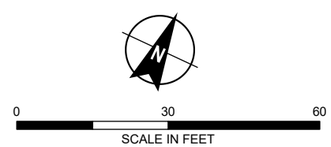
LEGEND

- SHAKE TEST - NEGATIVE (PASS) FOR LNAPL
- SHAKE TEST - POSITIVE (FAIL) FOR LNAPL
- CONTAINMENT BERM
- CROSS-SECTION LINE
- PREVIOUSLY DELINEATED LNAPL AREA
- PREVIOUSLY TREATED ISS CELL
- PROPOSED ISS AREA



NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. THE TOP FOUR FEET OF SOIL WILL BE REMOVED FROM THE ENTIRE PROPOSED ISS AREA. WHERE THE CLAY LAYER IS PRESENT, ISS WILL EXTEND TO A DEPTH OF 4 FEET
3. DEFINITIONS:
   LNAPL = LIGHT NON-AQUEOUS PHASE LIQUID
   ISS = IN SITU SOLIDIFICATION
4. AERIAL IMAGERY SOURCE: ESRI



HALEY ALDRICH

FORMER PORT MOBIL TERMINAL
STATEN ISLAND, NEWYORK

NOAB18 GCM DELINEATION AND PROPOSED ADDITIONAL ISS TREATMENT

SEPTEMBER 2026

FIGURE 1

GIS FILE PATH: \\haleyaldrich.com\share\CF\Projects\0208988\GIS\Maps\2026_09\208988_WORK_PLAN.aprx - USER: pdilillio - LAST SAVED: 9/15/2026 10:29 AM



LEGEND

- CONTAINMENT BERM
- STRUCTURES
- PROPOSED ISS MIX CELL
- ISS CELL PREVIOUSLY MIXED

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. DEFINITIONS:
   ISS = IN-SITU SOLIDIFICATION
   ESS = EX-SITU SOLIDIFICATION
3. AERIAL IMAGERY SOURCE: NEARMAP, APRIL 9, 2025

0 30 60
SCALE IN FEET

HALEY ALDRICH

FORMER PORT MOBIL TERMINAL
STATEN ISLAND, NEWYORK

NOAB18 PROPOSED ISS CELL LAYOUT

SEPTEMBER 2026

FIGURE 2

GIS FILE PATH: \\haleyaldrich.com\share\CF\Projects\0208988\GIS\Maps\2026_05\208988_AST_ISS_AREAS.aprx - USER: pdilillo - LAST SAVED: 9/24/2026 1:03 PM