March 23, 2022

Mr. Dan McNally
New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, New York 12233

Re: Remedial Action Work Plan Modification Addendum #1 – Endpoint Sampling
C203147 – 4720 Third Avenue, Bronx, NY

P.W. Grosser Consulting Engineer & Hydrogeologist, P.C. (PWGC) has prepared this Modification Addendum to the Remedial Action Work Plan (RAWP) prepared by PWGC in February 2022 and approved by the New York State Department of Environmental Conservation (NYSDEC) in March 2022. This addendum is based upon a conference call held between the NYSDEC, the Brownfield Cleanup Program (BCP) Volunteer, PWGC, and the Volunteer's environmental counsel, Knauf Shaw LLP, on March 22, 2022.

Based on the core sampling data obtained from the prior remedial investigations performed at the BCP Site, PWGC prepared a proposed remedial excavation figure (Figure 8 of the RAWP). This original figure showed the location of 40 bottom endpoint samples and 17 sidewall samples, as well as four proposed remedial excavation depths based on the depth of Track 1 Soil Cleanup Objectives (SCO) exceedances documented by extensive core sampling. The approved depths of excavation were based on the core data which exhibited contamination at least to these depths with samples from the next interval not exceeding Track 1 SCOs.

Upon implementation of the initial endpoint sampling in the 4-foot remedial excavation area (the green/turquoise area on the figure), conducted in accordance with the currently approved RAWP, six of the seven samples failed to meet the Track 1 SCOs at 4 feet, indicating that the vast majority of this proposed 4-foot excavation is impacted to at least 5 feet.

As a result of this unexpected discovery of additional Track 1 SCO contaminated soil requiring remediation, PWGC is required to modify Section 5.2.1 (and its subsections) and Figure 8 of the RAWP. Section 5.2.1 currently indicates that in the event of an endpoint sample's failure to achieve Track 1 SCOs, deeper excavation will proceed an additional 1 foot and a new endpoint sample will be collected and analyzed. Due to the large number of soil sample failures already obtained, the unprecedented delays at local environmental laboratories extending turnaround times to 5 to 15 business days or more, limited holding times on several analytes that preclude a sample and hold methodology with this extended turnaround time, and the very tight construction schedule for this 421-a affordable housing project on the BCP Site, PWGC and the Volunteer will concede that the only soil required to be remediated is shown at the pre-set remedial excavation depths on the revised and attached Figure 8 unless the endpoint samples at the bottom of construction excavation still reveal exceedances (see below).

The two revisions to this figure are lowering the proposed remedial excavation depth of the 4-foot excavation to 5 feet to account for the majority of failures at 4 feet and the removal of sidewall samples along the 5-foot excavation, 6-foot excavation, and 10-foot excavation zones as these areas will be fully excavated. Sidewall samples will still be collected adjacent to the 20-foot excavation which will be adjacent to soils remaining in place. Revised sampling locations are shown on the attached Revised Figure 8. Bottom endpoint samples will be collected at the bottom of the already proposed 20-foot excavation

as previously described and at the bottom of construction excavation (approximately 18 to 20 feet depending on site location) elsewhere. If samples from these depths fail, PWGC will revert back to the prior sampling methodology of removing 1 foot of soil in the failed areas and resampling. If these bottom of construction excavation endpoint samples fail to achieve Track 1 SCOs; the removal of the overlying soils above these areas will be considered remedial in nature. Soil disposal will still be conducted in accordance with the RAWP and the already approved disposal facilities.

One further modification that PWGC proposes is that, if there is an endpoint failure, sampling at the next deeper interval will consist only of the analyte list that was included the failed sample. As an example, if a bottom endpoint sample fails for lead, but all other constituents pass, the new deeper sample will be analyzed for target analyte list (TAL) metals only.

These modifications are still protective of human health and the environment as the impacted soils will still be remediated, the soil under the remedial excavation depths will still be properly handled as if contaminated, and confirmation endpoint samples will be collected to document the quality of the soil remaining in place.

Sincerely,
P.W. Grosser Consulting, Inc.

Jennifer Lewis, PG
Vice President

Michael Scanlon, PE
Senior Engineer

PWGC
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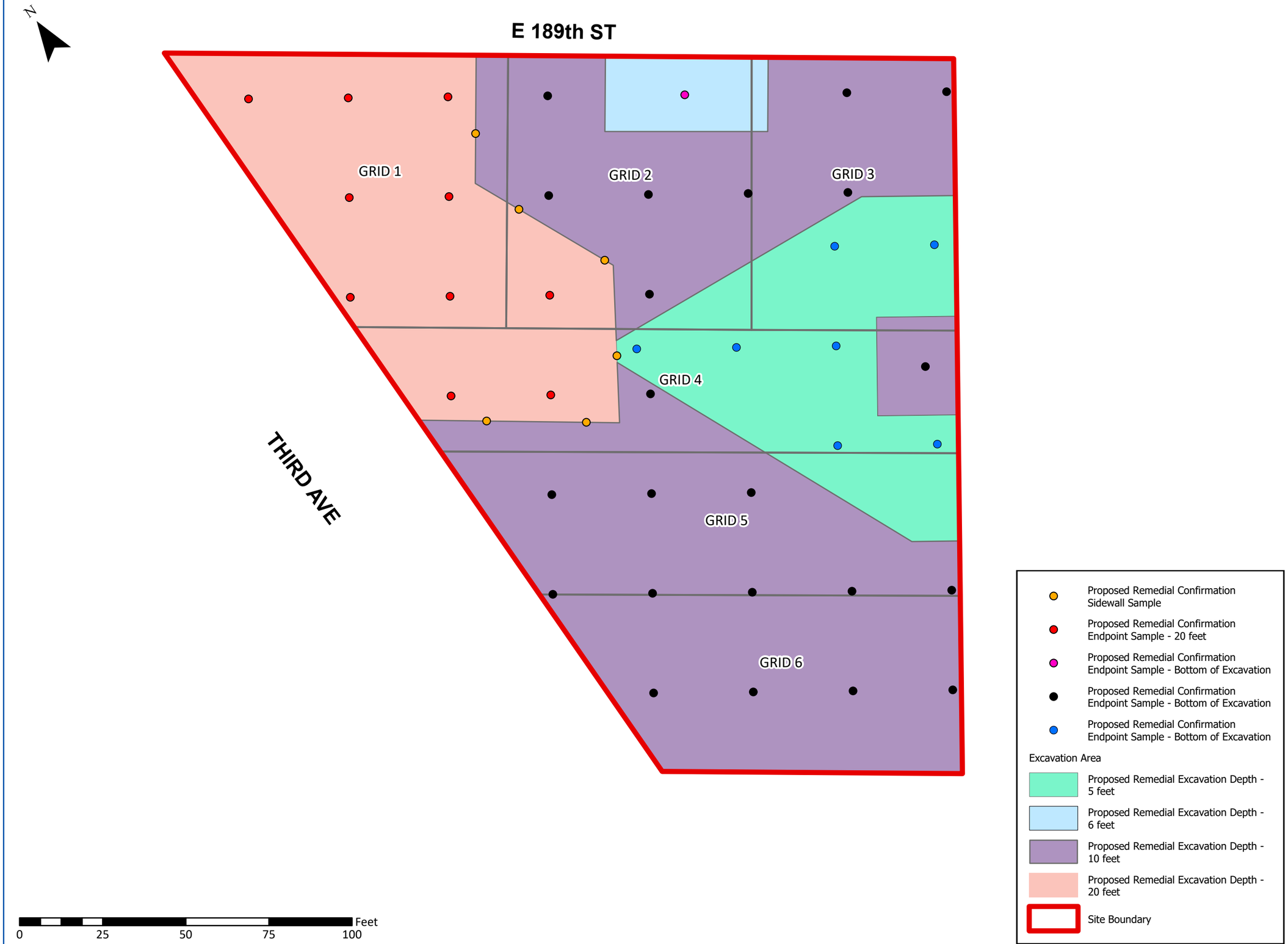
REVISED FIGURE 8



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DRAWING PREPARED FOR:

REVISION	DATE	INITIAL	COMMENTS

DRAWING INFORMATION:

Project:	OMN2102	Designed by:	MG
Date:	3/11/2022	Drawn by:	PH
Scale:	AS SHOWN	Approved by:	JL

Revised Proposed Confirmation Endpoint Locations

4720 Third Street
Bronx, NY

FIGURE NO:

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