October 15, 2026
Project No. 2405391

VIA EMAIL: nour.haredy@dec.ny.gov

Ms. Nour Haredy
New York State Department of Environmental Conservation
Division of Environmental Remediation
47-20 21st Street
Long Island City, NY 11101

Re: Remedial Action Work Plan Amendment
NYSDEC BCP Site No. C203177
431-441 Concord Avenue Development Project
431-441 Concord Avenue
Bronx, New York

Dear Ms. Haredy:

GEI Consultants, Inc. DBA GEI Consultants Engineering, Geology, Architecture & Landscape Architecture (GEI) is pleased to submit this amendment to the Remedial Action Work Plan (RAWP) dated January 2026. This amendment adds an additional approximately 5 feet by 5 feet excavation area to the original RAWP.

Endpoint samples EP-9 and EP-12 were collected on July 20, 2026, from the base of the excavation at approximately 2 feet below ground surface (bgs). Analytical results indicated the presence of barium above Track 1 Unrestricted Use Soil Cleanup Objectives (UUSCOs) and Track 2 Restricted Residential Use Soil Cleanup Objectives (RRUSCOs) in endpoint sample EP-12. Additionally, nickel was identified slightly above NYSDEC Part 375 UUSCOs in endpoint samples EP-9 and EP-12. In response, GEI re-collected these endpoint samples as EP-9A and EP-12A on August 6, 2026. Results of these endpoint samples did not reveal the presence of these metals above NYSDEC Part 375 UUSCOs. However, in the duplicate sample DUP-02, which is a duplicate of EP-12A, the metals nickel and zinc were identified slightly above Track 1 UUSCOs. The endpoint sample results for metals analysis are shown on the accompanying Table 1. Endpoint sample locations are shown on Figure 1.

To address the exceedances noted in DUP-02, the 5 feet by 5 feet area around endpoint sample EP-12 will be excavated an additional 2 feet bgs. At this depth, an additional bottom endpoint sample will be collected and analyzed for barium, nickel and zinc, only. If laboratory results indicate the concentration of barium, nickel and zinc below Track 1 UUSCOs, the Site will be considered to have met Track 1 UUSCOs, and no additional excavation would be conducted in this area. The excavation will then be backfilled to the required grade for development using soil from the area where no remedial excavation is required, as shown on Figure 1. If laboratory results indicate the concentration of barium, nickel and

zinc above Track 1 UUSCOs, the excavation will be extended an additional 2 feet bgs. and an additional endpoint sample collected.

Sincerely,

GEI CONSULTANTS, INC. DBA GEI CONSULTANTS ENGINEERING, GEOLOGY, ARCHITECTURE & LANDSCAPE ARCHITECTURE

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Appendices

Appendix A Table 1 - Endpoint Sample Analytical Results - Metals
Appendix B Figure 1 – Location of Additional Excavation

WJF/NJR/GR:ag
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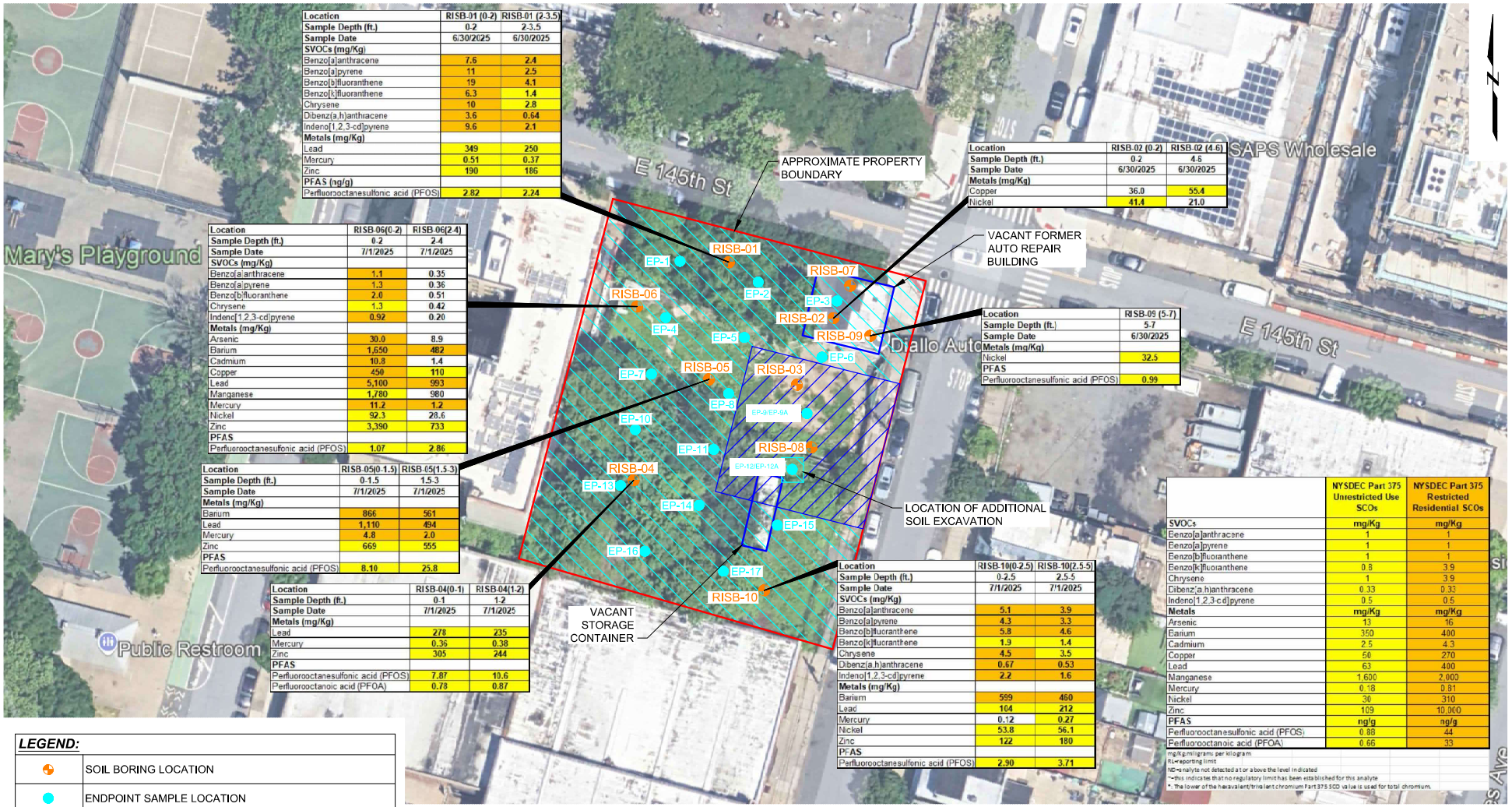
Appendix A Table 1 - Endpoint Sample Analytical Results - Metals

Table 1. Endpoint Sample Analytical Results - Metals
RAWP Amendment
431-441 Concord Avenue
Bronx, New York
NYSDEC BCP Site No. 203177

Sample ID Sample Date Matrix	Track 1 Unrestricted Use SCOs	Track 2 Restricted Residential Use SCOs	EP-9 7/20/2026 Solid		EP-12 7/20/2026 Solid		DUP-01 7/20/2026 Solid		EP-9A 8/6/2026 Solid		EP-12A 8/6/2026 Solid		DUP-02 8/6/2026 Solid	
Metals			**mg/kg**	**Q**	**mg/Kg**	**Q**	**mg/Kg**	**Q**	**mg/Kg**	**Q**	**mg/Kg**	**Q**	**mg/Kg**	**Q**
Aluminum	NA	NA	12300		25000		12700		16900		19100		19300	
Antimony	NA	NA	0.094	J	1.0	U	0.90	U	0.10	J	0.074	J	0.11	J
Arsenic	13	16	1.6		1.0		1.3		1.8		1.9		2.2	
Barium	410	410	101		**541**		99.1		166		204		318	
Beryllium	4.4	43	0.50		1.0		0.43		0.50		0.55		0.54	
Cadmium	2.5	2.5	0.19	J	0.52	U	0.45	U	0.14	J	0.13	J	0.18	J
Calcium	NA	NA	1390		4320		1120		3330	J	4940	J	3040	J
Chromium	NA	NA	28.9		109		34.5		31.9	J	37.2	J	46.1	J
Cobalt	NA	NA	11.0		19.7		8.9		13.9		14.4		16.1	
Copper	50	280	32.8		36.2		26.9		33.7	J	40.8	J	40.0	J
Iron	NA	NA	24400		34100		21300		28100		29200		31700	
Lead	63	400	10.4		15.8		8.8		40.5		51.9		52.0	
Magnesium	NA	NA	3840		16000		4210		6660		7580		8360	
Manganese	1600	2000	509		499		341		458		456		440	
Nickel	30	320	**33.8**		**81.8**		21.1		27.5		29.6		**41.4**	
Potassium	NA	NA	1960		6510		2210		4220		4220		6970	
Selenium	3.9	110	0.31	J	0.33	J	0.19	J	0.16	J	0.23	J	0.34	J
Silver	2	110	0.38	U	0.41	U	0.36	U	0.43	U	0.38	U	0.098	J
Sodium	NA	NA	88.9	J	163		89.0	J	160		200		164	
Thallium	NA	NA	0.36	J	0.55		0.20	J	0.33	J	0.34	J	0.44	
Vanadium	NA	NA	37.8		81.1		38.5		42.0	J	51.3	J	52.5	J
Zinc	109	6600	81.6		78.0		57.0		89.3		101		**122**	
Mercury	0.18	0.3	0.020		0.013	J	0.016	J	0.048		0.069		0.13	

Notes:
J : Sample result is greater than the MDL but below the CRDL
U : Indicates analyzed for but not detected.
Yellow Highlight indicates exceedance of Track 1 UUSCOs
Orange Highlight indicates exceedance of Track 2 RRUSCOs

Appendix B Figure 1 – Location of Additional Excavation



Location	RISB-01 (0-2)	RISB-01 (2-3.5)
Sample Depth (ft.)	0-2	2-3.5
Sample Date	6/30/2025	6/30/2025
SVOCs (mg/Kg)		
Benzo[a]anthracene	7.6	2.4
Benzo[a]pyrene	11	2.5
Benzo[b]fluoranthene	19	4.1
Benzo[k]fluoranthene	6.3	1.4
Chrysene	10	2.8
Dibenz(a,h)anthracene	3.6	0.64
Indeno[1,2,3-cd]pyrene	9.6	2.1
Metals (mg/Kg)		
Lead	349	250
Mercury	0.51	0.37
Zinc	190	186
PFAS (ng/g)		
Perfluorooctanesulfonic acid (PFOS)	2.82	2.24

Location	RISB-02 (0-2)	RISB-02 (4-6)
Sample Depth (ft.)	0-2	4-6
Sample Date	6/30/2025	6/30/2025
Metals (mg/Kg)		
Copper	36.0	55.4
Nickel	41.4	21.0

Location	RISB-06(0-2)	RISB-06(2-4)
Sample Depth (ft.)	0-2	2-4
Sample Date	7/1/2025	7/1/2025
SVOCs (mg/Kg)		
Benzo[a]anthracene	1.1	0.35
Benzo[a]pyrene	1.3	0.36
Benzo[b]fluoranthene	2.0	0.51
Chrysene	1.3	0.42
Indeno[1,2,3-cd]pyrene	0.92	0.20
Metals (mg/Kg)		
Arsenic	30.0	8.9
Barium	1,650	482
Cadmium	10.8	1.4
Copper	450	110
Lead	5,100	993
Manganese	1,780	980
Mercury	11.2	1.2
Nickel	92.3	28.6
Zinc	3,390	733
PFAS		
Perfluorooctanesulfonic acid (PFOS)	1.07	2.86

Location	RISB-09 (5-7)
Sample Depth (ft.)	5-7
Sample Date	6/30/2025
Metals (mg/Kg)	
Nickel	32.5
PFAS	
Perfluorooctanesulfonic acid (PFOS)	0.99

Location	RISB-05(0-1.5)	RISB-05(1.5-3)
Sample Depth (ft.)	0-1.5	1.5-3
Sample Date	7/1/2025	7/1/2025
Metals (mg/Kg)		
Barium	866	561
Lead	1,110	494
Mercury	4.8	2.0
Zinc	669	555
PFAS		
Perfluorooctanesulfonic acid (PFOS)	8.10	25.8

Location	RISB-04(0-1)	RISB-04(1-2)
Sample Depth (ft.)	0-1	1-2
Sample Date	7/1/2025	7/1/2025
Metals (mg/Kg)		
Lead	278	235
Mercury	0.36	0.38
Zinc	305	244
PFAS		
Perfluorooctanesulfonic acid (PFOS)	7.87	10.6
Perfluorooctanoic acid (PFOA)	0.78	0.87

Location	RISB-10(0-2.5)	RISB-10(2.5-5)
Sample Depth (ft.)	0-2.5	2.5-5
Sample Date	7/1/2025	7/1/2025
SVOCs (mg/Kg)		
Benzo[a]anthracene	5.1	3.9
Benzo[a]pyrene	4.3	3.3
Benzo[b]fluoranthene	5.8	4.6
Benzo[k]fluoranthene	1.9	1.4
Chrysene	4.5	3.5
Dibenz[a,h]anthracene	0.67	0.53
Indeno[1,2,3-cd]pyrene	2.2	1.6
Metals (mg/Kg)		
Barium	599	460
Lead	104	212
Mercury	0.12	0.27
Nickel	53.8	56.1
Zinc	122	180
PFAS		
Perfluorooctanesulfonic acid (PFOS)	2.90	3.71

	NYSDEC Part 375 Unrestricted Use SCOs	NYSDEC Part 375 Restricted Residential SCOs
SVOCs	mg/Kg	mg/Kg
Benzo[a]anthracene	1	1
Benzo[a]pyrene	1	1
Benzo[b]fluoranthene	1	1
Benzo[k]fluoranthene	0.8	3.9
Chrysene	1	3.9
Dibenz[a,h]anthracene	0.33	0.33
Indeno[1,2,3-cd]pyrene	0.5	0.5
Metals	mg/Kg	mg/Kg
Arsenic	13	16
Barium	350	400
Cadmium	2.5	4.3
Copper	50	270
Lead	63	400
Manganese	1,600	2,000
Mercury	0.18	0.81
Nickel	30	310
Zinc	109	10,000
PFAS	ng/g	ng/g
Perfluorooctanesulfonic acid (PFOS)	0.88	44
Perfluorooctanoic acid (PFOA)	0.66	33

mg/Kg-milligrams per kilogram
RL=reporting limit
ND=analyte not detected at or above the level indicated
"-"=this indicates that no regulatory limit has been established for this analyte
*: The lower of the hexavalent/trivalent chromium Part 375 SCO value is used for total chromium.

LEGEND:

	SOIL BORING LOCATION
	ENDPOINT SAMPLE LOCATION
	NO EXCAVATION REQUIRED FOR REMEDIATION. EXCAVATION CONDUCTED IN THIS AREA TO 3-6 FEET BGS FOR REDEVELOPMENT PURPOSES
	REMEDIAL EXCAVATION TO 2-7 FEET BGS DEPENDING ON BEDROCK DEPTH

SOURCE:
1. PLAN BASED ON GOOGLE MAP IMAGERY.

0 40 80
SCALE, FEET

Remedial Action Work Plan Amendment
431-441 Concord Avenue
Bronx, New York

Concord 145 L.P.
New York, New York

GEI Consultants

LOCATION OF ADDITIONAL EXCAVATION

Project 2405391 | September 2026 | Fig. 1