



HydroTech Environmental

ENGINEERING AND GEOLOGY, DPC

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USA - Middle East - North Africa

December 04, 2025

New York State Department of Environmental Conservation
Division of Environmental Remediation, Remedial Bureau B
625 Broadway, 12th Floor
Albany, NY 12233-7016
Attn.: Mr. Elliott Jackson, Project Manager

**Re: Supplemental Remedial Investigation Work Plan
3083 Webster Ave BCP Site
3083 Webster Avenue, Bronx, NY 10467
Block 3331; Lot 57
NYSDEC BCP Site Number: C203184**

Dear Mr. Jackson:

Hydro Tech Environmental Engineering and Geology, DPC (HTE) hereby submits a supplemental Remedial Investigation Work Plan (Supp RIWP) for above-referenced New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP) Site No. C203184 (Site) on behalf of 6014 BCD Realty, LLC (the "BCP Applicant"). This Supp RIWP addresses Comment #2 in NYSDEC correspondence dated October 29, following the review of the draft Remedial Investigation report prepared by HydroTech and dated September 2025. This Comment #2 is related to groundwater data gaps associated with insufficient characterization of bedrock hydraulic gradient and permeability to fully understand the site-wide fate and transport of chlorinated VOCs (CVOCs) identified during the RI in MW-2a. The scope this Supp RIWP consists of installing three bedrock monitoring wells screened in bedrock, only, and the performance of a downhole hydro-geophysical survey in these wells to determine the extent of vertical and horizontal migration of CVOCs through the bedrock beneath the Site.

Background for Groundwater Data Gaps

According to the draft RIR dated September 2025, the groundwater chemical and physical properties beneath the Site were determined from nine installed monitoring wells designated as MW-1a to MW-5a and MW-6 to MW-9. During monitoring wells installation overburden formation of weathered rock consisting of poorly grained sand was encountered in all wells at depths ranging between 9 ft and 18 ft below grade surface (bgs). Competent bedrock consisting of gray to light

gray, biotite gneiss rock was intercepted during the RI fieldwork at variable depths in the northern and northeastern portions of the Site; at the depths of 13 ft bgs and 20 ft in MW-2a and MW-8 in the northern portion, or approximately 9.68 ft and 4.33 ft above the depth to groundwater, respectively and, at depths of 20 ft bgs and 29 ft bgs in MW-3a and MW-9 in the northeastern and central portions, or approximately 3.77 ft and 4.3 ft below the depth to groundwater. As such, installed monitoring wells were screened across three different intervals; in overburden material/weathered rock in MW-1a, MW-2a, MW-4a, MW-5a and MW-6, across the interface between weathered rock/competent bedrock in MW-3a, MW-8 and MW-9 and, in competent bedrock, only in MW-2a. The depth to groundwater was measured at 22.68 ft in MW-2a, between 22.33 ft and 26.17 ft in the layer of overburden material/weathered rock, and between 16.23 ft and 24.7 ft in the layer across the interface between weathered and competent bedrock. The groundwater beneath the Site was determined to flow toward the west in the overburden material/weathered rock and toward the southwest across the interface between weathered and competent rock. **Figure 1** provides a map with existing monitoring wells with information on the depth to bedrock and wells screen intervals. **Appendix 1** provides the monitoring wells construction logs from the September 2025 draft RIR.

As noted by NYSDEC, the influence of geophysical properties of competent bedrock on the mapping of water flow beneath the Site precluded the vertical and horizontal delineation of contaminants in groundwater beneath the property, especially CVOCs that were detected during the RI at the highest concentrations in monitoring well MW-2a located along the northern Site boundary. This insufficient characterization of groundwater conditions in the RIR was identified by NYDEC as a data gap as outlined in comment #2 in the NYSDEC correspondence dated October 2025. **Figure 2** provides a map of VOCs in Groundwater from the September 2025 draft RIR.

Appendix 2 provides NYSDEC correspondence.

Borehole Specifications for Bedrock Geophysical Survey

Per NYSDEC Comment #2 in the October 2025 correspondence, downhole geophysical logging data shall be collected in two additional monitoring wells to be screened in bedrock and in any open borehole screened monitoring wells extending into bedrock. After consulting with a geophysical specialty firm, Hager-Richter Geoscience, dba HR Geological Services in New York (HRGS), the downhole geophysical logging will be performed with high efficiency in open bedrock borehole with a casing driven at least 5 feet into bedrock and in exposed bedrock column with a minimum length of 10 ft. Based on this bedrock survey criteria and the variation of the depth to bedrock beneath the Site as determined during the previous RI fieldwork, HydroTech proposes to install three bedrock monitoring wells designated as MW-10, MW-11 and MW-12. These three new

monitoring wells will be spaced adequately and screened in bedrock, only. Specifically, MW-10 will be installed in the vicinity of existing well MW-2a, MW-11 will be installed in the vicinity of existing well MW-8 and MW-12 will be installed in the space between existing wells MW-3a and MW-9. Per HRGS recommendations, the new monitoring wells shall be offset by at least 5-7 feet from existing ones. A map showing the locations of proposed bedrock monitoring wells is shown in **Figure 3**.

The three monitoring wells MW-10 through MW-12 will be drilled to the depth of 40 feet bgs using the same methodologies and procedures for bedrock wells installation as described in the NYSDEC-approved RIWP Addendum dated July 2025. The boreholes will be cased through the overburden and weathered bedrock portions of the holes to depth of approximately 5 feet into the competent bedrock. The boreholes will be left as open holes throughout the competent bedrock portions to depths of approximately 40 feet with a minimum of 10 ft of open bedrock available for borehole geophysical logging in each borehole.

The three new monitoring wells will then be finished at their respective boreholes following the completion of downhole geophysical logging. Wells construction will be performed in accordance with the NYSDEC-approved RIWP dated March 2025. The monitoring wells will be constructed using 2-inch diameter schedule-40 PVC pipe riser, and schedule-40 PVC 0.010-inch slot screen that will be set at the level of steel casing. The 2-inch annular space surrounding the monitoring well will be filled with an appropriately sized filter pack (No. 0 or 00 silica sand). A 2-foot bentonite seal will be emplaced on top of the sand, and the remaining annular space will be filled with bentonite cement to the ground surface. The monitoring wells will be completed using a flush-mount protective casing encased in a concrete pad. The casing of each well will be appropriately labeled inside the manhole cover by attaching a water-resistant tag listing the well identification number. As necessary, the monitoring wells will be properly developed following procedures described in the NYSDEC-approved RIWP and RIWP Addendum dated March and July 2025, respectively.

One groundwater sample will be collected from each of the newly installed bedrock monitoring wells MW-10 through MW-12 to determine the extent of CVOCs impact in MW-2a. Monitoring wells sampling will be performed in accordance with the project Quality Assurance Project Plan (QAPP) included as Appendix E in the March 2025 RIWP. A total of three groundwater samples along with their Quality Assurance (QA) and Quality Control (QC) samples will be analyzed for VOCs via EPA Method 8260.

Bedrock Geophysical Survey Specifications and Deliverables

The geophysical logging at MW-10 through MW-12 will be conducted by HRGS to characterize the geologic and hydrogeologic conditions encountered in their open boreholes including determining the depths and orientations (dip azimuths and dip angles) of bedrock fractures intersected by the subject boreholes and determining depths where water flows into and out of the boreholes under ambient and stressed (low constant rate pumping) conditions. Specifically, bedrock geophysical data will identify whether CVOCs contamination in groundwater is migrating horizontally from potential off-site sources or off the Site or vertically into deeper bedrock fractures or formations, the evaluation of any connectivity or communication between bedrock fractures and, the general distribution and orientation (strike/dip) of transmissive fractures sitewide. Geophysical data that will be collected in each borehole during this exercise will consist of the following parameters:

- Fluid Temperature & Fluid Conductivity/Resistivity
- Caliper
- Natural Gamma Ray
- Spontaneous Potential (SP)
- Optical Televiwer (OTV)
- Acoustic Televiwer (ATV) & Acoustic Caliper
- Heat Pulse Flow Meter (HPFM) Under Ambient Conditions
- HPFM Under Pumping Conditions

HRGS will provide a Mount Sopris Matrix portable digital logging system which displays and records data in real time in the field on a laptop computer. Data will be desktop processed by HRGS using WellCAD industry standard software for borehole geophysical logging.

Equipment used during this exercise include an ALT QL40-OBI-2G optical televiwer (OTV) probe for OTV logging, an ALT ABI-40 or QL40-ABI-2G acoustic televiwer (ATV) probe for ATV logging, an acoustic caliper which provides the average borehole diameter as a function of depth, a Mount Sopris QL40-FTC fluid temperature and conductivity/resistivity probe for the fluid temperature logging, a Mount Sopris QL40-FTC fluid temperature and conductivity/resistivity probe or comparable probe for the fluid conductivity/resistivity logging, Mount Sopris 2PGA-1000 or comparable poly-gamma probe for natural gamma ray logging, and a Mount Sopris HFP-2293 or LVHP-0723 heat pulse flow meter (HPFM) for the HPFM logging. The HPFM probe is calibrated for a measuring range of 0.03 to 1.0 gallons per minute (gal/min), and the pumping rate will be set at a low constant rate of approximately 0.25 gpm depending on the borehole conditions. Pumped fluids from the boreholes will be containerized in DOT-approved 55-gallon drums and will be subject to Field Management of

Investigation Derived Waste discussed below. Periodic groundwater level measurements will be collected from the two other open boreholes.

All equipment used during this exercise will be subject to HRGS assurance/control (QA/QC), Calibration, and Standardization.

HRGS deliverables for the borehole geophysical logging will include a data report consisting of the following.

- Borehole Geophysical Logs for the logged boreholes including a full interpretation of the logging data, the depths where groundwater flows into and out of the borehole, the vertical flow up and down the borehole and, the rates of flow where water flows into and out of the bedrock portions of the logged boreholes under ambient and pumping conditions.
- Bedrock Fracture Statistics Plots (stereograms, rose diagrams, histograms) of the orientations of bedrock fractures detected in the logged boreholes.
- Tables of Bedrock Fractures with the depths, orientations, and bedrock fracture category for each bedrock fracture detected in the logged boreholes.

Reporting

Borehole geophysical data will be provided to the NYSDEC in the Daily Field Report. The borehole geophysical logging data will be documented in a supplemental RI, which will enable us to revise the Site conceptual model (CSM) and the findings of the Qualitative Human Health Exposure Assessment (QHHEA) reported in the revised RIR dated November 17, 2025.

Site Safety

The Supplemental RIWP activities will be implemented in accordance Appendix A - Health and Safety Plan (HASP) and Appendix B - Community Air Monitoring Plan (CAMP) in the March 2025 RIWP.

Field Management of Investigation Derived Waste

Fluids and soil recovered during the installation of monitoring wells and geophysical logging will be containerized and sealed in labelled 55-gallon drums. The drums will be temporarily staged on-site and then properly disposed of as non-hazardous waste pursuant to a Contained-in Determination letter from NYSDEC and following disposal arrangements with a disposal facility.

Schedule


The table below provides an updated schedule for the performance of the Supplemental remedial investigation and other major tasks leading to the date of issuance of a

Certificate of Complete (COC). This schedule is tentative based upon the approvals of documents by the NYSDEC.

Schedule Milestone	Anticipated Date
NYSDEC Approval of Supp RIWP	December 2025
Implementation Supp RIWP	December 2025
Submit Supp RIR/RAWP	January-February 2026
Fact Sheet Announcing the 45-day Public Comment Period for RAWP Activities	April 2026
NYSDEC RAWP Approval/ Issuance of Decision Document	May 2026
Begin Implementation of Remedial Action	June 2026
Submittal of FER and SMP	July/August 2028
Issuance of Certificate of Completion	December 2028

Please contact us if you have any questions or require further clarification.

Very Truly Yours,
Hydro Tech Environmental Engineering and Geology, DPC



Paul I. Matli, PhD, PG.
Qualified Environmental Professional

PIM/am

cc: D. MacNeal - NYSDEC w/ Enc. (by email)
M. Froning - 6014 BCD Realty, LLC (by email)
T. Khouri, PE - HydroTech (by email)
Hydro Tech file 250033 w/ Enc.

ATTACHMENTS

Figure 1 - Map of Existing Monitoring Wells (September 2025 Draft RIR)

Figure 2 - Map of CVOCs in exiting monitoring wells (September 2025
Draft RIR)

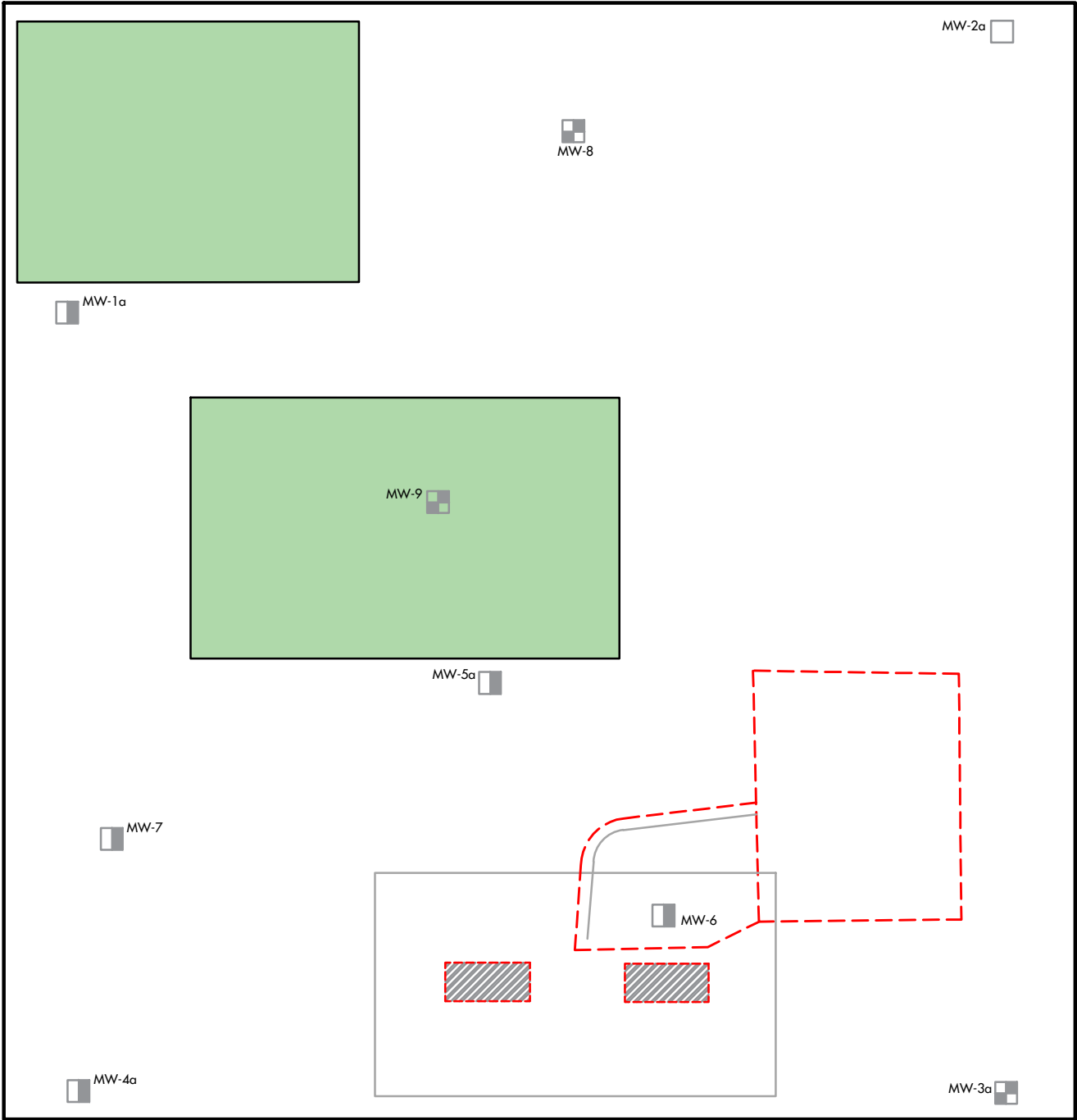
Figure 3 - Proposed Locations of Bedrock Monitoring Wells

Appendix A - Existing Monitoring Well Construction Logs (September 2025 Draft RIR)

Appendix B - NYSDEC Correspondence

ATTACHMENTS

Existing Wells Details	Depth in Feet				
	Groundwater	Screen Location	Screen Interval	Weathered Rock	Bedrock
MW-1a	26.17	WR	18-33	14-33	-
MW-2a	22.68	BR	15-30	10-13	13
MW-3a	16.23	BR/WR	11-26	16-20	20
MW-4a	23.86	WR	20-30	9-30	-
MW-5a	25.41	WR	18-33	10-33	-
MW-6	22.33	WR	13-28	13-28	-
MW-7	24.55	WR	19-34	9-34	-
MW-8	24.33	BR/WR	15-30	18-21	20
MW-9	24.7	BR/WR	17-32	14-29	29



LEGEND:

- SITE BOUNDARY
- EXTENT OF FORMER SOIL EXCAVATION AROUND REMOVED USTs AND DISPENSERS BY LABELLA IN AUGUST 2021
- FORMER LOCATIONS OF REMOVED DISPENSERS
- FORMER LOCATION OF REMOVED PRODUCT LINE
- CANOPY OF FORMER DISPENSERS
- 1-STORY FORMER AUTO REPAIR BUILDINGS

- EXISTING MONITORING WELL (MW-) SCREENED IN OVERBURDEN MATERIAL/WEATHERED BEDROCK (WR)-INSTALLED BY HYDROTECH IN JULY 2025
- EXISTING MONITORING WELL (MW-) SCREENED ACROSS INTERFACE BETWEEN WEATHERED AND COMPETENT BEDROCK (BR/WR)-INSTALLED BY HYDROTECH IN JULY 2025
- EXISTING MONITORING WELL (MW-2a) SCREENED IN BEDROCK ONLY (BR) - INSTALLED BY HYDROTECH IN JULY 2025



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TEL: (631) 462-5866

BASE DRAWING PREPARED BY

PROJECT NAME AND ADDRESS
3038 WEBSTER AVENUE, BRONX, NY.

PROJECT FIGURE
FIGURE 1: MAP OF EXISTING MONITORING WELLS (SEPTEMBER 2025 DRAFT RIR)

PROJECT NO. 240040	DATE 11/19/25
DRAWN BY A.S.	REVIEWED BY P.M.
SCALE (11X17) AS SHOWN	APPROVED BY P.M.

Sample ID	MW-1a	AWQS - TOGS 1.1.1
Sample Date	8/6/2025	
Units	ug/L	ug/L
Chloroform	3.1	7
cis-1,2-Dichloroethylene	2.28	5
Tetrachloroethylene	7.33	5
Trichloroethylene	3.55	5

Sample ID	MW-9	AWQS - TOGS 1.1.1
Sample Date	8/7/2025	
Units	ug/L	ug/L
Chloroform	4.7	7
Tetrachloroethylene	0.24 J	5

Sample ID	MW-7	AWQS - TOGS 1.1.1
Sample Date	8/7/2025	
Units	ug/L	ug/L
Chloroform	2.94	7
cis-1,2-Dichloroethylene	3.33	5
Tetrachloroethylene	10.5	5
Trichloroethylene	4.35	5

Sample ID	MW-4a	AWQS - TOGS 1.1.1
Sample Date	8/7/2025	
Units	ug/L	ug/L
cis-1,2-Dichloroethylene	1.35	5
Tetrachloroethylene	1.44	5
Trichloroethylene	2.02	5

Sample ID	MW-5a	AWQS - TOGS 1.1.1
Sample Date	8/5/2025	
Units	ug/L	ug/L
Chloroform	0.53	7
Tetrachloroethylene	0.29 J	5

Sample ID	MW-6	AWQS - TOGS 1.1.1
Sample Date	8/5/2025	
Units	ug/L	ug/L
Chloroform	0.7	7

Sample ID	MW-3a	AWQS - TOGS 1.1.1
Sample Date	8/5/2025	
Units	ug/L	ug/L
cis-1,2-Dichloroethylene	0.88	5

Sample ID	MW-2a	AWQS - TOGS 1.1.1
Sample Date	8/6/2025	
Units	ug/L	ug/L
Chloroform	0.28 J	7
cis-1,2-Dichloroethylene	19.4	5
Tetrachloroethylene	30.3	5
trans-1,2-Dichloroethylene	4.04	5
Trichloroethylene	40.7	5

Sample ID	MW-8	AWQS - TOGS 1.1.1
Sample Date	8/6/2025	
Units	ug/L	ug/L
Chloroform	0.36 J	7
cis-1,2-Dichloroethylene	0.3 J	5
Tetrachloroethylene	3.01	5
Trichloroethylene	1.8	5



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BASE DRAWING PREPARED BY

PROJECT NAME AND ADDRESS
3083 WEBSTER AVENUE, BRONX, NY

PROJECT FIGURE

FIGURE 2- MAP OF CVOCs IN EXISTING MONITORING WELLS (SEPTEMBER 2025 DRAFT RIR)

PROJECT NO. 250033	DATE 11/19/25
DRAWN BY A.S.	REVIEWED BY P.M.
SCALE (11X17) AS SHOWN	APPROVED BY P.M.

LEGEND:

— SITE BOUNDARY

- - - EXTENT OF FORMER SOIL EXCAVATION AROUND REMOVED USTs AND DISPENSERS BY LABELLA IN AUGUST 2021

FORMER LOCATIONS OF REMOVED DISPENSERS

FORMER LOCATION OF REMOVED PRODUCT LINE

CANOPY OF FORMER DISPENSERS

1-STORY FORMER AUTO REPAIR BUILDINGS

EXISTING MONITORING WELL (MW-) SCREENED IN OVERBURDEN MATERIAL/WEATHERED BEDROCK (WR)-INSTALLED BY HYDROTECH IN JULY 2025

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EXISTING MONITORING WELL (MW-2a) SCREENED IN BEDROCK ONLY (BR) - INSTALLED BY HYDROTECH IN JULY 2025

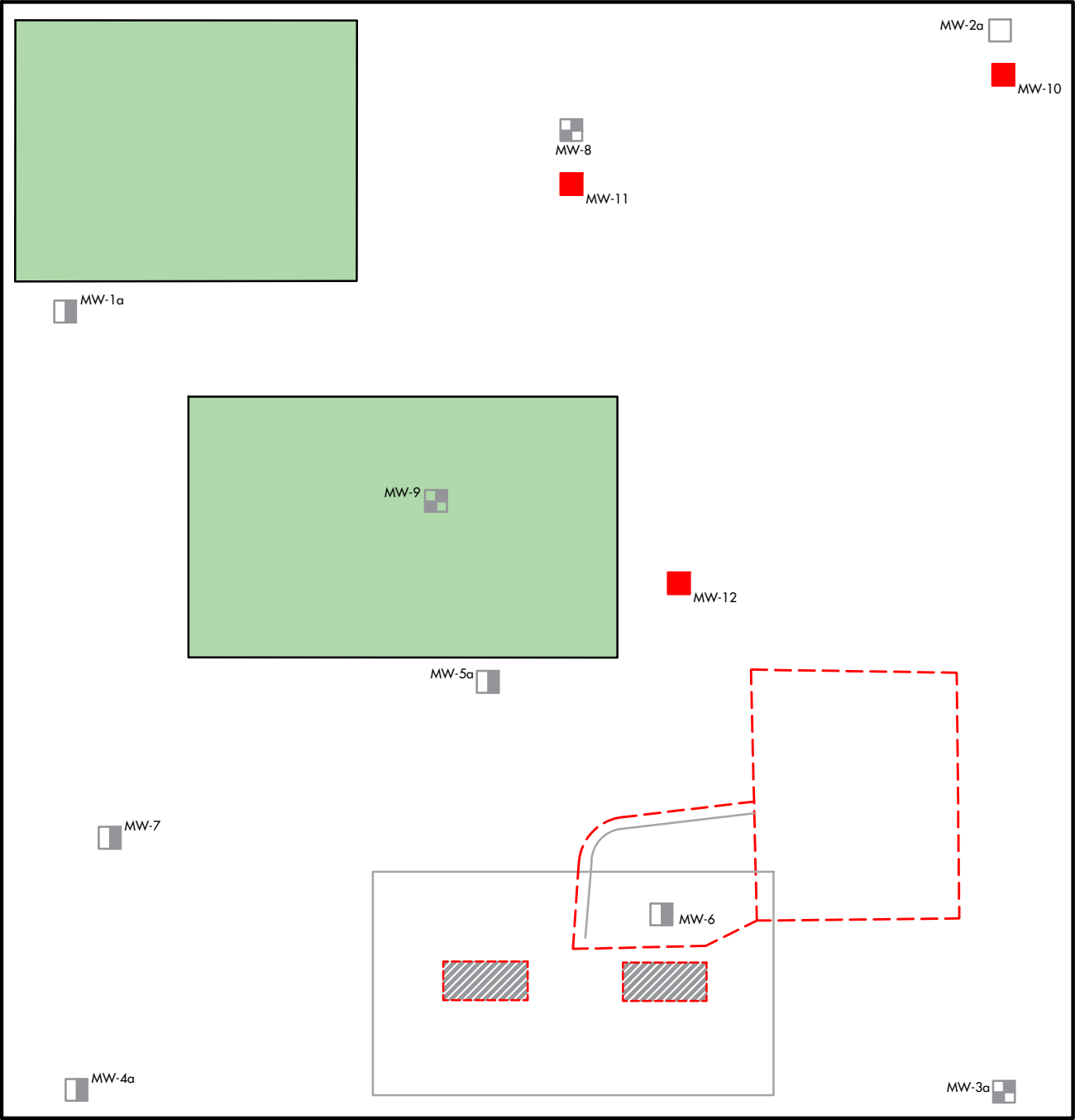
J = ANALYTE DETECTED AT OR ABOVE THE MDL(METHOD DETECTION LIMIT) BUT BELOW THE RL(REPORTING LIMIT) - DATA IS ESTIMATED

CVOCs = CHLORINATED VOLATILE ORGANIC COMPOUNDS

AWQS - TOGS 1.1.1 = NYSDEC 6 NYCRR PART 703 AMBIENT WATER QUALITY STANDARDS - TECHNICAL AND OPERATIONAL GUIDANCE SERIES 1.1.1

INDICATES CONCENTRATION EXCEEDS AWQS

0' 40'
APPROXIMATE SCALE IN FEET



WEBSTER AVENUE

LEGEND:

- SITE BOUNDARY
- EXTENT OF FORMER SOIL EXCAVATION AROUND REMOVED USTs AND DISPENSERS BY LABELLA IN AUGUST 2021
- FORMER LOCATIONS OF REMOVED DISPENSERS
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- EXISTING MONITORING WELL (MW-2a) SCREENED IN BEDROCK ONLY (BR) - INSTALLED BY HYDROTECH IN JULY 2025
- PROPOSED LOCATION OF BEDROCK MONITORING WELL (MW-)



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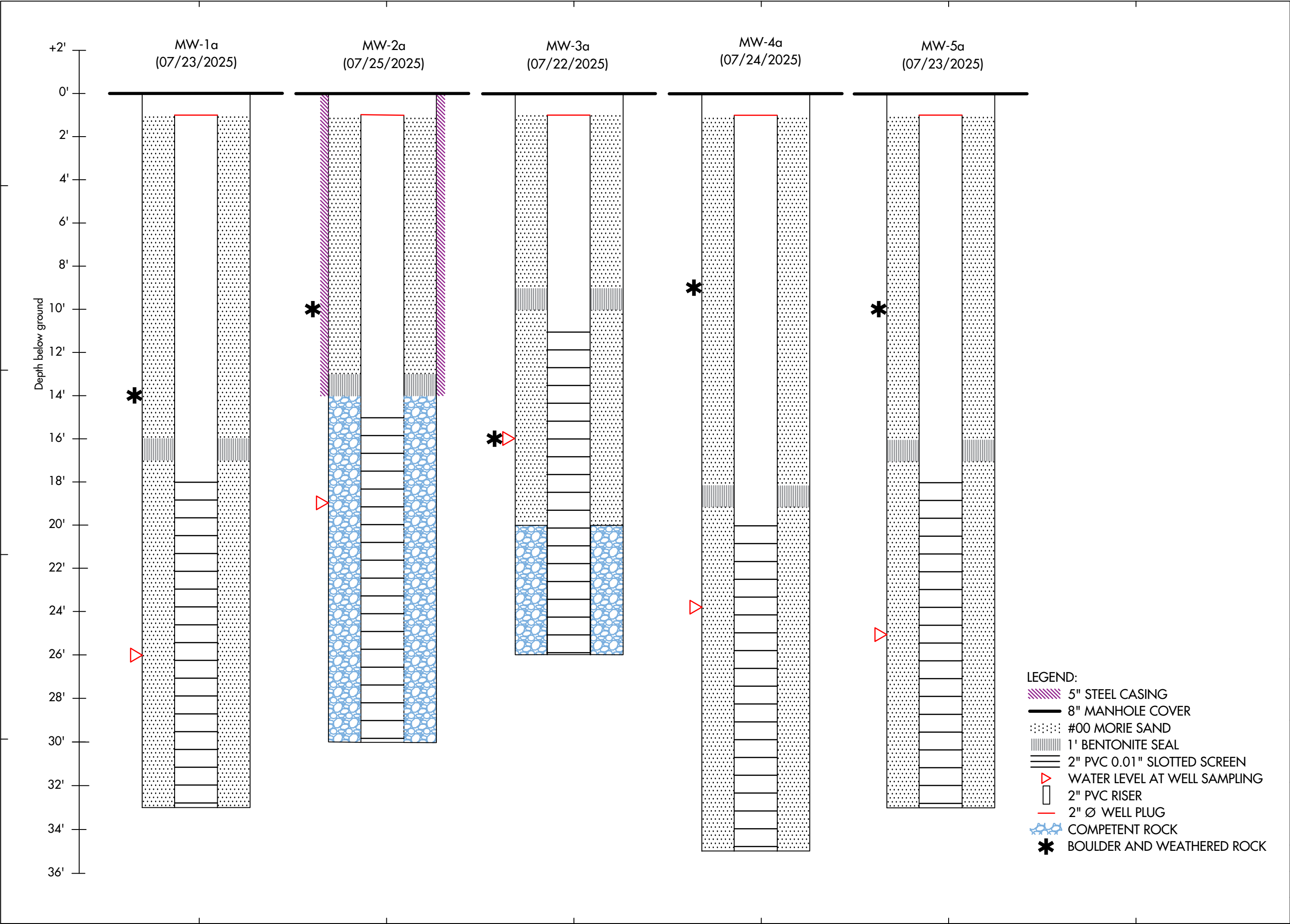
BASE DRAWING PREPARED BY

PROJECT NAME AND ADDRESS
3038 WEBSTER AVENUE, BRONX, NY.

PROJECT FIGURE
FIGURE 3: PROPOSED LOCATIONS OF BEDROCK MONITORING WELLS

PROJECT NO. 240040	DATE 11/19/25
DRAWN BY A.S.	REVIEWED BY P.M.
SCALE (11X17) AS SHOWN	APPROVED BY P.M.

APPENDIX A
Existing Monitoring Well Construction Logs
(September 2025 Draft RIR)



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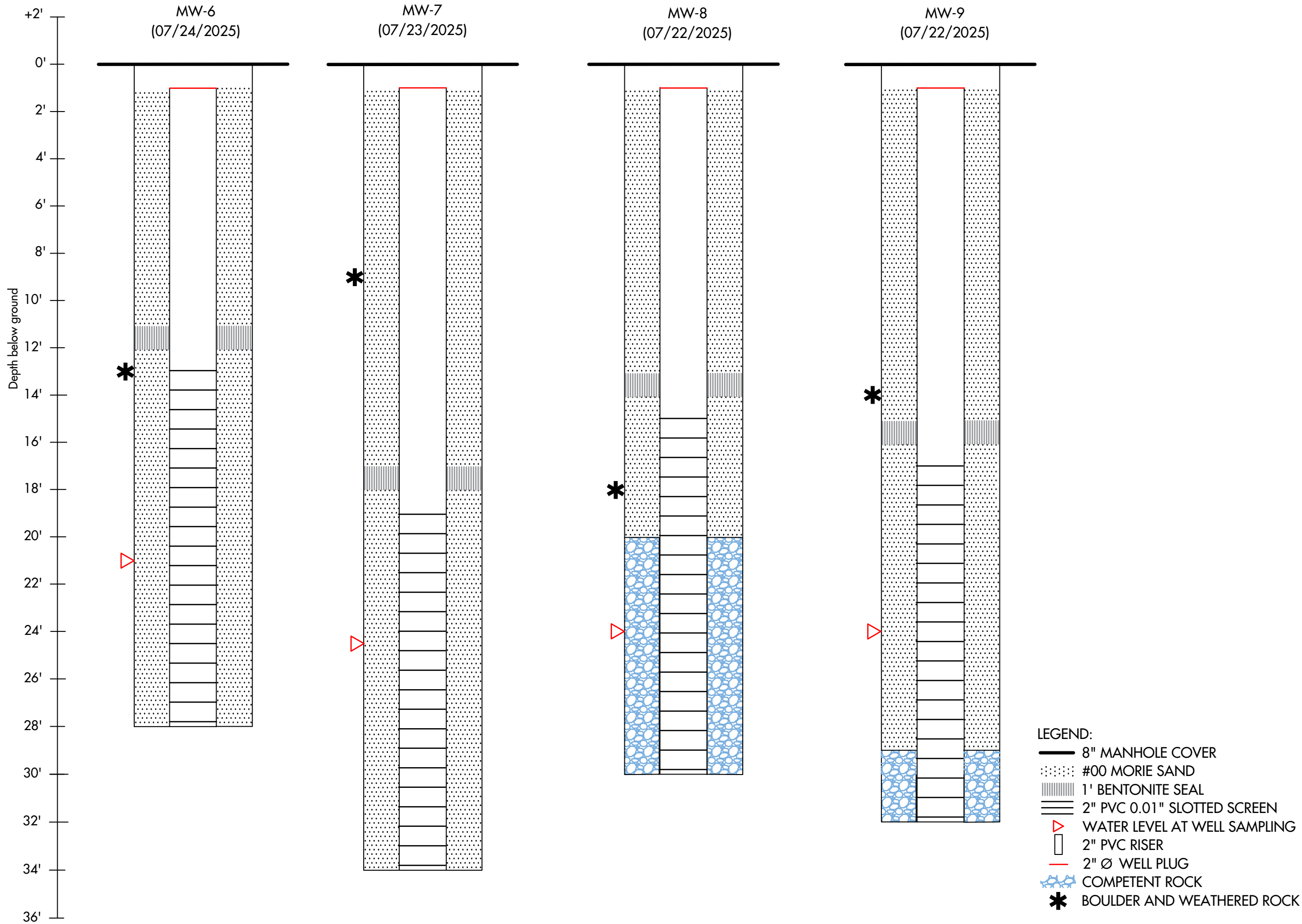
PROJECT NAME AND ADDRESS

3083 WEBSTER AVENUE, BRONX, NY

PROJECT FIGURE

EXISTING MONITORING WELLS
CONSTRUCTION LOGS (SEPTEMBER 2025
DRAFT RIR)

PROJECT NO. 250033	DATE 11/19/25
DRAWN BY A.S.	REVIEWED BY P.M.
SCALE (11X17) AS SHOWN	APPROVED BY P.M.



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TEL: (631) 462-5866

BASE DRAWING PREPARED BY

PROJECT NAME AND ADDRESS
3083 WEBSTER AVENUE, BRONX, NY

PROJECT FIGURE
EXISTING MONITORING WELLS
CONSTRUCTION LOGS (SEPTEMBER 2025
DRAFT RIR)

PROJECT NO. 250033	DATE 11/19/25
DRAWN BY A.S.	REVIEWED BY P.M.
SCALE (11X17) AS SHOWN	APPROVED BY P.M.

APPENDIX B
NYSDEC Correspondence



October 29, 2025

Paul I. Matli
Qualified Environmental Professional
Hydrotech Environmental Engineering and Geology, D.P.C.
231 West 29th Street, Suite 1104
New York, NY 10001

Re: Remedial Investigation Report
3083 Webster Avenue BCP Site
Site No. C203184
Norwood, Bronx, New York

Dear Mr. Matli,

The New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH) have reviewed the Hydrotech Environmental Engineering and Geology, D.P.C. (Hydrotech) submission of a Remedial Investigation Report (RIR) dated September 12, 2025 for the 3083 Webster Avenue BCP Site. NYSDEC has provided comments on the RIR (below). NYSDEC requests that additional data is collected under a Supplemental RI Work Plan (as detailed in Comment #2, below) and that the remaining comments be addressed via report revisions after implementation of the Supplemental RI Work Plan. Please note that page numbers referenced below relate to PDF page numbers, not document page numbers.

- 1) General Comment: There are multiple required elements of an RIR which are missing from this report. Please add sections which detail the following:
 - a) A Qualitative Human Health Exposure Assessment (QHHEA) is required to evaluate any/all exposure pathways related to site contamination. Please include a QHHEA, pursuant to Section 3.3(c)(4) and Appendix 3B of DER-10, which should speak to potential on-site and off-site exposure pathways.
 - b) A Conceptual Site Model (CSM) should be presented in the RIR. Please add a section detailing the current CSM for the Site pursuant to Section 3.2(2a) of DER-10.
 - c) Presently, there are data gaps which preclude an encompassing review of the RIR, chiefly pertaining to groundwater fate and transport. Please expand discussions of hydrogeological factors pursuant to Section 3.14(a)(3) of DER-10. NYSDEC requests that additional data is collected as described in Comment #2, below, in order to close these data gaps.

- 2) General Comment: Pursuant to Comment #1(c) above, NYSDEC requests that additional wells are installed on the Site to collect additional hydrogeological data at the Site. Please prepare a Supplemental RI Work Plan which includes the following:
 - a) Installation of two additional monitoring wells screened in bedrock, only, using procedures outlined in the NYSDEC-approved RIWP Addendum dated July 18, 2025. Bedrock monitoring wells should be spaced adequately to determine extent of chlorinated VOC impacts identified in MW-2a.
 - b) Downhole geophysical logging of newly installed boreholes and any open-hole screened monitoring wells extending into bedrock which will gather data from the following probes: fluid temperature, fluid conductivity and resistivity, optical televiewer, acoustic televiewer and caliper, heat pulse flow meter (under both ambient and pumping conditions), natural gamma, and spontaneous potential.
- 3) Pages 5-8 (Table of Contents and Tables): Please revise the *Tables* sections of the Table of Contents to correctly reflect the Tables throughout the document (ex. Table 12, Table 9, and Table 10 are *In-Attachment*, not *In-Text*, Table 3 is listed in the Table of Contents to include *Off-Site Soil Vapor*, etc.).
- 4) Page 10, Section 1.0 (Executive Summary): In the fifth paragraph of this section, it is stated that “the groundwater flow beneath the Site is determined to be toward the southwest.” Wells installed during the RI appear to be screened across three different intervals: overburden material/weathered bedrock, competent bedrock, and the interface between weathered and competent bedrock. Please expand the discussion of groundwater flow in this section to include the three different intervals.
- 5) Page 13, Section 2.1 (Site Description): In the third paragraph of this section, a description of a receptor survey is provided. The second sentence of this paragraph states that “both facilities are in the 11-story building located across the southeastern vicinity of the Site,” while the third paragraph states that “the other facility... is located on the southern side of East 202nd Street to the east.” Please revise the second sentence to indicate that only one facility is found at 3084 Webster Avenue and another facility is found on East 202nd Street.
- 6) Page 22, Section 2.3 (Environmental Setting): In the third paragraph of this section, a discussion of the site survey conducted in 2024 is presented. Based on the provided elevations, it is unclear how elevation varies across the Site. Please revise this paragraph for clarity and include the survey map as a separate attachment.
- 7) Pages 22-23, Section 2.3 (Environmental Setting): The fourth paragraph of this section presents a discussion of groundwater elevation measurements over time. Please revise this paragraph pursuant to Comment #4, above.

- 8) Pages 30-31, Section 3.3 (Groundwater Monitoring Wells): In Table 5, please add a column indicating whether each monitoring well was installed in the weathered rock interval (only), the competent rock interval (only), or at the weathered rock-competent rock interface. Current descriptions indicate that MW-1a, MW-4a, MW-5a, MW-6, and MW-7 are screened in the weathered rock interval; MW-3a, MW-8, and MW-9 are screened across the weathered rock-bedrock interface, and MW-2a is screened in bedrock, only.
- 9) Page 32, Section 3.3 (Groundwater Monitoring Wells): The second sentence on this page indicated that a continuous core was collected across the entire length of the borehole. Please provide any physical observations made from continuous coring (competent bedrock properties, rock quality designation, etcetera).
- 10) Page 35, Section 3.3 (Groundwater Monitoring Wells): In the first paragraph on this page, it is stated that the interface probe “can measure depths to water to 0.01 inch.” Please revise to indicate the interface probe can measure depths to 0.01 *feet*.
- 11) Page 35, Section 3.3 (Groundwater Monitoring Wells): In the paragraph referencing Table 6 and Figure 6, it should be noted that groundwater elevations from each monitoring well do not necessarily represent the same groundwater intervals. Please revise this section pursuant to Comments #4 and #7, above.
- 12) Page 61 (Figure 2): Please expand the site boundary map (or add an additional figure) to include the surrounding land use and any sensitive receptors in a half-mile radius per DER-10.
- 13) Page 62 (Figure 3): Please include the historic soil vapor sample locations on this figure.
- 14) Page 64 (Figure 5): Please revise this figure and attach two additional figures depicting groundwater elevation contours from each screened interval (weathered rock, weathered rock/bedrock interface, and bedrock, as mentioned in Comments #4, #7, and #11, above) separately. Include additional data collected under the Supplemental RI Work Plan on these figures.
- 15) Page 117, Soil Boring Logs: For borings advanced into competent bedrock, please describe the characteristics of the recovered bedrock during drilling.

Please be advised that the data collected under the Supplemental RI Work Plan (as detailed in Comment #2) will need to be incorporated into the revised version of the RIR. All other comments (#1, #3 through #15) pertain to the content of the RIR and will require revision following the implementation of the Supplemental RI Work Plan.

Please also be advised that additional work is required to delineate impacts identified in MW-2a as well as to generate data for use in determining the future remedial actions to take place at the Site.

If you have any questions regarding the comments above, please contact me by email at Elliott.Jackson@dec.ny.gov or by phone at 518-402-9789.

Sincerely,

A handwritten signature in black ink, appearing to read "Elliott Jackson", followed by a long horizontal flourish.

Project Manager
Bureau B
Division of Environmental Remediation

ec: D. MacNeal – DEC Central Office
K. Pollard, S. Lawrence, J. Deming – DOH
D2