



February 11, 2026

Ms. Wendi Zheng
New York State Department of Environmental Conservation
47-40 21st Street
Long Island City, NY 11101

*RE: Vapor Intrusion Evaluation Work Plan Memorandum
Former El Puente Site
100 South 4th Street, Brooklyn, New York
NYSDEC BCP Number: C224260*

Dear Ms. Zheng:

Impact Environmental Engineering and Geology PLLC (IEEG) on behalf of HDH 3.0, LLC, has prepared this Vapor Intrusion Evaluation Work Plan Memorandum for 100 South 4th Street, Brooklyn, NY (the "Site"). The purpose of the sampling event is to evaluate potential vapor intrusion impacts at the Site within the typical heating season, defined within NYSDOH guidance as November 15 to March 31. The proposed sampling and pressure testing activities are planned to be conducted during the current heating season (2025-2026) to ensure consistency with the NYSDOH guidance. Based on the results of this evaluation, the NYSDEC and NYSDOH will determine the frequency of operation, maintenance, and monitoring (OM&M) of the SSDS. Typically, OM&M is performed on an annual basis for a period of at least 3-5 years, or until such time that subsequent sub-slab soil vapor and indoor air sample results deem that active SSDS is no longer required by the NYSDEC/NYSDOH. The proposed work will be implemented in accordance with the approved Interim Remedial Measure (IRM) Work Plan. The details of the proposed sampling are presented below.

ACTIVE SUB-SLAB DEPRESSURIZATION SYSTEM EVALUATION

A visual inspection of the accessible active SSD system components will be completed during this event and will include, but is not limited to:

- Complete a visual inspection of the complete system to identify components that are damaged or not operating properly and require corrective action;
- Inspection of building conditions to identify changes that may impact operation of the SSD system;
- Pressure differential readings will be collected from associated test points (designated SV-1 a/b, SV-2 a/b, SV-3 a/b, SV-4, SV-5 a/b, VMP-1, VMP-2, VMP-3, VMP-4, VMP-5, and VMP-6) in the building slab within 98, 100, and 104 South 4th Street using a digital manometer, to ensure pressure readings of at least -0.004 wci are achieved (Refer to **Figure 1**).

- Confirm operation of the fans (blowers), differential pressure gauges and audible alarm for the system risers.
- Evaluate the system's exhaust to confirm that no modifications have occurred with respect to its proximity to building openings, air intakes, or supply registers.

Indoor air sampling will be performed with the SSDS operating to evaluate system performance and confirm mitigation effectiveness under normal operating conditions.

INDOOR AIR EVALUATION SAMPLING

As requested by the NYSDEC, a total of 12 indoor air samples (designated IA-1, IA-2, IA-3, IA-4a through IA-4h, and IA-5) will be collected from both commercial and residential areas throughout the building at the proposed sample locations depicted on **Figure 1**. The indoor air samples will be collected from the lowest level in the building. One (1) outdoor ambient air sample (OA-1) will be collected for comparative purposes. 6.0 L Summa canisters will be utilized to collect both indoor air and outdoor ambient air samples with a 24-hour collection period. The work will be conducted in accordance with the applicable NYS Department of Health (NYSDOH), Final Guidance for Evaluating Soil Vapor Intrusion in the State of New York (NYSDOH October 2006, and subsequent updates), hereinafter referred to as the "NYSDOH Guidance Document". Analytical results for the indoor air samples will be compared to the NYSDOH guidance values and USEPA Building Assessment and Survey Evaluation (BASE) background concentrations data. Indoor air results will also be compared to indoor air concentrations measured during the initial remedial investigation to evaluate the performance of the SSDS in reducing potential indoor air exposures.

LABORATORY ANALYSIS

Laboratory analysis will be performed by Phoenix Environmental Laboratories, Inc. (Phoenix) of Manchester, Connecticut (National Environmental Laboratory Accreditation Conference NY#11301). Air samples will be analyzed for individual VOCs by USEPA Method TO-15; Select Ion Monitoring (SIM) (Determination of VOCs in Air Collected in Specially Prepared Canisters and Analyzed by Gas Chromatography Mass Spectrometry). Laboratory data will be reported in ug/m³.

DATA EVALUATION AND REPORTING

The sample analytical results will be evaluated in accordance with the technical guidance provided in the NYSDOH Guidance Document. The sampling results will be reviewed "as a whole" in conjunction with the results of other environmental sampling and the Conceptual Site Model (CSM) to identify trends and spatial variations in the data. A Building Questionnaire, Product Inventory, and a Summary Report describing sampling methodology, analytical results, data evaluation, and significant findings associated with present-day conditions will be prepared and submitted to the NYSDEC and NYSDOH for review.

CERTIFICATION

I, Kevin Kleaka, certify that I am a Qualified Environmental Professional as defined in 6 NYCRR Part 375 and that this Work Plan was prepared in accordance with applicable statues and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

Impact Environmental Engineering and Geology PLLC

Kevin Kleaka _____	02/11/2026 _____	 _____
Name	Date	Signature

Attachments

Attachment 1 – Site Plan Proposed Indoor Air Sample locations

