April 22, 2024

Mr. Richard Mustico
Case Manager
NYSDEC – Division of Environmental Remediation
625 Broadway
Albany, New York 12233

Re: SRIWP Addendum – LNAPL Delineation
12 Franklin Street, Brooklyn, New York
BCP Site No. C224286

Dear Mr. Mustico:

On behalf of Franklin Point LLC/Franklin Point Holding LLC, Roux Environmental Engineering and Geology, D.P.C. (Roux) is submitting this Supplemental Remedial Investigation Work Plan (SRIWP) Addendum to the New York State Department of Environmental Conservation (NYSDEC). The purpose and scope of work described herein is to investigate the extent of the petroleum impacts observed during the removal of the 1,080-gallon #2 fuel oil underground storage tank (UST) within Building D (former lot 8) at the above referenced property (Site). During the removal of the UST at former lot 8 (8 Meserole Avenue), light non-aqueous phase liquid (LNAPL) was observed on top of the groundwater within the excavation along with odorous and stained soils observed at the groundwater interface. Petroleum impacts were observed throughout the UST grave, which extended to a depth of 8 feet below land surface (ft bls). The area around the UST grave is being treated as a hotspot that needs to be delineated and then remediated.

This SRIWP Addendum has been prepared in accordance with NYSDEC procedures set forth in the guidance document titled DER-10 Technical Guidance for Site Investigation and Remediation, dated May 2010 (DER-10) and complies with all applicable Federal, State, and local laws, regulations, and requirements. Additionally, all work will be completed in accordance with the health and safety plan (HASP) and Field Sampling Plan/Quality Assurance Project Plan (FSP/QAPP) included with the SRIWP. Implementation of a Community Air Monitoring Plan is not proposed for this SRIWP due to the limited nature of the ground intrusive work as the majority of the work is inside an existing building structure (one or two borings in the sidewalk). Ambient air will be monitored for worker protection using a photoionization detector (PID).

Soil and Groundwater Delineation Field Work

Soil Delineation: Roux proposes to collect delineation soil samples in a "step-out" method around the UST grave. The first round of step-out soil borings will be advanced to a depth of 15 ft bls using a Geoprobe® Direct Push rig at locations approximately 5 feet beyond the UST grave in all four cardinal directions. Soil from each of the soil borings will be visually inspected for evidence of impacts and screened for organic vapors in the field using a PID. Soil lithology will be recorded according to the Unified Soils Classification System (USCS). One soil sample will be collected from the two-foot soil interval in each soil boring that exhibits the greatest degree of impacts (i.e., staining, odors, or PID readings above background), if any. If no impacts are observed, one sample will be collected from the two-foot interval above the observed water table. A second step-out soil boring will be completed approximately 10 feet from the UST grave (5 feet from each initial step-out soil boring) and soil samples will be collected in the same manner as described above. However, these samples will be placed on hold, pending the results of the initial step-out samples. A western 10 feet step-out location will not be completed due to the conflict with the existing basement wall located in that area. Additional soil samples

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may be collected if deemed necessary based on field observations. Proposed approximate sample locations are shown in Figure 1.

During the delineation soil sampling, a range of four to 10 soil samples may be analyzed for CP-51 VOCs and SVOCs, depending on the results of the initial 5 feet step-out samples and whether or not continued analysis is required for delineation.

Monitoring Well Installation and Groundwater Investigation: Up to two soil borings will be converted to permanent groundwater monitoring wells based on field observations. Monitoring wells will be constructed of two-inch diameter schedule 40 polyvinyl chloride (PVC) and consist of 10 feet of 0.020-inch slot well screen. A sand pack will be placed around the monitoring well screen, extending two feet above the top of the screened zone above which a two-foot thick bentonite pellet seal will be placed and hydrated with potable water. The annular space above the bentonite seal will be filled with a cement bentonite grout and brought to grade. The monitoring wells will be finished with a flush mount traffic bearing road box. Following installation, each monitoring well will be developed using a submersible pump to remove fines that may have accumulated within the well and sand pack during installation. To establish groundwater flow direction, the elevation of the top of the casing will be surveyed, by a New York State licensed surveyor, at each newly installed monitoring well location.

Following installation and development, the monitoring wells will be given one week to equilibrate prior to gauging and collection of samples. The newly installed monitoring wells and the existing monitoring well network will be gauged using an oil/water interface probe. Following gauging activities (if LNAPL is not detected in the monitoring wells), groundwater samples will be collected from each of the newly installed monitoring wells utilizing low-flow groundwater sampling methods. Excess soil and water generated as part of the well development and purging activities prior to sample collection will be drummed, labeled, and stored on-site pending laboratory results and off-site disposal. Samples will be collected for waste characterization purposes.

Laboratory Analysis: Soil samples will be submitted to a New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP)-certified laboratory for CP-51 volatile organic compounds (VOCs) and semivolatile organic compounds (SVOCs) analyses.

Groundwater samples will be submitted to a NYSDOH ELAP-certified laboratory for CP-51 VOCs and SVOCs analyses. Quality assurance/quality control samples will be collected in accordance with the FSP/QAPP.

All soil and groundwater samples will be analyzed on a standard turnaround time and will be reported as Category B data deliverables and validated by a third-party validator.

Reporting

Reporting During Site Activities: Daily reports will be prepared and submitted to the NYSDEC and NYSDOH project managers by the end of each day following the reporting period and will include:

- An update of progress made during the reporting day;
- Photographic documentation of the activities completed during the reporting day;
- Identification of samples collected during the reporting day;
- Locations and references to a Site map for completed activities;
- A summary of any and all complaints with relevant details, including contact information;
- An explanation of notable site conditions; and
- A list of anticipated work for the following reporting day.

Daily reports are not intended to notify the NYSDEC of emergencies (e.g., accident, spill), request changes to the SRIWP Addendum, or communicate other sensitive or time-critical information. However, such conditions will also be included in the daily reports. Emergency conditions and changes to the SRIWP Amendment will be communicated directly to the NYSDEC Project Manager.

Delineation Summary Report: Following receipt of all laboratory results, Roux will compile the soil and groundwater delineation data and findings in a Supplemental Remedial Investigation Report (SRI Report), which will include data summary tables, figures, soil boring logs/monitoring well installation logs, and data usability summary report.

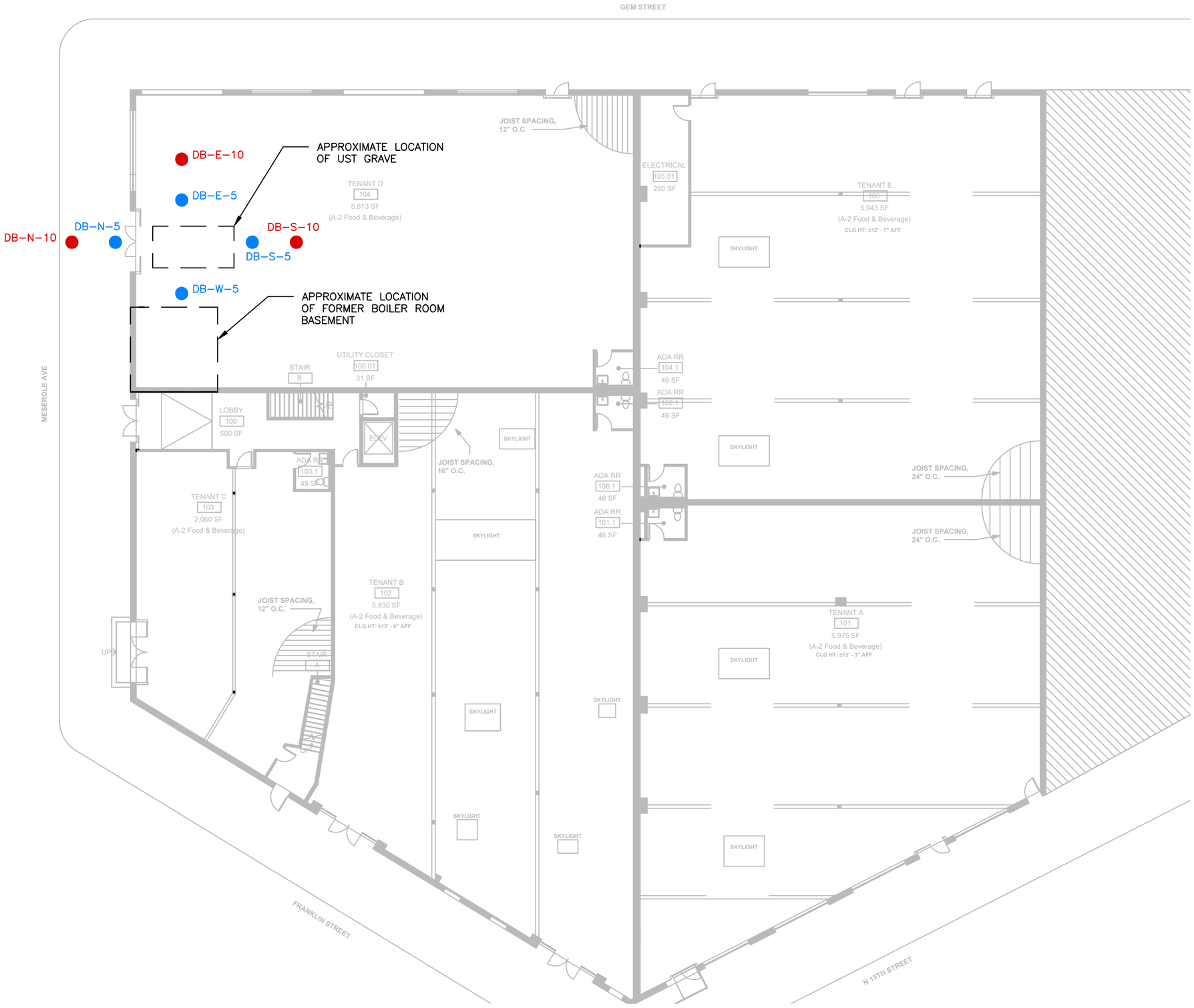
If you have any questions concerning this Proposal or require additional information, please do not hesitate to contact either of the undersigned at (631) 232-2600 or via email at rkovacs@rouxinc.com or rhenke@rouxinc.com.

Sincerely,

ROUX ENVIRONMENTAL ENGINEERING AND GEOLOGY, D.P.C.

Rachel Henke
Senior Scientist

Robert Kovacs, P.G.
Principal Scientist



LEGEND

- DB–N–5 — FIRST STEPOUT BORING (5 FT OFF UST GRAVE)
- DB–N–10 — SECOND STEPOUT BORING (IF CONTAMINATION IS PRESENT IN FIRST STEP OUT BORING: 10 FT OFF UST GRAVE)
- WELL LOCATIONS WILL BE SELECTED BASED ON FIELD OBSERVATIONS

20' 0 20'

Title:

PROPOSED LNAPL DELINEATION SAMPLE LOCATIONS

12 FRANKLIN STREET
BROOKLYN, NEW YORK 11222

Prepared for:

FRANKLIN POINT HOLDING LLC

ROUX

Compiled by: R.H.	Date: 4/22/2024	FIGURE
Prepared by: G.M.	Scale: AS SHOWN	1
Project Mgr: R.H.	Project: 4170.0001Y000	
File: 4170.0001Y113.01.DWG		

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