

July 7, 2023

Richard P. Mustico Assistant Engineer NYSDEC Division of Environmental Remediation 625 Broadway Albany, New York 12233-7016

Re: Contingency Plan for Arsenic Exceeding Protection of Groundwater Soil Cleanup

Objectives

Former Anglo Chemical and Rubber Site (BCP No. C224337)

1-9 Wythe Avenue, Brooklyn, New York

Mr. Mustico:

This letter presents a contingency remedy for arsenic contamination at the Former Anglo Chemical and Rubber Site (C224337) in Brooklyn, New York (the Site). The proposed remedy for the Site intends to achieve Track 1 Unrestricted Use and includes excavation of the entire Site to at least 17 feet below grade surface (bgs) with additional excavation as needed. In order to excavate soils below the groundwater table, support of excavation (SOE) elements including sheet piles along the site perimeters will be designed and installed. Metals impacted groundwater will be dewatered in compliance with city, state, and federal laws and regulations after treatment.

Post-excavation endpoint samples will be collected to evaluate the performance of the remedy with respect to attainment of Track 1 Unrestricted Use Soil Cleanup Objectives (UUSCOs). If endpoint samples do not meet UUSCOs, further excavation will be completed until they are met (as demonstrated by the collection of additional endpoint samples), otherwise a Track 2 Commercial SCO remedy or Track 4 Site Specific SCO will be pursued. If a Track 2 or Track 4 remedy is pursued as a result of post-excavation endpoint samples, a contingency remedial action will be implemented to address concentration of arsenic exceeding the Protection of Groundwater Soil Cleanup Objectives (PGSCOs). This remedial action will include solidification/stabilization (S/S) of arsenic remaining beneath the Site. The S/S process involves mixing the contaminated soil with an appropriate ratio of binder/stabilizer and water. For the in-situ application, the binding agents (e.g., cement, lime, silicates, clay, etc.) used for contaminant of concern are mixed with the contaminated material by the surface area, injection, or auger method. A pilot study including delineation of arsenic will be conducted prior to S/S process to determine the depth and area of arsenic contamination requiring treatment.



