250 Water Street and the New York State Department of Environmental Conservation Brownfield Cleanup Program

Revised Remedial Investigation Work Plan

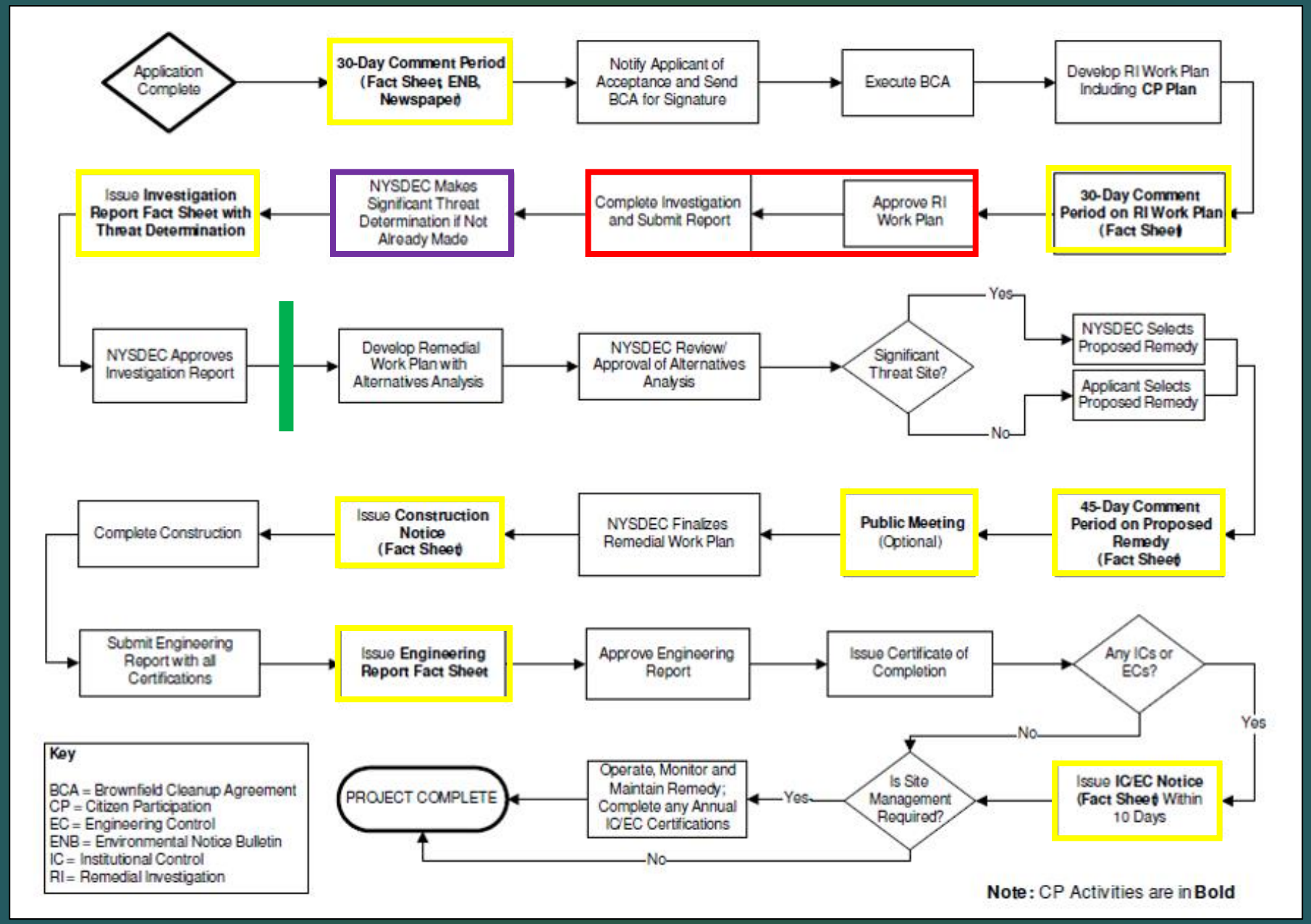
250 Water Street, New York, New York

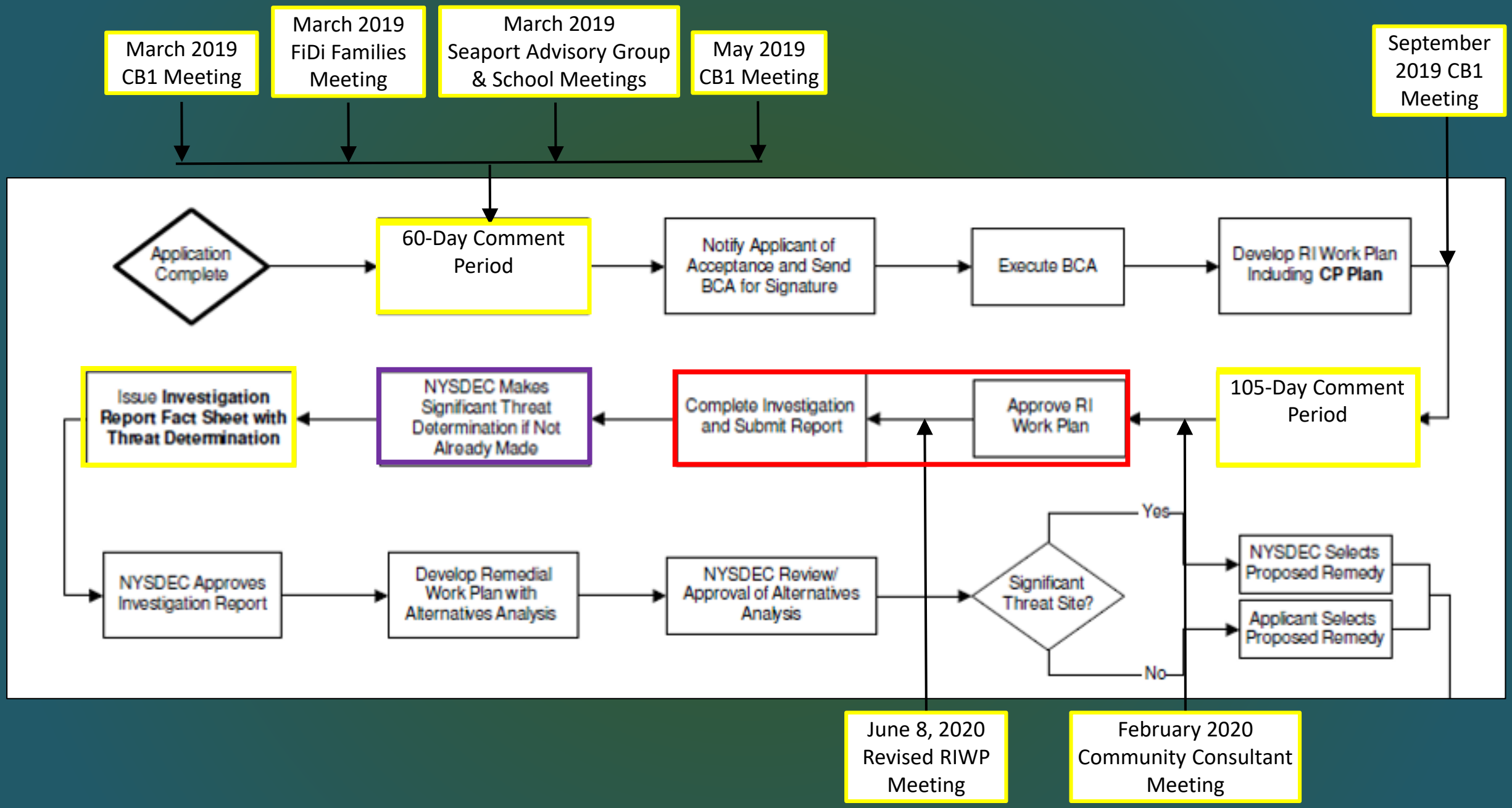
Manhattan Community Board 1

NYSDEC BCP Site No. C231127

June 8, 2020

BCP Process

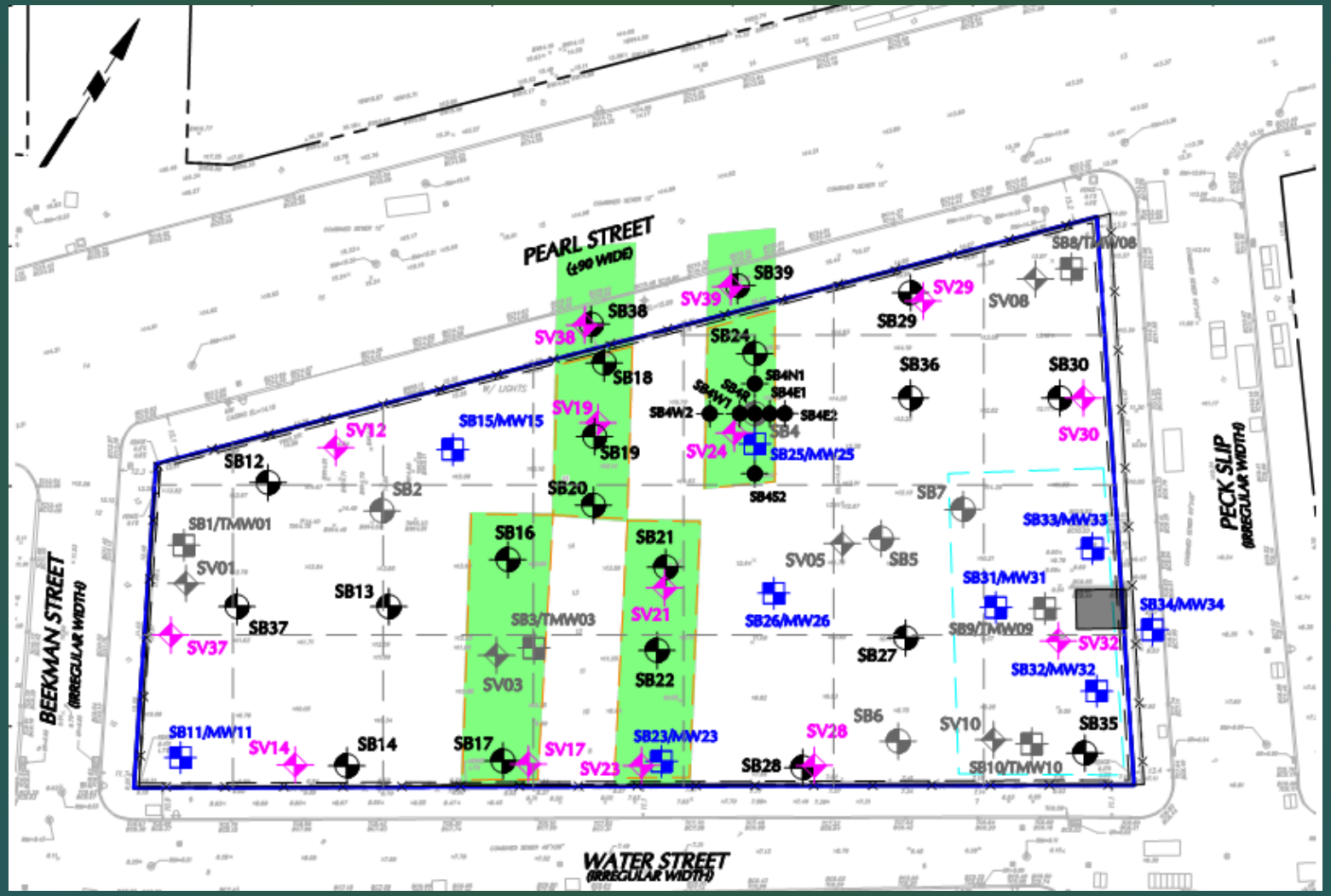

Application Complete
30-Day Comment Period (Fact Sheet, ENB, Newspaper)
Notify Applicant of Acceptance and Send BCA for Signature
Execute BCA
Develop RI Work Plan Including CP Plan
30-Day Comment Period on RI Work Plan (Fact Sheet)
Approve RI Work Plan
Complete Investigation and Submit Report
NYSDEC Makes Significant Threat Determination if Not Already Made
Issue Investigation Report Fact Sheet with Threat Determination
NYSDEC Approves Investigation Report
Develop Remedial Work Plan with Alternatives Analysis
NYSDEC Review/ Approval of Alternatives Analysis
Significant Threat Site?
Yes
No
NYSDEC Selects Proposed Remedy
Applicant Selects Proposed Remedy
45-Day Comment Period on Proposed Remedy (Fact Sheet)
Public Meeting (Optional)
NYSDEC Finalizes Remedial Work Plan
Issue Construction Notice (Fact Sheet)
Complete Construction
Submit Engineering Report with all Certifications
Issue Engineering Report Fact Sheet
Approve Engineering Report
Issue Certificate of Completion
Any ICs or ECs?
Yes
No
Issue IC/EC Notice (Fact Sheet) Within 10 Days
Is Site Management Required?
Yes
No
Operate, Monitor and Maintain Remedy; Complete any Annual IC/EC Certifications
PROJECT COMPLETE
Key
BCA = Brownfield Cleanup Agreement
CP = Citizen Participation
EC = Engineering Control
ENB = Environmental Notice Bulletin
IC = Institutional Control
RI = Remedial Investigation
Note: CP Activities are in Bold


March 2019 CB1 Meeting
March 2019 FiDi Families Meeting
March 2019 Seaport Advisory Group & School Meetings
May 2019 CB1 Meeting
September 2019 CB1 Meeting
Application Complete
60-Day Comment Period
Notify Applicant of Acceptance and Send BCA for Signature
Execute BCA
Develop RI Work Plan Including CP Plan
105-Day Comment Period
Approve RI Work Plan
Complete Investigation and Submit Report
NYSDEC Makes Significant Threat Determination if Not Already Made
Issue Investigation Report Fact Sheet with Threat Determination
NYSDEC Approves Investigation Report
Develop Remedial Work Plan with Alternatives Analysis
NYSDEC Review/ Approval of Alternatives Analysis
Significant Threat Site?
Yes
No
NYSDEC Selects Proposed Remedy
Applicant Selects Proposed Remedy
June 8, 2020 Revised RIWP Meeting
February 2020 Community Consultant Meeting

Presentation Outline – RIWP Revisions

- Overview of Remedial Investigation
- RIWP Revisions
- Phased Work Schedule

Overview of Remedial Investigation



Overview of Remedial Investigation

Soil Borings

Drill Rig

2-Inch-Diameter Soil Samples

Patched Completed Boring

Overview of Remedial Investigation

Groundwater Monitoring Wells/Soil Vapor Sampling Points

2-Inch-Diameter Monitoring Well

Groundwater Monitoring Well Cover

Soil Vapor Sampling Point

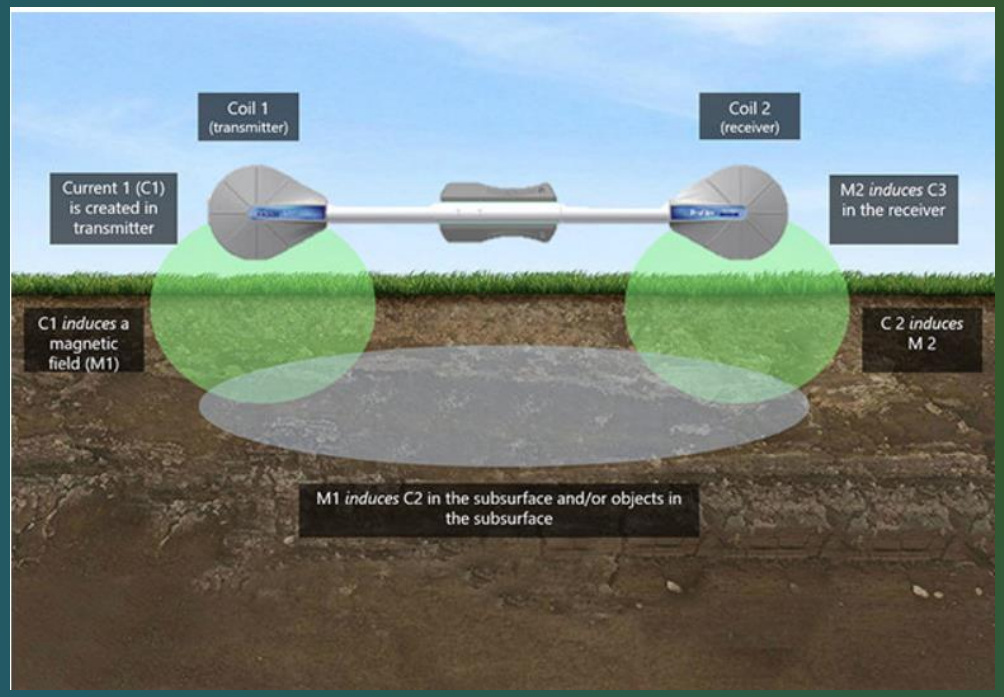
RIWP Revisions – Geophysical Survey Additions

Ground Penetrating Radar

Utility Markout

RIWP Revisions – Geophysical Survey Additions

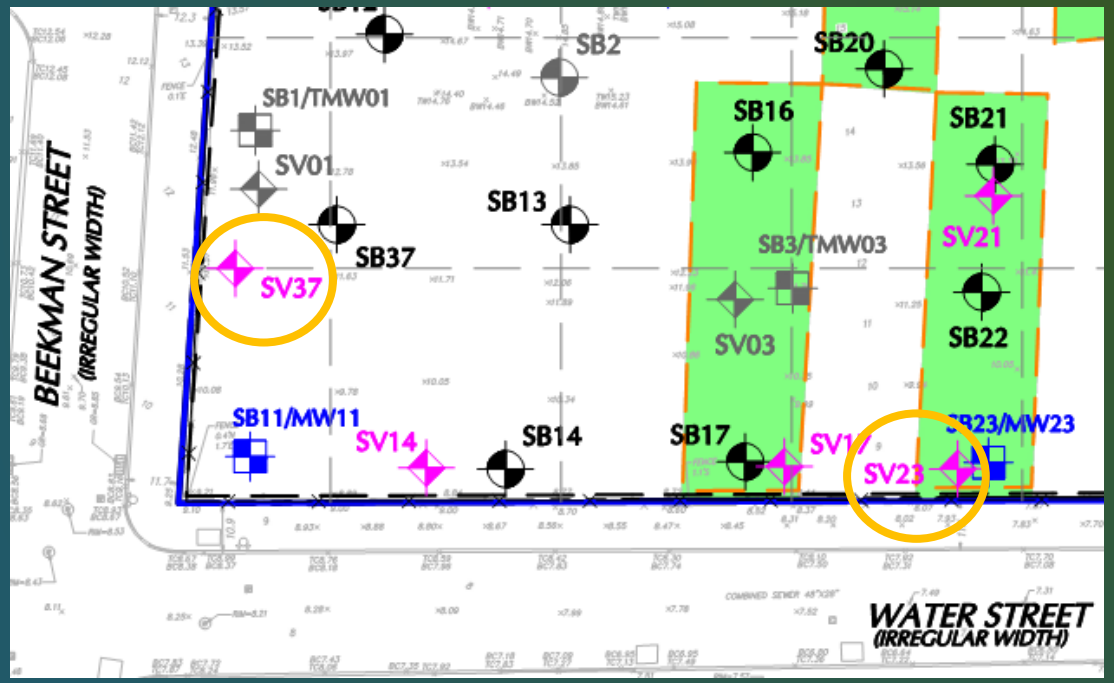
Electromagnetic (EM) Survey

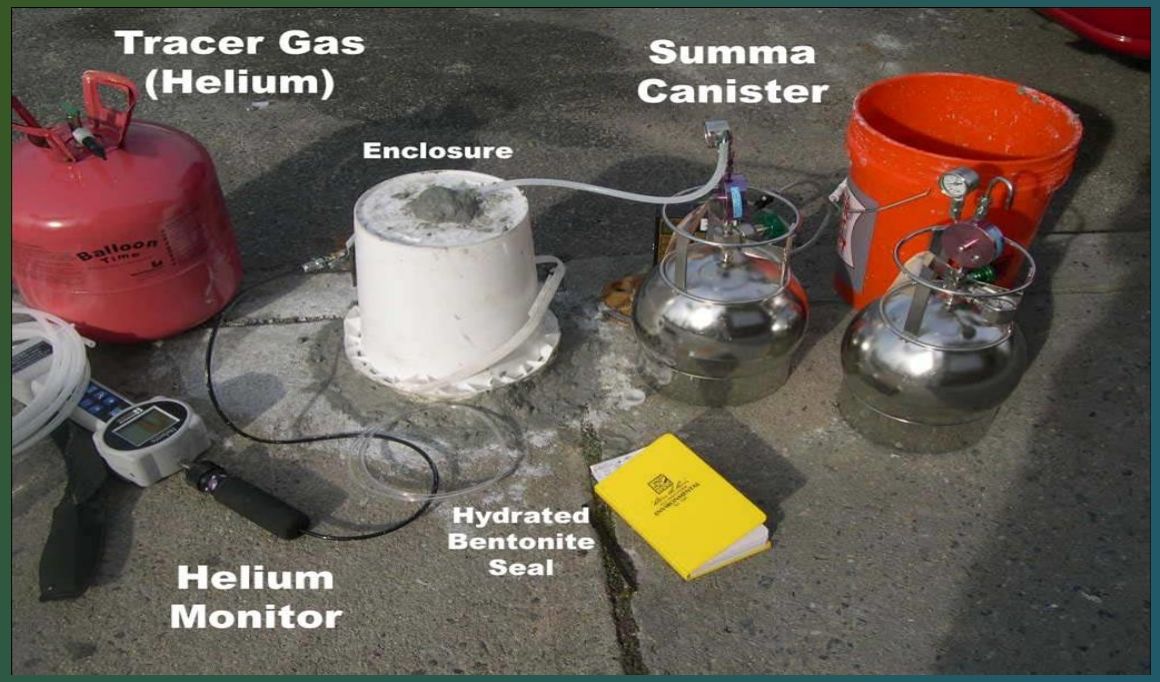


Comparison with Historical Records

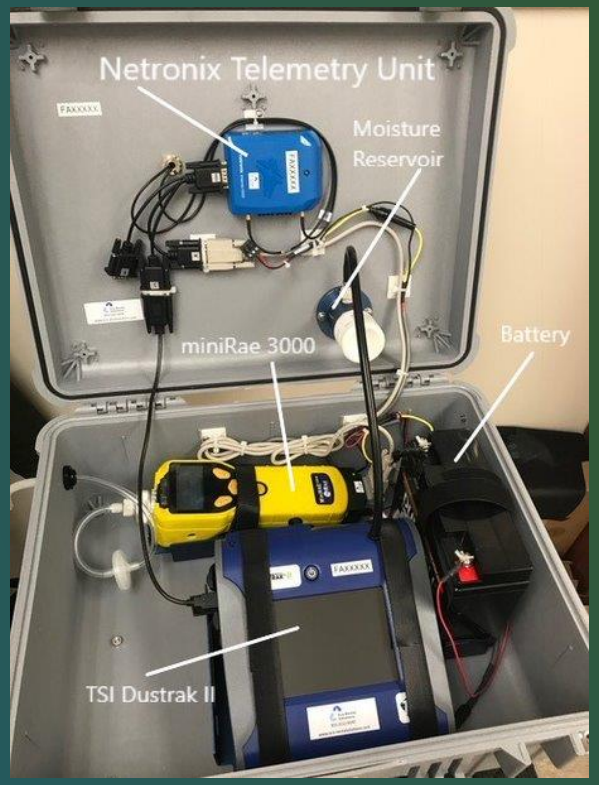
RIWP Revisions – Additional Soil Vapor Samples

- One Near Beekman Street (SV37)
- One Near Water Street (SV23)





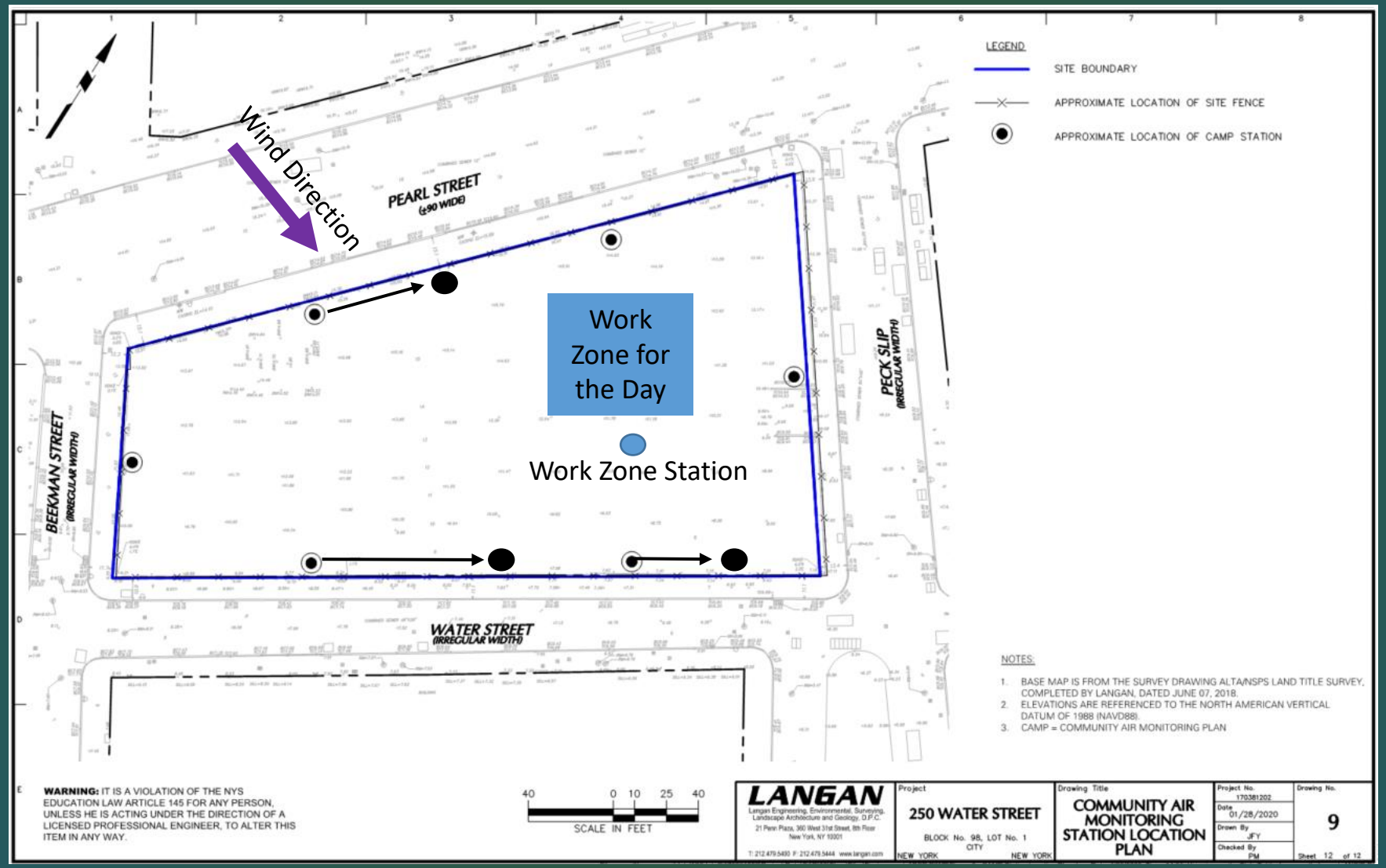
Revisions to the Community Air Monitoring Plan (CAMP)



Mercury Vapor Action Levels

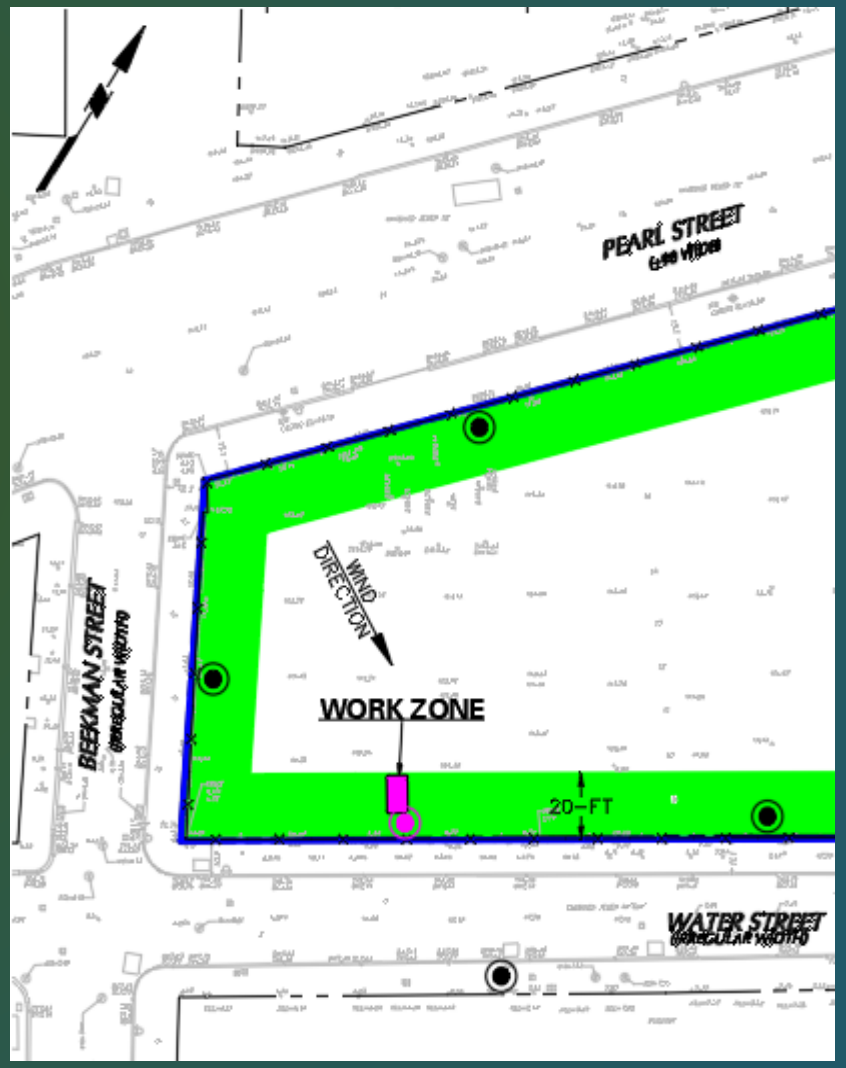
- Mercury Vapor Action Levels
  - Work Zone – 10 micrograms per cubic meter ($\mu g/m^3$)
  - Site boundary/Community Air Monitoring Stations – **1** $\mu g/m^3$

Additional CAMP Stations



Intrusive Work Near the Site Boundary

- Intrusive work within 20 feet of the site boundary will trigger the following:
  1. The nearest CAMP station will be moved across the street; and
  2. The Work Zone Action Levels are lowered to the CAMP Action Levels



Dedicated CAMP Personnel

- One dedicated and mobile field personnel will use a handheld Jerome J505 mercury vapor analyzer.
  - Lower detection limit
  - Monitor in between the Work Zone and perimeter
  - Monitor ambient conditions and proactively mitigate
  - Identify sources
  - Confirm Work Zone and CAMP readings
  - Increases mobility and adaptability of the CAMP

CAMP Stages/Response Plan

- If an elevated instantaneous readings are recorded:
  - Auto notification to field personnel, dedicated CAMP personnel investigates, corrective measures taken as needed
- If a 15-Minute-Average Action Level is exceeded:
  - Work stopped and corrective measures taken (cover/containerize soil, use vapor suppressant, identify potential sources, continued monitoring)

Major Emissions Response Plan (MERP)

When is it Implemented?

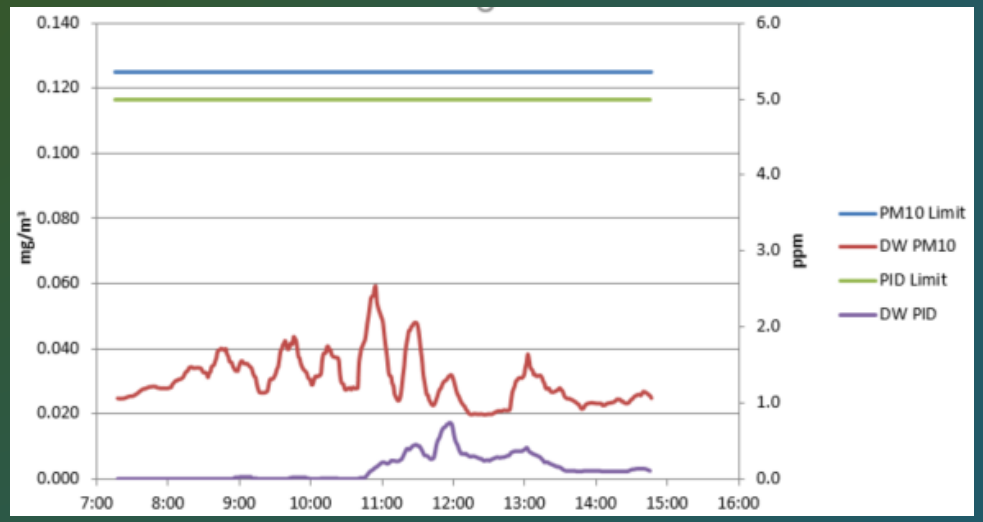
- CAMP action level exceedance causes work to stop for more than one hour

What is in the Notification?

- Date, time and duration of emissions exceedance, emissions concentrations, and a brief summary mitigation performed

Who is Notified?

1. NYSDEC/NYSDOH/NYCOER
2. Elected Officials/Community Board
3. Adjoining Schools
4. Southbridge Towers
5. Community Consultant/Leaders



Updated RIWP Text

- Typical Langan Field Procedure
- Proactive Vapor Mitigation
- Third Party Data Validation
- Phased Work Schedule
- Contingency Test Pits and Soil, Soil Vapor, and Groundwater Samples

Phased Work Schedule Overview

The remedial field investigation will be completed in phases

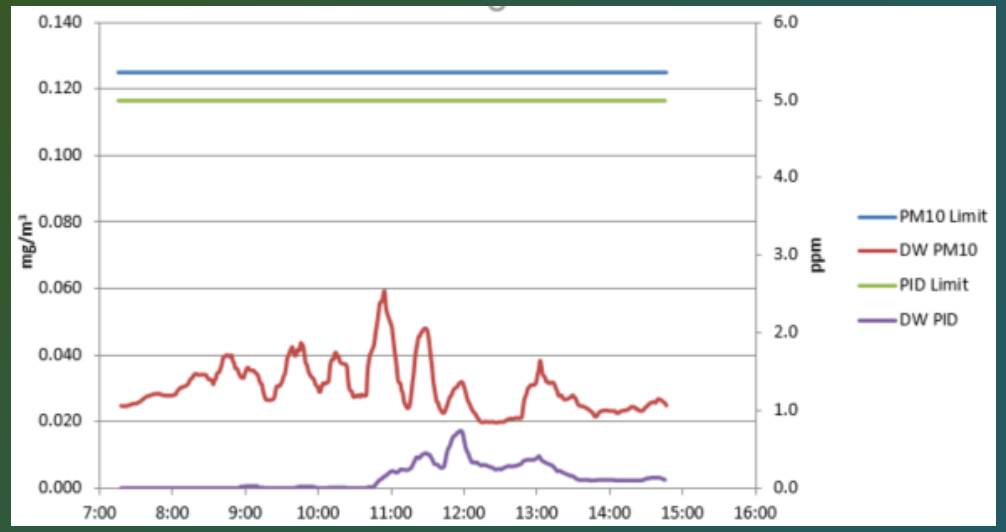
<u>Purpose</u>

To determine if changes to subsequent scopes of work are necessary to achieve the objectives of the RIWP:

- Characterize the nature and extent of contamination at the site
- Support the preparation of a qualitative human health exposure assessment
- Provide sufficient information to evaluate remedial alternatives

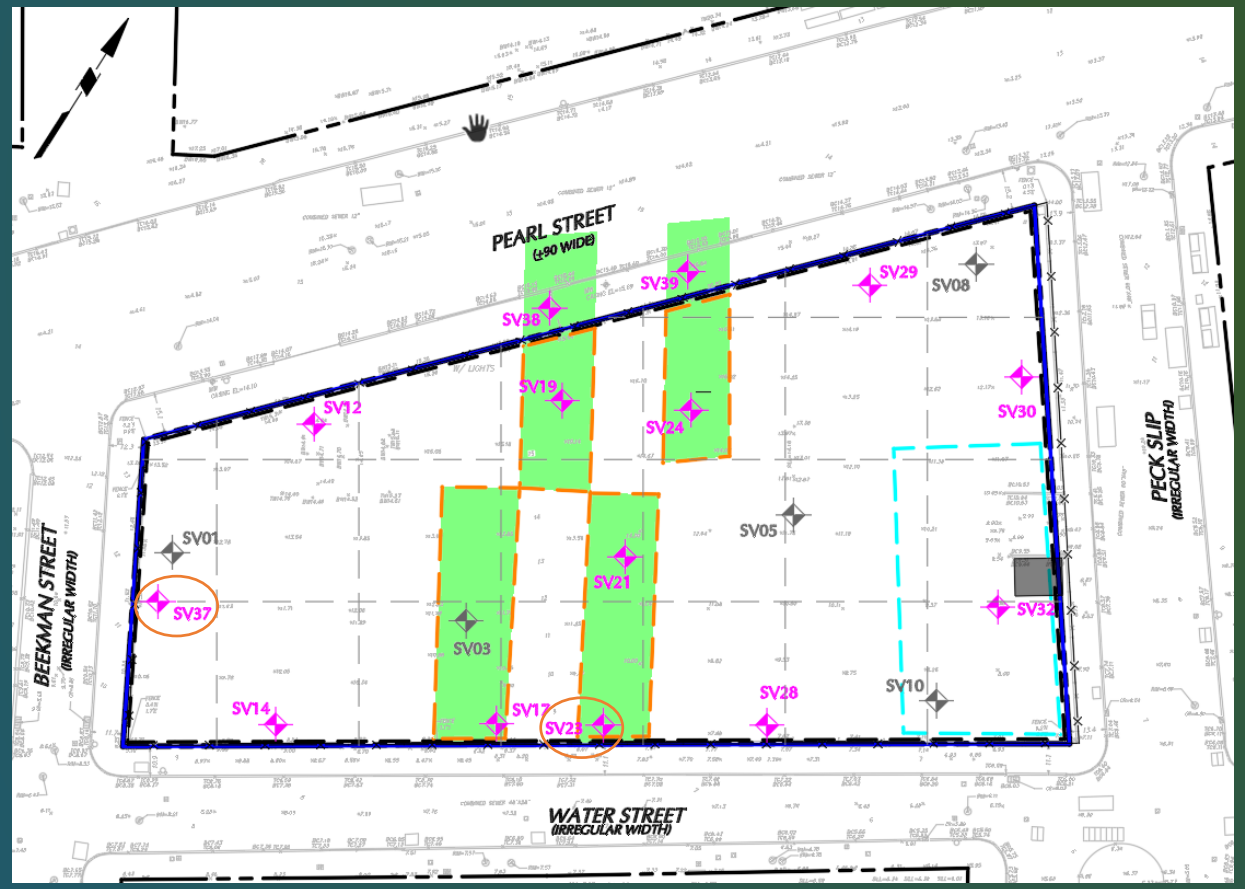
Phase 1: Non-Intrusive

Scope of Work - Baseline community air monitoring and geophysical survey



Phase 2: Soil Vapor

Scope of Work - Soil vapor point installation and sampling

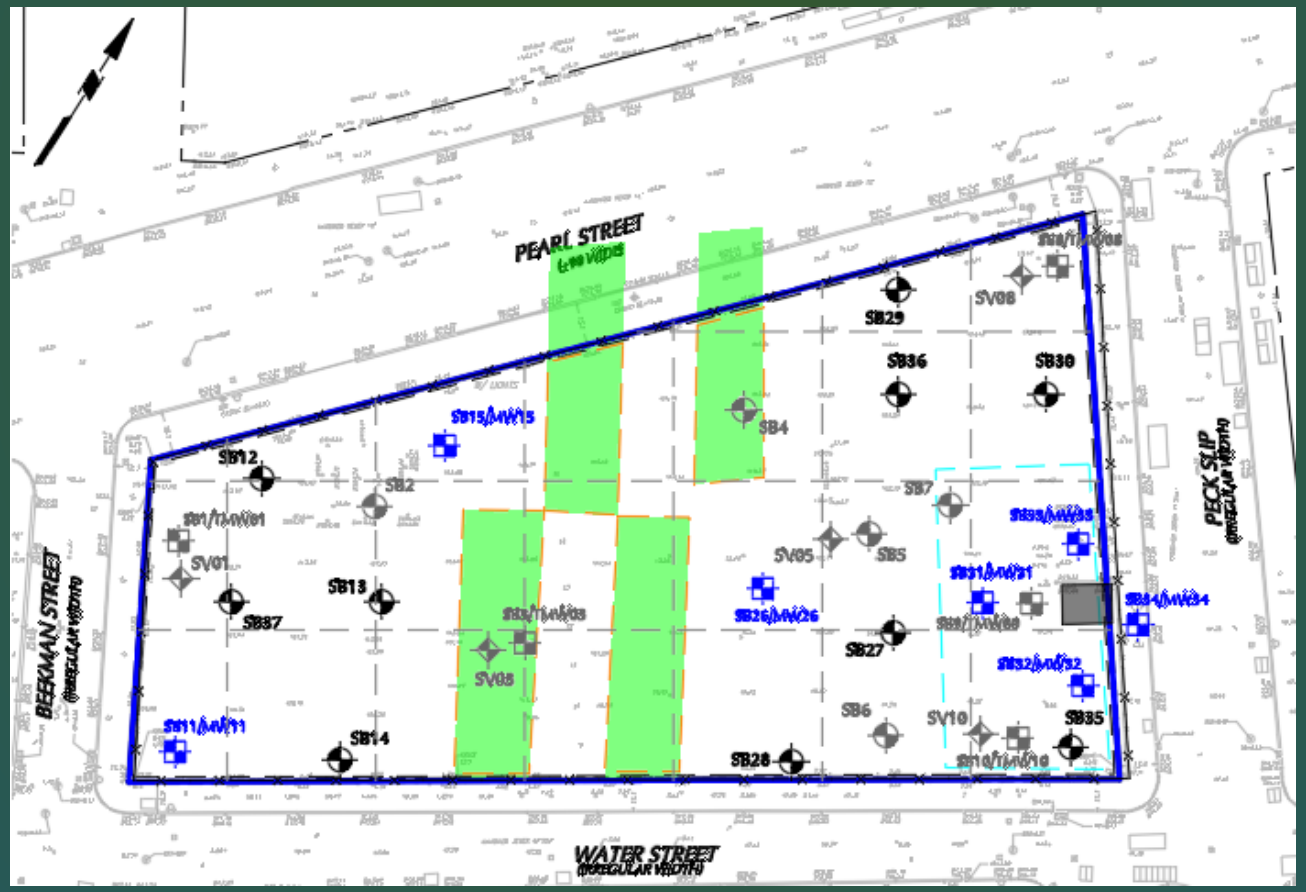


Phase 3: Mercury Delineation

Scope of Work - Mercury delineation borings and AOC-3 soil borings and monitoring well installation

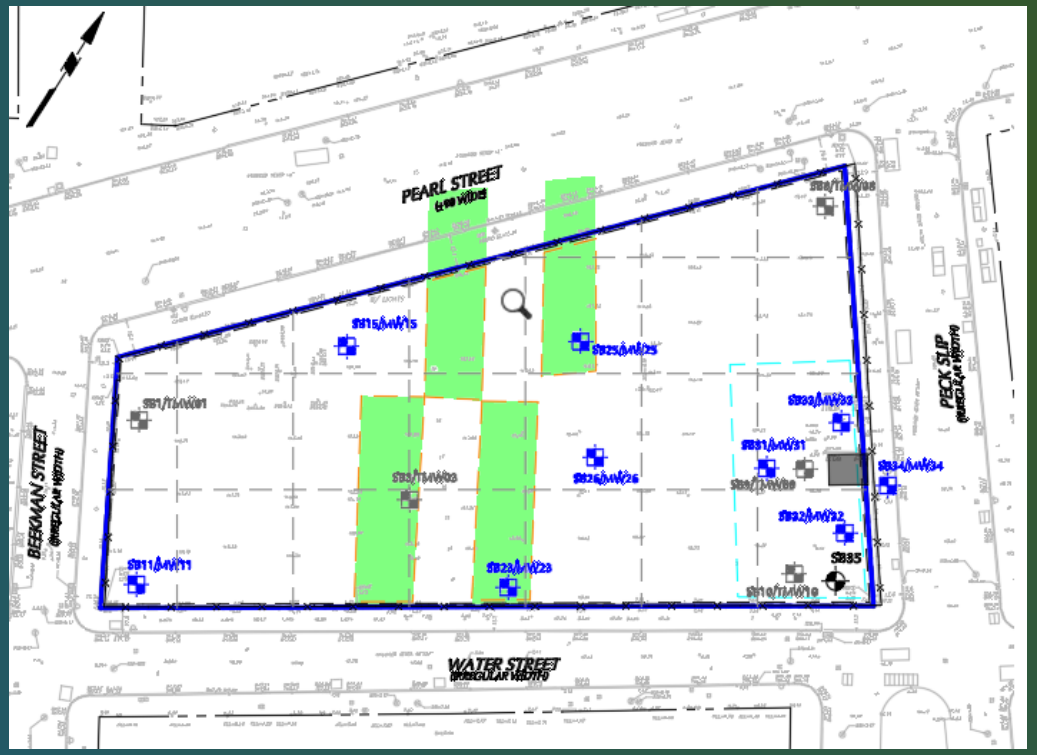
Phase 4: Remaining Intrusive Work

Scope of Work - AOC-2 soil borings and all other site-wide soil borings and monitoring well installations



Phase 5: Groundwater Sample Collection

Monitoring well surveying and groundwater sampling



Remedial Investigation Schedule

- Remedial Investigation – about eighteen (18) non-consecutive field days
  - The first phase (non-intrusive) will begin as soon as allowed under the Executive Order and according to subcontractor availability
  - The investigation will be conducted in phases (each phase ranging from 1 day of field work to 5-7 days of field work)
  - Consultation between Langan, NYSDEC, and community consultant after each phase is completed
- Conducted when students are not in school
- Preparation and Submission of Remedial Investigation Report – about 12 to 16 weeks

Ongoing Community Engagement

- Daily reports and CAMP results will be posted on a website
- Remedial Investigation Report Fact Sheet with Significant Threat Determination
- Remedial Action Work Plan 45-day Public Comment Period with Optional Public Meeting
- Construction Notice Fact Sheet
- Engineering Report Fact Sheet
- Institutional/Engineering Control Fact Sheet

Q & A

Thank you