ENGINEERING EXCELLENCE SINCE 1889

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September 8, 2025

Erick Bower
New York State Department of Environmental Conservation
Division of Environmental Remediation, Bureau B, Section B
625 Broadway
Albany, New York 12233-1010

**RE: Remedial Investigation Work Plan Addendum**
**Site Name: 300 East 12th Street Site**
**Site No. C231158**

Mr. Bower:

On behalf of 188 Second Equities Corp. (the Volunteer), Lockwood Kessler & Bartlett, Inc. (LKB) is pleased to provide this letter as an addendum to the Remedial Investigation Work Plan (RIWP) for the above-referenced property (Site). The Site Location is depicted on **Figure 1**. This addendum is provided to supplement the scope of work provided in the RIWP and outlines the sub-slab depressurization system (SSDS) efficacy testing (ET) requested by the NYSDEC in email correspondence dated January 13, 2025, and addresses comments provided by the NYSDEC in a letter dated May 20, 2025.

**SSDS Efficacy Testing**

SSDS ET will be conducted via the previously installed sub-slab monitoring points (MP-1 through MP-4), the proposed temporary sub-slab soil vapor sampling locations (SG-8 through SG-15), and three additional permanent sub-slab monitoring points (MP-5, MP-6, and MP-7). The three additional permanent sub-slab monitoring points, along with previously installed permanent sub-slab monitoring point MP-4, are positioned in the four corners of the Site building, to ensure full-building coverage and allow for the radius of influence to be accurately determined. The temporary sub-slab soil vapor points will be installed as outlined in Section 6.6 of the RIWP. The permanent sub-slab monitoring points will consist of Mini Vapor Pins®. The objective of ET is to assess whether the existing system is capable of sufficiently depressurizing the Site building slab, and to determine whether the SSDS is efficacious in abating the risk of vapor intrusion of sub-slab vapors into the indoor air at the Site building. As presented in the Design Drawing Set (Appendix D of the RIWP), the monitoring points are located in random areas throughout the SSDS influence footprint and are depicted on **Figure 2**. The proposed additional permanent sub-

slab monitoring points are depicted on **Figure 2**. The proposed temporary sub-slab soil vapor sampling locations are depicted on **Figure 3**. Differential pressure readings at each monitoring point will be measured and recorded.

The active SSDS at the Site consists of two horizontal extraction trenches and one vertical extraction point. The extraction trenches consist of two-inch diameter slotted PVC well screen (0.020-inch slot size) set in clean pea gravel with caps at the ends of each piping run. The single vertical extraction point consists of a one-foot length of slotted PVC well screen set in a pea gravel 1 cubic foot pit. A section of below-grade horizontal piping, connecting to a riser, consists of a solid two-inch Schedule 40 PVC pipe. Vertical and horizontal piping runs located inside the building and above the slab consist of 2-inch and 4-inch diameter Schedule 40 steel pipe from the cellar floor to the building exterior. Building exterior runs consisted of 3-inch PVC pipe up to the roof. Three Dwyer Minihelic® 0-10 inches of water column pressure gauges are installed along the above grade piping runs to monitor system vacuums. Sample ports are installed within each pipe run to allow for monitoring of each individual extraction point. System air flow is imparted with the use of one OBAR GBR 76-SOE high pressure, direct drive, blower (200 cubic feet per minute at five inches of water column). In accordance with NYSDOH guidance, the exhaust was located at least 10 feet from any operable openings or air intakes. The blower is connected electrically to its own circuit in an existing electrical panel in the cellar. Four permanent, sub-slab monitoring points (Mini Vapor Pin®) were installed to be able to monitor below grade vacuum and contaminant concentrations. An alarm (Radon Away™ Checkpoint IIA) was installed on the system to warn of a loss of system vacuum. The layout of the SSDS is depicted on **Figure 2**.

Slab design information for the Site building was not available, as it was constructed in 1920. During installation of the SSDS, slab thickness varied but was generally three inches thick. No reinforcement was noted in the Site building slab. Commissioning of the SSDS confirmed that the SSDS was operating within design parameters and was effectively creating a negative pressure gradient below the building slab. Furthermore, LKB inspected the SSDS on March 6, 2025, to ensure that the system was functioning as designed. No issues were identified with the blower, and based on the current readings, the system is operating within design/commissioning parameters.

In addition to measuring sub-slab influence, ET of the SSDS will include the measurement and recording of the vacuum and flow rate at each riser and flow rate of the combined effluent. A photoionization detector (PID) will be utilized to monitor areas for total organic vapor concentrations. The information gathered will be compared to that previously collected upon the initial startup and commissioning of the SSDS to confirm it is operating within design parameters.

**Indoor Air Sampling**

Prior to indoor air sampling, LKB will evaluate building operations, storage of chemicals, and the building envelope that could influence indoor air results. LKB will scan the interior of the buildings with a PID to obtain indoor air readings. If elevated PID readings are observed, LKB will make the determination if indoor air sampling should be delayed. In addition, ambient weather conditions, including temperature and atmospheric pressure, will be recorded. LKB will complete a NYSDOH Soil Vapor Intrusion – Structure Sampling Building Questionnaire and Structure Sampling – Product Inventory form.

For the collection of indoor air and ambient air samples, stainless-steel 6-Liter Summa canister sampling will be performed over a 24-hour sample duration. The canisters will be placed in a location to collect breathing height air (three to five feet above ground surface) and will not be placed immediately adjacent to any recently completed interior finish materials.

LKB proposes to collect seven indoor air samples and one ambient air sample. The sampling locations would correspond to indoor air samples (IA-10 through IA-16) and ambient air sample (AA-2) depicted on **Figure 3**.

All samples collected will be submitted under proper chain-of-custody protocols to Pace Analytical in Westborough, Massachusetts [New York Environmental Laboratory Approval Program (ELAP) No. 11148] for laboratory analysis of volatile organic compounds (VOCs) by United States Environmental Protection Agency (USEPA) Method TO-15.

In accordance with DER-10 Section 2.3(c)2, field duplicates, matrix/matrix-spike duplicates, and field blanks will be collected at a frequency of 1 per 20 samples and will be analyzed for VOCs via USEPA Method TO-15.

**Vapor Intrusion Investigation**

A grab sample will be collected from the SSDS effluent once the ET is completed to determine the volatile organic compounds (VOCs) being vented and their concentrations prior to conducting the vapor intrusion sampling outlined in the RIWP. The grab sample will be collected from the exterior effluent riser using a 2.7L Summa canister with a 15-minute flow controller. The grab sample will be analyzed for volatile organic compounds (VOCs) via United States Environmental Protection Agency (USEPA) Method TO-15.

Following the ET, sub-slab soil gas, indoor air, and ambient air samples will be collected as outlined in Section 6.6 of the RIWP. In addition to those samples outlined in the RIWP, one indoor air sample will be collected within each of the two first floor (i.e., street level over cellar) commercial tenant spaces. One unit contains a vacant restaurant tenant space, and one unit is

an occupied restaurant tenant space (Five Guys), both with access to separate cellar support areas. Furthermore, one indoor air sample will be collected within each of the four second-floor residential units (Units 1, 2, 3, and 4). The additional indoor air sampling will be conducted in accordance with the methodology outlined in Section 4.2 of the RIWP.

LKB will consult with the NYSDOH and NYSDEC regarding whether shut down of the SSDS is required prior to the RIWP vapor intrusion investigation and what information will be acquired from the resulting data. If a shutdown is required, LKB will consult further with the NYSDOH to determine the specifics of the shutdown (including passive venting and the duration of the shutdown). If a shutdown is required, LKB proposes that the active SSDS at the Site be shut down for 72 hours prior to sample collection to ensure that the collected samples are representative of static on-site conditions.

If you have any questions or concerns, please feel free to contact me at (908) 500-2369 or rtobia@vertexeng.com.

**Lockwood Kessler & Bartlett, Inc.**



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LKB Project No. 10153.LK

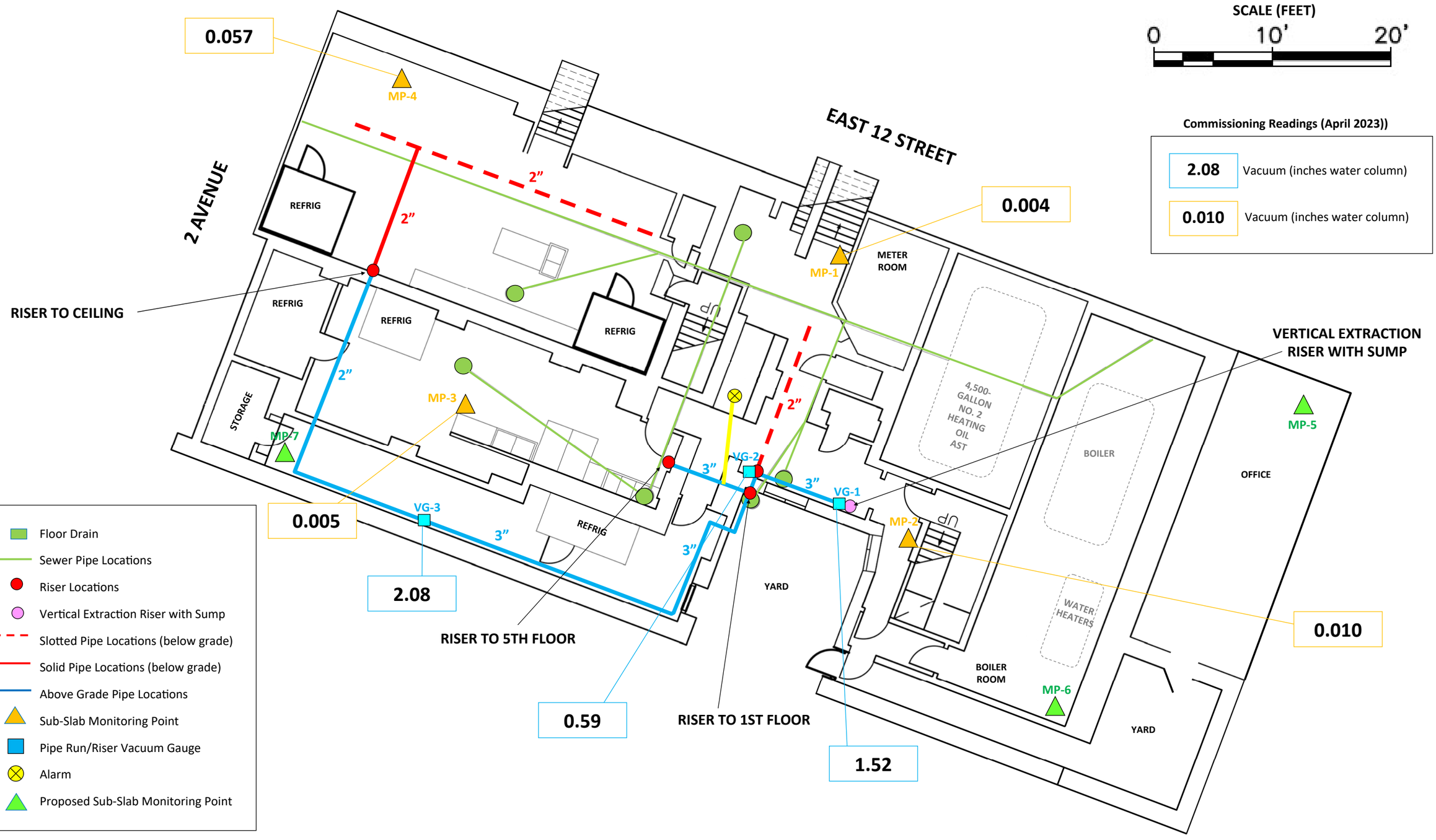
# SITE LOCATION MAP

300 East 12th Street
New York, New York

USGS Topographic Map, Brooklyn, NY (2019); Scale 1:24,000

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**FIGURE NO. 1**




Map Source: *Basement Map - Plan*, VERTEX, 9/12/2022

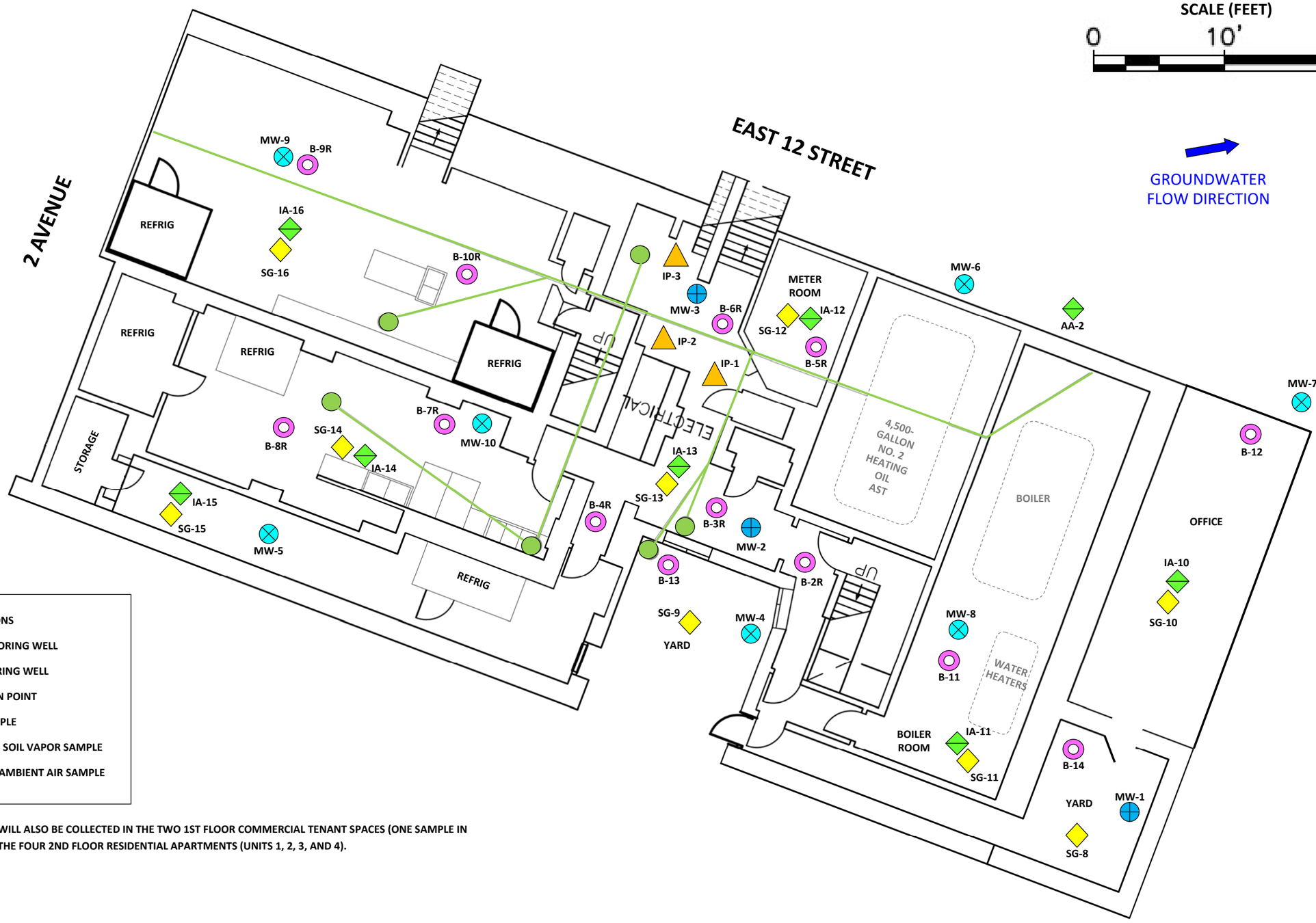
## SSDS LAYOUT AND COMMISSIONING RESULTS (APRIL 2023)

300 EAST 12th STREET
NEW YORK, NEW YORK

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**FIGURE NO. 2**

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NOTE: INDOOR AIR SAMPLES WILL ALSO BE COLLECTED IN THE TWO 1ST FLOOR COMMERCIAL TENANT SPACES (ONE SAMPLE IN EACH UNIT), AND IN EACH OF THE FOUR 2ND FLOOR RESIDENTIAL APARTMENTS (UNITS 1, 2, 3, AND 4).

Map Source: *Basement Map - Plan*, VERTEX, 9/12/2022

# PROPOSED SAMPLE LOCATION MAP

300 EAST 12th STREET
NEW YORK, NEW YORK

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**FIGURE NO. 3**

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