October 5, 2026

Ms. Wendi Zheng, P.E.
Project Manager, Division of Environmental Remediation
New York State Department of Environmental Conservation – Region 2
47-40 21st Street
Long Island City, New York 11101

Re: Soil Vapor Intrusion Work Plan
Former Paragon Paint and Varnish Site (C241108)
5-49 46th Avenue, Long Island City, Queens New York

Dear Ms. Zhang:

Roux Environmental Engineering and Geology, D.P.C. (Roux) has prepared this Soil Vapor Intrusion Evaluation Work Plan (SVI Work Plan), on behalf of ZDJ Vernon, LLC (Volunteer) for the property located at 5-43 to 5-49 46th Avenue and 45-38 to 45-40 Vernon Boulevard, Long Island City, Queens New York 11101 (collectively referred to as the Site). The Site received a BCP Certificate of Completion (COC) on January 13, 2017 and a Modification to the Certificate of Completion in April 24, 2019. Transfer of the COC to ZDJ Vernon LLC was recorded and notice was provided to the NYSDEC on May 15, 2024. Confirmation of receipt of this notice was provided by NYSDEC on June 4, 2024. This work plan was prepared as required by the New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Agreement (BCA) Index No. 241108, dated September 4, 2008 with 549 46th Avenue LLC as Volunteer.

The Site, which is currently enrolled in the New York State Brownfield Cleanup Program (BCP) as Site Code No. C241108, is approximately 0.76 acres. The Site is currently an active construction site that consists of the façade and front portion of a four-story former paint factory, an area of new building construction, and a rear courtyard that fronts approximately 50 feet of Anable Basin. The Site is currently zoned as manufacturing and residential and is currently undergoing active redevelopment.

Soil vapor impacts at the Site were initially addressed through the removal of VOC-impacted soil and in-situ chemical oxidation (ISCO) treatment. However, due to the continued potential for residual VOCs in subsurface soil vapor beneath existing and newly constructed buildings, a vapor mitigation system was designed as part of the Site redevelopment plan.

To mitigate VOCs, Roux completed the design of a Sub-Slab Depressurization System (SSDS) to be installed beneath the slab of the new building and the existing building. The SSDS is designed to prevent soil vapor intrusion into future structures by venting subsurface soil vapor to the atmosphere. The SSDS design and soil vapor monitoring point locations were completed in February 2025 and NYSDEC approval was obtained on February 24, 2025, following review and comments. The installation of the below-grade SSDS components is ongoing and scheduled for completion in the fourth quarter of 2026.

The most recent round of Site Management Plan (SMP) annual groundwater sampling in July 2026 indicated detections of VOCs above NYSDEC Ambient Water Quality Standards and Guidance Values (AWQSGV) for eleven compounds.

- One detection of chloroform, 42 µg/L, detected at MW-34;

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- One detection of benzene, 2.1 µg/L, detected at RMW-9;
- Two detections of 1,2,4-trimethylbenzene, 77 µg/L and 66 µg/L, detected at RMW-2 and RMW-1 DUP, respectively;
- Two detections of 1,3,5-trimethylbenzene (mesitylene), 24 µg/L and 20 µg/L, detected at RMW-2 and RMW-1 DUP, respectively;
- Two detections of acetone, 54 µg/L and 51 µg/L, detected at RMW-1 DUP and RMW-2, respectively;
- Three detections of isopropylbenzene (cumene), 50 µg/L, 48 µg/L, and 42 µg/L, detected at RMW-1 DUP, RMW-2, and RMW-9, respectively;
- Two detections of m-p-Xylene, 5.4 µg/L and 5.6 µg/L at RMW-1 and RMW-2, respectively;
- Three detections of n-Propylbenzene, 55 µg/L, 50 µg/L, and 14 µg/L, detected at RMW-1 DUP, RMW-2, and RMW-9, respectively;
- Three detections of sec-Butylbenzene, 19 µg/L, 16 µg/L, and 14 µg/L, detected at RMW-9, RMW-1 DUP, and RMW-2, respectively;
- Two detections of tert-Butylbenzene, 5.8 µg/L and 5.6 µg/L, detected at RMW-1 DUP and RMW-2, respectively; and
- Two detections of xylenes, 8.8 µg/L and 8.2 µg/L, detected at RMW-2 and RMW-1 DUP, respectively.

Based on the continued presence of VOCs in groundwater, NYSDEC requested that a SVI Work Plan be prepared to evaluate concentrations of VOCs remaining beneath the Site after the completion of remedial soil excavation. Based on the results of the soil vapor assessment, Roux will evaluate whether the SSDS system will be an active or passive system.

Sub-Slab Vapor Monitoring Point Installation

Roux's approved SSDS design drawings included six sub-slab soil vapor monitoring points (SVMPs). The NYSDEC-approved locations of the SVMPs are shown on Plate 1, and the installation detail is shown in Plate 2. The locations were selected and distributed across the slab-on-grade area to provide representative vapor coverage beneath the building footprint and to evaluate potential vapor intrusion conditions throughout the first floor of the building.

On the west side of the building, with the lateral piping of the SSDS, sub-slab soil vapor points will be installed at NYSDEC-approved locations where PVC sleeves have already been incorporated into the building foundation slab. The PVC sleeve terminates at the bottom of the concrete building slab and native soil is directly below the sleeve. At each location, a vapor sampling point consisting of small-diameter PVC tubing will be installed through the sleeve to terminate within the sub-slab material beneath the foundation. The annular space around the tubing will be sealed to prevent infiltration of indoor air and to maintain an airtight sampling point. The tubing will be completed at the surface with an appropriate fitting or valve and protected with a flush-mounted cover. Each point will be leak tested prior to sampling to confirm the integrity of the seal and sampling assembly. On the east side of the building, where the suction points are located, a concrete coring device will be used to create a hole in the concrete and to allow the point to be directly installed in the soil immediately beneath the building slab. The construction of the point will follow the detail in Plate 2. After installation, the point will be capped and allowed to equilibrate to surrounding conditions for a minimum of 24-hours prior to sampling in accordance with the New York State Department of Health (NYSDOH) Guidance for Evaluating Soil Vapor Intrusion in the State of New York, October 2006 (Updated February 2024) (NYSDOH Guidance). Following installation and prior to sampling, one to three volumes (i.e., the volume of the sample probe

and tube) will be purged to ensure samples collected are representative and a helium tracer gas test will be conducted to confirm seal integrity in accordance with the procedures outlined in the NYSDOH Guidance.

SVI Sampling and Schedule

SVI sampling will occur following complete enclosure of the relevant part of the building and any operable windows in these areas will remain closed during sampling, and use of exterior doors will be minimized to the extent possible. At each soil vapor point there will be a collocated indoor air sample collected for analysis that will be used in order to compare the data to the NYSDOH Soil Vapor Intrusion Matrices.

The soil vapor samples will be collected for laboratory analysis of VOCs via USEPA Method TO-15. Reporting limits will be sufficient to evaluate the NYSDOH decision matrices. One blind duplicate soil vapor sample and one ambient air sample will also be collected for QA/QC purposes. The soil vapor samples will be collected at least 24 hours after installation using batch certified pre-cleaned 6-liter summa canisters with flow regulators that have been calibrated to collect samples over an eight-hour period. A tracer gas will be employed prior to the collection of the soil vapor sample to ensure the integrity of the vapor probe seal and to verify that the vapor samples do not become inadvertently diluted with ambient air. Field parameters will be recorded on vapor sampling data forms. The laboratory will provide Category B deliverables. Laboratory turnaround time is expected to be 5 days from receipt by the laboratory but may be expedited based on availability.

Following receipt of data, Roux will submit an SVI Evaluation letter to the NYSDEC and the NYSDOH. Indoor air and sub-slab vapor results for each round will be compared to the current NYSDOH Soil Vapor and Indoor Air Decision Matrices and interpreted with information from the NYSDOH Building Inventory Form. The report will include a narrative of activities and conditions, a figure showing sampling locations and photographs, field forms including the building survey and chemical inventory, laboratory reports with Category B deliverables, comparison tables to the NYSDOH decision matrices, and conclusions with a recommendation regarding SSDS operation. Only a determination of “Mitigate” based on the applicable decision matrices will result in conversion of the system from passive to active operation through the installation and use of blowers. If the decision matrices result in a “Monitor” result the system will be evaluated for ongoing monitoring, but an active system will not be implemented.

Implementation Schedule

Installation of the SVMPs is anticipated to require one workday. Twenty-four hours following installation, soil vapor samples will be collected from each location for laboratory analysis. Implementation of the proposed SVI Work Plan is anticipated to occur following NYSDEC and NYSDOH approval of this Work Plan and pending contractor availability.

Sincerely,

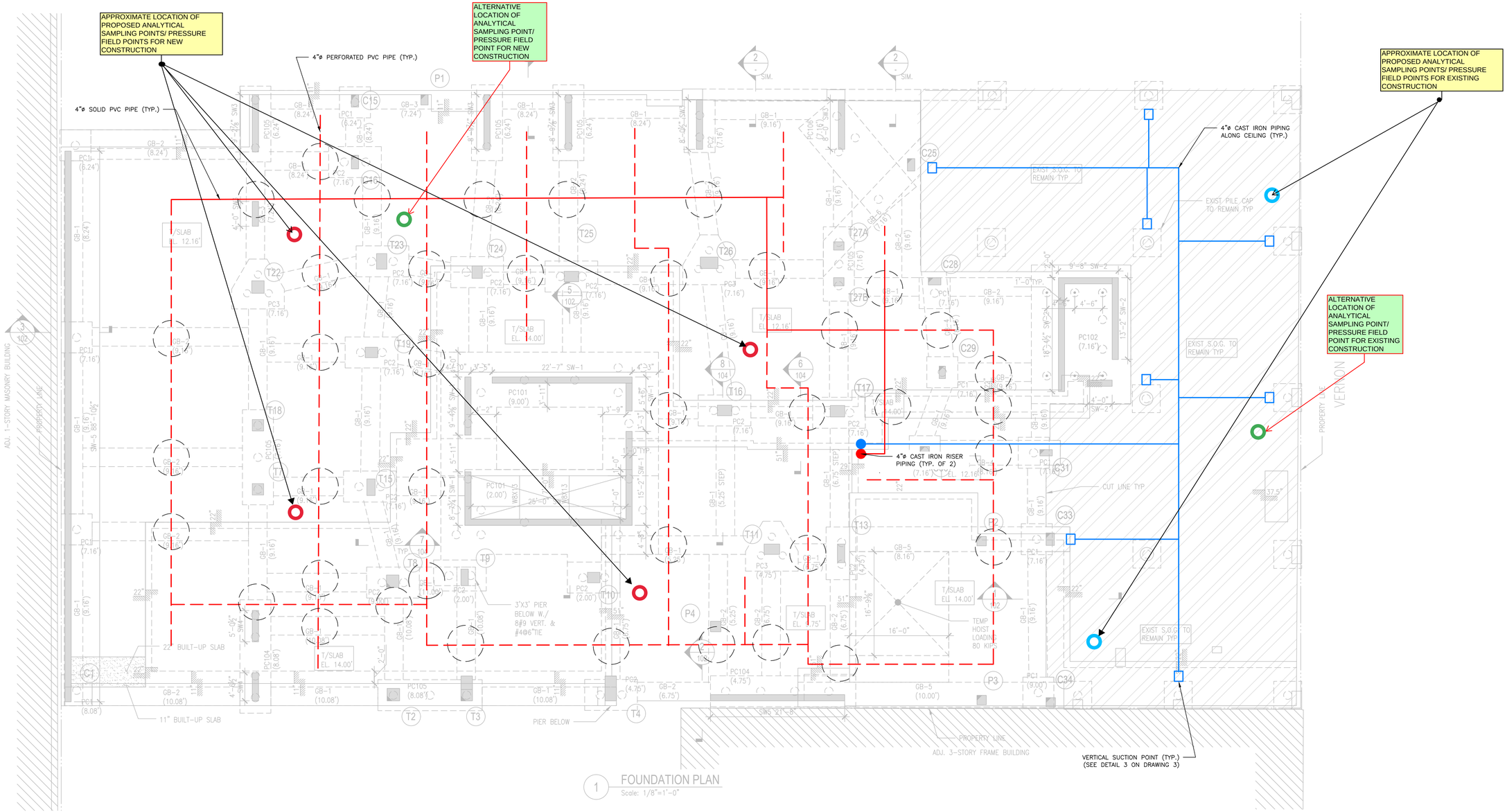
ROUX ENVIRONMENTAL ENGINEERING AND GEOLOGY, D.P.C.

Rachel Miller
Senior Engineer

Jessica L. Taylor, P.G.
Principal Hydrogeologist

Omar Ramotar, P.E.
Principal Engineer

Attachment



1 FOUNDATION PLAN
Scale: 1/8"=1'-0"

LEGEND

- ABOVEGROUND 4"ø CAST IRON PIPING
- BELOWGROUND SOLID 4"ø PVC PIPING
- BELOWGROUND PERFORATED 4"ø PVC PIPING
- SSDS VERTICAL SUCTION POINT
- RISER PIPING TO ROOF
- RISER PIPING TO ROOF
- STEEL SLEEVE THROUGH GRADE BEAM

NOTE

1. LOCATIONS OF VAPOR POINTS ARE NOT SHOWN ON THIS FIGURE. VAPOR PINS WILL BE ADDED BASED ON DISCUSSIONS WITH ARCHITECT.
2. THE ACTUAL INSTALLATION LOCATION OF SUCTION POINTS WILL BE BASED ON ACTUAL LIMITS OF FOOTINGS WITH SUMPS BEING INSTALLED AT LEAST 2 FEET FROM EDGE OF FOOTING.
3. ABOVE GRADE PIPING FROM EACH SUCTION POINT SHALL BE INSTALLED VERTICALLY ALONG THE INTERIOR WALL OR COLUMN AND HORIZONTALLY ALONG THE CEILING WHERE THE PIPING ULTIMATELY CONNECTS TO THE MAIN RISERS AS SHOWN.

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NO.	DATE	REVISION DESCRIPTION	INT.

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PROJECT NAME: FORMER PARAGON PAINT

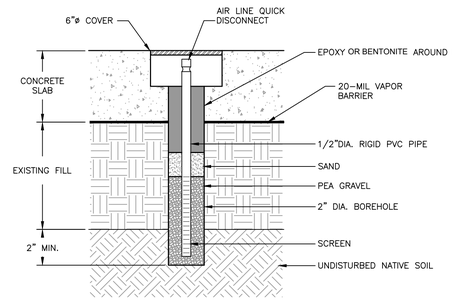
PROJECT FOR: ZDJ VERNON LLC

TITLE: SSDS LAYOUT

DRAWING NO. 1

DRAWING 1 OF 3

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2 SUB-SLAB VAPOR MONITORING POINT DETAIL

SCALE: 1" = 4'

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