

January 21, 2026

Wendi Zheng
Division of Environmental Remediation
New York State Department of Environmental Conservation
47-40 21st Street
Long Island City, NY 11101

**Re: Corrective Measures Work Plan
Willets Point Development Stadium
Queens, New York
NYSDEC BCP Site No. C241146C
Langan Project No.: 170746403**

Dear Ms. Zheng,

Langan Engineering, Environmental, Survey, Landscape Architecture and Geology, D.P.C. (Langan) prepared this Corrective Measures Work Plan (CMWP) for the Willets Point Development Stadium Brownfield Cleanup Program (BCP) site No. C241146C (the Site). This CMWP was prepared to document the current status of the institutional and engineering controls (ICs/ECs) at the Site and to summarize the actions that will be implemented to correct the ICs and ECs throughout the ongoing Site redevelopment, which is anticipated to be completed by March 2027.

SITE BACKGROUND

A Track 4 remediation was implemented in accordance with the June 7, 2022 Remedial Action Work Plan (RAWP) and June 21, 2023 RAWP Modification Letter for light non-aqueous phase liquid (LNAPL) recovery between June 6, 2022 and December 1, 2023. A detailed account of the remedy is provided in the April 22, 2024 Final Engineering Report (FER). Controls to be implemented at the Site pursuant to the April 22, 2024 Site Management Plan (SMP) and Environmental Easement (EE) are:

Institutional Controls:

- The Site may be used for restricted-residential, commercial, and industrial uses as defined in Part 375-1.8(g), subject to local zoning laws;
- The Site owner must complete and submit to New York State Department of Environmental Conservation (NYSDEC) a periodic certification of ICs and ECs in accordance with Part 375-1.8(h)3;

- All ECs must be operated and maintained as specified in the SMP;
- All ECs must be inspected at a frequency and in a manner defined in the SMP;
- The use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the New York State Department of Health (NYSDOH) or the New York City Department of Health and Mental Hygiene (DOHMH) to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval to do so from the Department;
- Compliance with the April 22, 2024 NYSDEC-approved SMP and EE;
- Groundwater and other environmental or public health monitoring must be performed as defined in the SMP;
- Data and information pertinent to Site management must be reported at the frequency and in a manner as defined in the SMP;
- All future activities that will disturb remaining contaminated material must be conducted in accordance with the SMP;
- Monitoring to assess the performance and effectiveness of the remedy must be performed as defined in the SMP;
- Operation, maintenance, monitoring, inspection, and reporting of any mechanical or physical component of the remedy shall be performed as defined in the SMP;
- Access to the Site must be provided to agents, employees or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by the EE;
- The potential for vapor intrusion must be evaluated for any buildings developed in the area within the Site and the IC boundaries, and any potential impacts that are identified must be monitored or mitigated;
- Vegetable gardens and farming in residual soil on the Site are prohibited; and
- An evaluation shall be performed to determine the need for further investigation and remediation should large scale redevelopment occur, if any of the existing structures are demolished, or if the subsurface is otherwise made accessible¹.

Engineering Controls:

ECs for the Site include a site cover system to eliminate exposure to remaining contaminated soil, and a vapor mitigation system(s) for the stadium including a Submembrane Depressurization

¹ This IC does not apply to the known and planned redevelopment of the Site as a stadium.

(SMD) system and vapor barrier incorporated into concrete foundation slabs. The Site has the following primary ECs:

- Composite cover system, consisting of: (1) a minimum 12-inch-thick concrete building slab across the majority of the Site footprint, and (2) previously installed site cover system consisting of a minimum of 2 feet of clean fill or gravel in the eastern, southern, western, and central parts of the Site.
- Vapor mitigation system beneath areas of the building to be occupied, consisting of: (1) a 20-mil vapor barrier, and (2) an SMD system, including sub-slab piping, vapor monitoring points, active roof-mounted blowers, and associated alarms. To date, only the sub-grade components of the SMD system have been completed.

The extent of the existing ECs is included on Figure 1.

PROPOSED CORRECTIVE MEASURES

The above-listed ICs will continue to be implemented pursuant to the April 22, 2024 SMP and EE during the ongoing Site redevelopment, except the following IC temporarily not to be maintained:

- All ECs must be inspected at a frequency and in a manner defined in the SMP;

This IC is not being maintained on a temporary basis because of modification of ECs throughout the ongoing redevelopment and superstructure construction. Site redevelopment and superstructure construction will include the installation of above-grade SMD components, and the installation of piles, concrete slabs, hardscaping, and landscaping at the Site, which is anticipated to continue through the stadium opening in March 2027. Maintenance with the above-listed IC will resume in March 2027 concurrently with stadium completion.

The above-listed ECs will be modified throughout the remaining Site redevelopment. Anticipated modifications during this period include:

- Composite Cover System: Ground-intrusive work that will penetrate the existing composite cover system is anticipated throughout all parts of the Site not covered by the stadium foundation: the western, southern, and eastern areas planned for public open space hardscaping and landscaping, and the central part of the Site for the future playing field. Following the completion of the stadium construction and related hardscape and landscape work, the composite cover will consist of: (1) a minimum 12-inch-thick concrete building slab across the majority of the Site footprint, (2) a minimum 12-inch-thick concrete foundation slab beneath landscaped areas along the western, southern, and eastern boundaries of the Site, and (3) a minimum of 12-inch-thick concrete foundation slab beneath the playing field in the central part of the Site.
- Vapor Mitigation System: Above-grade components of the SMD system, including riser piping, blowers, methane sensors, and alarms, will continue to be installed throughout

the construction of the stadium superstructure. Following the installation of the above-grade SMD components and completion of the SMD system, start-up testing will be performed to confirm the system is operating as intended.

The proposed final ECs map is included on Figure 2.

Based on the construction schedule, we propose pausing periodic reporting for one year to allow for the completion of the remaining stadium construction and above-listed ECs. Documentation, including final as-built surveys of the ECs, will be included in the subsequent Periodic Review Report (PRR) to be submitted on October 1, 2027. The SMP will also be updated at this time to reflect the updated ICs and ECs.

All ongoing ground-intrusive work and site cover system modifications requiring SMP compliance will be observed and documented by Langan on behalf of the Volunteer. Daily reports will be prepared and submitted to the NYSDEC in the forthcoming 2027 PRR.

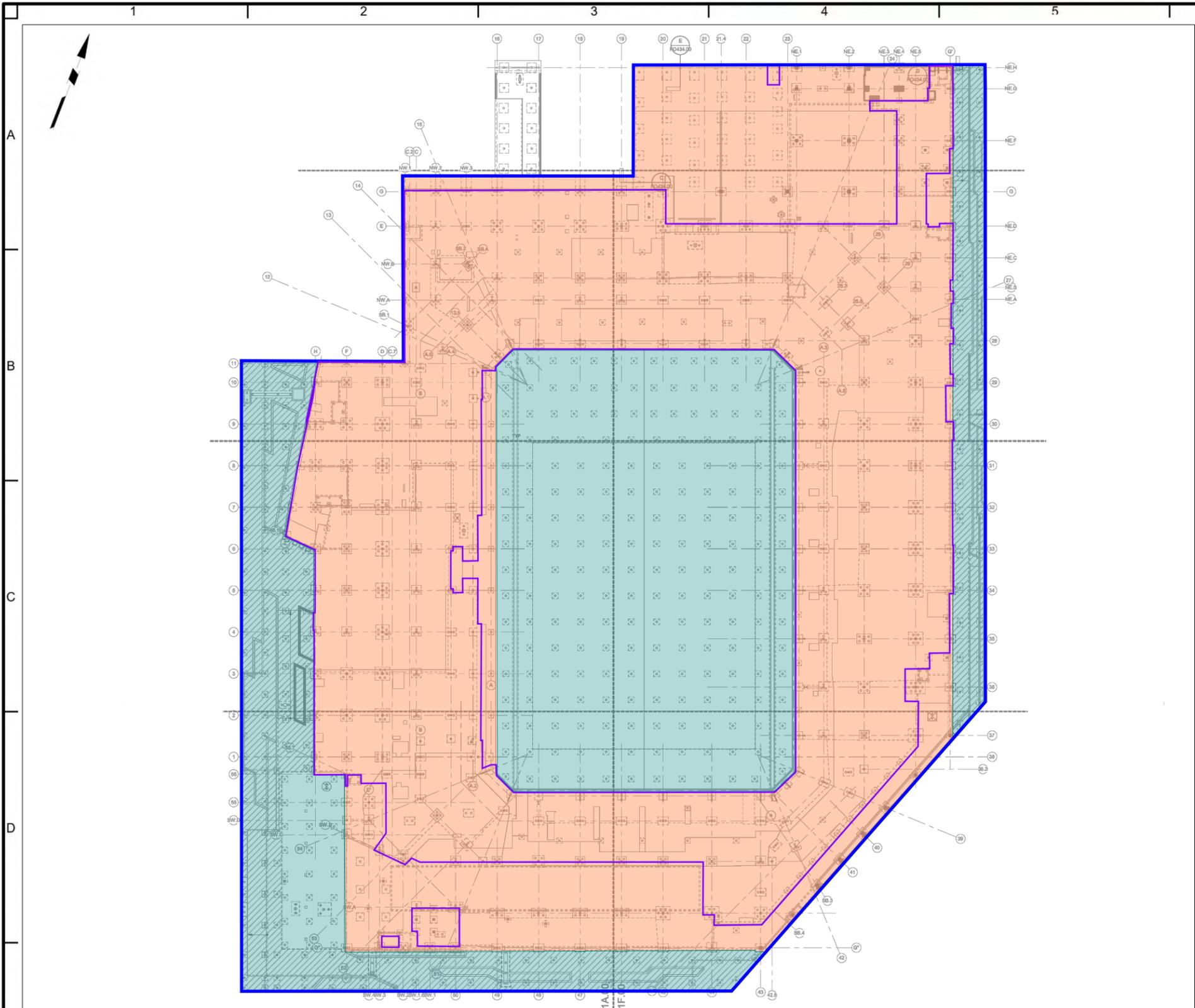
Sincerely,
**Langan Engineering, Environmental, Surveying,
Landscape Architecture and Geology, D.P.C.**



Gerald F. Nicholls, PE, CHMM
Principal

Enclosures: Figure 1 – Engineering Controls Map: Site Cover System Extents
Figure 2 – Proposed Engineering Controls Map and Site Cover System Extents

Figures



LEGEND:

- APPROXIMATE BCP SITE BOUNDARY
- APPROXIMATE EXTENTS OF MINIMUM 2-FOOT-THICK SITE COVER SYSTEM CONSISTING OF ABOUT 20 INCHES OF IMPORTED CLEAN FILL AND 4 INCHES OF IMPORTED VIRGIN QUARRY STONE
- APPROXIMATE EXTENTS OF MINIMUM OF 12-INCH-THICK CONCRETE SLAB
- APPROXIMATE EXTENTS OF THE SUB-MEMBRANE DEPRESSURIZATION SYSTEM AND WATERPROOFING/VAPOR BARRIER MEMBRANE

NOTES:

1. BACKGROUND ADAPTED FROM PRELIMINARY CONSTRUCTION INT CD PROGRESS SET, STRUCTURAL COMPOSITE PLAN - FIELD LEVEL FO101.00, DATED SEPTEMBER 5, 2024.
2. BCP = BROWNFIELD CLEANUP PROGRAM

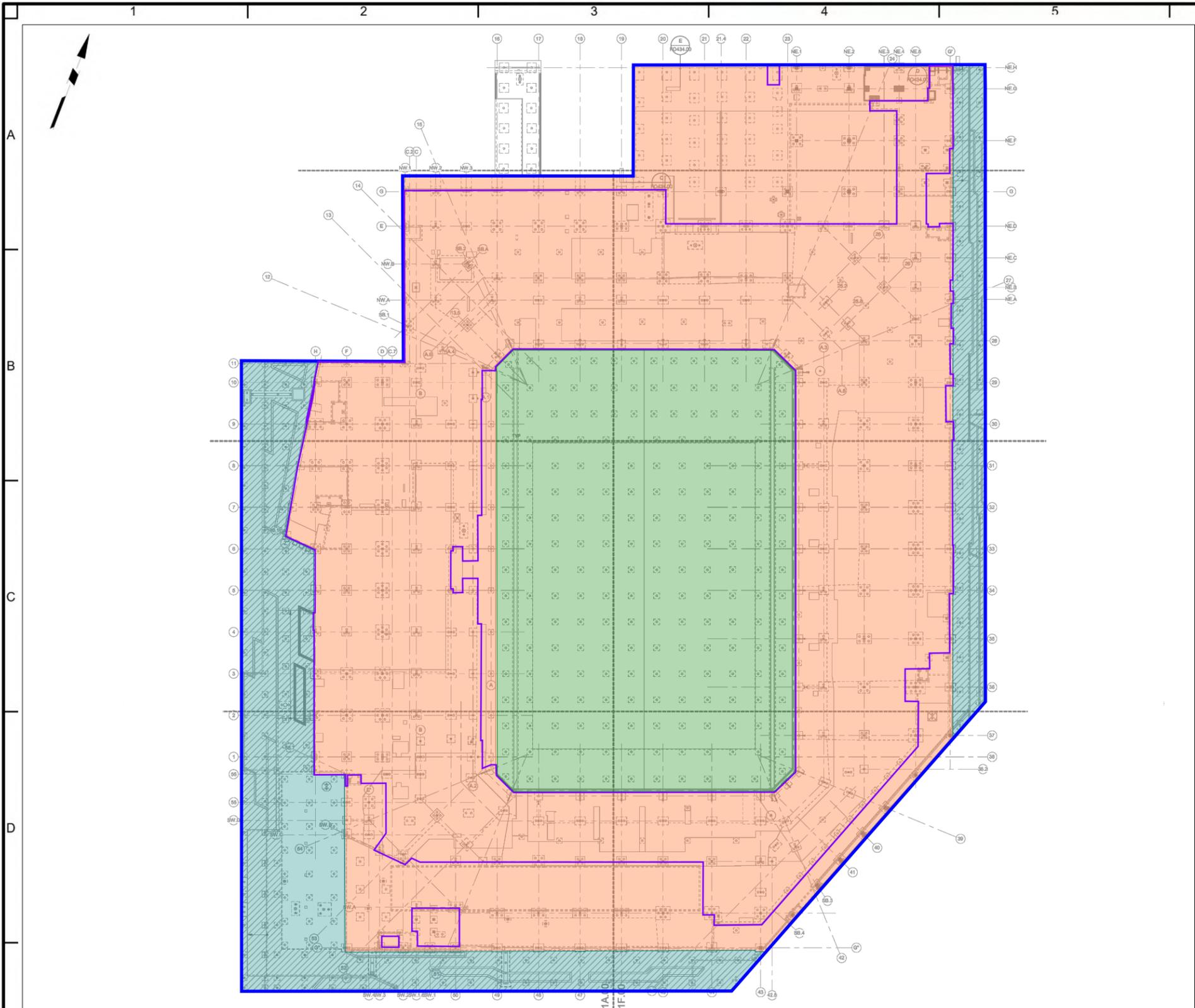


LANGAN
 Langan Engineering, Environmental, Surveying,
 Landscape Architecture and Geology, D.P.C.
 368 Ninth Avenue, 8th Floor
 New York, NY 10001
 T: 212.479.5400 F: 212.479.5444 www.langan.com

Project
**WILLETS POINT
 DEVELOPMENT STADIUM**
 BLOCK 1824, P/O LOT 12
 BCP SITE NO. C241146C
 QUEENS NEW YORK

Figure Title
**ENGINEERING
 CONTROLS MAP:
 SITE COVER
 SYSTEM EXTENTS**

| | |
|--------------------------|----------|
| Project No. 170197601 | 1 |
| Date 9/5/2025 | |
| Scale 1"=100' | |
| Drawn By GS | |



LEGEND:

- APPROXIMATE BCP SITE BOUNDARY
- APPROXIMATE EXTENTS OF MINIMUM 12-INCH-THICK CONCRETE FOUNDATION SLAB BENEATH LANDSCAPED AREAS
- APPROXIMATE EXTENTS OF MINIMUM 12-INCH-THICK CONCRETE BUILDING SLAB
- APPROXIMATE EXTENTS OF MINIMUM 12-INCH-THICK CONCRETE SLAB BENEATH THE PLAYING FIELD
- APPROXIMATE EXTENTS OF THE SUB-MEMBRANE DEPRESSURIZATION SYSTEM AND WATERPROOFING/VAPOR BARRIER MEMBRANE

NOTES:

1. BACKGROUND ADAPTED FROM PRELIMINARY CONSTRUCTION INT CD PROGRESS SET, STRUCTURAL COMPOSITE PLAN - FIELD LEVEL FO101.00, DATED SEPTEMBER 5, 2024.
2. BCP = BROWNFIELD CLEANUP PROGRAM

SCALE IN FEET

| | | | | |
|---|--|--|--------------------------|--|
| <small>Langan Engineering, Environmental, Surveying, Landscape Architecture and Geology, D.P.C. 368 Ninth Avenue, 8th Floor New York, NY 10001 T: 212.479.5400 F: 212.479.5444 www.langan.com</small> | Project WILLETS POINT DEVELOPMENT STADIUM BLOCK 1824, P/O LOT 12 BCP SITE NO. C241146C | Figure Title PROPOSED ENGINEERING CONTROLS MAP AND SITE COVER SYSTEM EXTENTS | Project No. 170197601 | Figure No. 2 |
| | QUEENS NEW YORK | Date 9/5/2025 | Scale 1"=100' | Drawn By GS |