

December 7, 2022

Christopher Allan
Project Manager
NYSDEC Division of Environmental Remediation, Region 2
47-40 21st Street
Long Island City, New York 11101

Re: Corrective Measures Work Plan
HPS Parcel G, Site No. C241222
56-27 2nd Street, Long Island City, New York

Dear Mr. Allan:

Roux Environmental Engineering and Geology, D.P.C. (Roux), on behalf of GO HPS LLC, South Point Housing Development Fund Corporation, and GO HPS LIHTC LLC (collectively referred to as the Volunteer), is submitting this Corrective Measures Work Plan (CMWP) in response to the Site Management Periodic Review Report (PRR) Response Letter issued to the Volunteer by New York State Department of Environmental Conservation (NYSDEC) on November 30, 2022, for the HPS Parcel G site located at 56-27 2nd Street in Long Island City, New York (Site). On August 23, 2022, Roux submitted a PRR for the period of December 28, 2020 to April 28, 2022, to NYSED informing the Department that approximately 140 cubic yards (CY) of topsoil was imported for landscaping during February and March 2022 without oversight of a Qualified Environmental Professional (QEP), prior testing, or NYSED pre-approval. A Notice of Violation (NOV) was issued by NYSED to the Volunteer on October 25, 2022, and a settlement conference was held at the NYSED Region 2 office on November 17, 2022. Additionally, an on-Site meeting and conference call were also held with NYSED on November 29, 2022 and November 30, 2022, respectively, to discuss the proposed corrective sampling activities and the sampling approach was verbally approved by NYSED. The purpose of this CMWP is to memorialize the corrective measures discussed during these meetings.

Corrective Measures Implementation

The corrective measures will include sampling the previously imported topsoil to determine if the material meets the criteria for import to the Site as described in the December 2020 Site Management Plan (SMP). The SMP states that imported materials must meet the lower of the Restricted Residential Soil Cleanup Objectives (SCOs) and Protection of Groundwater SCOs (PGWSCOs).

As shown on the attached Figure L-111.00, there are six landscaping beds across the first-floor terrace of the Site where imported topsoil was backfilled. A total of eight borings will be completed using hand tools (e.g., post hole digger, shovel, hand auger, etc.) to approximately two feet below land surface (the presumed minimum thickness of the topsoil within landscaping beds) at the locations shown on the figure. The thickness of the topsoil imported for use in the cover system will be documented during sampling activities and provided to NYSED. The soil borings will be visually inspected and screened for organic vapors in the field using a photoionization detector (PID).

As required by NYSED, one discrete sample for volatile organic compounds (VOCs) will be collected from each bed for a total of six VOC samples. Three composite samples will also be collected using the following methodology:

- Composite Sample #1: A three-point composite sample will be collected from Bed 1;

- Composite Sample #2: A three-point composite sample will be collected between Beds 2, 3, and 4; and
- Composite Sample #3: A two-point composite sample will be collected between Beds 5 and 6.

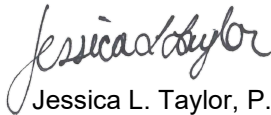
In accordance with the SMP and the NYSDEC DER-10 Technical Guidance for Site Investigation and Remediation (DER-10), the composite samples will be analyzed for semivolatile organic compounds (SVOCs), metals, pesticides, polychlorinated biphenyls (PCBs), and the emerging contaminants 1,4-dioxane and per-and polyfluoroalkyl substances (PFAS). Samples from each boring will be submitted to an Environmental Laboratory Approved Program (ELAP)-certified laboratory and composited and analyzed at the laboratory. Supplemental volume from each boring comprising Composite Samples #2 and #3 will also be submitted to the laboratory with the analysis placed on hold as a contingency. If the data from the samples composited between landscaping beds exceed the SCOs set forth for the Site, the individual samples from each bed in question will then be analyzed only for the compounds that exceeded SCOs to determine which location contained material that exceeded Site standards prior to any remedial action taking place.

All intrusive work will be performed in compliance with the Excavation Work Plan and Health and Safety Plan (HASP) included in the SMP. In accordance with the SMP, a community air monitoring plan (CAMP) should be implemented during all intrusive activities. Due to the limited amount of soil disturbance that will occur during CMWP sampling, NYSDEC approved on November 29, 2022, that a modified CAMP can be implemented and one handheld particulate meter and PID can be used for air monitoring during sampling activities. CAMP data will be tabulated and submitted to NYSDEC.

Roux will not commence sampling until written approval of the CMWP is granted by NYSDEC and NYS Department of Health (NYSDOH). Once sampling is complete, the analytical results will be submitted to NYSDEC for further discussion regarding the need for any further corrective measures to be completed for the Site.

Sincerely,

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



Jessica L. Taylor, P.G.
Principal Hydrogeologist



Charles J. McGuckin, P.E.
Principal Engineer



Attachments

cc: Brian McGrath, GO HPS LLC c/o Gotham Organization LLC
Stephanie Rhoades, GO HPS LIHTC LLC, South Point Housing Development Fund Corporation

LAYOUT NOTES:

- CONTRACTOR TO LOCATE AND PROTECT ALL UTILITIES AND STRUCTURES PRIOR TO AND DURING CONSTRUCTION AND TO REPAIR / REPLACE ANY ELEMENT DAMAGED DURING CONSTRUCTION.
- CONTRACTOR TO NOTIFY OWNER, ARCHITECT AND LANDSCAPE ARCHITECT OF ANY DISCREPANCIES OR ERROR BETWEEN PLAN AND SITE CONDITIONS PRIOR TO COMMENCEMENT OF WORK.
- ALL BUILT ELEMENTS IN THE LANDSCAPE SHALL BE CONSTRUCTED TO MEET ALL APPLICABLE BUILDING CODES. CONTRACTOR TO NOTIFY LANDSCAPE ARCHITECT OF ANY DISCREPANCIES PRIOR TO CONSTRUCTION.
- WORK REQUIRING CONNECTION TO SLAB AND/OR IMPACTS WATERPROOFING SHALL BE FULLY COORDINATED WITH WORK OF OTHER TRADES PRIOR TO INSTALLATION OF WATERPROOFING MEMBRANE AND INSULATION PROTECTION TO AVOID DISTURBANCE ONCE IN PLACE.
- SEE ARCHITECTURAL PLANS FOR BUILDING DIMENSIONS.
- ALL DIMENSIONS TO BE VERIFIED IN FIELD.
- LAYOUT AND ALIGNMENT OF SCREENS, FIXED SEATING, EDGING, PLANTERS AND OTHER STRUCTURAL ELEMENTS ASSOCIATED WITH LANDSCAPE TO BE VERIFIED IN FIELD AND APPROVED BY THE ARCHITECT AND LANDSCAPE ARCHITECT PRIOR TO CONSTRUCTION.

DIGITAL DIMENSION NOTE:

- PLANTING BEDS, CURBS AND DRAIN INLETS ARE TO BE LOCATED IN THE FIELD BY A LICENSED SURVEYOR USING DIGITAL FILES SUPPLIED BY LANDSCAPE ARCHITECT; STAKEOUT IS TO BE REVIEWED AND APPROVED BY LANDSCAPE ARCHITECT PRIOR TO CONSTRUCTION.

GRADING AND SOIL INSTALLATION NOTES:

- GRADES INDICATED ARE FINISHED GRADES. GRADING MAY REQUIRE ADJUSTMENTS AS DIRECTED IN THE FIELD BY THE LANDSCAPE ARCHITECT.
- CONTRACTOR TO LOCATE AND PROTECT ALL UTILITIES, STRUCTURES AND GREENROOF ASSEMBLY PRIOR TO AND DURING CONSTRUCTION AND TO REPAIR/REPLACE ANY ELEMENT DAMAGED DURING CONSTRUCTION AT NO ADDITIONAL COST TO THE OWNER.
- CONFIRM ALL QUANTITIES AGAINST PLANTING AND GRADING DRAWINGS AND VERIFY IN FIELD.
- DO NOT PLACE, COMPACT, GRADE OR HANDLE SOILS THAT ARE WET.
- DO NOT PLACE GROWING MEDIUM ON SUBGRADE PRIOR TO INSPECTION AND APPROVAL OF LANDSCAPE ARCHITECT FOR COMPLIANCE WITH GREENROOF ROOT STOP BARRIER, INSULATION, DRAINAGE SYSTEM AND TREE ANCHORING SYSTEM. REQUEST INSPECTION BEFORE PROCEEDING WITH GROWING MEDIUM INSTALLATION.
- CONTRACTOR TO ROUGH GRADE FOR PLANTING AREAS TO THE DEPTHS INDICATED AS PER GRADING AND GROWING MEDIUM PROFILES. COORDINATE WITH LANDSCAPE PLANTINGS.
- CONTRACTOR TO SPREAD GROWING MEDIUM TO GRADES SHOWN AND RAKE CLEAN AFTER INSTALLATION.
- LANDSCAPE ARCHITECT TO FIELD VERIFY FINAL GRADING LAYOUT PRIOR TO PLACING FINAL GRADE BY CONTRACTOR.
- CONTRACTOR TO ENSURE POSITIVE DRAINAGE TO ROOFTOP DRAIN INLETS. SHOULD THERE BE ANY FOUND OBSTRUCTION TO PREVENT SUCH DRAINAGE FLOW, OR WHICH WOULD PREVENT IMPLEMENTING GRADING PLAN AS SHOWN, THE CONTRACTOR SHALL NOTIFY CONSTRUCTION MANAGER AND LANDSCAPE ARCHITECT PRIOR TO PROCEEDING.
- CONTRACTOR SHALL COORDINATE EARTHWORK AND PLANTING ACTIVITY WITH SITE ELECTRICAL AND PLUMBING/ IRRIGATION INSTALLATIONS.
- CONTRACTOR TO LEAVE THE SITE IN A SAFE AND NEAT CONDITION AT THE END OF EACH WORK DAY.

Notes:

- One discrete sample for VOCs will be collected from each bed for a total of 6 VOC samples.
- At Beds 2-6, discrete VOC sample and composite sample collected from same location. The discrete sample location for Bed 1A/1B is indicated.

Composite Sample #1 -
Bed 1A/1B (~56 total CY)

Composite Sample #2 -
Beds 2-4 (~46 total CY)

Composite Sample #3 -
Beds 5-6 (~40 total CY)

Landscape Section	Area (sf)	Volume (CY)
1A	580	43
1B	170	13
2	160	12
3	275	20
4	190	14
5	296	22
6	220	16
TOTAL		140

