September 22, 2026

Erick Bower
Division of Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway, Albany, NY 12233 via email: erick.bower@dec.ny.gov

Re: 10-16 Beach 19th Street, New York BCP Site Number: C241276
Revised Excavation Plan Letter
GBTS Project: 21003-0004

Dear Mr. Bower:

This letter follows email correspondence with the New York State Department of Environmental Conservation (NYSDEC) regarding modifications to the grid map from the Remedial Action Work Plan (RAWP; July 2026) and Decision Document (DD; July 2026). Changes were made to the grid size after the approval of these documents and prior to the start of remediation. The purpose of this letter is to acknowledge this deviation, document the revised excavation plan, and confirm there are no substantive errors in excavation or end point sampling.

BACKGROUND

Prior to commencement of remediation, GBTS had reviewed the grid map in the RAWP and noted the grids were 26 feet by 26 feet, each representing an area of surface soil removal of less than 700 square feet. GBTS created a revised figure with a 30 feet by 30 feet grid. This was to be consistent with RAWP Section 5.2.2 Confirmatory Sampling Frequency, which states the following:

Discrete confirmatory soil samples will be collected (at a minimum) from each 30 linear feet of wall (at least one sample per wall) and from every 900 square feet of excavation floor (at least one sample per floor) in excavation areas (the final number and location of samples will be determined in consultation with NYSDEC).

REVISED GRID MAP

The revised grid map has been used to guide remedial excavation and end-point sampling. Per NYSDEC email correspondence dated September 18, 2026, the RAWP and DD are certified design documents which must be adhered to, and use of the revised grid map represents a deviation from the RAWP and DD.

Beyond this procedural deviation, use of the revised grid map raises the possibility of two categories of error in the field. The first is that the revised grid map would change the lateral and vertical relationship between RI data documented exceedances of RRU SCOs and remedial excavations. The second category of potential error would be to change the frequency and location of endpoint sampling such that post remedial site conditions are not completely represented.

CONCLUSIONS

The revised grid maintains alignment with RI borings and documented RRU SCO exceedances. Proposed remedial excavation locations and depths remain appropriate and are not impacted by the revised grid size. The estimated remedial soil export volume of 1,750 cubic yards remains consistent with the RAWP. Endpoint sample locations are sufficient to fully characterize post-remedial conditions at the site.

Please see the attached figures confirming these conclusions as requested by NYSDEC:

1. New Excavation Grid vs RI Borings/Results (revision of RAWP Figure 9: Proposed Remedial Excavation)
2. New Excavation Grid vs. Endpoint Sampling Locations (revision of RAWP Figure 13: Proposed Endpoint Sample Locations)

These figures confirm that the revised grid map does not compromise implementation of the remedy. The revised grid map will continue to be used going forward.

Please review the above and confirm that NYSDEC can accept this deviation from the RAWP/DD. The deviation will be noted in the Final Engineering Report.

Sincerely,



Richard Hooker
Manager Environmental Consulting
Gallagher Bassett Technical Services

Attachments: New Excavation Grid vs RI Borings/Results
New Excavation Grid vs. Endpoint Sampling Locations

CERTIFICATION STATEMENTS

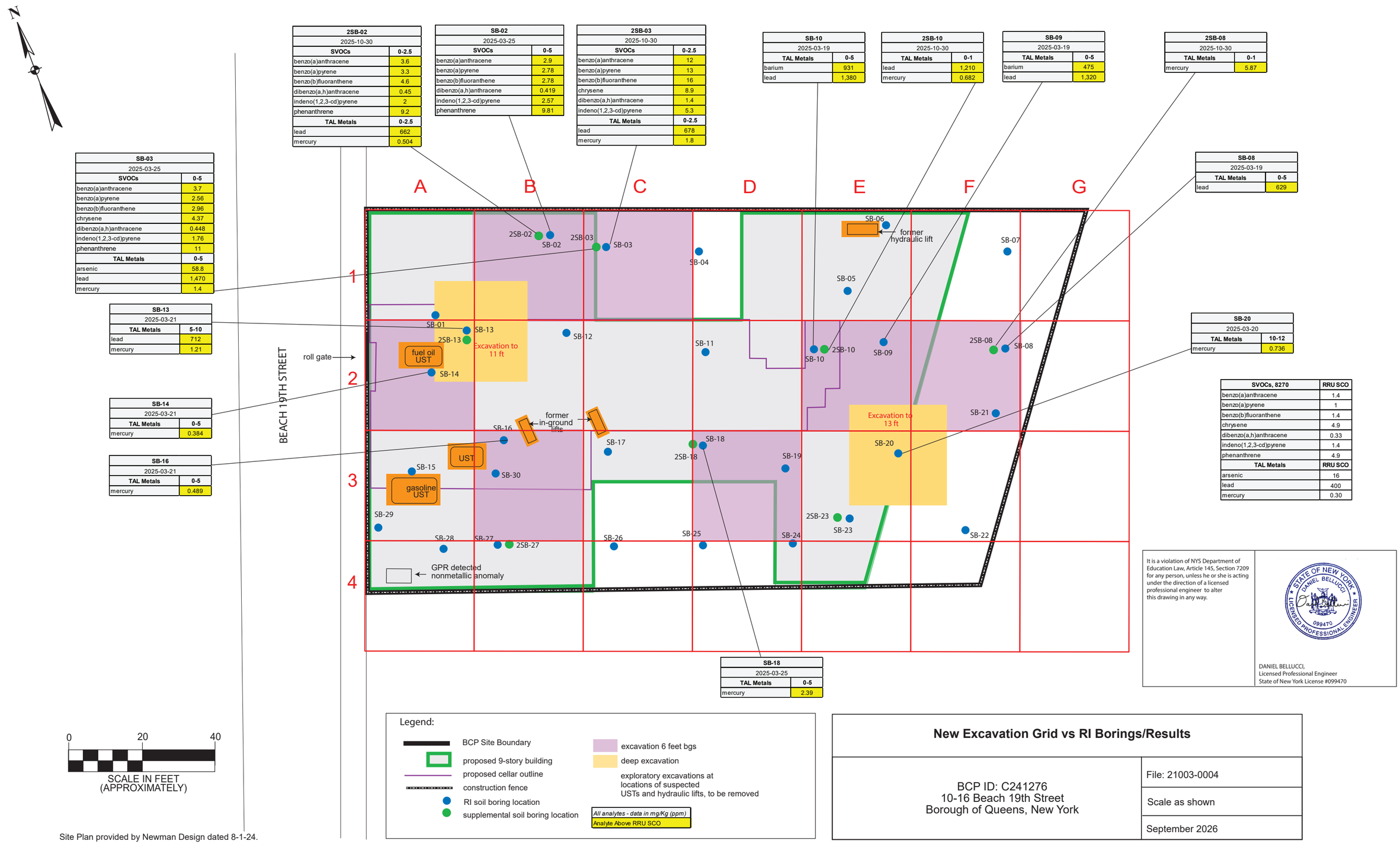
I, Daniel Bellucci, PE, certify that I am Professional Engineer as defined in 6 NYCRR Part 375 and that this *Revised Excavation Plan letter*, documenting the new excavation plan and explaining any deviations from the approved RAWP, was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

Daniel Bellucci, PE

P.E. Signature:

Date: 9/22/26





2SB-02	
2025-10-30	
SVOCs	**0-2.5**
benzo(a)anthracene	3.6
benzo(a)pyrene	3.3
benzo(b)fluoranthene	4.6
dibenzo(a,h)anthracene	0.45
indeno(1,2,3-cd)pyrene	2
phenanthrene	9.2
TAL Metals	**0-2.5**
lead	662
mercury	0.504

SB-02	
2025-03-25	
SVOCs	**0-5**
benzo(a)anthracene	2.9
benzo(a)pyrene	2.78
benzo(b)fluoranthene	2.78
dibenzo(a,h)anthracene	0.419
indeno(1,2,3-cd)pyrene	2.57
phenanthrene	9.81

2SB-03	
2025-10-30	
SVOCs	**0-2.5**
benzo(a)anthracene	12
benzo(a)pyrene	13
benzo(b)fluoranthene	16
chrysene	8.9
dibenzo(a,h)anthracene	1.4
indeno(1,2,3-cd)pyrene	5.3
TAL Metals	**0-2.5**
lead	678
mercury	1.8

SB-10	
2025-03-19	
TAL Metals	**0-5**
barium	931
lead	1,380

2SB-10	
2025-10-30	
TAL Metals	**0-1**
lead	1,210
mercury	0.682

SB-09	
2025-03-19	
TAL Metals	**0-5**
barium	475
lead	1,320

2SB-08	
2025-10-30	
TAL Metals	**0-1**
mercury	5.87

SB-03	
2025-03-25	
SVOCs	**0-5**
benzo(a)anthracene	3.7
benzo(a)pyrene	2.56
benzo(b)fluoranthene	2.96
chrysene	4.37
dibenzo(a,h)anthracene	0.448
indeno(1,2,3-cd)pyrene	1.76
phenanthrene	11
TAL Metals	**0-5**
arsenic	58.8
lead	1,470
mercury	1.4

SB-08	
2025-03-19	
TAL Metals	**0-5**
lead	629

SB-13	
2025-03-21	
TAL Metals	**5-10**
lead	712
mercury	1.21

SB-20	
2025-03-20	
TAL Metals	**10-12**
mercury	0.736

SVOCs, 8270	RRU SCO
benzo(a)anthracene	1.4
benzo(a)pyrene	1
benzo(b)fluoranthene	1.4
chrysene	4.9
dibenzo(a,h)anthracene	0.33
indeno(1,2,3-cd)pyrene	1.4
phenanthrene	4.9
TAL Metals	**RRU SCO**
arsenic	16
lead	400
mercury	0.30

SB-14	
2025-03-21	
TAL Metals	**0-5**
mercury	0.384

SB-16	
2025-03-21	
TAL Metals	**0-5**
mercury	0.489

SB-18	
2025-03-25	
TAL Metals	**0-5**
mercury	2.39

Legend:

- BCP Site Boundary
- proposed 9-story building
- proposed cellar outline
- construction fence
- RI soil boring location
- supplemental soil boring location
- excavation 6 feet bgs
- deep excavation
- exploratory excavations at locations of suspected USTs and hydraulic lifts, to be removed

All analytes - data in mg/Kg (ppm)

Analyte Above RRU SCO

Site Plan provided by Newman Design dated 8-1-24.

It is a violation of NYS Department of Education Law, Article 145, Section 7209 for any person, unless he or she is acting under the direction of a licensed professional engineer to alter this drawing in any way.

DANIEL BELLUCCI,
Licensed Professional Engineer
State of New York License #099470

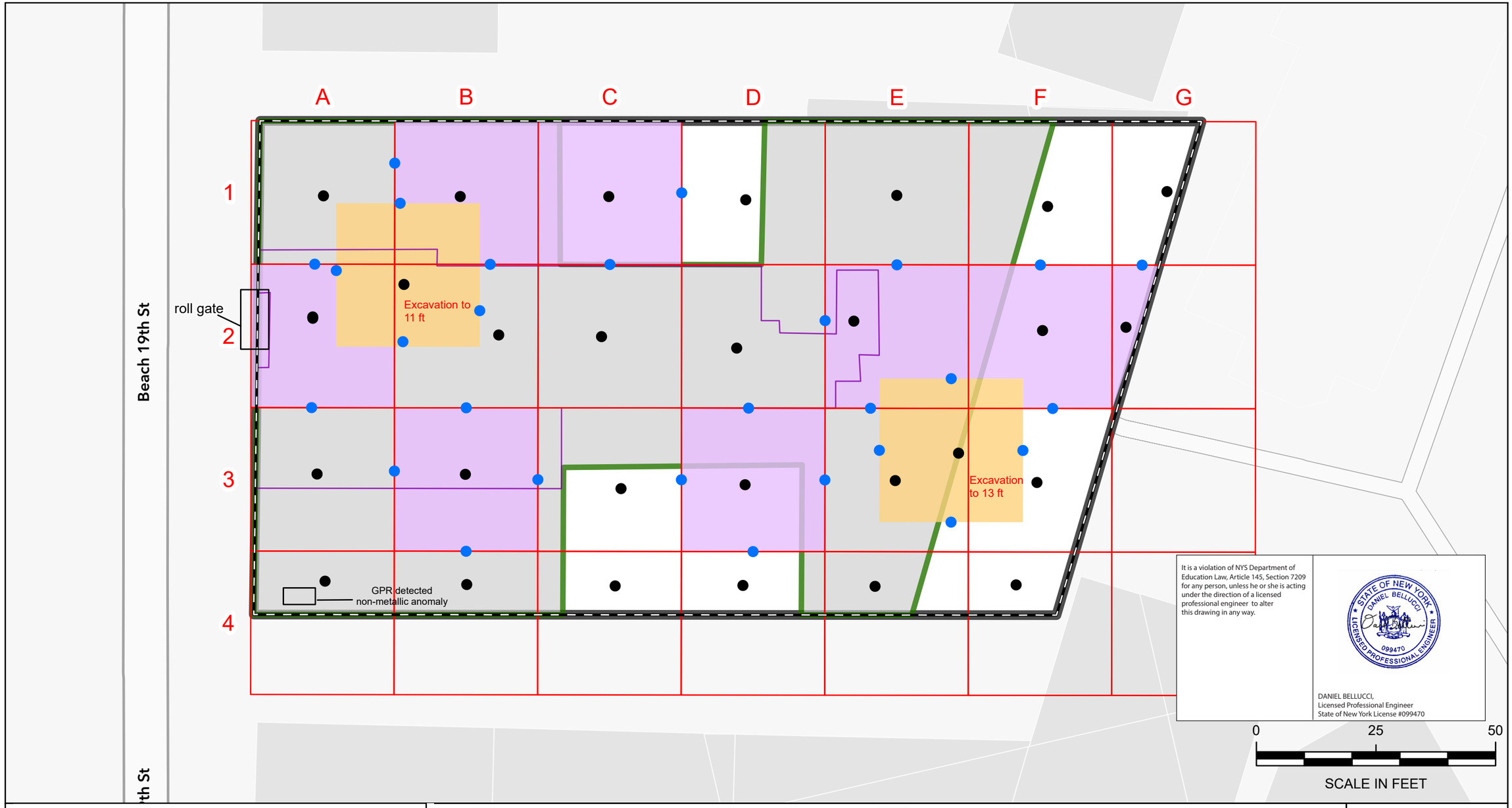
New Excavation Grid vs RI Borings/Results

BCP ID: C241276
10-16 Beach 19th Street
Borough of Queens, New York

File: 21003-0004

Scale as shown

September 2026



It is a violation of NYS Department of Education Law, Article 145, Section 7209 for any person, unless he or she is acting under the direction of a licensed professional engineer to alter this drawing in any way.

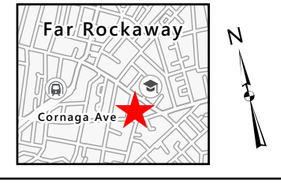
STATE OF NEW YORK · DANIEL BELLUCCI · 099470 · LICENSED PROFESSIONAL ENGINEER

DANIEL BELLUCCI,
Licensed Professional Engineer
State of New York License #099470

Endpoint Sample Locations
Revised Grid Map

BCP Site No. C241276
10-16 Beach 19th Street
Borough of Queens, NY

- BCP Site Boundary
- 30 x 30 = 900 ft²
- proposed base of excavation endpoint sample locations
- proposed wall endpoint sample locations
- construction fence
- proposed cellar outline
- deep excavation
- excavation 6 feet bgs
- proposed 9-story building



File: 21003-0004

September 2026

Scale as shown