

August 28, 2014

**Via Electronic Mail**

Mr. Javier Perez-Maldonado  
Division of Environmental Remediation  
Remedial Bureau B, Section B  
New York State Department of Environmental Conservation  
625 Broadway, 12th Floor  
Albany, NY 12233-7020

**Re: Remedial Investigation Work Plan Addendum  
SUN/DIC Acquisition Corp.  
441-443 Tompkins Avenue  
Staten Island, New York  
Site #C243024**

Dear Mr. Perez:

On behalf of Sun Chemical Corporation (Sun Chemical), ENVIRON International Corporation (ENVIRON) prepared this Remedial Investigation Work Plan Addendum (RIWPA) to propose sampling of certain regraded/reworked and exposed soil areas at 441-443 Tompkins Avenue (i.e., the Site). The scope of this work plan is based on discussions with Sun Chemical and ENVIRON during July and August 2014, and incorporates revisions to the sampling intervals to address NYSDOH comments to the August 26, 2014 version of this work plan, such comments provided by NYSDEC on August 28, 2014.

**Background**

NYSDEC has noted during recent discussions with Sun Chemical and ENVIRON that data were not available to evaluate current conditions and enable comparison to the Restricted Residential SCOs for shallow soils in areas that had been subject to regrading/reworking following completion of the 2008 – 2009 initial remedial actions. As outlined in the September 2010 Remedial Investigation Work Plan, following remediation of impacted soils to the commercial-use SCOs (the SCOs being used at that time), soils were regraded to prevent the accumulation of storm water, control soil erosion and prevent the overland migration of soil to the storm water drainage system and/or to neighboring properties.

Additionally, exposed soils are present at the former Warehouse/Office/Laboratory (WOL) following removal of the building slab. As sub-slab soil sampling was not completed prior to the building demolition, and as this area was subject to only limited soil remediation during the initial remedial actions, current shallow soil conditions have not been evaluated to the same degree as at other locations across the site.

Accordingly, to address these concerns, Sun Chemical proposes the soil sampling plan outlined below.

**Proposed Sampling of Regraded/Reworked Soils**

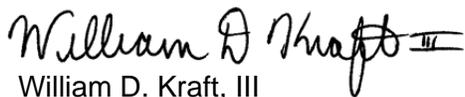
As shown on Plate 1 and consistent with NYSDEC comments during an August 9, 2014 teleconference, Sun Chemical proposes to collect shallow soil samples (i.e., in the upper 2-feet) at 12 locations across the Site, targeting (1) areas where soils were reworked following completion of post-

excavation sampling following the initial remedial actions; and (2) areas where concrete slab was removed, but underlying soils were not disturbed. These areas have a lighter blue border on Plate 1 and comprise the general vicinity of the Red Wing, Blue Wing and Basement, the Powerhouse, and the WOL. Two soil samples will be collected from each location, one from the upper 2 inches, then the second from the 2-24-inch interval. All soil samples will be analyzed for TCL SVOC+15, TCL Pesticides/PCBs and TAL metals including total cyanide, and a soil sample for TCL VOC+30 will be collected from 12-24 inches. As confirmed during the August 19, 2014 conference call between ENVIRON and NYSDEC, no VOC sample will be collected from the 0-2-inch interval. All soil samples borings will be collected using hand auger and other manual methods, and discrete soil samples will be collected at the proposed intervals using decontaminated stainless steel instruments.

All soil samples will be immediately placed in laboratory-provided sample containers and stored on ice to maintain a maximum sample temperature of 4°C until sample delivery at the laboratory. ENVIRON will follow appropriate chain of custody procedures. All soil and groundwater analyses proposed herein will be conducted by Integrated Analytical Laboratories, Inc. (IAL) of Randolph, New Jersey, a laboratory certified by the State of New York to perform the proposed analyses (New York ELAP Certification #11402), or another appropriately NYSDEC-certified laboratory.

Sun Chemical and ENVIRON are prepared to proceed with the soil sampling upon NYSDEC approval of this proposal. Accordingly, Sun Chemical and ENVIRON would appreciate NYSDEC approval of this RIWPA as soon as feasible, preferably by the week of September 1, 2014. If NYSDEC has any questions regarding this RIWPA, please do not hesitate to contact me.

Sincerely,



William D. Kraft, III  
Principal Consultant

WDK:ags  
2116443A\PRIN\_WP\37873v1

Enclosures

cc: G. Andrzejewski, Sun Chemical Corporation  
J. Brown, NYSDEC  
W. Faure, Esq., Sun Chemical Corporation  
C. Doroski, NYSDOH  
B. Garner, Sun Chemical Corporation  
D. Schlott, ENVIRON Int'l Corporation  
G. Walker, U.S. Ink  
T. Wolff, Esq., Manatt, Phelps & Phillips, LLP

**CHESTNUT AVENUE**  
ONE-WAY TRAFFIC

**TOMPKINS AVENUE**  
(70' WIDE)  
TWO-WAY TRAFFIC

**BUTLER PLACE**  
(50' WIDE)  
TWO-WAY TRAFFIC

**TILSON PLACE**  
(VARIABLE WIDTH)  
TWO-WAY TRAFFIC

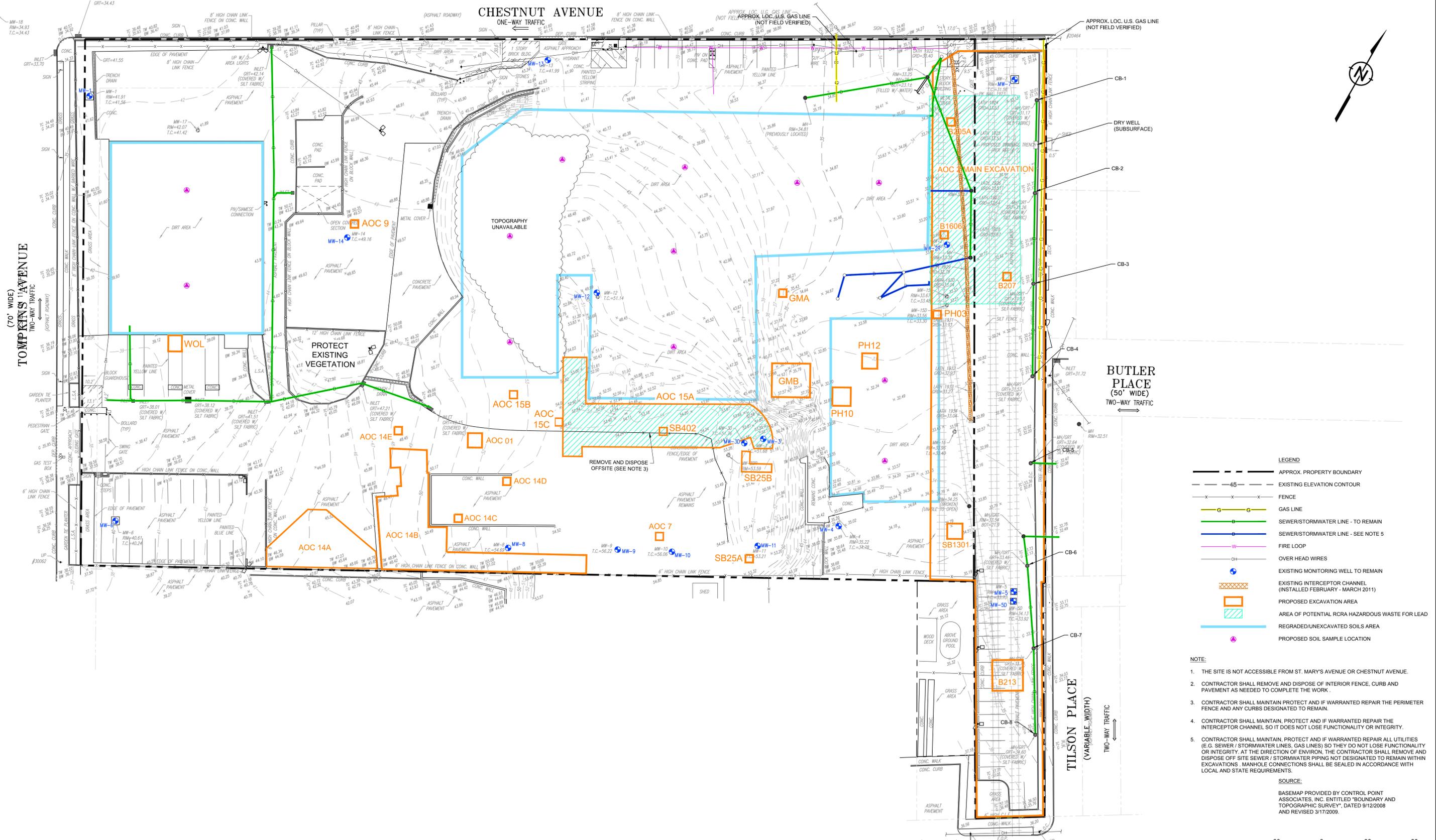
**ST. MARY'S AVENUE**



- LEGEND**
- APPROX. PROPERTY BOUNDARY
  - EXISTING ELEVATION CONTOUR
  - FENCE
  - GAS LINE
  - SEWER/STORMWATER LINE - TO REMAIN
  - SEWER/STORMWATER LINE - SEE NOTE 5
  - FIRE LOOP
  - OVER HEAD WIRES
  - EXISTING MONITORING WELL TO REMAIN
  - EXISTING INTERCEPTOR CHANNEL (INSTALLED FEBRUARY - MARCH 2011)
  - PROPOSED EXCAVATION AREA
  - AREA OF POTENTIAL RCRA HAZARDOUS WASTE FOR LEAD
  - REGRADED/UNEXCAVATED SOILS AREA
  - PROPOSED SOIL SAMPLE LOCATION

- NOTE:**
1. THE SITE IS NOT ACCESSIBLE FROM ST. MARY'S AVENUE OR CHESTNUT AVENUE.
  2. CONTRACTOR SHALL REMOVE AND DISPOSE OF INTERIOR FENCE, CURB AND PAVEMENT AS NEEDED TO COMPLETE THE WORK.
  3. CONTRACTOR SHALL MAINTAIN PROTECT AND IF WARRANTED REPAIR THE PERIMETER FENCE AND ANY CURBS DESIGNATED TO REMAIN.
  4. CONTRACTOR SHALL MAINTAIN, PROTECT AND IF WARRANTED REPAIR THE INTERCEPTOR CHANNEL SO IT DOES NOT LOSE FUNCTIONALITY OR INTEGRITY.
  5. CONTRACTOR SHALL MAINTAIN, PROTECT AND IF WARRANTED REPAIR ALL UTILITIES (E.G. SEWER / STORMWATER LINES, GAS LINES) SO THEY DO NOT LOSE FUNCTIONALITY OR INTEGRITY. AT THE DIRECTION OF ENVIRON, THE CONTRACTOR SHALL REMOVE AND DISPOSE OFF SITE SEWER / STORMWATER PIPING NOT DESIGNATED TO REMAIN WITHIN EXCAVATIONS. MANHOLE CONNECTIONS SHALL BE SEALED IN ACCORDANCE WITH LOCAL AND STATE REQUIREMENTS.

**SOURCE:**  
BASEMAP PROVIDED BY CONTROL POINT ASSOCIATES, INC. ENTITLED "BOUNDARY AND TOPOGRAPHIC SURVEY", DATED 9/12/2008 AND REVISED 3/17/2009.



DATE	BY	CH.	REVISION

**PROPOSED SUPPLEMENTAL REMEDIAL INVESTIGATION**

SUN CHEMICAL CORPORATION-  
ROSEBANK FACILITY  
441 TOMPKINS AVE.  
STATEN ISLAND, NY



PREPARED BY: JS/TA	DATE: 08/08/2014	PLATE
DRAFTED BY: BJK/KM	SCALE: AS SHOWN	
APPROVED BY: JS	PROJECT: 2116443A	

P:\2116443A\2116443A.dwg  
 8/12/2014 10:52:11 AM  
 BJK