

Zero Valent Iron Injection Workplan

For:

Centre Avenue Development – South 33 Centre Avenue New Rochelle, Westchester County, New York NYSDEC BCP Site # C360182

Prepared for:

Volunteer: RFMCH Huguenot Property Owner, LLC 7 Renaissance Square, 4th Floor White Plains, New York 10601

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Project No. 12056

JANUARY 2023

AC NICL

CERTIFICATIONS

I, Fuad Dahan, certify that I am currently a NYS registered professional engineer as defined in 6 NYCRR Part 375 and that this Zero Valent Iron Injection Workplan was prepared in accordance with all applicable statutes and regulations.

090531	1/23/2023	
NYS Professional Engineer #	Date	Signature

It is a violation of Article 130 of New York State Education Law for any person to alter this document in any way without the express written verification of adoption by any New York State licensed engineer in accordance with Section 7209(2), Article 130, New York State Education Law.

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LIST OF ACRONYMS

Acronym	Definition			
AWQS	Ambient Water Quality Standards			
BCA	Brownfield Cleanup Agreement			
BCP	Brownfield Cleanup Program			
COC	Certificate of Completion			
CVOCs	Chlorinated Volatile Organic Compounds			
FSP	Field Sampling Plan			
HASP	Health and Safety Plan			
ISCO	In-Situ Chemical Oxidation			
NYSDEC	New York State Department of Environmental			
PFAS	Per- and poly-fluoroalkyl Substances			
QAPP	Quality Assurance Project Plan			
SESI	SESI Consulting Engineers, DPC			
SMP	Site Management Plan			
TCA	Trichloroethane			
USEPA	United States Environmental Protection Agency			
VOCs	Volatile Organic Compounds			
ZVI	Zero Valent Iron			

1.0 INTRODUCTION

The Zero Valent Iron (ZVI) Injection Workplan is an element of the remedial program for the Centre Avenue Development – South Site located at 33-35 Centre Avenue in New Rochelle, New York. The Site is currently in the New York State (NYS) Brownfield Cleanup Program (BCP), Site No. C360182 which is administered by the New York State Department of Environmental Conservation (NYSDEC).

Huguenot Partners, LLC entered into a Brownfield Cleanup Program (BCP) Agreement (BCA) with the NYSDEC on June 28, 2019. RFMCH Huguenot Property Owner, LLC, RFMCH Huguenot Development Partners LLC, Huguenot Centre Holdings LLC (collectively with Huguenot Partners LLC shall be hereinafter referred to as the "Volunteers") were added as additional volunteers to the BCA pursuant to a BCA Amendment executed on December 12, 2019. The Site received a certificate of completion (COC) in December 2021. The Site achieved a conditional Track 1 remedy with groundwater contamination. The proposed work in this document is governed by the approved Site Management Plan (SMP).

Prior to issuance of the COC, SESI Consulting Engineers (SESI) previously completed two (2) rounds of in-situ chemical oxidation (ISCO) treatments at the above-referenced BCP Site to reduce contaminant mass in the source area. SESI also installed an in-situ liquid activated carbon barrier (PlumeStop[®]) to prevent downgradient migration of the residual contaminants of concern including chlorinated volatile organic compounds (CVOCs), 1,4-dioxane, chromium, nickel and per- and polyfluoroalkyl substances (PFAS).

SESI has to date conducted seven (7) sampling rounds of all on-Site monitoring wells for volatile organic compounds (VOCs), PFAS, 1,4-dioxane, chromium and nickel. Four (4) sampling rounds were conducted prior to issuance of the COC in 2021, and three (3) sampling rounds have been conducted post-COC in 2022. The 4 sampling rounds in 2021 included one round before the first ISCO injection, one round post the first injection, one round post the second ISCO injection, and one round post-PlumeStop[®] injection. The groundwater sampling results are summarized in **Figure 1** of **Attachment A**, which exhibits all constituents that either formerly exceeded or currently exceed the NYSDEC Ambient Water Quality Standards (AWQS). The results indicate that 1,1,1-Trichloroethane (TCA) concentrations have decreased from a maximum concentration of 1,000,000 ppb in December 2019 to a maximum of 19,000 ppb in September 2022, which is a

98 percent reduction. Based on conversations with the NYSDEC in October 2022, quarterly sampling has ceased following the 3rd quarter of 2022 in anticipation of conducting additional treatment.

The ISCO has resulted in complete destruction of previously detected Toluene, and sharp reductions of 1,4 Dioxane in many wells. Post ISCO results show that some Chlorinated VOCs and metals (chromium, nickel) are remaining in the Site groundwater at levels that require further treatment. The ISCO treatment is no longer active since the persulfate oxidant injected has been spent through high-pH activation. Because the bulk of the remaining contamination in the source area consists of chlorinated VOCs and the metals nickel and chromium, an alternative technology can be implemented. SESI will use in-situ chemical reduction (ISCR), a long-lasting in-situ treatment method that involves the transfer of electrons from a reductant such as ZVI to a contaminant such as the main chlorinated VOC at this Site (1,1,1-TCA), whereby the molecule is converted to harmless compounds. ZVI has also been shown to treat certain metals. The oxidation of ZVI leads to the formation of various iron oxide species on the surface of the material, which can adsorb contaminants such as the cations of nickel and chromium metals present at this Site. Note that ISCR is a contingency remedy to be considered when the Site groundwater contaminants include only CVOCs per the approved Site remedial action work plan (RAWP) and the Site Decision Document. However, since ISCR can also be utilized to treat metal contamination including chromium and nickel cations, it will be used as the contingency remedy for long-term in-situ treatment of CVOCs and metals at this Site.

This ZVI Injection Workplan discusses the rationale, design, and post-injection groundwater sampling approach.

2.0 INJECTION RATIONALE

To further decrease CVOC and metal concentrations in the groundwater at the Site, SESI proposes to inject zero valent iron (ZVI). This ISCR treatment method involves the transfer of electrons from a reductant such as ZVI to a contaminant such as 1,1,1-TCA, whereby the molecule is converted to harmless compounds. SESI proposes to inject Höganäs/Cascade CleanER-iZVI, a highly engineered, directly injectable form of ZVI that is optimized for direct injection via DPT, injection wells, and other methods. CleanER-iZVI is optimized for placement in bedrock injection wells and formulated to promote broad dispersion in the subsurface at low injection pressures. The CleanER-ZVI family of products includes formulations for remediation of CVOCs, as well as removal of heavy metal contaminants such as metal cations chromium and nickel.

CleanER-iZVI delivers superior injectability and distribution through the combination of advanced metallurgy, advanced surfactant/dispersant chemistry, and advanced blending technologies, and is offered as a precisely blended liquid-suspension concentrate. Delivered as a neat product that is diluted on-site without clumping and other ZVI blending issues, CleanER-iZVI accelerates treatment and delivers multiple advantages for this Site including direct injection into the existing bedrock injection wells at sub-fracture pressures and rapid dispersion in the subsurface via the advanced surfactant/dispersant chemistry. This technology can be integrated as a combined remedy with other remediation chemistries and amendments to support anaerobic bioremediation or activated carbon sequestration, as is the case at this Site. CleanER-iZVI also fosters all the known benefits of ZVI biotic/abiotic reactions to rapidly accelerate treatment results such as up to two (2) years of persistence in the subsurface to overcome back diffusion issues.

3.0 INJECTION DESIGN

The design of the CleanER-iZVI injection plan was conducted in close cooperation with Cascade. Cascade's injection proposal is presented in **Attachment B**. A total of 3,083 lbs of CleanER-iZVI will be injected in 23 existing injection wells at a 0.9% by weight concentration. A total of 16,442 gallons of CleanER-iZVI solution is proposed to be injected. The injectant will be gravity-fed into the wells without using pressure. The injection well locations are depicted in **Figure 2** of **Attachment A**. Injection details are presented in a table in **Attachment C**.

4.0 POST-INJECTION GROUNDWATER SAMPLING

Following an appropriate time interval of no less than four (4) weeks post-injection, all existing monitoring wells will be sampled utilizing low-flow purging/sampling in accordance with United States Environmental Protection Agency (USEPA) low flow sampling procedures or 3-volume purging/sampling. Care will be taken to ensure that samples are collected with as low a turbidity as possible, which may entail additional well purging. The sampling results will be compared to the NYSDEC Ambient Water Quality Standards (AWQS) and provided to NYSDEC to discuss the next steps of the remedial program.

Following post-injection sampling, quarterly sampling will continue during 2023 per the monitoring plan detailed in the SMP.

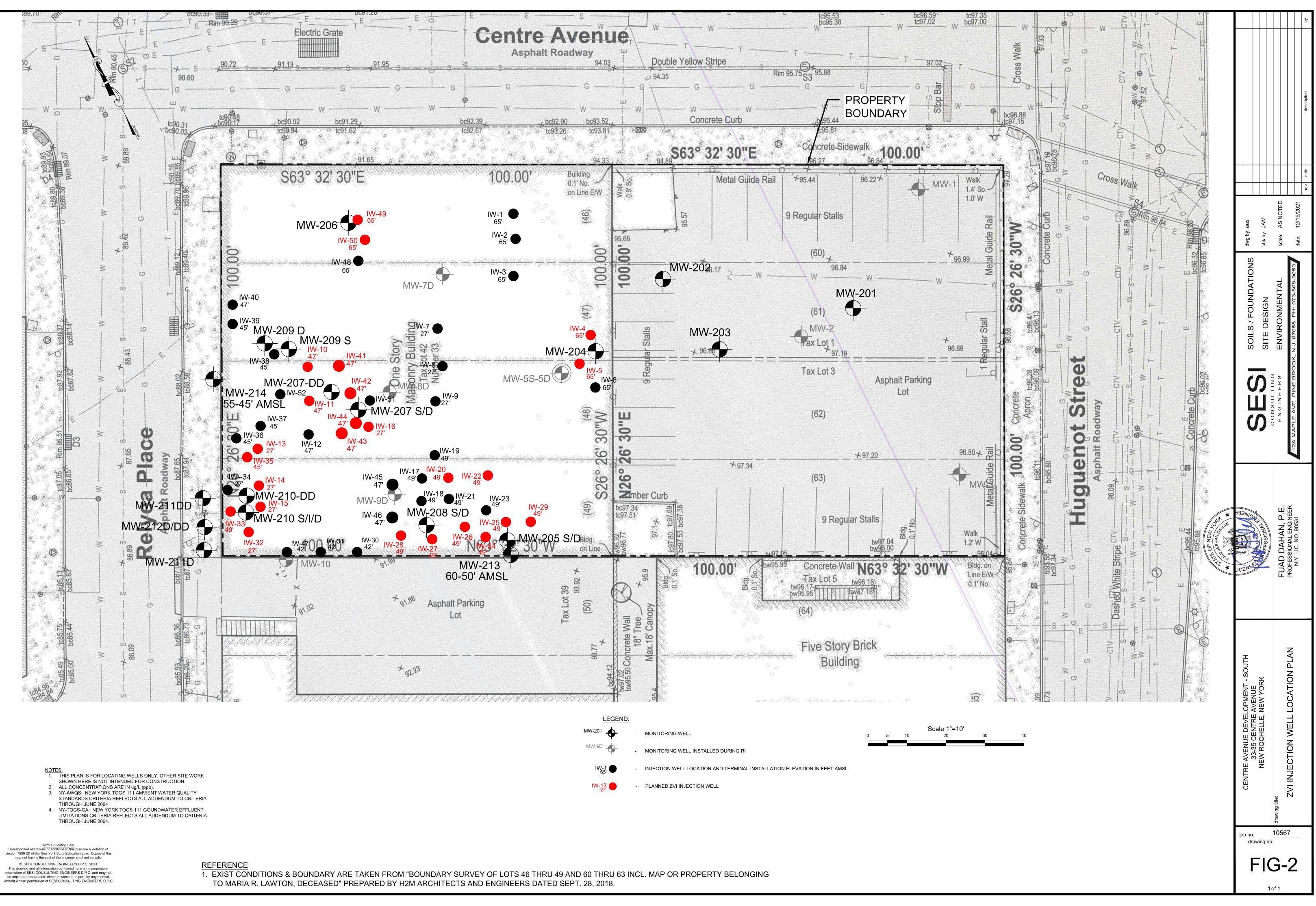
5.0 GOVERNING DOCUMENTS

All field work will be conducted in accordance with the approved Site Management Plan (SMP) on file for the Site, which includes an appended Health and Safety Plan (HASP), Field Sampling Plan (FSP), and Quality Assurance Project Plan (QAPP).

Attachment A:

Figures





Attachment B:

Cascade Injection Proposal

Optimized In Situ Remediation Solutions

CASCADE



Remediation Services

Hugenot Site 33 Centre Avenue New Rochelle, New York

> Prepared For SESI 8/26/2022

www.cascade-env.com

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CleanER-iZVI_Spec Sheet

INTRODUCTION

Cascade Remediation Services (Cascade) is pleased to present this Proposal for remediation services to SESI (Client) at the Hugenot site located in New Rochelle, New York (Site). Cascade's proposal provides for an integrated turnkey solution supporting injection of CleanER iZVI including cost-effective options for remediation and schedule optimization.

Cascade's follows these best practices on all projects that we support through our turnkey services with or without Cascade Chemistries. The result is that regardless of site complexity, a positive remediation return on investment (RORI) can be achieved.

Project Schedule

Cascade will mobilize from our Jackson, New Jersey office and assumes 9-hours on site per day, Monday through Friday. We estimate the remediation scope will take approximately 7 days to complete (1 setup day, 1 breakdown day and 5 days of injection services).

We are prepared to mobilize four weeks from notice to proceed. Additional considerations for mobilization are dependent upon amendment lead times based on current supply chain conditions. Currently, the lead time to prepare the Cascade Chemistries is four to six weeks following execution of a negotiated contract or Notice to Proceed.

Project Understanding

Project Understanding	Site Specific Data Comments			
Remediation Objective	Remediation to achieve reduction in con	itaminants in Plume		
Contaminants of	Primary: TCA			
Concern				
Lithology/Hydrogeology	Bedrock			
Cascade Chemistry	CleanER iZVI			
Cascade Chemistry	Requested by Client to further polish rer	lested by Client to further polish remaining TCA concentrations.		
Selection Basis				

Cascade understands the following components of the project.

In addition to the Summary provided below, Cascade has also provided <u>value-added services</u> to ensure best RORI achievable. These include:

• Manifolding to save time and lower cost, while maintaining key injection parameters control.

SUMMARY OF WORK

Cascade will provide injection services to reduce contaminant concentrations in bedrock at the New Rochelle Site. Twenty-six installed injection wells will be used to deliver approximately 3,000 lbs of iZVI. Cascade will procure and coordinate delivery of selected amendment. Cascade will also handle amendment on site, and if required cascade will procure a hydrant permit for water.

Proposed Remediation Approach and Cost Summary

The estimated costs for injection services at the New Rochelle, NY site are provided below. These prices include the following: 1 day set up; 1 day breakdown; 5 days of field injection services, water hydrant permit, frac tank for water storage, project manager oversight; report submittal, per diems for the crew, etc. If some of these items are not needed (frac tank, hydrant permit, etc); Cascade can revise costs for SESI.

	SESI			
	Center Avenue Developmer	nt		
	New Rochelle, NY			
	Colloidal ZVI Chemical Reduct	ion		
Date: 8/26/20	22	Prepared By	Eliot	
	Budget Estimate			
	Treatment Zone		-	
	Unit	Value	Com	ments
Treatment Interval Avg.	ft	30	Well a	average
Application Type	type	Grid		
	Injection		-	
	Unit	Total		
Locations	#	26	W	ells
			2x ISCO Volu	ime since iZV
			won't dist	ribute post
Total Gallons Injected	gallons	16442	inje	ction
			recommend	ded injection
wt% iZVI injected	%	0.9%		
Total Manifolded Injection Rate	gpm	12	4 simultaneous wells	
Injection Days	days	5		
	Quantity and Cost			
	CleanER-iZVI			
	Units	Total		Price
Total (No tax and shipping)	lbs	3083		\$27,747
	Total Injection			
	Units	Total		Price
Total	Days	7		\$37,305
	Total Injection and iZVI			
			Total	\$ 65,052

Due to the volatile pricing environment, taxes and delivery costs are TBD.

Reporting

Cascade will provide in an Excel format, a daily summary of injection volumes per interval, measured pressures and flows at each of the injection locations. At the completion of the project, the field logs and relevant field notes will be reviewed and evaluated for quality and accuracy prior to the submittal of a final injection report, which will include:

- Location of each borehole
- Volume and depth interval of the solutions applied to each injection location
- Collected data for injection flow, gallons per minute, pressure, and volume

Proposal Assumptions and Clarifications

Due to a volatile pricing environment, Cascade is unable to guarantee the pricing for a period longer than three months for field services from the date of the bid submittal. If the work extends past 11/26/2022, the agreement can be amended to extend the period of performance and address any potential adjustment in pricing resulting from actual increases in costs of labor, materials, and fuel. If you would like to discuss it further, please feel free to reach out to Christine Jurczak.

- 1. This quotation is firm for 90 days.
- 2. Our proposal assumes the following conditions:
- 3. Work performed Non-Union, Non-Prevailing Wage unless otherwise noted
- 4. Work hours assumed 10 hours per day on-site; Monday through Friday.
- 5. Level D PPE is included and supplemental PPE for amendment handling and contaminant exposure. If higher level PPE is required, additional costs will be quoted. Estimated costs include, where applicable, mobilization/demobilization, rentals, drums, HASP/SDS/Reporting. These costs do not include, where applicable, traffic control, water conditioning, security, utility locates and location clearing, or any unique logistical considerations not identified in this proposal.
- 6. Cascade will procure the proposed amendments, arrange shipping and coordination of deliveries to the site. The costs provided in do not include shipping and taxes. Due to the volatile pricing environment taxes and shipping are TBD.
- 7. Cascade will unload and store amendments during field implementation. Client is responsible for leftover amendment and amendment containers.
- 8. Project will be overseen by a CASCADE project manager who will assist with pre-project planning, monitoring daily performance, reporting, and addressing project concerns. Injection data will be available to the Client site representative at all times. Compiled field data from the injection event will be submitted to the Client in electronic format upon completion
- 9. Cascade will procure a hydrant permit. Cascade assumes that the hydrant used, will be no more than 100' away from injection and mixing area(s), costs for a frac tank are also included for water storage.
- 10. The Client will obtain all necessary regulatory approvals or permits related to the work and make all necessary notifications
- 11. Site is secure; temporary fencing is not needed. If fencing is required, additional costs will be provided by Cascade
- 12. It is assumed that the work area will be free of surface obstructions allowing easy access to our injection system, conveyance hoses, and crews so as not to cause any production/schedule delays. It is assumed that CASCADE can store equipment onsite overnight.
- 13. Additional safety and/or site-specific training is not required. If client and/or property owner requests such training, extra costs may be incurred.
- 14. Portable sanitary facilities will be provided by Client
- 15. Circumstances encountered during the performance of these services could warrant additional time or expense (e.g., lower injection rates and/or higher injection pressures lightning, and client-imposed injection restrictions or downtime). We will notify Client site representative immediately of any such circumstances that could affect the completion time or costs of the engagement. The Client acknowledges that although this proposal may contain remediation options, CRS bears no responsibility for remediation results or impact to existing conditions. The Client indemnifies, holds harmless and shall defend CRS and affiliates against claims or actions, including third party claims or actions, arising from any remediation design, results, or impact to existing conditions.

We appreciate the opportunity to provide you with our estimate and proposal. If you need any additional information, please contact Christine Jurczak at cjurczak@cascade-env.com.

Cascade Remediation Services, LLC

By Christine Jurezak		Ву
Name	Christine Jurczak	Name
Title Operations Manager		Title
Date	8/26/2022	Date

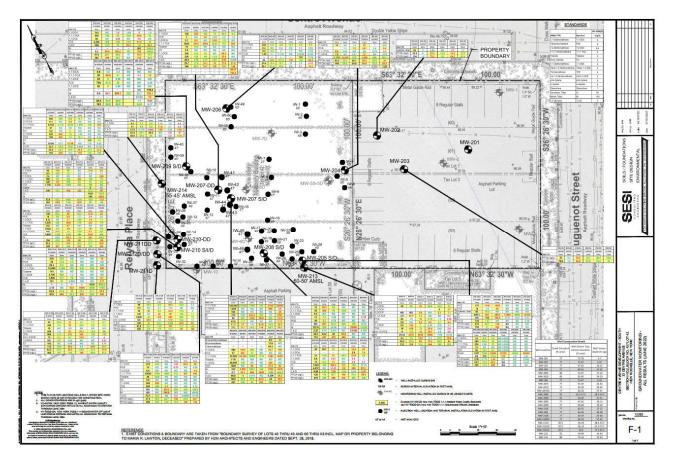
Please sign below to acknowledge acceptance of this estimate and proposal and authorize Cascade to begin with final contract and work authorization.

Authorized Signature	Date
Name (Print)	P.O. or Project #.

Signature above confirms signee has reviewed the cost estimate and proposal and agrees with remediation approach, assumptions, and budgetary costs. The next steps toward project implementation:

- 1. Sign Cost Estimate and Proposal.
- 2. Finalize Contract Documents incorporating this proposal.
- 3. Cascade to schedule project after all local and regulatory permits, access agreements, pre-payments for chemistries have been completed.
- 4. Client and Cascade participate in pre-mobilization project call finalizing all project requirements, equipment to be utilized and contingencies
- 5. Cascade implements remediation.
- 6. Cascade and Client work collaboratively in evaluating post remediation groundwater data until remediation goals have been met.

FIGURES



Injection Locations on Site Figure. Doesn't include wells already injected with PlumeStop.

ATTACHMENTS

Attachment A: CleanER-iZVI Spec Sheet.

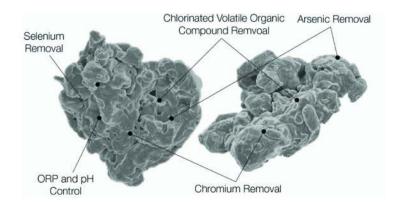


Cascade New Turnkey in Situ Remediation Chemistries: Colloidal ZVI / CleanER[®]*i*ZVI

Cascade Remediation Services, a leading provider of environmental remediation technology and services, and Höganäs Environment Solutions, LLC, the world's leading supplier of iron-based media, are pleased to introduce an injectable zero valent iron (iZVI) technology specifically developed for the remediation of chlorinated solvent (CVOC) soil and groundwater contamination.

Höganäs CleanER-iZVI Remediation Technology

Developed by Höganäs Environment Solutions, LLC, CleanER-*i*ZVI is a directly injectable form of Zero Valent Iron (ZVI) for the remediation for the cleanup of CVOCs. Based on Höganäs' highly engineered zero-valent iron (ZVI) media, CleanER-*i*ZVI is optimized for direct injection via DPT, injection wells, and other methods and formulated to promote broad dispersion in the subsurface at low injection pressures. The CleanER-ZVI family of products includes formulations for remediation of CVOCs, as well as removal of heavy metal contaminants such as hexavalent chromium, arsenic, and selenium. See Figure 1 below.





CleanER-*i*ZVI delivers superior injectability and distribution through the combination of the worlds most advanced metallurgy, advanced surfactant / dispersant chemistry, and advanced blending technologies, and is offered as a precisely blended liquid-suspension concentrate. Delivered as a neat product that is diluted onsite, CleanER-*i*ZVI accelerates treatment and delivers multiple cost-saving advantages for environmental remediation projects including

• Direct injection into either wells or DPT injection points at sub-fracture pressures

- Rapid dispersion in the subsurface via the most advanced surfactant / dispersant chemistry available
- Minimized potential for daylighting via water-miscible formulation
- Flexible chemistry that allows up to 80:1 dilution to customize distribution & residence time for the specific needs of each project

CleanER-*i*ZVI also fosters all the known benefits of ZVI biotic/abiotic reactions to rapidly accelerate treatment results via:

- Up to 2 years of persistence in the subsurface to overcome back diffusion issues at these highly heterogeneous sites.
- Neat, pre-blended ZVI suspension that eliminates clumping and other ZVI blending issues in the field.
- Simple mixing and dilution without the need for further suspension chemistry.
- Easily integrated as a combined remedy with other remediation chemistries and amendments to support anaerobic bioremediation or activated carbon sequestration.

Attachment C:

Injection Details Tables

Table 1 Proposed ZVI Injection Details By Well C360182 - Centre Ave Development South

Injection Well Location	Grade Elevation (ft amsl)	Final Depth (FT BGS)	Date IW Installed	Final Elevation (Ft amsl)	Injection Elevation (Ft amsl)	Weight of ZVI (lbs)	Concentration of ZVI (%)	Volume Injected (gal)
IW-4	77	12	8/26/2020	65	77	57	0.9	305
IW-5	77	12	8/26/2020	65	77	57	0.9	305
IW-10	77	30	8/25/2020	47	57	143	0.9	763
IW-11	77	30	8/23/2020	47	57	143	0.9	763
IW-14	77	32	8/19/2020	27	77	153	0.9	814
IW-15	77	28	8/18/2020	27	77	134	0.9	712
IW-16	77	50	8/20/2020	27	67	239	0.9	1271
IW-18	81	32	8/17/2020	49	81	153	0.9	814
IW-24	81	32	8/14/2020	49	81	153	0.9	814
IW-25	81	32	8/14/2020	49	81	153	0.9	814
IW-26	81	32	8/15/2020	49	81	153	0.9	814
IW-27	81	32	8/15/2020	49	81	153	0.9	814
IW-28	77	28	8/15/2020	49	77	134	0.9	712
IW-29	81	32	8/16/2020	49	81	153	0.9	814
IW-32	77	28	8/18/2020	49	77	134	0.9	712
IW-33	77	28	8/18/2020	49	77	134	0.9	712
IW-35	77	32	8/20/2020	45	77	153	0.9	814
IW-41	77	30	8/25/2020	47	77	143	0.9	763
IW-42	77	30	8/25/2020	47	77	143	0.9	763
IW-43	77	30	8/22/2020	47	77	143	0.9	763
IW-44	77	30	8/25/2020	47	77	143	0.9	763
IW-49	77	12	6/5/2021	65	77	57	0.9	305
IW-50	77	12	6/5/2021	65	77	57	0.9	305

Table 4.2 Injection Well Construction Details 33 Centre Avenue, New Rochelle, NY

Well Location	Grade Elevation (ft amsl)	Final Depth (FT BGS)	Date IW Installed	Final Elevation (Ft amsl)	IW Construction
IW-1	77'	12	8/12/2020	65	Screened 2-12'
IW-2	77'	12	8/12/2020	65	Screened 2-12'
IW-3	77'	12	8/12/2020	65	Screened 2-12'
IW-4	77'	12	8/26/2020	65	Gravel
IW-5	77'	12	8/26/2020	65	Gravel
IW-6	77'	12	8/26/2020	65	Gravel
IW-7	77'	50	8/19/2020	27	Open
IW-8	77'	50	8/20/2020	27	Open
IW-9	77'	50	8/19/2020	27	Open
IW-10	77'	30	8/25/2020	47	Opened
IW-11	77'	30	8/23/2020	47	Opened
IW-12	77'	30	8/20/2020	47	Opened
IW-13	77'	32	8/19/2020	27	Gravel
IW-14	77'	32	8/19/2020	27	Gravel
IW-15	77'	28	8/18/2020	27	Gravel
IW-16	77'	50	8/20/2020	27	Open
IW-17	81'	32	8/17/2020	49	Gravel
IW-18	81'	32	8/17/2020	49	Gravel
IW-19	77'	28	8/18/2020	49	Gravel
IW-20*	81'	32	8/17/2020	49	Gravel
IW-21	81'	32	8/15/2020	49	Gravel
IW-22	81'	32	8/14/2020	49	Gravel
IW-23	81'	32	8/14/2020	49	Gravel
IW-24	81'	32	8/14/2020	49	Gravel
IW-25	81'	32	8/14/2020	49	Gravel
IW-26	81'	32	8/15/2020	49	Gravel
IW-27	81'	32	8/15/2020	49	Gravel
IW-28	77'	28	8/15/2020	49	Gravel
IW-29	81'	32	8/16/2020	49	Gravel
IW-41	77'	30	8/25/2020	47	Gravel
IW-42	77'	30	8/25/2020	47	Opened
IW-43	77'	30	8/22/2020	47	Gravel
IW-44	77'	30	8/25/2020	47	Opened
IW-45	77'	30	8/25/2020	47	Gravel
IW-46*	77'	30	8/25/2020	47	Gravel
IW-48	77'	12	6/5/2021	65	Open
IW-49	77'	12	6/5/2021	65	Open
IW-50	77'	12	6/5/2021	65	Open
IW-51	77'	50	9/13/2021	27'	Open
IW-52	77	30	10/24/2021	47	Open