MOVE YOUR ENVIRONMENT FORWARD

January 12, 2026

Site Control Section
Attn: Len Zinoman
New York State Department of Environmental Conservation
Bureau of Technical Support
625 Broadway, 12th Floor
Albany, NY 12233-7015

RE: REVISED NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION BROWNFIELDS CLEANUP PROGRAM APPLICATION FOR SITE C OF THE REMINGTON SITE, 14 HOEFLER AVENUE, ILION, NY. BCP # C622036C (HRP # TUR3502.P2)

Dear Mr. Zinoman:

On November 6, 2025, HRP Associates (HRP) submitted an application on behalf of Turin Hoefler Avenue LLC (applicant) to enroll Site C (7.837 acres) of the former Remington Arms site located at 14 Hoefler Avenue, Ilion, New York in the New York State Brownfield Cleanup Program (BCP). Following review, the New York State Department of Environmental Conservation (NYSDEC) issued a letter of Incomplete Application on December 9, 2025, identifying required changes and additional information.

This letter is submitted in response to NYSDEC's comments and requested revisions in the December 9, 2025 correspondence. Note that prior to this submission, the applicant also submitted a supplemental disclosure to the NYSDEC detailing conformance with certain requirements of Division of Environmental Remediation-32 guidance.

Please accept this revised submission for review at your earliest convenience. HRP, on behalf of the applicant, hereby provides the requested revisions to address NYSDEC's comments, along with an updated version of the application materials.

SECTION I: PROPERTY INFORMATION

- **The application indicates the proposed site boundaries do not correspond to tax map metes and bounds. Per the application instructions, insert "p/o" in front of the lot number in the appropriate box in this section of the application form.**
  The BCP Application Form has been updated to include "p/o" before Lot Number 16 for Section 120.37, Block 5.

- **A metes and bounds description of the proposed site boundary was not provided. Per the application instructions, a metes and bounds description of the proposed site boundary must be attached if the site boundary does not correspond to tax map boundaries. Please provide.**
  A survey has been completed to meet these requirements and is included as Attachment H. The acreage for Site C is 7.837 acres. This acreage, as determined by the survey, has been updated in both the BCP Application form and the narrative description.

- **Figure C does not clearly identify the boundary of SBL 120.37-5-16. Please clearly identify the site boundary and all associated tax lot boundaries.**
  An updated Figure 3 Site C Tax Map has been attached to clearly identify the boundary of SBL 120.37-5-16.

- **Please see any attached comments regarding the Environmental Assessment provided by the Project Manager**
- **Comments from Project Manager:**
  - **The Site is located in the Town of German Flatts. Please correct on application Section I.**
    The BCP Application Form for Site C has been revised to list the City/Town as *Town of German Flatts* and the Municipality (list all if more than one) as *Village of Ilion; Town of German Flatts*.

  - **Modify the text and response to number 11 on the application, this site was listed with DER code 622021 and is class C.**
    The BCP Application Form for Site C has been revised. In Section I, Question 11, the option "Yes" is now selected, and the following details have been provided: DEC Site Number 622021 and Class C.

SECTION II: PROJECT DESCRIPTION

- **Please see any attached comments provided by the Project Manager.**
- **Comments from Project Manager:**
  - **The GSR evaluation is to occur during the remedial investigation and IRM phases as well. Please revise Attachment B to include how these activities will implement GSR.**
    The GSR evaluation has been revised to reflect this change. The corresponding information has also been added to Attachment B.

SECTION III: ECOLOGICAL CONCERNS

- **Please see any attached comments provided by the Project Manager.**
  Not applicable, as no comments were provided by the Project Manager

SECTION VI: PROPERTY'S ENVIORNMENTAL HISTORY

- **The narrative provided indicates, "The previous Site investigations are included in Appendices A though D." An Appendix D was not provided with the application. Please correct.**
  Section VI of the description narrative has been revised to indicate Appendices A through C. The reference to Appendix D has been removed, as no Appendix D was provided with the application. Please see below for the modification:
  Site C is a proposed brownfield site at which contaminants are present at levels exceeding the soil cleanup objectives and environmental standards, criteria and guidance adopted by the NYSDEC, and which are applicable based on the anticipated use of the property. Data including Site drawings (Figure 1 and 2) and data summary tables (Tables 2) are provided separately as attachments to this BCP application form. The previous Site investigations are included in Appendices A through C.

- **The response to Question 4 does not indicate all known past land uses described in the Past Land Use section of the Property Description narrative provided. Ensure past land uses match throughout the application.**
  For Question 4 of the BCP Application Form (Section VI: Property's Environmental History), additional details are provided in the "Other" section as follows: Site C was used for industrial manufacturing, primarily dedicated to firearms production as part of the larger Remington Arms facility.

- **Please see attached comments provided by the Project Manager.**
- **Comments from Project Manager:**
  - **Revise the first sentence to "proposed brownfield site"**
    Section VI of the description narrative has been edited to reflect the requested change as shown below:
    Site C is a proposed brownfield site at which contaminants are present at levels exceeding the soil cleanup objectives and environmental standards, criteria and guidance adopted by the NYSDEC, and which are applicable based on the anticipated use of the property. Data including Site drawings (Figure 1 and 2) and data summary tables (Tables 2) are provided separately as attachments to this BCP application form. The previous Site investigations are included in Appendices A through C.

SECTION VII: REQUESTOR INFORMATION

- **The requestor name provided on the application form, "Turin Hoefler Avenue", does not match the print-out from the NYS Department of State Division of Corporations Entity database, "Turin Hoefler Avenue LLC". The requestor name in the application must appear exactly as it does in the NYSDOS database. Please correct.**
  In Section VII, Requestor Information, of the BCP Application Form, the applicant's name has been corrected to match the NYS Department of State Division of Corporations record. It now reads: "Turin Hoefler Avenue LLC."

If you have any questions, please feel free to contact HRP at (518) 877-7101.

Sincerely,
HRP Associates, Inc.

Kim L. Baines
Project Manager

Stephanie Pascual
Project Consultant

Attachments

NYSDEC BCP Application – Site C, The Remington Site, Ilion, NY

MOVE YOUR ENVIRONMENT FORWARD

New York State Department of Environmental Conservation
Brownfield Cleanup Program Application

The Remington Site C
14 Hoefler Ave
Ilion, NY 13357

Prepared For:

Turin Hoefler Avenue LLC
69 Main Street, 2nd Floor
Ilion, NY 11963

Prepared By:

HRP Associates, Inc.
1 Fairchild Square, Suite 110
Clifton Park, NY 12065

HRP Project Number: TUR3502.P2

Issued On: November 6, 2025

TABLE OF CONTENTS

BCP APPLICATION 1

I. SECTION I: PROPERTY INFORMATION 2

LOCATION 2
SITE FEATURES 2
CURRENT ZONING AND LAND USE 3
PAST USE OF THE SITE 3
SITE GEOLOGY 4

II. SECTION II: PROJECT DESCRIPTION 6

III. SECTION III: ECOLOGICAL CONCERNS 8

IV. SECTION IV: LAND USE FACTORS 9

ZONING AND CURRENT USE 9
ANTICIPATED USE 9
RENEWABLE ENERGY FACILITY SITE 9
COMPLIANCE WITH ZONING LAWS, RECENT DEVELOPMENT, AND COMMUNITY MASTER PLANS 10

V. SECTION V: CURRENT AND HISTORICAL PROPERTY OWNER AND OPERATOR 12

OWNER INFORMATION 12
OPERATOR INFORMATION 12
HISTORICAL OWNERS AND OPERATORS 12

VI. SECTION VI: PROPERTY'S ENVIRONMENTAL HISTORY 13

VII. SECTION VII: REQUESTOR INFORMATION 14

REQUESTOR NAME 14
REQUESTOR CONTACT INFORMATION 14
LLC INFORMATION 14
DOCUMENT CERTIFICATION 14

VIII. SECTION VIII: REQUESTOR CONTACT INFORMATION 15

REQUESTOR'S REPRESENTATIVE 15
REQUESTOR'S CONSULTANT AND REQUESTOR'S ATTORNEY 15

IX. SECTION IX: PROGRAM FEE 16

X. SECTION X: REQUESTOR ELIGIBILITY 17

VOLUNTEER STATEMENT 17
PROOF OF SITE ACCESS 17

XI. SECTION XI: PROPERTY ELIGIBILITY INFORMATION 18

CERCLA/NPL LISTING 18
REGISTRY LISTING..... 18
RCRA LISTING 18
REGISTRY / RCRA SITES OWNED BY VOLUNTEERS..... 18
EXISTING ORDER..... 19
PENDING ENFORCEMENT ACTIONS 19

XII. SECTION XII: SITE CONTACT LIST 20

XIII. SECTION XIII: STATEMENT OF CERTIFICATION AND SIGNATURES..... 22

Figures

Figure 1	Site Location Map
Figure 2	Surrounding Properties Map
Figure 3	Tax Map
Figure 4	New York State En-Zone Map
Figure 5	New York State Disadvantaged Communities Map
Figure 6A	Soil Analytical Results Exceedances Over Part 375 Restricted Residential Use SCO
Figure 6B	Groundwater Analytical Results Exceedances Over Class GA Criteria
Figure 7	Ilion Zoning Map

Tables

Table 1	Surrounding Property Owners and Addresses
Table 2	Soil Analytical Results Exceedances Over Part 375 Restricted Residential Use SCO
Table 3	Groundwater Analytical Results Exceedances Above Class GA Ambient Water Quality Standards

Attachments

Attachment A	Conceptual Project Development Plan
Attachment B	Green and Sustainable Remediation Objectives
Attachment C	Village of Ilion's Draft Local Waterfront Revitalization Plan
Attachment D	NYS LLC Entity Information
Attachment E	LLC Organization Chart
Attachment F	Application Fee Waiver Request
Attachment G	Document Repository Agreement
Attachment H	Meets and Bounds Descriptions and Survey Map

Previous Environmental Reports

Appendix A	Phase II Environmental Site Assessment, HRP Associates, February 3, 2025
Appendix B	Supplemental Phase II Environmental Site Assessment, HGL, October 2025
Appendix C	Integrated Site Assessment Report, Remington Site, HRP Associates, November 6, 2025

General Information

Project/Site Information:

The Remington Site C
14 Hoefler Avenue
Ilion, NY 13357

Consultant Information:

HRP Associates, Inc.
1 Fairchild Square, Suite 110
Clifton Park, NY 12065
Phone: 518-877-7101
Fax: 518-877-8561
E-mail: Tom.Seguljic@hrpassociates.com
Project Number: TUR3502.P2

Client Information:

Kristen O'Neill
Chief Executive Officer
Turin Hoefler Avenue LLC
69 Main Street, 2nd Floor
Ilion, NY 11963

BCP APPLICATION

NEW YORK STATE | Department of Environmental Conservation

BROWNFIELD CLEANUP PROGRAM (BCP) APPLICATION FORM

SUBMITTAL INSTRUCTIONS:

1. Compile the application package in the following manner:
   a. one file in non-fillable PDF which includes a Table of Contents, the application form, and supplemental information (excluding the previous environmental reports and work plans, if applicable);
   b. one individual file (PDF) of each previous environmental report; and,
   c. one file (PDF) of each work plan being submitted with the application, if applicable.
2. *OPTIONAL: Compress all files (PDFs) into one zipped/compressed folder
3. Submit the application to the Site Control Section either via NYSDEC dropbox or ground mail, as described below.
   Please select only ONE submittal method – do NOT submit both via dropbox and ground mail.
   a. VIA SITE CONTROL DROPBOX:
      - Request an invitation to upload files to the Site Control submittal dropbox.
      - In the "Title" field, please include the following: "New BCP Application - *Proposed Site Name*".
      - After uploading files, an automated email will be sent to the submitter's email address with a link to verify the status of the submission. Please do not send a separate email to confirm receipt.
      - Application packages submitted through third-party file transfer services will not be accepted.
   a. VIA GROUND MAIL:
      - Save the application file(s) and cover letter to an external storage device (e.g., thumb drive, flash drive). Do NOT include paper copies of the application or attachments.
      - Mail the external storage device to the following address:
        Chief, Site Control Section
        Division of Environmental Remediation
        625 Broadway, 12th Floor
        Albany, NY 12233-7015

SITE NAME: THE REMINGTON SITE C	
Is this an application to amend an existing BCA with a major modification? Please refer to the application instructions for further guidance related to BCA amendments. If yes, provide existing site number: _____	○ **Yes** ◉ **No**
Is this a revised submission of an incomplete application? If yes, provide existing site number: C622036C	◉ **Yes** ○ **No**

NEW YORK STATE | Department of Environmental Conservation

BROWNFIELD CLEANUP PROGRAM (BCP) APPLICATION FORM

BCP App Rev 17 – October 2025

SECTION I: Property Information

PROPOSED SITE NAME THE REMINGTON SITE C

ADDRESS/LOCATION 14 HOEFLER AVENUE

CITY/TOWN TOWN OF GERMAN FLATTS | ZIP CODE 13357

MUNICIPALITY (LIST ALL IF MORE THAN ONE) VILLAGE OF ILION; TOWN OF GERMAN FLATTS

COUNTY HERKIMER | SITE SIZE (ACRES) 7.837

LATITUDE			LONGITUDE		
43 °	00 ‘	50.1 “	75 °	02 ‘	7.6 “

Provide tax map information for all tax parcels included within the proposed site boundary below. If a portion of any lot is to be included, please indicate as such by inserting “p/o” in front of the lot number in the appropriate box below, and only include the acreage for that portion of the tax parcel in the corresponding acreage column.
ATTACH REQUIRED TAX MAPS PER THE APPLICATION INSTRUCTIONS.

Parcel Address	Section	Block	Lot	Acreage
14 HOEFLER AVENUE (SITE C)	120.37	5	p/o 16	7.837

	Y	N
1. Do the proposed site boundaries correspond to tax map metes and bounds? If no, please attach an accurate map of the proposed site including a metes and bounds description.	○	◉
2. Is the required property map, provided in electronic format, included with the application? (Application will not be processed without a map)	◉	○
3. Is the property within a designated Environmental Zone (En-zone) pursuant to Tax Law 21(b)(6)? (See *DEC’s website* for more information) If yes, identify census tract: 104 Percentage of property in En-zone (check one): ○ 0% ○ 1-49% ○ 50-99% ◉ 100%	◉	○
4. Is the project located within a disadvantaged community? See application instructions for additional information.	◉	○
5. Is the project located within a NYS Department of State (NYS DOS) Brownfield Opportunity Area (BOA)? See application instructions for additional information.	○	◉
6. Is this application one of multiple applications for a large development project, where the development spans more than 25 acres (see additional criteria in application instructions)? If yes, identify names of properties and site numbers, if available, in related BCP applications: THE REMINGTON SITE: SITE A, B, D, and E	◉	○

SECTION I: Property Information (continued)	Y	N
7. Is the contamination from groundwater or soil vapor solely emanating from property other than the site subject to the present application?	○	◉
8. Has the property previously been remediated pursuant to Titles 9, 13 or 14 of ECL Article 27, Title 5 of ECL Article 56, or Article 12 of Navigation Law? If yes, attach relevant supporting documentation.	○	◉
9. Are there any lands under water? If yes, these lands should be clearly delineated on the site map.	○	◉
10. Has the property been the subject of or included in a previous BCP application? If yes, please provide the DEC site number: _____	○	◉
11. Is the site currently listed on the Registry of Inactive Hazardous Waste Disposal Sites (Class 2, 3, or 4) or identified as a Potential Site (Class P)? If yes, please provide the DEC site number: 622021 Class: C	◉	○
12. Are there any easements or existing rights-of-way that would preclude remediation in these areas? If yes, identify each here and attach appropriate information. Easement/Right-of-Way Holder — Description	○	◉
13. List of permits issued by the DEC or USEPA relating to the proposed site (describe below or attach appropriate information): Type — Issuing Agency — Description - State Pollutant Discharge Elimination System (SPDES) Permit — -NYS DEC — -Division of Water, Remington Steam Plant (NY0245097) -State Pollutant Discharge Elimination System (SPDES) Permit — -NYS DEC — -Division of Water, Wastewater (NY0005282) -Water Withdrawal Permit — -NYS DEC — -Division of Water (#11830) * Application to Transfer to Turin Submitted to DEC 2/24/2025.	◉	○
14. Property Description and Environmental Assessment – please refer to the application instructions for the proper format of each narrative requested. Are the Property Description and Environmental Assessment narratives included in the prescribed format?	◉	○

Note: Questions 15 through 17 below pertain ONLY to proposed sites located within the five counties comprising New York City.

	Y	N
15. Is the Requestor seeking a determination that the site is eligible for tangible property tax credits? If yes, Requestor must answer the Supplemental Questions for Sites Seeking Tangible Property Credits Located in New York City ONLY on pages 11-13 of this form.	○	○
16. Is the Requestor now, or will the Requestor in the future, seek a determination that the property is Upside Down?	○	○
17. If you have answered *YES* to Question 16 above, is an independent appraisal of the value of the property, as of the date of application, prepared under the hypothetical condition that the property is not contaminated, included with the application?	○	○

NOTE: If a tangible property tax credit determination is not being requested at the time of application, the applicant may seek this determination at any time before issuance of a Certificate of Completion by using the BCP Amendment Application, except for sites seeking eligibility under the underutilized category.

If any changes to Section I are required prior to application approval, a new page, initialed by each Requestor, must be submitted with the application revisions.
Initials of each Requestor:

_____ _____ _____ _____ _____ _____

SECTION II: Project Description

1. The project will be starting at: ◉ Investigation ○ Remediation

If the project is proposed to start at the remediation stage, at a minimum, a Remedial Investigation Report (RIR) must be included, resulting in a 30-day public comment period. If an Alternatives Analysis and Remedial Action Work Plan (RAWP) are also included (see *DER-10, Technical Guidance for Site Investigation and Remediation* for further guidance), then a 45-day public comment period is required.

2. If a final RIR is included, does it meet the requirements in ECL Article 27-1415(2)?

○ Yes ○ No ◉ N/A

3. Have any draft work plans been submitted with the application (select all that apply)?

☐ RIWP ☐ RAWP ☐ IRM ☑ No

4a. Please provide a short description of the overall project development, including a complete project schedule with all key BCP program milestones through issuance of the Certificate of Completion. Include DEC/DOH review times in the schedule (best efforts to review documents within 45 days pursuant to 6 NYCRR Part 375-3.6(b)).
Is this information attached? ◉ Yes ○ No

4b. Please include in the project schedule the dates of any outside public or private funding source deadlines with the associated BCP milestones, e.g., NYC HPD or NYS HCR funding deadlines, or private funding interim milestones from loan documents, that depend on a particular BCP milestone such as a work plan or report approval, decision document issuance, etc.

Is this information clearly identified in the BCP project schedule? ◉ Yes ○ No ○ N/A

Beginning January 1, 2024, all work plans and reports submitted for the BCP shall address Green and Sustainable Remediation (GSR) and DER-31 (see *DER-31, Green Remediation*). Work plans, reports and design documents will need to be certified in accordance with DER-31.

5. Please provide a description of how Green and Sustainable Remediation will be evaluated and incorporated throughout the remedial phases of the project including Remedial Investigation, Remedial Design/Remedial Action, and Site Management and reporting efforts.

Is this information attached? ◉ Yes ○ No

6. If the project is proposed to start at the remediation stage (Section 2, Item 1, above), a climate change screening or vulnerability assessment must have been completed. Is this attached?

○ Yes ◉ No

SECTION III: Ecological Concerns

	Y	N
1. Are there fish, wildlife, or ecological resources within a ½-mile radius of the site?	○	◉
2. Is there a potential path for contamination to potentially impact fish, wildlife or ecological resources?	○	◉
3. Is/are there a/any Contaminant(s) of Ecological Concern?	○	◉

If any of the conditions above exist, a Fish and Wildlife Resources Impact Analysis (FWRIA) Part I, as outlined in DER-10 Section 3.10.1, is required. The applicant may submit the FWRIA with the application or as part of the Remedial Investigation Report.

4. Is a Fish and Wildlife Resources Impact Analysis Part I included with this application? N/A ◉	○	○

SECTION IV: Land Use Factors		
1. What is the property's current municipal zoning designation? M1 MANUFACTURING DISTRICT		
2. What uses are allowed by the property's current zoning (select all that apply)? Residential ☑ Commercial ☑ Industrial ☑		
3. Current use (select all that apply): Residential ☐ Commercial ☐ Industrial ☐ Recreational ☐ Vacant ☑		
	Y	**N**
4. Please provide a summary of current business operations or uses, with an emphasis on identifying possible contaminant source areas. If operations or uses have ceased, provide the date by which the site became vacant. Is this summary included with the application?	◉	○
5. Reasonably anticipated post-remediation use (check all that apply): Residential ☐ Commercial ☑ Industrial ☐ If residential, does it qualify as single-family housing? N/A ◉	○	○
6. Please provide a statement detailing the specific proposed post-remediation use. Is this summary attached?	◉	○
7. Is the proposed post-remediation use a renewable energy facility? See application instructions for additional information.	○	◉
8. Do current and/or recent development patterns support the proposed use?	◉	○
9. Is the proposed use consistent with applicable zoning laws/maps? Please provide a brief explanation. Include additional documentation if necessary.	◉	○
10. Is the proposed use consistent with applicable comprehensive community master plans, local waterfront revitalization plans, or other adopted land use plans? Please provide a brief explanation. Include additional documentation if necessary.	◉	○

SECTION V: Current and Historical Property Owner and Operator Information			
CURRENT OWNER TURIN HOEFLER AVENUE LLC			
CONTACT NAME KRISTEN O'NEILL			
ADDRESS 69 MAIN STREET 2ND FLOOR			
CITY SAG HARBOR	STATE NY	ZIP CODE 11963	
PHONE (914) 552-3316	EMAIL KRISTEN@TURINMANAGEMENT.COM		
OWNERSHIP START DATE 06/20/2025			
CURRENT OPERATOR TURIN HOEFLER AVENUE LLC			
CONTACT NAME KRISTEN O'NEILL			
ADDRESS 69 MAIN STREET 2ND FLOOR			
CITY SAG HARBOR	STATE NY	ZIP CODE 11963	
PHONE (914) 552-3316	EMAIL KRISTEN@TURINMANAGEMENT.COM		
OPERATION START DATE NOVEMBER 2027			

SECTION VI: Property's Environmental History

All applications **must include** an Investigation Report (per ECL 27-1407(1)). The report must be sufficient to establish that contamination of environmental media exists on the site above applicable Standards, Criteria and Guidance (SCGs) based on the reasonably anticipated use of the site property and that the site requires remediation. To the extent that existing information/studies/reports are available to the requestor, please attach the following (***please submit information requested in this section in electronic format ONLY***):

1. **Reports:** an example of an Investigation Report is a Phase II Environmental Site Assessment report prepared in accordance with the latest American Society for Testing and Materials standard (*ASTM E1903*). **Please submit a separate electronic copy of each report in Portable Document Format (PDF). Please do NOT submit paper copies of ANY supporting documents.**
2. **SAMPLING DATA: Indicate (by selecting the options below) known contaminants and the media which are known to have been affected. Data summary tables should be included as an attachment, with laboratory reports referenced and included.**

CONTAMINANT CATEGORY	SOIL	GROUNDWATER	SOIL GAS
Petroleum	☐	☐	☐
Chlorinated Solvents	☐	☐	☐
Other VOCs	☐	☐	☐
SVOCs	☐	☐	☐
Metals	☑	☐	☐
Pesticides	☐	☐	☐
PCBs	☐	☐	☐
PFAS	☐	☐	☐
1,4-dioxane	☐	☐	☐
Other – indicated below	☐	☐	☐

*Please describe other known contaminants and the media affected:

3. For each impacted medium above, include a site drawing indicating:
   - Sample location
   - Date of sampling event
   - Key contaminants and concentration detected
   - For soil, highlight exceedances of reasonably anticipated use
   - For groundwater, highlight exceedances of 6 NYCRR part 703.5
   - For soil gas/soil vapor/indoor air, refer to the NYS Department of Health matrix and highlight exceedances that require mitigation

These drawings are to be representative of all data being relied upon to determine if the site requires remediation under the BCP. Drawings should be no larger than 11"x17" and should only be provided electronically. These drawings should be prepared in accordance with any guidance provided.

Are the required drawings included with this application? ◉ YES ○ NO

4. Indicate Past Land Uses (check all that apply):

☐ Coal Gas Manufacturing	☑ Manufacturing	☐ Agricultural Co-Op	☐ Dry Cleaner
☐ Salvage Yard	☐ Bulk Plant	☐ Pipeline	☐ Service Station
☐ Landfill	☐ Tannery	☐ Electroplating	☐ Unknown

Other: Site C was used for industrial manufacturing, primarily dedicated to firearms production as part of the larger Remington Arms facility.

SECTION VII: Requestor Information			
NAME TURIN HOEFLER AVENUE LLC			
ADDRESS 69 MAIN STREET 2nd FLOOR			
CITY/TOWN SAG HARBOR	STATE NY	ZIP CODE 11963	
PHONE (914) 552-3316	EMAIL KRISTEN@TURINMANAGEMENT.COM		

	Y	N
1. Is the requestor authorized to conduct business in New York State (NYS)?	◉	○
2. If the requestor is a Corporation, LLC, LLP or other entity requiring authorization from the NYS DOS to conduct business in NYS, the requestor's name must appear, exactly as given above, in the *NYS Department of State's Corporation & Business Entity Database.* A print-out of entity information from the database must be submitted with this application to document that the requestor is authorized to conduct business in NYS. Is this attached?	◉	○
3. If the requestor is an LLC, a list of the names of the members/owners is required on a separate attachment. Is this attached? N/A ○	◉	○
4. Individuals that will be certifying BCP documents, as well as their employers, must meet the requirements of Section 1.5 of *DER-10: Technical Guidance for Site Investigation and Remediation* and Article 145 of New York State Education Law. Do all individuals that will be certifying documents meet these requirements? **Documents that are not properly certified will not be approved under the BCP.**	◉	○

SECTION VIII: Requestor Contact Information		
REQUESTOR'S REPRESENTATIVE KRISTEN O'NEILL		
ADDRESS 69 MAIN STREET 2ND FLOOR		
CITY SAG HARBOR	STATE NY	ZIP CODE 11963
PHONE (914) 552-3316	EMAIL KRISTEN@TURINMANAGEMENT.COM	
REQUESTOR'S CONSULTANT (CONTACT NAME) THOMAS SEGULJIC, PE.		
COMPANY HRP ASSOCIATES, INC		
ADDRESS 1 FAIRCHILD SQUARE,SUITE 110		
CITY CLIFTON PARK	STATE NY	ZIP CODE 12065
PHONE (518) 877-7101	EMAIL TOM.SEGULJIC@HRPASSOCIATES.com	
REQUESTOR'S ATTORNEY (CONTACT NAME) MICHAEL J. HECKER, ESQ.		
COMPANY HODGSON RUSS LLP		
ADDRESS 140 PEARL STREET, SUITE 100		
CITY BUFFALO	STATE NY	ZIP CODE 14202
PHONE (716) 848-1595	EMAIL MHECKER@HODGSONRUSS.COM	

SECTION IX: Program Fee		
Upon submission of an executed Brownfield Cleanup Agreement to the Department, the requestor is required to pay a non-refundable program fee of $50,000. Requestors may apply for a fee waiver with supporting documentation.		
	Y	**N**
1. Is the requestor applying for a fee waiver?	◉	○
2. If yes, appropriate documentation must be provided with the application. See application instructions for additional information. Is the appropriate documentation included with this application? N/A ○	◉	○

SECTION X: Requestor Eligibility		
If answering "yes" to any of the following questions, please provide appropriate explanation and/or documentation as an attachment.		
	Y	**N**
1. Are any enforcement actions pending against the requestor regarding this site?	○	◉
2. Is the requestor subject to an existing order for the investigation, removal or remediation of contamination at the site?	○	◉
3. Is the requestor subject to an outstanding claim by the Spill Fund for this site? Any questions regarding whether a party is subject to a spill claim should be discussed with the Spill Fund Administrator.	○	◉
4. Has the requestor been determined in an administrative, civil or criminal proceeding to be in violation of (i) any provision of the ECL Article 27; (ii) any order or determination; (iii) any regulation implementing Title 14; or (iv) any similar statute or regulation of the State or Federal government?	○	◉
5. Has the requestor previously been denied entry to the BCP? If so, please provide the site name, address, assigned DEC site number, the reason for denial, and any other relevant information regarding the denied application.	○	◉
6. Has the requestor been found in a civil proceeding to have committed a negligent or intentionally tortious act involving the handling, storing, treating, disposing or transporting of contaminants?	○	◉
7. Has the requestor been convicted of a criminal offence (i) involving the handling, storing, treating, disposing or transporting or contaminants; or (ii) that involved a violent felony, fraud, bribery, perjury, theft or offense against public administration (as that term is used in Article 195 of the Penal Law) under Federal law or the laws of any state?	○	◉
8. Has the requestor knowingly falsified statements or concealed material facts in any matter within the jurisdiction of DEC, or submitted a false statement or made use of a false statement in connection with any document or application submitted to DEC?	○	◉
9. Is the requestor an individual or entity of the type set forth in ECL 27-1407.9(f) that committed an act or failed to act, and such act or failure to act could be the basis for denial of a BCP application?	○	◉
10. Was the requestor's participation in any remedial program under DEC's oversight terminated by DEC or by a court for failure to substantially comply with an agreement or order?	○	◉
11. Are there any unregistered bulk storage tanks on-site which require registration?	○	◉

SECTION X: Requestor Eligibility (continued)

12. The requestor must certify that he/she/they is/are either a participant or volunteer in accordance with ECL 27-1405(1) by checking one of the boxes below:

PARTICIPANT ☐	VOLUNTEER ☑
A requestor who either (1) was the owner of the site at the time of the disposal of hazardous waste or discharge of petroleum, or (2) is otherwise a person responsible for the contamination, unless the liability arises solely as a result of ownership, operation of, or involvement with the site subsequent to the disposal of hazardous waste or discharge of petroleum.	A requestor other than a participant, including a requestor whose liability arises solely as a result of ownership, operation of or involvement with the site subsequent to the disposal of hazardous waste or discharge of petroleum. NOTE: By selecting this option, a requestor whose liability arises solely as a result of ownership, operation of or involvement with the site certifies that he/she has exercised appropriate care with respect to the hazardous waste found at the facility by taking reasonable steps to: (i) stop any continuing discharge; (ii) prevent any threatened future release; and, (iii) prevent or limit human, environmental or natural resource exposure to any previously released hazardous waste. **If a requestor whose liability arises solely as a result of ownership, operation of, or involvement with the site, submit a statement describing why you should be considered a volunteer – be specific as to the appropriate care taken.**

13. If the requestor is a volunteer, is a statement describing why the requestor should be considered a volunteer attached?

◉ Yes ○ No ○ N/A

14. Requestor relationship to the property (check one; if multiple applicants, check all that apply):

○ Previous Owner ◉ Current Owner ○ Potential/Future Purchaser ○ Other: _____

If the requestor is not the current owner, **proof of site access sufficient to complete remediation must be provided.** Proof must show that the requestor will have access to the property before signing the BCA and throughout the BCP project, including the ability to place an environmental easement on the site.

Is this proof attached? ○ Yes ○ No ◉ N/A

Note: A purchase contract or lease agreement does not suffice as proof of site access.

SECTION XI: Property Eligibility Information		
	Y	N
1. Is/was the property, or any portion of the property, listed on the National Priorities List? If yes, please provide additional information.	○	◉
2. Is/was the property, or any portion of the property, listed on the NYS Registry of Inactive Hazardous Waste Disposal Site pursuant to ECL 27-1305? If yes, please provide the DEC site number: _____ Class: _____	○	◉
3. Is/was the property subject to a permit under ECL Article 27, Title 9, other than an Interim Status facility? If yes, please provide: Permit Type: RCRA TSDF EPA ID Number: NYD002240638 Date Permit Issued: January 1985 Permit Expiration Date: Terminated 2003	◉	○
4. If the answer to question 2 or 3 above is *YES*, is the site owned by a volunteer as defined under ECL 27-1405(1)(b), or under contract to be transferred to a volunteer? If yes, attach any available information related to previous owners or operators of the facility or property and their financial viability, including any bankruptcy filings and corporate dissolution documents. N/A ○	◉	○
5. Is the property subject to a cleanup order under Navigation Law Article 12 or ECL Article 17 Title 10? If yes, please provide the order number: _____	○	◉
6. Is the property subject to a state or federal enforcement action related to hazardous waste or petroleum? If yes, please provide additional information as an attachment.	○	◉

SECTION XII: Site Contact List

To be considered complete, the application must include the Brownfield Site Contact List in accordance with *DER-23: Citizen Participation Handbook for Remedial Programs*. Please attach, at a minimum, the names and mailing addresses of the following:

- The chief executive officer and planning board chairperson of each county, city, town and village in which the property is located.
- Residents, owners, and occupants of the property and adjacent properties.
- Local news media from which the community typically obtains information.
- The public water supplier which services the area in which the property is located.
- Any person who has requested to be placed on the contact list.
- The administrator of any school or day care facility located on or near the property.
- The location of a document repository for the project (e.g., local library). **If the site is located in a city with a population of one million or more, add the appropriate community board as an additional document repository.** In addition, attach a copy of an acknowledgement from each repository indicating that it agrees to act as the document repository for the site.
- For sites located in the five counties comprising New York City, the Director of the Mayor's Office of Environmental Remediation.

SECTION XIII: Statement of Certification and Signatures

(By requestor who is an individual)

If this application is approved, I hereby acknowledge and agree: (1) to execute a Brownfield Cleanup Agreement (BCA) within 60 days of the date of DEC's approval letter; (2) to the general terms and conditions set forth in the *DER-32, Brownfield Cleanup Program Applications and Agreements*; and (3) that in the event of a conflict between the general terms and conditions of participation and terms contained in a site-specific BCA, the terms in the site-specific BCA shall control. Further, I hereby affirm that information provided on this form and its attachments is true and complete to the best of my knowledge and belief. I am aware that any false statement made herein is punishable as a Class A misdemeanor pursuant to section 210.45 of the Penal Law.

Date: _____ Signature: _____

Print Name: _____

(By a requestor other than an individual)

I hereby affirm that I am the CEO (title) of Turin Hoefler Avenue LLC (entity); that I am authorized by that entity to make this application and execute a Brownfield Cleanup Agreement (BCA) and all subsequent documents; that this application was prepared by me or under my supervision and direction. If this application is approved, I hereby acknowledge and agree: (1) to execute a Brownfield Cleanup Agreement (BCA) within 60 days of the date of DEC's approval letter; (2) to the general terms and conditions set forth in the *DER-32, Brownfield Cleanup Program Applications and Agreements*; and (3) that in the event of a conflict between the general terms and conditions of participation and terms contained in a site-specific BCA, the terms in the site-specific BCA shall control. Further, I hereby affirm that information provided on this form and its attachments is true and complete to the best of my knowledge and belief. I am aware that any false statement made herein is punishable as a Class A misdemeanor pursuant to section 210.45 of the Penal Law.

Date: 11/5/25 Signature: Kristen O'Neill

Print Name: Kristen O'Neill

PLEASE REFER TO THE APPLICATION COVER PAGE AND BCP APPLICATION INSTRUCTIONS FOR DETAILS OF PAPERLESS DIGITAL SUBMISSION REQUIREMENTS.

I. SECTION I: PROPERTY INFORMATION

PROPERTY DESCRIPTION NARRATIVE

LOCATION

Site C of the Remington Site is located in an urban area at 14 Hoefler Avenue, within the Town of German Flatts, Village of Ilion, Herkimer County, New York. It is situated approximately 0.2 miles northeast of the intersection of Otsego Street and East Clark Street. Site C encompasses 7.837 acres and part of parcel identified by the Herkimer County tax assessor as Parcel ID: 120.37-5-16.

SITE FEATURES

Site C includes 15 large, abandoned industrial buildings (see Table below), totaling approximately 171,413 ft^2 that were formerly part of the Remington Arms Facility. These buildings are surrounded by remnants of former parking areas and internal roadways. The Site fronts Otsego Street, where several retail businesses are currently located. While the majority of the Site is developed, a small portion includes vegetated areas along the perimeter.

Buildings on Site C			
Building	**Date of Construction**	**Size (sq. ft)**	**Notes**
Building 44	1968	2,100	Unused Chemical Storage Building, oil storage
Building 62	1975	2,000	Wastewater Treatment, Concrete foundations, steel frame, Butler type building, concrete floor.
Building 63	1975	3,750	Concrete foundations, steel frame, Butler type building, concrete floor.
Building 65	1986	16,721	Concrete foundation and floor; metal walls and steel frame. Eastern portion is part of Site D, the Western portion is part of Site C.
Building 66	1979	14,976	Concrete foundations, steel frame, concrete brick walls. Eastern portion is part of Site D; the Western portion is part of Site C.
Building 72	1916	24,960	Concrete foundation, brick and concrete block walls, steel frame, reinforced concrete floor.
Building 74	1977	11,916	Concrete foundations, steel frame, concrete block walls with brick facing, concrete floors.
Building 75	1916	Not provided	Not provided

Building 76	1916	52,845	Oil staining. Concrete foundation, brick walls, steel frame and concrete floor.
Building 77	1916	8,487	2,350-gallon holding tank. Concrete foundation, brick walls, steel frame and concrete floors.
Building 78	1916	13,488	Old Hot Forge Area; oil staining ('the swamp'). Concrete foundations, steel frame, brick walls, reinforced concrete floor.
Building 79	1977	8,606	Hazardous Waste Storage. Concrete foundations, concrete floors, concrete, block and brick walls.
Building 80	1916	9,000	Quench Bath. Reinforced concrete floors, earth fill, steel frame, brick walls, reinforced concrete floor
Building 81	1916	1,220	Concrete foundations, steel frame, brick walls, reinforced concrete floor
Building 89	1956	1,344	Concrete foundations, steel frame, brick walls, concrete floors

CURRENT ZONING AND LAND USE

Site C, currently vacant, is zoned as M1 Manufacturing District under municipal zoning regulations. Permitted uses within M-1 Manufacturing Districts include:

(1) Existing manufacturing;
(2) All uses not otherwise prohibited by law; and
(3) Junkyards or automobile wrecking yards or scrap iron, scrap paper or rag storage, sorting or baling, provided that they are conducted within a building or where entirely enclosed within a fence or by other means approved by the Board of Appeals.

Surrounding parcels include a vacant manufacturing lot to the north and retail business parcels to the west, with additional light industrial and commercial properties nearby. The nearest residential area is located approximately 0.2 miles southeast along East Clark Street.

PAST USE OF THE SITE

Until its closure, Site C was used for industrial manufacturing, primarily dedicated to firearms production as part of the larger Remington Arms facility. These structures are mainly constructed of brick and mortar, steel framing, and concrete slab foundations. Most of the buildings were reportedly built between 1914 and 1916, with additional construction occurring from the 1940s through the 1980s.

A Phase I ESA and two Phase II Site investigations were completed on the Site from 2024 to 2025. The investigations determined that due to the Site's historic industrial

development/use, contaminated fill materials are present across this Site, with widespread metals contamination in the fill materials. The fill is predominantly impacted with heavy metals including arsenic, lead and copper at concentrations exceeding NYSDEC Soil Cleanup Objectives for the proposed Site use.

No remediation activities have been completed at the Site.

SITE GEOLOGY

Soils

According to the United States Department of Agriculture Natural Conservation Service, soil at the Subject Property is defined as Herkimer gravelly silt loam, 0 to 3 percent slopes (77%), and Hartland-Agawam complex, 8 to 15 percent slopes (23%). Herkimer gravelly silt loam consists of loamy old alluvium derived from dark, calcareous shale, and varying amounts of sandstone and limestone, well-drained. Hartland Agawam complex consists of silty eolian or glaciolacustrine deposits, well-drained.

Previous Site investigations revealed the presence of fill materials at depths ranging from 0 to 35 (ft bg) across Site C. These materials are underlain by native fine to medium sands, silts, and clays.

Surficial Geology

According to the Surficial Geologic Map of New York, Hudson-Mohawk Sheet, Surficial Geology of the Subject Property is classified as outwash sand and gravel. Materials are characterized as coarse to fine gravel with sand from proglacial fluvial deposition, well rounded and stratified, generally with finer materials away from the ice border, with variable thickness of 2-20 meters.

Bedrock Geology

According to the Geologic Map of New York – Hudson-Mohawk Sheet, geology at the Subject Property consists of glacial and alluvial deposits, with unknown underlying bedrock, The depth to bedrock remains unknown, as prior borings were advanced to a maximum depth of 30 (ft bg) without encountering bedrock.

SITE HYDROGEOLOGY

Groundwater at Site C was observed at depths ranging from approximately 17 to 24 (ft bg) during the sitewide groundwater investigation. Groundwater flow is directed northward toward the Mohawk River. Site C contains one non-potable water supply well (WS-3), which was historically used for process water in manufacturing operations. WS-3 is approximately 110 feet deep and has a maximum withdrawal rate of 345 gallons per minute (gpm). Additionally, another non-potable water supply well (WS-1) is located on Site D. Potable water for the Site is provided by a public water system.

SITE TOPOGRAPHY

Site C and the surrounding area exhibit gentle topographic variation from the northern to southern, with elevations ranging from approximately 408 to 441 feet above mean sea level (AMSL). Regional topography generally slopes downward toward the north, with elevation gradually decreasing in the direction of the Mohawk River, which is located approximately 0.50 miles to the north and northeast of Site C.

ENVIRONMENTAL ASSESSMENT

Based upon prior and remedial investigations, the primary contaminants of concern for Site C include heavy metals.

Soil

Site C encompasses several industrial buildings, formerly part of the Remington Facility, raising concern for the presence of contaminants in the soil. The primary contaminants of concern are metals, particularly arsenic, copper and nickel, which were detected predominantly in shallow soil and fill materials across Site C. Arsenic was found at concentrations exceeding the Industrial Soil Cleanup Objectives (SCOs) in most samples, ranging from 17.4 mg/kg to 21.1 mg/kg. Copper was found at a concentration of 644 mg/kg and Nickel at 1140 mg/kg both exceeding the Commercial SCOs. Overall, contamination appears to be widespread in shallow soils, with concentrations of primary contaminants significantly above applicable SCOs, suggesting the need for remedial action focused on metals in surface and near-surface soils.

Overall, contamination appears to be widespread in shallow soils, with concentrations of primary contaminants significantly above applicable SCOs, suggesting the need for remedial action focused on metals in surface and near-surface soils.

Groundwater

Groundwater sampling conducted during the Phase II investigation in 2025 detected the presence of contaminants; however, none exceeded the New York State Class GA Groundwater Criteria.

II. SECTION II: PROJECT DESCRIPTION

QUESTION 1: The project will be starting at:

The project will enter the Brownfield Cleanup Program (BCP) at the Investigation Phase.

QUESTION 2: If a final RIR is included, does it meet the requirements in ECL Article 27-1415(2)?

Not applicable, a RIR is not included in the submission.

QUESTION 3: Have any draft work plans been submitted with the application?

No draft work plans are included within this submission.

QUESTION 4A: Please provide a short description of the overall project development, including a complete project schedule with all key BCP program milestones through issuance of the certificate of completion. Include DEC/DOH review times in the schedule (best efforts to review documents within 45 days pursuant to 6 NYCRR Part 375-3.6(b))?

The anticipated post-remediation use of Site C is Commercial, consisting of a 250,000 ft^2 (est.) data center. A conceptual model of it anticipated post remediation use is found in **Attachment A.** The estimated project schedule is outlined below:

Site C: Anticipated Project Schedule		
Item	**Date**	**Duration (Days)**
Submit application	11/03/2025	
NYSDEC Review and Public Comment	01/02/2026	60
Submit IRM Workplan	01/02/2026	
NYSDEC Review and Public Comment	03/03/2026	60
IRM Field Activities	08/30/2026	180
Submit RI Work Plan	02/02/2026	
NYSDEC Review and Public Comment	04/03/2026	60
RI Field Activities	09/30/2026	180
RI/AA Report	11/29/2026	60
NYSDEC Review and Public Comment	01/28/2027	60
Submit DRAFT FER, SMP	02/02/2027	
NYSDEC Review and Public Comment	04/03/2027	60
Submit Final FER. SMP	06/01/2027	
Certificate of Completion	11/01/2027	

QUESTION 4B: Please include in the project schedule the dates of any outside public or private funding source deadlines with the associated BCP milestones, e.g., NYC HPD or NYS HCR funding deadlines, or private funding interim milestones from loan documents, that depend on a particular BCP milestone such as a work plan or report approval, decision document issuance, etc.

At this stage, the only financing in place is an acquisition loan, which requires site development progress within five years. Currently, there are no external public or private funding deadlines associated to BCP milestones.

QUESTION 5-6: GREEN AND SUSTAINABLE REMEDIATION

QUESTION 5: Please provide a description of how Green and Sustainable Remediation will be evaluated and incorporated throughout the remedial phases of the project including Remedial Investigation, Remedial Design/Remedial Action, and Site Management and reporting efforts.

A description of the Green and Sustainable Remediation strategies is included in **Attachment B.**

QUESTION 6: If the project is proposed to start at the remediation stage (Section 2, Item 1, above), a climate change screening or vulnerability assessment must have been completed. Is this attached?

The project is proposed to start at the Remedial Investigation stage; therefore, no Climate Change Screening or vulnerability assessment is included.

III. SECTION III: ECOLOGICAL CONCERNS

There are no fish, wildlife, or ecological resources within a ½-mile radius of Site C. Additionally, there is no potential pathway for contamination to impact fish, wildlife, or ecological resources. No contaminants of ecological concern have been identified. A Fish and Wildlife Resources Impact Analysis (FWRIA) Part 1 is not included in the application, as it is not applicable. None of the conditions outlined in DER 10 Section 3.10.1 are present.

IV. SECTION IV: LAND USE FACTORS

ZONING AND CURRENT USE

Site C, currently vacant, is zoned as M1 Manufacturing District under municipal zoning regulations. Permitted uses within M-1 Manufacturing Districts include:

(1) Existing manufacturing;
(2) All uses not otherwise prohibited by law; and
(3) Junkyards or automobile wrecking yards or scrap iron, scrap paper or rag storage, sorting or baling, provided that they are conducted within a building or where entirely enclosed within a fence or by other means approved by the Board of Appeals.

RemArms closed on March 4, 2024, but physically vacated the Site in August 2025.

Until its closure, Site C was used for industrial manufacturing, primarily dedicated to firearms production as part of the larger Remington Arms facility. These structures are mainly constructed of brick and mortar, steel framing, and concrete slab foundations. Most of the buildings were reportedly built between 1914 and 1916, with additional construction occurring from the 1940s through the 1980s.

As a result of the site's historic industrial development/use, contaminated fill materials are present across this Site, with widespread metals contamination in the fill materials. The fill is predominantly impacted with heavy metals including arsenic, lead and copper at concentrations exceeding NYSDEC Soil Cleanup Objectives for the proposed Site use.

ANTICIPATED USE

The anticipated post-remediation use of the Site is Commercial. The development plan includes the construction of a 250,000 ft^2 (est.) datacenter that houses critical IT infrastructure, such as servers, storage systems, and networking equipment, to process, store, and manage an organization's data and applications. Datacenters are vital for business operations and include redundant systems for power, cooling, and connectivity, with modern data centers also utilizing virtualization and other advanced technologies.

RENEWABLE ENERGY FACILITY SITE

The post-remediation use of Site C is not proposed to be a renewable energy facility. The Site does not meet the definition of a "renewable energy facility site" as outlined in Section 66-p of the Public Service Law. Specifically, the Site will not be used for a renewable energy system, nor will it host any co-located energy storage systems associated with renewable energy generation. Therefore, no plans, documentation, or permits related to renewable energy development are applicable or included in this application.

COMPLIANCE WITH ZONING LAWS, RECENT DEVELOPMENT, AND COMMUNITY MASTER PLANS

QUESTION 8: Do current and/or recent development patterns support the proposed use?

The area surrounding Site C, which has been subjected to disinvestment since the 1970s, includes vacant manufacturing buildings to the north, residential parcels to the south and east, and retail business parcels to the west. The proposed reuse is consistent with the commercial use of the surrounding area and will provide investment and job investment to residents in the surrounding area.

QUESTION 9: Is the proposed use consistent with applicable zoning laws/maps? Please provide a brief explanation.

Site C, currently vacant, is zoned as M1 Manufacturing District under municipal zoning regulations. Permitted uses within M-1 Manufacturing Districts include:

(1) Existing manufacturing;
(2) All uses not otherwise prohibited by law; and
(3) Junkyards or automobile wrecking yards or scrap iron, scrap paper or rag storage, sorting or baling, provided that they are conducted within a building or where entirely enclosed within a fence or by other means approved by the Board of Appeals.

Surrounding parcels include a vacant manufacturing lot to the north and retail business parcels to the west, with additional light industrial and commercial properties nearby. These permitted uses are consistent with the planned datacenter redevelopment of Site C within the former Remington Arms Facility.

Question 10: Is the proposed use consistent with applicable comprehensive community master plans, local waterfront revitalization plans, or other adopted land use plans? Please provide a brief explanation. Include additional documentation if necessary.

The proposed redevelopment of Site C, located within the former Remington Arms Facility, is consistent with applicable comprehensive community master plans, as outlined in the draft Village of Ilion's Local Waterfront Revitalization Program (LWRP), and other adopted land use plans. The LWRP formally identifies the former Remington Arms facility, including Site C, as part of the designated waterfront revitalization study area, which encompasses approximately 963 acres and includes a diverse mix of industrial, residential, commercial, and recreational land uses. Notably, the LWRP states, "The proposed study area includes the Village's central commercial district, the Duofold industrial site and the Remington Arms factory," further affirming Site C's inclusion within the scope of planned revitalization efforts.

The overarching objectives of the LWRP include fostering economic development, enhancing public access and recreational use of the Mohawk River, and promoting sustainable and resilient land use practices. The redevelopment of Site C directly supports

these goals by facilitating the revitalization of historically industrial property and contributing to the broader vision for community renewal and waterfront enhancement.

The LWRP was developed through a comprehensive planning process that incorporated extensive public engagement, stakeholder consultation, and coordination with relevant regulatory agencies. This inclusive approach ensured that proposed land uses reflect both community priorities and environmental stewardship. Accordingly, the proposed reuse of Site C aligns with the strategic land use policies and revitalization initiatives articulated in the LWRP **(Attachment C)**.

The proposed Site reuse, which is consistent with the applicable community plans, has been presented at public meetings and has received positive comments from the public.

V. SECTION V: CURRENT AND HISTORICAL PROPERTY OWNER AND OPERATOR

OWNER INFORMATION

The current owner of Site C is Turin Hoefler Avenue LLC. Ownership of Site C was transferred to Turin Hoefler Avenue LLC on June 20, 2025.

Turin Hoefler Avenue LLC is the sole owner of the entire Site C of the Remington Site. Since the requestor is the current owner, no additional relationship disclosure is required. There are no other parties holding an interest in the property.

OPERATOR INFORMATION

There are currently no active operations being conducted at the Site. All buildings located on the property are vacant, and no operators are utilizing the property at this time.

HISTORICAL OWNERS AND OPERATORS

Provided below is a list of previous operators, including dates of ownership or operation and last-known addresses and phone numbers. In addition, the requestor's relationship with each previous owner and operator is described below including requestor's relationship to current and historical owners and operators, and any relationship between the requestor's corporate members and the previous owners and operators.

Historical Owners / Operators			
Owner/Operator	Ownership Period / Acquisition Date	Notes	Contact Information
Eliphalet Remington II	Founded in 1816	Established as E. Remington & Sons in Ilion, NY	Not applicable
Marcellus Hartley and Partners	Acquired on March 7, 1888	Renamed company to Remington Arms Company	Not applicable
DuPont	Acquired in ~ 1933	Purchased during the Great Depression era	Phone: 833-338-7668
Cerberus Capital Management	Acquired in June 2007		Email: info@cerberus.com Phone: +1-212-891-2100
Roundhill Group LLC	Acquired the Remington firearms business on October 12, 2020	Operated under RemArms, LLC	Email: info@remarms.com Phone: 844-736-2767

Turin Hoefler Avenue LLC has no known relationship with the former owner, Roundhill Group, LLC, or any previous operators of the property.

VI. SECTION VI: PROPERTY'S ENVIRONMENTAL HISTORY

Site C is a proposed brownfield site at which contaminants are present at levels exceeding the soil cleanup objectives and environmental standards, criteria and guidance adopted by the NYSDEC, and which are applicable based on the anticipated use of the property. Data including Site drawings (**Figure 1 and 2)** and data summary tables **(Tables 2)** are provided separately as attachments to this BCP application form. The previous Site investigations are included in **Appendices A through C.**

VII. SECTION VII: REQUESTOR INFORMATION

REQUESTOR NAME

The entity requesting participation in the BCP is Turin Hoefler Avenue LLC, a New York State registered Limited Liability Company (DOS ID: 7583010). Entity information from the NYS Department of State's Corporation and Business Entity Database is included in **Attachment D.**

REQUESTOR CONTACT INFORMATION

The requestor, Kristen O'Neill, is affiliated with Turin Hoefler Avenue LLC and can be contacted at 69 Main Street, 2nd Floor, Sag Harbor, NY 11963, United States. The requestor's phone number is (914) 552-3316 and their email is kristen@turinmanagement.com.

LLC INFORMATION

An organizational chart mentioning the members/owners of Turin Hoefler Avenue LLC is provided in **Attachment E.**

DOCUMENT CERTIFICATION

All individuals who will be certifying Brownfield Cleanup Program (BCP) documents, as well as their employers, will meet the requirements of Section 1.5 of DER-10: Technical Guidance for Site Investigation and Remediation and Article 145 of New York State Education Law.

VIII. SECTION VIII: REQUESTOR CONTACT INFORMATION

REQUESTOR'S REPRESENTATIVE

The authorized representative for the requestor is Kristen O'Neill, who will serve as the primary contact for all correspondence, notices, and invoicing related to the Brownfield Cleanup Agreement (BCA). Kristen O'Neill is affiliated with Turin Hoefler Avenue LLC and can be reached at 69 Main Street, 2nd Floor, Sag Harbor, NY 11963. Her phone number is (914) 552-3316, and her email address is kristen@turinmanagement.com.

REQUESTOR'S CONSULTANT AND REQUESTOR'S ATTORNEY

The consultant for the requestor is:

Thomas Seguljic PE., PG.
Principal
HRP Associates, Inc.
Fairchild Square, Suite 110
Clifton Park, NY 12065
(518) 877-7101
tom.seguljic@hrpassociates.com

The attorney for the requestor:

Micheal Hecker, Esq
Hodgson Russ
The Guaranty Building
140 Pearl Street, Suite 100
Buffalo, NY 14202
(716) 848-1599
mhecker@hodgsonruss.com

IX. SECTION IX: PROGRAM FEE

The requester is seeking a waiver of the $50,000 BCP application fee for Site C; please see **Attachment F** for the waiver request.

X. SECTION X: REQUESTOR ELIGIBILITY

VOLUNTEER STATEMENT

Turin Hoefler Avenue LLC requests consideration for volunteer status under the BCP. The requestor's liability arises solely from property ownership acquired after the discharge of contaminants occurred at the Site.

Turin Hoefler Avenue LLC purchased the property located at 14 Hoefler Avenue, Ilion, NY, finalized on June 20, 2025, at which time contamination was already present due to historical industrial operations by prior owners. The requestor was not involved in the operations or disposal activities that led to the contamination and has no prior or current responsibility relating to Site ownership or operations.

Turin Hoefler Avenue LLC is applying to the BCP as a volunteer and has committed to addressing environmental impacts associated with the Site. The company intends to remediate the property in accordance with the restricted residential soil cleanup objective standards as part of its ownership and redevelopment efforts. Upon NYSDEC approval of entry into the BCP, Turin Hoefler Avenue LLC will proceed with the planned Site development while concurrently addressing Site contamination in accordance with BCP requirements.

PROOF OF SITE ACCESS

This requirement is not applicable, as Turin Hoefler Avenue LLC is the current owner of Site C.

XI. SECTION XI: PROPERTY ELIGIBILITY INFORMATION

CERCLA/NPL LISTING

Has any portion of the property ever been listed on the National Priorities List (NPL) established under CERCLA? If so, provide relevant information.

Site C has not been listed on the National Priorities List (NPL) established under CERCLA.

REGISTRY LISTING

Has any portion of the property ever been listed on the New York State Registry of Inactive Hazardous Waste Disposal Sites established under ECL 27-1305? If so, please provide the site number and classification. See the Division of Environmental Remediation (DER) for a database of sites with classifications.

Site C has not been listed on the New York State Registry of Inactive Hazardous Waste Disposal Sites established under ECL 27-1305. As this designation is not applicable, no Site number or classification has been provided.

RCRA LISTING

Does the property have a Resource Conservation and Recovery Act (RCRA) TSDF Permit in accordance with the ECL 27-0900 et seq? If so, please provide the EPA Identification Number, the date the permit was issued, and its expiration date. Note: for purposes of this application, interim status facilities are not deemed to be subject to a RCRA permit.

A former Site operator, Remington Arms Company Inc. was issued a TSDF Permit (NYD 002240638) in January 1985 for treatment of cyanide in wastewater and storage of hazardous wastes. In 2000, Remington closed its permitted storage facility and began using a less than 90-day hazardous waste storage area. In 2003, based on the change in facility operations, and on completion of corrective action groundwater monitoring requirements, the Part 373 hazardous waste management permit was terminated. The Permit was terminated in 2003 and the Site notified EPA for a change in status for less than 90-day storage of hazardous waste.

REGISTRY / RCRA SITES OWNED BY VOLUNTEERS

QUESTION 2. Is/was the property, or any portion of the property, listed on the NYS Registry of Inactive Hazardous Waste Disposal Site pursuant to ECL 27-1305

The property was not listed on the NYS Registry of Inactive Hazardous Waste Disposal Site pursuant to ECL 27-1305.

QUESTION 3. Is/was the property subject to a permit under ECL Article 27, Title 9, other than an Interim Status facility?

The Property maintained a TSDF permit that was closed in 2003, please see detail prior to this section.

If the answer to question 2 or 3 above is yes, is the site owned by a volunteer as defined under ECL 27- 1405(1)(b), or under contract to be transferred to a volunteer? Attach any information available to the requestor related to previous owners or operators of the facility or property and their financial viability, including any bankruptcy filing and corporate dissolution documentation.

The requestor, Turin Hoefler Avenue LLC (Turin), meets the definition of a volunteer under ECL Article 27, Title 9. Turin requested the previous owner, Roundhill Group LLC remove all hazardous materials prior to the property transfer. In addition, Turin Hoefler Avenue LLC conducted Phase I and Phase II environmental assessments prior to acquisition.

EXISTING ORDER

Is the property subject to an order for cleanup under Article 12 of the Navigation Law or Article 17 Title 10 of the ECL? If so, please provide information on an attachment. Note: if the property is subject to a stipulation agreement, relevant information should be provided; however, property will not be deemed ineligible solely on the basis of the stipulation agreement.

The property is not subject to an order for cleanup under Article 12 of the Navigation Law or Article 17 Title 10 of the Environmental Conservation Law.

PENDING ENFORCEMENT ACTIONS

Is the property subject to an enforcement action under Article 27, Titles 7 or 9 of the ECL or subject to any other ongoing state or federal enforcement action related to the contamination which is at or emanating from the property? If so, please provide information as an attachment.

Based on due diligence completed and discussions with DEC representatives, the Owner is not aware of enforcement action under Article 27, Titles 7 or 9 of the Environmental Conservation Law (ECL) or subject to another ongoing state or federal enforcement action related to hazardous waste or petroleum at or emanating from the property.

XII. SECTION XII: SITE CONTACT LIST

LOCAL GOVERNMENT OFFICIALS		
Jurisdiction	**Name**	**Title**
Village of Ilion	Alan Robinson	Chairperson, Zoning Board of Appeals
Village of Ilion	John P. Stevens	Village Mayor
Village of Ilion	Kari A. Allen	Deputy Mayor and Village Trustee
Town of German Flatts	Hon. L. Peter Rovazzi	Town Board Supervisor
Town of German Flatts	Justin H. Dibble	Town Councilman
Town of German Flatts	Scott Hendrix	Town Councilman
Town of German Flatts	Michale Stone	Town Councilman
Town of German Flatts	Pandora "Penny" Watkins	Town Councilwoman
County of Herkimer	Peter J. Campione	Herkimer County Chairman
County of Herkimer	John J. Piseck	Herkimer IDA CEO
County of Herkimer	John Kent, Jr.	Planning Agency Program Director
County of Herkimer	Robert Hoyt	Herkimer Democratic Commissioner
County of Herkimer	Teresa L. Robotham	Herkimer Republican Commissioner

Residents, owners, occupants of property and adjacent properties-
-Provided as **Table 1**

LOCAL NEWS MEDIA		
Media Outlet	**Address**	**Phone Number**
WKTV Television Station	5936 Smith Hill Rd, Utica, NY 13502-6520	(315) 793-3475
WFXV Television Station	5956 Smith Hill Rd, Utica	(315) 272-1322
Northeast Gospel Broadcasting	1017 Higby Rd, New Hartford, NY 13413	(315) 793-9882
WVVC TV	1017 Higby Rd, New Hartford, NY 13413	(315) 792-9882
KISS-FM	Canal Park 215 Leland Ave Ste 101, Utica, NY 13502	(315) 734-9245
WPNR	1600 Burrstone Rd, Utica NY 13502-4857	(315) 792-3062
WSKU	185 Genesee St, Utica, NY 13501	(315) 733-5477
MIX 102.5	520 Seneca St Ste 101, Utica, NY 13502	(315) 721-0102
92.7 The Drive	1900 Genesee St Ste 302, Utica, NY 13502	(315) 889-8088

SUPPLIER OF POTABLE WATER		
Name	**Address**	**Phone Number**
Ilion Water Department	49 Morgan St, Ste 3, Ilion NY 13357	(315) 895-7711

Catskill Spring Water Inc.	216 Seward Ave, Utica NY 13502	(800) 801-1158

NEARBY SCHOOLS AND DAYCARE		
Name	**Address**	**Phone Number**
Laugh Learn & Play Child Care	121 Central Ave, Ilion, NY 13357	(315) 868-9844
A to Z Daycare	101 W Clark St, Ilion, NY 13357	(315) 894-5593
Mohawk Valley Daycare Center	285 W Main St, Ilion, NY 13357	(315) 894-3771
Remington Elementary School	77 E North St, Ilion, NY 13357-1269	(315) 895-7729
Central Valley Academy	111 Frederick St, Ilion, NY 13357	(315) 895-7471
Barringer Road Elementary School	326 Barringer Rd, Ilion, NY 13357	(315) 894-8420

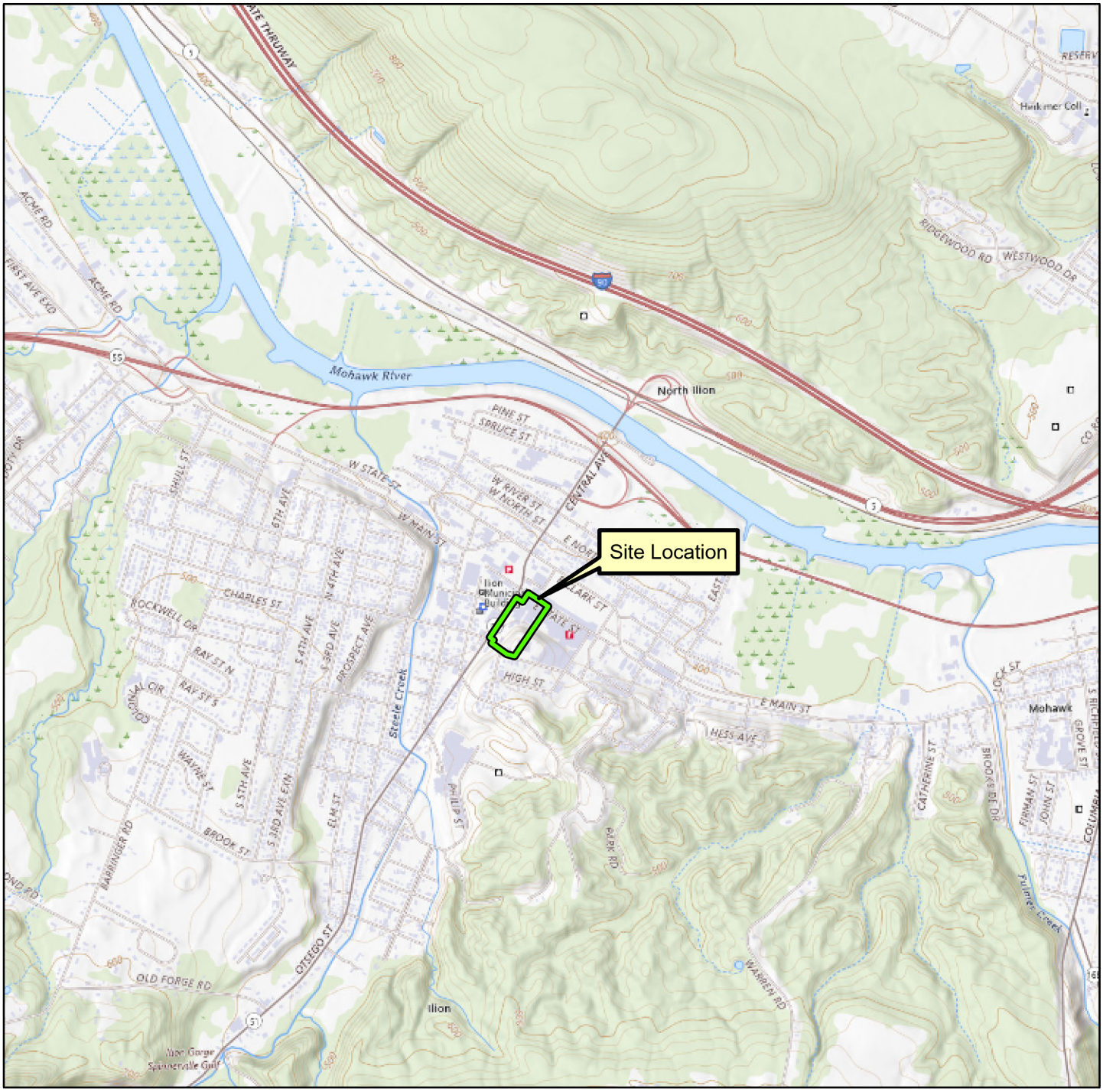
Letter(s) from repositories acknowledging their acceptance to act as a document repository for the proposed BCP project are provided as **Attachment G**.

DOCUMENT REPOSITORY			
Repository Name	**Address**	**Phone Number**	**Website**
Herkimer County IDA	420 East German Street, Ste 101A, Herkimer NY 13350	(315) 866-3000	www.herkimercountyida.org

XIII. SECTION XIII: STATEMENT OF CERTIFICATION AND SIGNATURES

Kristen O'Neill, Chief Executive Officer of Turin Hoefler Avenue LLC, has signed the application as the authorized representative of the requestor. The entity name appears exactly as registered in the NYS Department of State's Corporation and Business Entity Database. No consultant or attorney has signed the application, and there are no additional requestors involved in the submission.

FIGURES



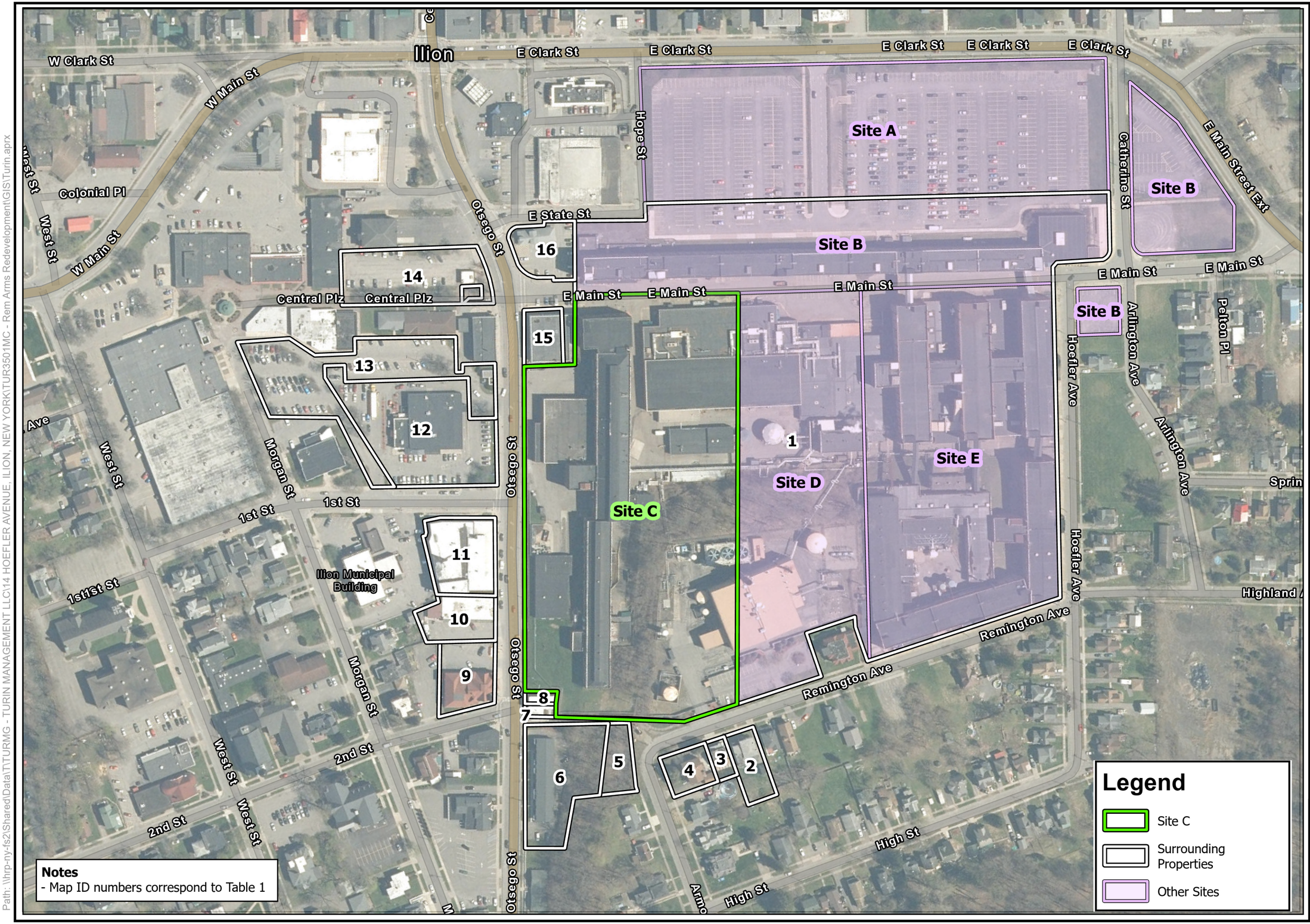
N

USGS Quadrangle Information
Quad ID: 42075-F6
Name: Ilion, New York
Date Rev: 2016
Date Pub: 2019

Figure 1
Site Location
The Remington Site C
14 Hoefler Avenue
Ilion, New York
HRP # TUR3502.P2
Scale 1" = 2,000

HRP
MOVE YOUR ENVIRONMENT FORWARD
ONE FAIRCHILD SQUARE
SUITE 110
CLIFTON PARK, NY 12065
(518) 877-7101
HRPASSOCIATES.COM

Path: \\hrp-ny-fs2\Shared\Data\T\TURMG - TURIN MANAGEMENT LLC\14 HOEFLER AVENUE, ILION, NEW YORK\TUR3501MC - Rem Arms Redevelopment\GIS\Turin.aprx



Path: \\hrp-ny-fs2\Shared\Data\T\TURMG - TURIN MANAGEMENT LLC\14 HOEFLER AVENUE, ILION, NEW YORK\TUR3501MC - Rem Arms Redevelopment\GIS\Turin.aprx

HRP
MOVE YOUR ENVIRONMENT FORWARD
197 SCOTT SWAMP ROAD
FARMINGTON, CT 06032
(860) 674-9570
HRPASSOCIATES.COM

North

0 90 180 Feet

Revisions					
No.	Date				

Designed By:	Drawn By:	Reviewed By:
EY	EY	DRAFT

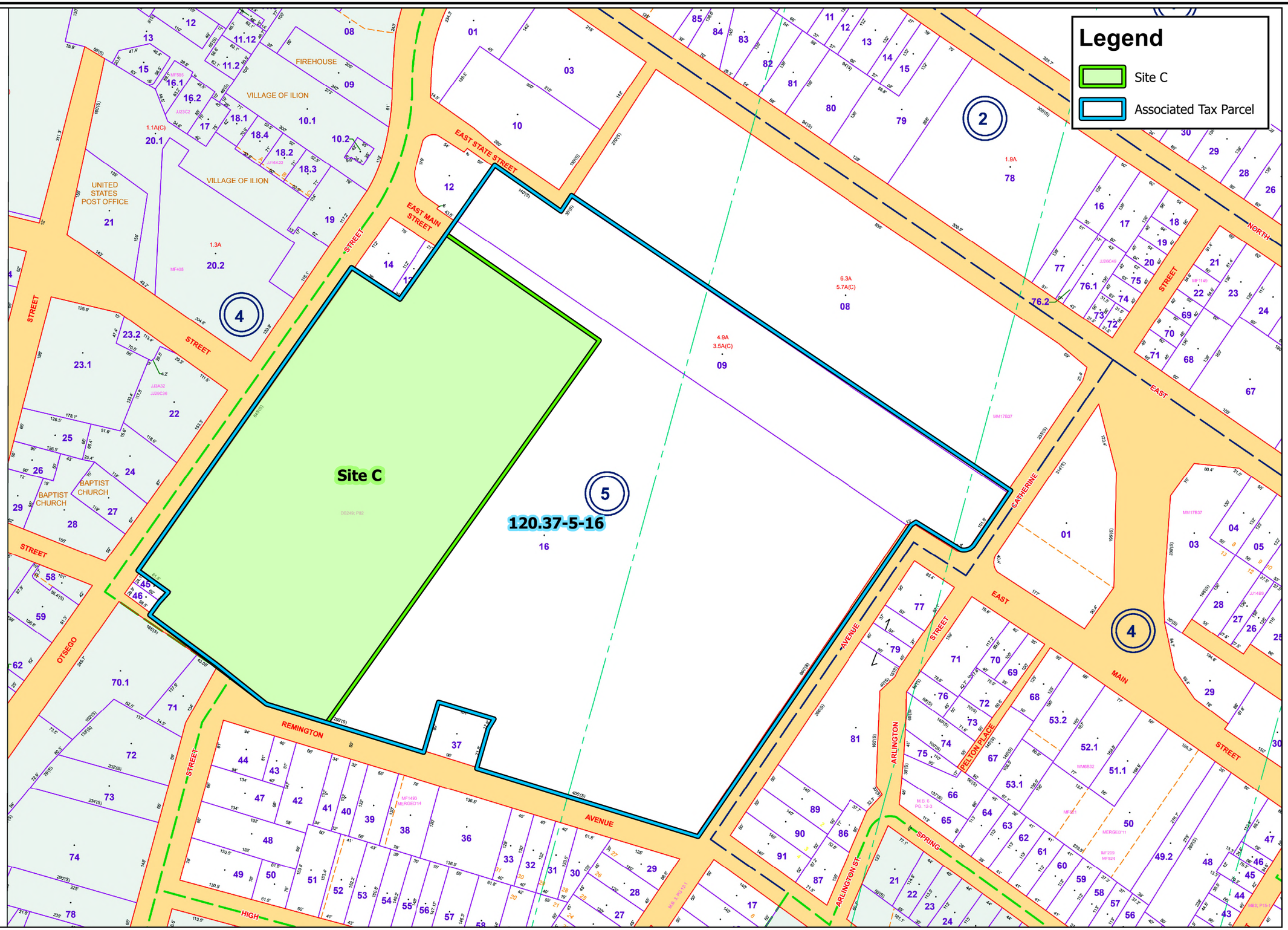
Issue Date:	Project No:	Sheet Size:
10/24/2025	TUR3502.P2	11x17

Surrounding Properties

The Remington Site C
14 Hoefler Avenue
Ilion, New York

Figure No.

2



HRP
MOVE YOUR ENVIRONMENT FORWARD
197 SCOTT SWAMP ROAD
FARMINGTON, CT 06032
(860) 674-9570
HRPASSOCIATES.COM

North

0 80 160
Feet

Revisions						
No.	Date					

Designed By:	Drawn By:	Reviewed By:
CMS	EY	MEW

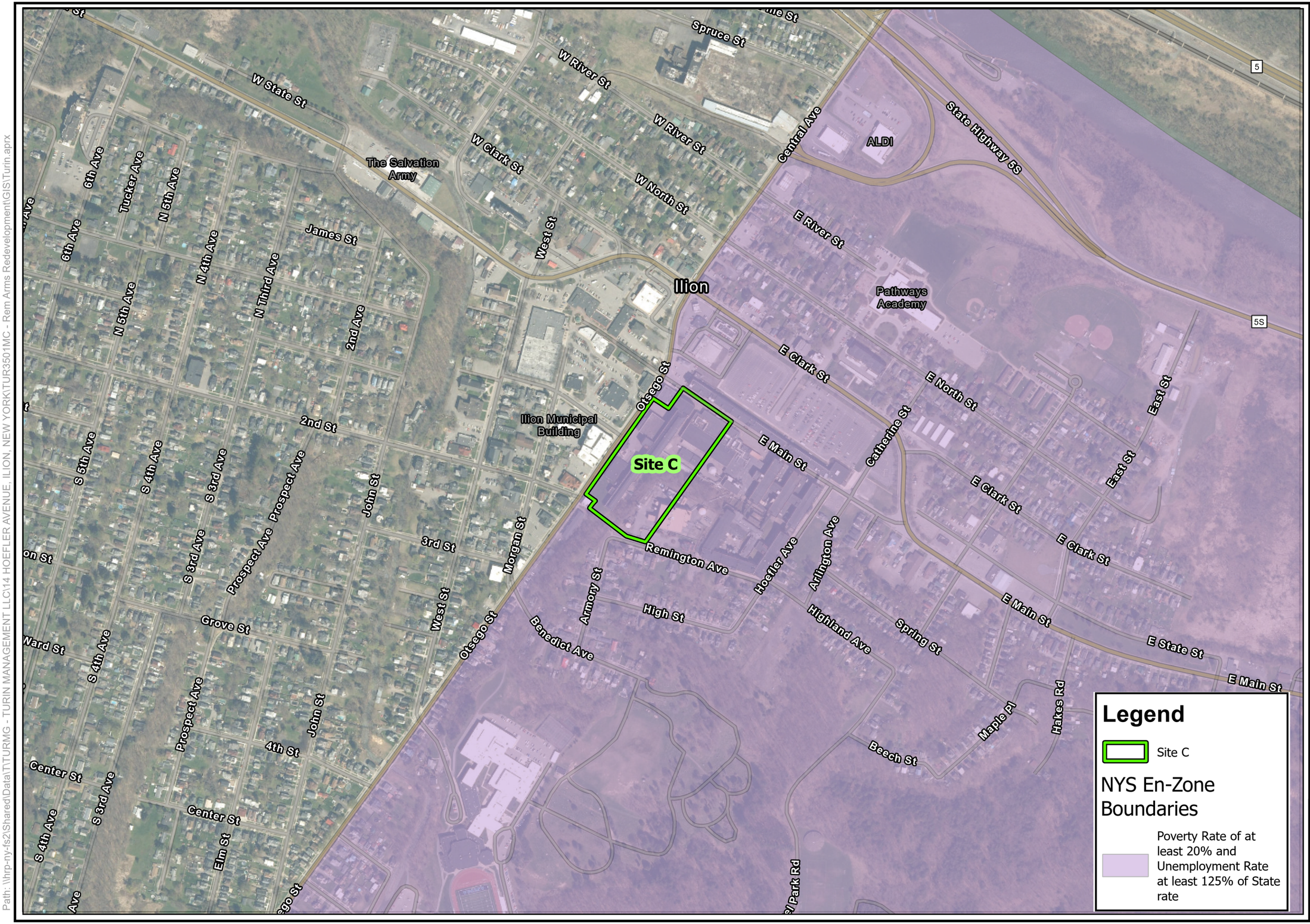
Issue Date:	Project No:	Sheet Size:
12/10/2025	TUR3502.P2	11x17

Tax Map

The Remington Site C
14 Hoefler Avenue
Ilion, New York

Figure No.
3

Path: S:\Data\TTURMG - TURIN MANAGEMENT LLC\14 HOEFLER AVENUE, ILION, NEW YORK\TUR3501MC - Rem Arms Redevelopment\GIS\Turin.aprx



HRP
MOVE YOUR ENVIRONMENT FORWARD
197 SCOTT SWAMP ROAD
FARMINGTON, CT 06032
(860) 674-9570
HRPASSOCIATES.COM

North

0 250 500 Feet

Revisions						
No.	Date					

Designed By:	Drawn By:	Reviewed By:
EY	EY	DRAFT

Issue Date:	Project No:	Sheet Size:
10/24/2025	TUR3502.P2	11x17

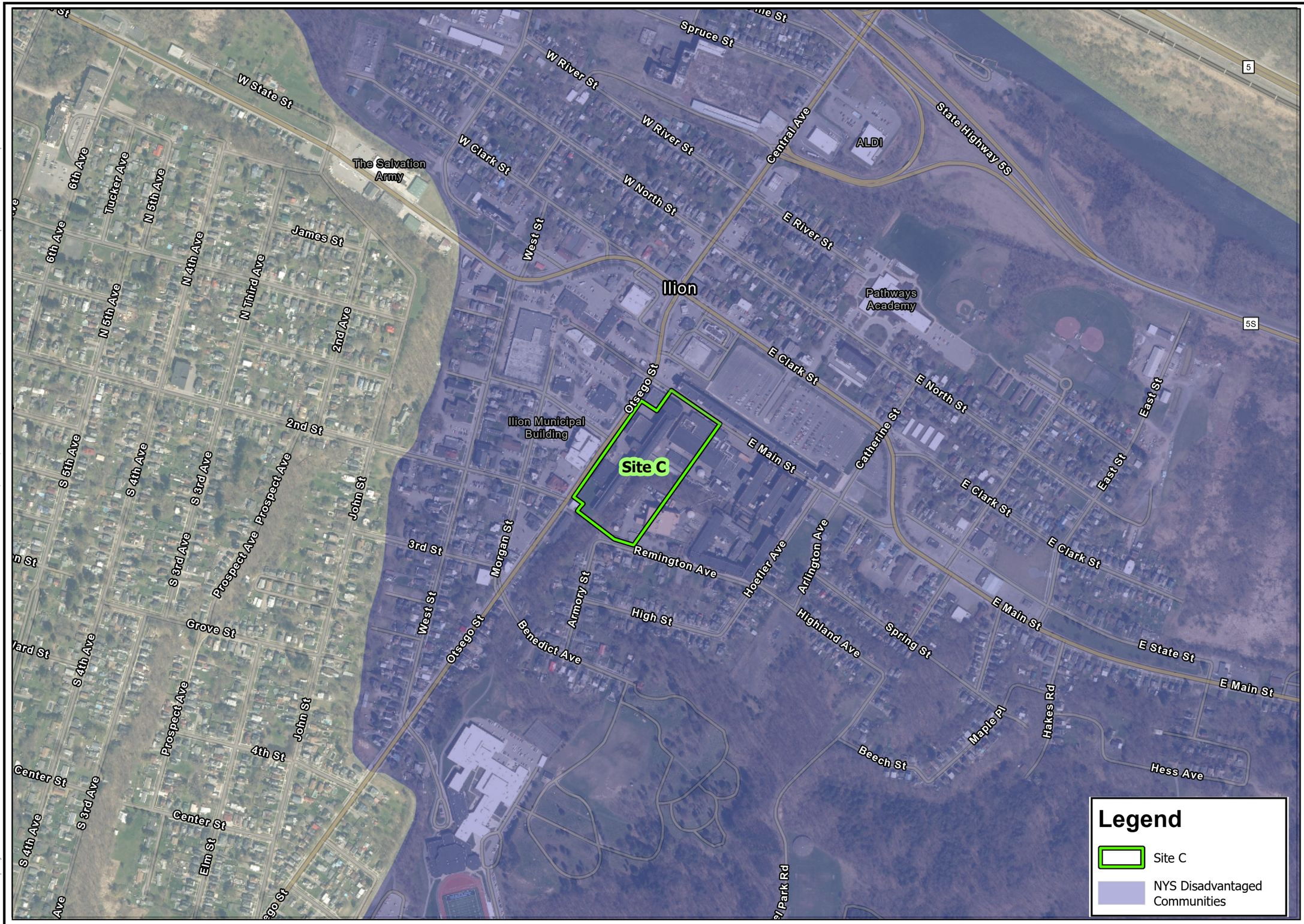
New York State En-Zone Map

The Remington Site C
14 Hoefler Avenue
Ilion, New York

Figure No.

4

Path: \\hrp-ny-fs2\Shared\Data\TI\TURMG - TURIN MANAGEMENT LLC\14 HOEFLER AVENUE, ILION, NEW YORK\TUR3501MC - Rem Arms Redevelopment\GIS\Turin.aprx



HRP
MOVE YOUR ENVIRONMENT FORWARD
197 SCOTT SWAMP ROAD
FARMINGTON, CT 06032
(860) 674-9570
HRPASSOCIATES.COM

North

0 250 500 Feet

Revisions						
No.						
Date						

Designed By:	Drawn By:	Reviewed By:
EY	EY	DRAFT

Issue Date:	Project No:	Sheet Size:
10/24/2025	TUR3502.P2	11x17

New York State Disadvantaged Communities

The Remington Site C
14 Hoefler Avenue
Ilion, New York

Figure No.

5

Path: \\hrp-ny-fs2\Shared\Data\T\TURMG - TURIN MANAGEMENT LLC\14 HOEFLER AVENUE, ILION, NEW YORK\TUR3501MC - Rem Arms Redevelopment\GIS\Turin.aprx

	Part 375 Commercial	Part 375 Industrial
Metals (mg/kg)		
Arsenic	16	16
Copper	280	10000
Lead	1000	3900

Legend	
<1	Parameter not detected above the laboratory reporting limit
1	Parameter reported above the laboratory reporting limit but below the applicable regulatory standard/criterion
1	Parameter reported at a concentration greater than Part 375 Commercial SCOs
1	Parameter reported at a concentration greater than Part 375 Industrial SCOs

Notes:
ft bg = feet below grade
mg/kg = milligrams per kilogram
SCO = Soil Cleanup Objective

Sample ID	HRP-SB-29
Date Collected	9/4/2024
Sample Depth (ft bg)	1-4
Metals (mg/kg)	
Copper	**644**
Lead	**1140**

Sample ID	HRP-SB-30
Date Collected	9/3/2024
Sample Depth (ft bg)	4-6
Metals (mg/kg)	
Arsenic	**17.4**

Sample ID	HRP-SB-60
Date Collected	9/3/2024
Sample Depth (ft bg)	3-6
Metals (mg/kg)	
Arsenic	**21.1**

SB-22
HRP-SB-27
SB-24
HRP-SB-30
HRP-SB-60
HRP-SB-29
Site C
SB-25
HRP-SB-62
HRP-SB-61
SB-26

Legend
- Site C
- P/O 120.37-5-16
- HRP Soil Boring
- HGL Soil Boring

HRP
MOVE YOUR ENVIRONMENT FORWARD
197 SCOTT SWAMP ROAD
FARMINGTON, CT 06032
(860) 674-9570
HRPASSOCIATES.COM

North

0 75 150
Feet

Revisions						
No.						
Date						

Designed By: EY
Drawn By: EY
Reviewed By: CSG

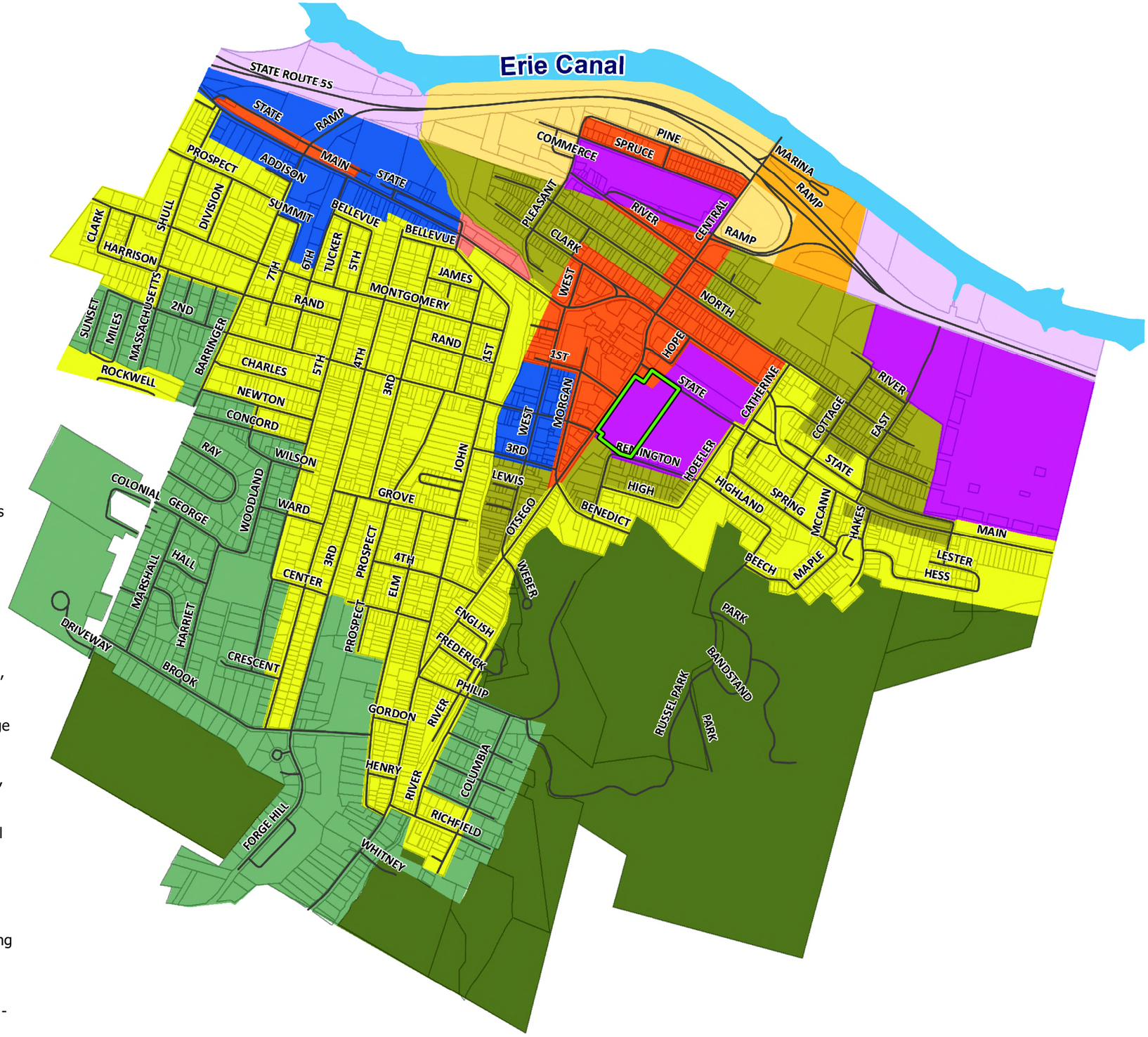
Issue Date: 10/24/2025
Project No: TUR3502.P2
Sheet Size: 11x17

Soil Analytical Results Exceedances Over Part 375 Commercial Use SCO

The Remington Site C
14 Hoefler Avenue
Ilion, New York

Figure No.
6

Path: \\hrp-ny-fs2.hrp.local\shared\Data\TURMG - TURIN MANAGEMENT LLC\14 HOEFLER AVENUE, ILION, NEW YORK\TUR3501MC - Rem Arms Redevelopment\GIS\Turin.aprx



Legend

- Site C
- R-3 Residence - Multiple family dwellings
- R-6 Residence - 2-family dwellings
- R-10 Residence - 1 family residences
- Residence Agricultural - 1- or 2-famiy dwellings, farms
- B-1 Retail Business - Existing residences, retail stores and shops
- B-2 General Business - Wholesale storage and warehouses, light manufacturing
- M-1 Manufacturing - Existing residences, existing manufacturing
- OP Office and Professional - Professional offices, hospitals
- PDR Planned Development Residential - Family dwellings
- PDM Planned Development Manufacturing - Light manufacturing, development centers
- PRD Planned Recreational Development - Commercial recreation

HRP
MOVE YOUR ENVIRONMENT FORWARD
197 SCOTT SWAMP ROAD
FARMINGTON, CT 06032
(860) 674-9570
HRPASSOCIATES.COM

North

0 525 1,050
Feet

Revisions					
No.	Date				

Designed By: EY	Drawn By: EY	Reviewed By: DRAFT
Issue Date: 10/24/2025	Project No: TUR3502.P2	Sheet Size: 11x17

Ilion Zoning Map

The Remington Site C
14 Hoefler Avenue
Ilion, New York

Figure No.

7

Path: \\hrp-ny-fs2\Shared\Data\TUR\MG - TURIN MANAGEMENT LLC\14 HOEFLER AVENUE, ILION, NEW YORK\TUR3501MC - Rem Arms Redevelopment\GIS\Turin.aprx

TABLES

Table 1
Surrounding Property Owners and Addresses
The Remington Site C
14 Hoefler Avenue, Ilion, NY

Map ID	Property Address	Property Owner	Property Owner Address	SBL
1	E Main St	Turin Hoefler Avenue LLC	69 Main St Fl 2 Sag Harbor, NY 11963	120.37-5-16
2	14 Remington Ave	Barry D VanAlstine Tara M VanAlstine	14 Remington Ave Ilion, NY 13357	120.37-5-42
3	10 Remington Ave	Debra Van Nort	10 Remington Ave Ilion, NY 13357	120.37-5-43
4	46 Armory St	Peter Macri Evelynn Macri	46 Armory St Ilion, NY 13357	120.37-5-44
5	51 Armory St	Florence Johnson Sean Conroy	37 Armory St Ilion, NY 13357	119.44-4-71
6	91-95 Otsego St	Mohawk Valley Holdings LLC	59 Royal Oak Cir Grand Island, NY 14072	119.44-4-70.1
7	85 Otsego St	85 Otsego Street, LLC	85 Otsego St Ilion, NY 13357	120.37-5-46
8	83 Otsego St	85 Otsego Street, LLC	85 Otsego St Ilion, NY 13357	120.37-5-45
9	78 Otsego St	River Valley Church	8 Second St Ilion, NY 13357	119.44-4-27
10	68 Otsego St	Robert McDowell Julie McDowell	1494 Barringer Rd Ilion, NY 13357	119.44-4-24
11	54-66 Otsego St	Doolen Realty Inc	P.O. Box 5 Ilion, NY 13357	119.44-4-22
12	40-42 First St	Valmer Development LLC	24 Maple St Marcellus, NY 13108	119.44-4-20.2
13	Central Plz	Ilion Village	Morgan St Ilion, NY 13357	119.44-4-20.1
14	Central Plz	Ilion Village	Morgan St Ilion, NY 13357	119.44-4-10.1
15	2-8 Main St	Cosenza Prop Managmt LLC	P.O. Box 39 E Williston, NY 11596	120.37-5-14
16	10 Central Ave	Steven Pardi Colleen Pardi	2600 Suites Ave Blossvale, NY 13308	120.37-5-12

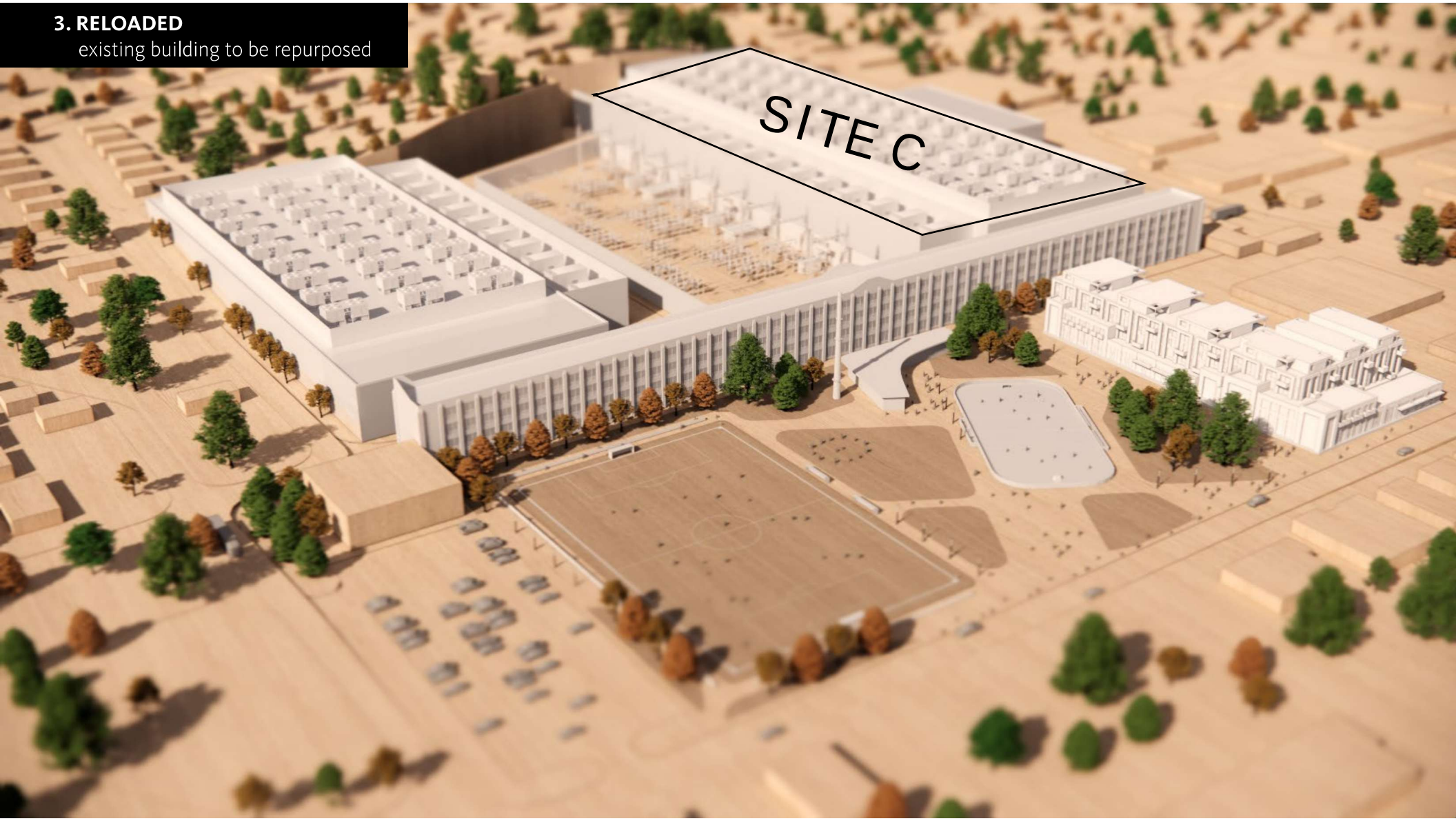
Table 2
Soil Analytical Results
Exceedances Over Part 375 Commercial Use Soil Cleanup Objective
The Remington Site C
14 Hoefler Avenue, Illion, New York

Analytes > CU SCOs	Detections > CU SCOs	Maximum Detection (ppm)	CU SCO (ppm)	Depth (ft bg)
Metals				
Arsenic	2	21.1	16	3-6
Copper	1	644	280	1-4
Lead	1	1140	1000	1-4

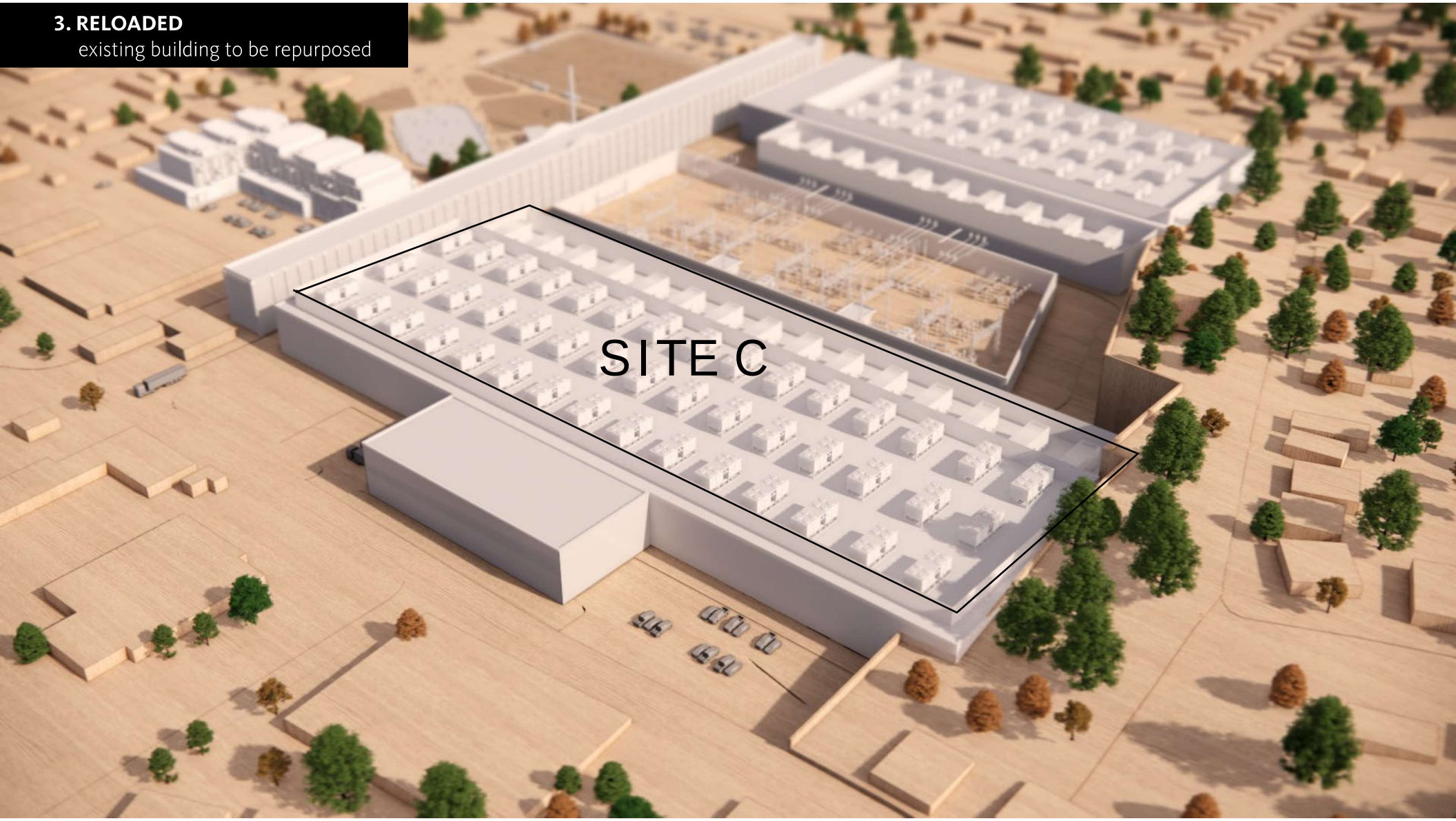
Notes
CU SCO = Commercial Use Soil Cleanup Objective
ppm = parts per million
ft bg = feet below grade

ATTACHMENT A
Conceptual Project Development Plan

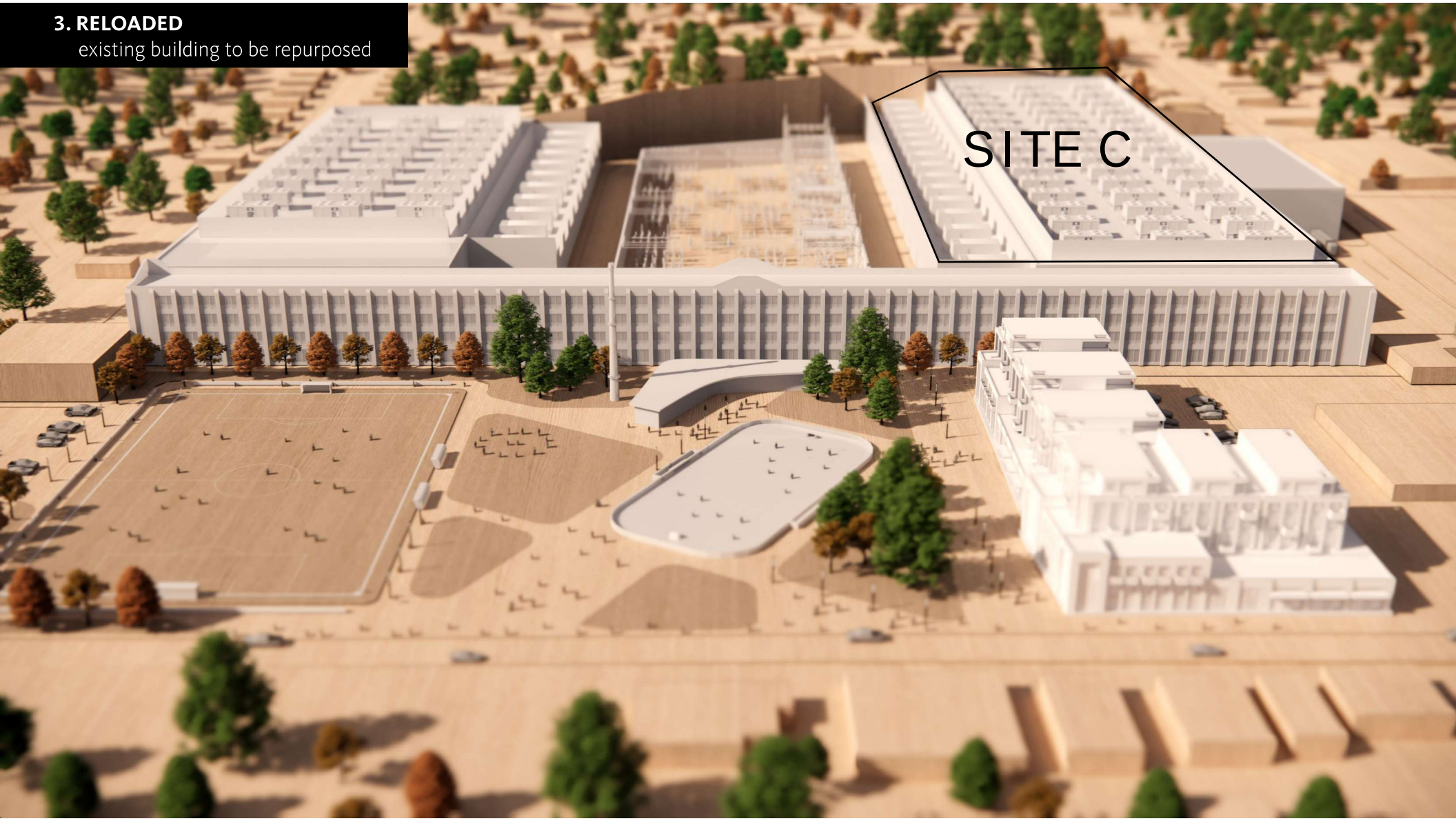
3. RELOADED
existing building to be repurposed



3. RELOADED
existing building to be repurposed



3. RELOADED
existing building to be repurposed



ATTACHMENT B
Green and Sustainable Remediation Objectives

GREEN AND SUSTAINABLE REMEDIATION

Investigation and remediation of Inactive Hazardous Waste Disposal Sites have the potential to impact vegetation/habitat, generate waste, emit greenhouse gases and air toxics, and require a considerable amount of energy and other resources. To ensure that NYSDEC continues to lead-by-example as NYS transitions to the low carbon sustainable economy of the future, "Green and Sustainable Remediation" practices will be implementedto reduce environmental impacts and minimize the generation of waste, greenhouse gases, air toxics, and consumption of energy and other resources during site investigation and remediation.

All remedial actions must conform with requirements from the Climate Leadership and Community Protection Act (CLCPA) – Section 7(2) which requires all state agencies to consider "whether such decisions are inconsistent with, or will interfere with, the attainment of the statewide GHG emission limits established in Article 75 of the environmental conservation law." If deemed inconsistent, the state agency must provide a detailed justification and identify alternatives or GHG mitigation measures to be imposed. While the goal of the RA is to address unacceptable risk from hazardous substance releases, consideration of the cleanup activities' broader impacts on the community and the environment is consistent with the NYSDEC sustainability and GHG reduction goals as outlined in NYSDEC policies (e.g., CP-75-DEC Sustainability, DER-31 Green Remediation, CP-49 Climate Change Climate Change and DEC Action and CP-75 Sustainability).

This attachment provides detailed information on GSR principles to be evaluated and incorporated into each project phase:

- Remedial Investigation / Alternatives Analysis
- Remedial Design
- Remedial Action
- Site Management

It describes how GSR will be integrated into project planning, environmental footprint analysis, climate resiliency measures, and beneficial end uses such as greenways and pollinator habitats.

1.0 REMEDIAL INVESTIGATION (RI) / ALTERNATIVES ANALYSIS (AA)

RI/AA Project Planning & GSR Integration

- GSR Planning will be embedded in the RI Work Plan (RIWP): optimize mobilizations, sequence field tasks to reduce fuel use and idling, and prioritize lower-emission equipment (Tier 4/Stage V where feasible).
- Materials & Waste Minimization: specify sampling methods that reduce expendables, segregate investigation-derived waste for reuse/recycling where feasible, and plan laboratory loads to minimize shipments and re-runs.
- Water Use Controls: conserve and, where possible, recirculate dewatering/test water; employ water-efficient practices per EPA guidance [epa.gov].

Environmental Footprint Analysis Tool

- The project will apply EPA Spreadsheets for Environmental Footprint Analysis (SEFA) v3.0 during RI/AA to quantify the footprint across 21 metrics (energy, air emissions incl. GHG, water use, materials/waste). SEFA outputs will identify footprint drivers and inform BMP selection for AA.

- Where needed, supplementary tools (e.g., SiteWise) may support sensitivity analyses; SEFA remains the primary reporting tool for DEC submittals.

Climate Resiliency in RI/AA

- Conduct a screening-level climate vulnerability assessment (CVA) to identify potential stressors (extreme precipitation, heat, flood/sea-level influences, high winds) that could affect investigation activities and future remedies; reference EPA's Superfund Climate Resilience approach [epa.gov].
- Integrate nature-based solutions (e.g., vegetated buffers for erosion control during intrusive work) where practicable [epa.gov].

Alternatives Analysis with GSR

- Evaluate remedial alternatives with quantitative footprint comparisons (SEFA) and BMP bundles per ASTM E2893 to minimize energy use, air emissions, water consumption, and waste generation while maintaining protectiveness
- Consider beneficial end uses (e.g., greenways, pollinator habitats) within AA to maximize land & ecosystem benefits consistent with EPA greener cleanup principles. [epa.gov]

2.0 REMEDIAL DESIGN (RD)

Green and Sustainable Remediation (GSR) principles and techniques will be incorporated into the design, implementation, and site management of the remedy to the extent feasible, in accordance with DER-31.

Major GSR Components

- Evaluate environmental impacts of treatment technologies and long-term remedy stewardship.
- Reduce greenhouse gas emissions and other air pollutants.
- Increase energy efficiency and minimize use of non-renewable energy sources.
- Conserve and manage resources and materials efficiently.
- Reduce waste, increase recycling, and maximize reuse of materials that would otherwise be discarded.
- Enhance habitat value and create new habitat where possible, including planting trees, shrubs, and other carbon sinks during redevelopment.
- Promote green and healthy communities and working landscapes that balance ecological, economic, and social goals.
- Integrate the remedy with end use where possible and encourage sustainable redevelopment.
- Ensure that future on-site buildings meet, at minimum, the 2020 Energy Conservation Construction Code of New York (or latest edition) to improve energy efficiency.

Evaluation and Tracking

To evaluate the remedy with respect to GSR principles during the remedial design program:

- Conduct a Best Management Practices (BMP) assessment and an environmental footprint analysis using an accepted tool such as:
    - SEFA (Spreadsheets for Environmental Footprint Analysis, USEPA)
    - SiteWise™ (available through the Sustainable Remediation Forum)
    - Or another NYSDEC-approved tool.

The analysis will address:

- Water consumption
- Greenhouse gas emissions
- Renewable and non-renewable energy use
- Waste reduction and material use
- Community impact minimization
- Habitat and natural/cultural resource protection
- Environmental justice considerations

Design Specifications

Project design documents will include detailed requirements for implementing BMPs to achieve GSR goals. These specifications will:

- Incorporate measurable targets for energy, emissions, water, and waste reduction.
- Include strategies for habitat enhancement and sustainable redevelopment.

Reporting

Progress on GSR metrics will be tracked during remedial action and summarized in the Final Engineering Report (FER), including:

- A comparison of actual performance to goals established during remedial design.
- Documentation of BMPs implemented and footprint reductions achieved.

3.0 REMEDIAL ACTION (RA)

GSR Implementation During Construction

- Use low-emission equipment, enforce anti-idling, optimize routing/scheduling to reduce transport emissions; implement dust/noise controls for community protection per EPA/ASTM guidance. [epa.gov]
- Materials & Waste: maximize onsite reuse where permitted, specify recycled content, and track diversion rates; minimize hazardous and non-hazardous waste.
- Water Stewardship: conserve process water, implement capture/reuse where feasible, and protect receiving waters. [epa.gov]

Real-Time Metrics Tracking & Reporting

- Collect monthly SEFA input data (fuel, electricity, materials, waste, water, logistics) and produce quarterly footprint summaries with trend charts; maintain auditable data packages. [clu-in.org]
- Summarize GSR performance (BMPs applied, footprint reductions vs. baseline) in construction progress reports and the Final Engineering Report (FER). [dec.ny.gov]

Climate Resilience During RA

- Stage and secure critical assets, confirm emergency procedures and remote monitoring/controls before high-risk weather periods; verify erosion/sediment controls after extreme events. [epa.gov]

4.0 SITE MANAGEMENT (SM)

SMP Integration & DEC Templates

- Incorporate GSR practices into the NYSDEC SMP (inspection checklists, maintenance procedures, energy/resource tracking, and IC/EC documentation) using the current DEC SMP template. [dec.ny.gov]
- Define roles/responsibilities for data collection, QA/QC, and annual performance summaries to support PRRs. [dec.ny.gov]

PRRs & Ongoing Optimization

- Include GSR metrics and evaluation in Periodic Review Reports (PRRs)—summaries of energy/resource consumption, waste generation/diversion, emissions, and BMP effectiveness—consistent with DER-10/BCP reporting. [dec.ny.gov]
- Conduct Remedial (System) Optimization reviews as part of SM to identify practicable footprint reductions (e.g., right-sizing equipment, renewable integration, automation for intermittent operations). (Optimization is consistent with EPA/SURF sustainable remediation practice.)

Climate Resiliency Evaluation in SM

- Re-evaluate climate vulnerabilities annually (or after significant events) and update adaptive measures (e.g., flood barriers, power redundancy, nature-based erosion controls) to maintain remedy protectiveness. Document in PRRs and SMP updates per DEC guidance. [dec.ny.gov], [epa.gov]

ATTACHMENT C

Village of Ilion's Draft Local Waterfront Revitalization Plan

Village of Ilion

Local Waterfront Revitalization Program

Community Outreach Process and Plan

Contents

No table of contents entries found.

Appendix A: Local Waterfront Revitalization Advisory Committee (LWRAG)

Appendix B: Proposed Waterfront Revitalization Area

Appendix C: Local Waterfront Revitalization Program - Project Schedule

Project Overview

The Village of Ilion (Village) has received funding from the New York State Department of State (NYSDOS) Division of Coastal Resources to develop the Village's Local Waterfront Revitalization Program (LWRP).

An LWRP is a voluntary mechanism for local municipalities to participate in New York State's Coastal Management Program (CMP). Once approved by the New York State Secretary of State, actions by State agencies must be consistent with the approved LWRP. Similarly, once the federal government concurs with an LWRP, federal agency actions are required to be consistent.

The Village Board established a Local Waterfront Revitalization Advisory Committee (LWRAC) to guide the programs development. The LWRAC includes a broad range of stakeholders including residents, property owners, and business owners. For a complete list of LWRAC members and afflictions, see Appendix A.

The process for developing an LWRP involves multiple tasks including public participation, an analysis of existing conditions, and an identification of projects and actions needed to address issues and opportunities identified by the community. Additionally, the plan will include recommendations for implementation.

The LWRP is intended to encourage new economic activity and improve public access and recreational use of the Mohawk River, while protecting and restoring natural resources. Some goals to be considered in the LWRP may address climate change, evaluate rising water levels in relation to proposed development areas and Village infrastructure, and support the evolution of the waterfront into a sustainable and resilient entity.

Project Players

Barton and Loguidice (B&L) has been selected to work with the Village and the LWRAC to develop the LWRP.

Community Outreach Process and Plan

A community outreach process and plan provides an opportunity to gather information from members of the public and stakeholders about the study area. Input received is critical to making informed decisions regarding the study area.

This community outreach process and plan has been developed to establish a communication channel between the public, the Village, the LWRAC, applicable regulatory agencies, and the Project Team throughout the development of the LWRP.

This process and plan aims to achieve this communication channel by sharing information with the public regarding the planning process, and by providing occasions for the public to provide input regarding potential issues, concerns, and opportunities.

Local Waterfront Revitalization Study Area

The proposed waterfront revitalization study area measures approximately 963 acres. A mix of industrial, residential, commercial, and recreational uses currently exist throughout the study area.

The Proposed study area includes the Village's central commercial district, the Duofold industrial site and the Remington Arms factory.

Scope of Work

Project Scope

An LWRP includes a planning document and a management program to implement the plan.

An LWRP may address issues that affect the waterfront of an entire community or may address the issues for a portion of its waterfront. Villages, towns or cities located along the State's coast can prepare a new or amend an existing LWRP. Municipalities are encouraged to address local revitalization issues in a broader context, aligned with regional economic development strategies and regional resource protection and management programs.

This effort involves the following tasks, which closely align with the outline of the document:

- Project Meeting with the Village and LWRAC
- Community Outreach Process and Plan
- Section I – Waterfront Revitalization Area Boundary
- Section II – Inventory Analysis Section III – Coastal Policies Within the Massena Waterfront Revitalization Area
- Section IV – Proposed Land and Water Uses and Proposed Projects
- Section V – Techniques for Local Implementation
- Section VI – Federal and State Actions Likely to Affect Implementation
- Section VII – Local Commitment and Consultation
- Draft LWRP document
- Public Meetings/Workshops
- Upon a Draft LWRP being accepted by the municipality and NYSDOS as complete, a formal public review of the document is initiated by NYSDOS. The review is conducted in accordance with the following three criteria:
    - Article 42 of the Executive Law, the Waterfront Revitalization of Coastal Area and Inland Waterways Act, and its implementing regulations, 19 NYCRR Part 600-603
    - State Environmental Quality Review Act and its implementing regulations, 6 NYCRR Part 617
    - Coastal Zone Management Act of 1972 and its implementing regulations, 15 CFR Part 923

Community Participation

Community participation for this effort includes a variety of outreach and engagement activities designed to inform the public and gather input to guide the LWRP. The following community participation activities are included in this effort:

- Stakeholder Outreach
- Public Meetings/Workshops
- Digital Outreach

Additionally, public notice procedures and information repositories are also discussed.

Stakeholder Outreach

Community participation begins with an understanding of the needs of stakeholders within the waterfront revitalization study area. The Project team will support the Village as it organizes meetings with key stakeholders, including property owners, business owners, and neighborhood groups within the study area. Fulfilling this outreach will allow the Village and the Project Team to know about potential plans underway, needs, and opportunities for the study area.

As these meetings are organized and conducted by Village staff, findings will be summarized, reviewed, and discussed with the LWRAC. Ultimately, these conversations are anticipated to help shape the recommendations identified in the final LWRP.

Public Meetings / Workshops

In addition to direct shareholder outreach to be conducted by the Village staff, there will be four

(4) opportunities to learn about progress, findings, and next steps of the LWRP process through public meetings and/or workshops. Each public meeting is set to occur at key milestones of the project schedule.

The format for each of the public meetings will be determined cooperatively with the Village and the LWRAC. Each meeting will be organized to maximize public involvement. Public meetings formats may include:

- A traditional public meeting with a formal presentation followed by a questions and answer period;
- An interactive public workshop with a brief presentation followed by group break-out sessions;
- An open house-style engagement event with facilitated stations; and
- Or a combination of formats that best meets the engagement needs of the Village for this effort.

The Project Team will work with the Village to identify an appropriate meeting location for each meetings. Meetings participants will have the opportunity to weigh in about issues and opportunities identified.

Public Meeting #1 – Virtual Meeting (3/30/22)

Following the completion of the initial drafts of Section I – Waterfront Revitalization Area Boundary and Section II – Inventory and Analysis, the Project Team will conduct a public information meeting regarding the identified local waterfront issues and opportunities and solicit public input regarding the completeness and accuracy of Sections I and II. The Project Team will work with the Village to prepare notifications and announcements to be posted to the project website. The project website is hosted by the Village of Ilion. All input received will be compiled into a meeting summary and be made available publicly.

Public Meeting #2 – In-Person @ Village Hall (10/15/22)

Following the completion of the initial draft of Section IV – Proposed Land Uses and Proposed Projects, the Project Team will conduct a public information meeting regarding the proposed land and water uses and projects. The intent of this meeting will be to solicit public input regarding the completeness and accuracy of Section IV. The Project Team will work with the Village to prepare notifications and announcements to be posted to the project website

Public Meeting #3

Following the completion of the draft Section V – Techniques for Local Implementation of the Program, the Project Team will conduct a public information meeting to present to the public the draft LWRP policies included in Section III and the proposed laws that will support and enhance the implementation of these policies, and solicit public feedback. The Project Team will work with the Village to prepare notifications and announcements to be posted to the project website.

All input received will be compiled into a meeting summary. The Project Team will identify and address requested changes, as directed by the LWRAC.

Public Hearing / Public Meeting #4

Following completion of the Draft LWRP and in conjunction with a 60-Day Review and compliance with the State Environmental Quality Review Act (SEQRA), the Project Team will conduct a public hearing/meeting on the draft LWRP and identify any document changes as a result of feedback received from Public Meeting #3. The Project Team will work with the Village to prepare notifications and announcements to be posted to the project website.

The final LWRP amendment will include responses to comments received, a schedule of adoption, and posting of the final LWRP amendment to the project website.

Digital Outreach

Digital outreach includes use of a website and digital media to share project information with the public and notify the public of opportunities to participate in the process. The intent is to reach all interested stakeholders using a variety of outreach methods. Digital media is a preferred method of sharing and gathering information by many.

Website

The project website is hosted by the Village of Ilion and will include a variety of materials to keep the public informed of the study progress. Materials available on the website may include, but not be limited to the following:

- An inventory of applicable plans, studies, and policies
- Meetings presentations, handouts, and summaries
- List of LWRAG members
- Mapping

The website is located at the following link: https://ilioncompplan.com/

Public Notice Procedures

Public notice and meeting materials will be prepared by the Project Team and provided to the Village approximately two (2) weeks in advance of public meetings. The Village will be responsible for distributing those materials to LWRAC members.

Meetings announcements will be the responsibility of the Village and are suggested to be posted on the project website as well as in local news outlets, per the Village's discretion and as per the Village's meetings noticing requirements.

Schedule

Appendix C identifies a tentative project schedule. Please note that this schedule is based upon an assumed review time by involved agencies and is approximate. If review times exceed the assumed task duration, the schedule will be adjusted accordingly. Revised schedules, as needed, will be provided on a regular basis to the LWRAC and members of the public.

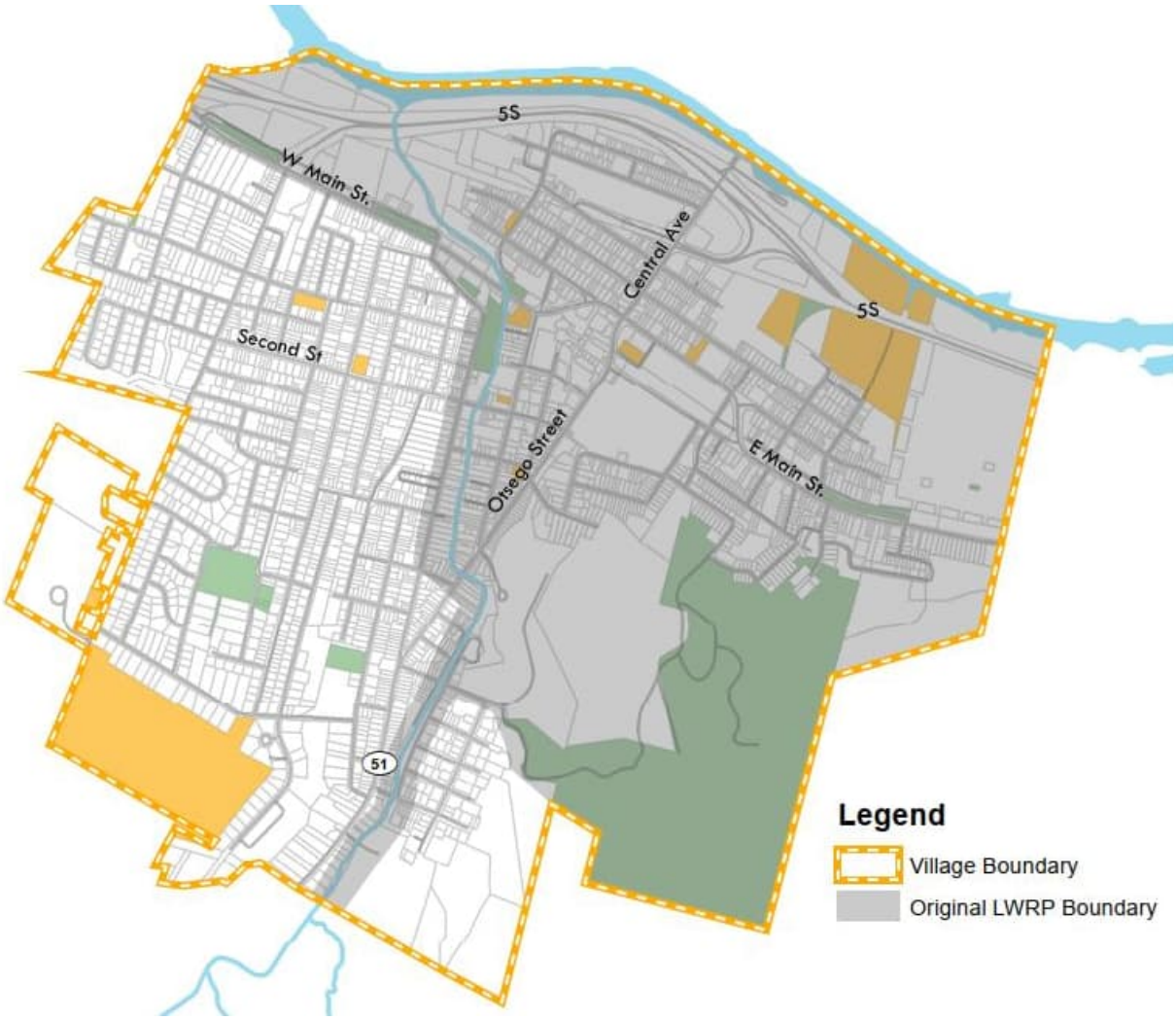
Appendix A

Local Waterfront Revitalization Advisory Group (LWRAG)

Name	Affiliation
Cory Albrecht	HCIDA Board Member
Pat Brien	Businessman and Commercial Property Owner
Bob Fletcher	Local Resident, Veteran
Bill Lennox	Former Business Owner / School Board
Bob McDowell	Business Owner
Bridget McKinley	Former Village Board Member
Alan Robinson	Ilion Zoning Board Chair
Mike Emrich	Village Board Liaison
Mike Lennox	Village Resident
Marijo Thompson	Village Treasurer
Liz Hoffman	Business Owner
Dick Keeler	HS Principal / Business Owner

Appendix B

Proposed Waterfront Revitalization Study Area


5S
W Main St.
Central Ave
5S
Second St
Otsego Street
E Main St.
51
Legend
Village Boundary
Original LWRP Boundary

Appendix C

Local Waterfront Revitalization Program – Project Schedule*

Task #	Description	Date of Completion (assuming Week 1 is the date of Contract execution)
1	Project Initiation Meeting	3/2020
7	Community Outreach Process and Plan	1/2022
28	Draft Section I – Waterfront Revitalization Area Boundary	8/2021
29	LWRP – Section II – Inventory and Analysis	8/2021
11	Public Information Meeting #1	3/2021
31	*LWRP – Section III – Local Waterfront Revitalization Policies*	*9/2021*
32	*LWRP – Section IV – Proposed Land Uses and Projects*	*3/2023*
13	Public Information Meeting #2	10/2022
34	*LWRP – Section V – Techniques for Local Implementation of the Program*	*2/2023*
35	*LWRP – Section VI – Federal and State Actions and Programs Likely to Affect Implementation of the LWRP*	*3/2023*
36	*LWRP – Section VII – Local Commitment and Consultation*	*4/2023*
37	*Determination of Significance with SEQRA*	*5/2023*
39	*Third Public Information Meeting*	*7/2023*
38	*Draft LWRP*	*6/2023*
41	*Final LWRP*	*9/2023*
42	*Local Adoption of the LWRP*	*12/2023*
45	*Final Project Summary Report and Measurable Results forms*	*2/2025*

ATTACHMENT D
NYS LLC Entity Information

An official website of New York State.
Here's how you know

Department of State
Division of Corporations

Entity Information

Return to Results | Return to Search

Entity Details

ENTITY NAME: TURIN HOEFLER AVENUE LLC
DOS ID: 7583010
FOREIGN LEGAL NAME: TURIN HOEFLER AVENUE LLC
FICTITIOUS NAME:
ENTITY TYPE: FOREIGN LIMITED LIABILITY COMPANY
DURATION DATE/LATEST DATE OF DISSOLUTION:
SECTIONOF LAW: LIMITED LIABILITY COMPANY - 802 LIMITED LIABILITY COMPANY LAW - LIMITED LIABILITY COMPANY LAW
ENTITY STATUS: ACTIVE
DATE OF INITIAL DOS FILING: 04/09/2025
REASON FOR STATUS:
EFFECTIVE DATE INITIAL FILING: 04/09/2025
INACTIVE DATE:
FOREIGN FORMATION DATE: 02/20/2025
STATEMENT STATUS: CURRENT
COUNTY: SUFFOLK
NEXT STATEMENT DUE DATE: 04/30/2027
JURISDICTION: DELAWARE, UNITED STATES
NFP CATEGORY:

ENTITY DISPLAY | NAME HISTORY | FILING HISTORY | MERGER HISTORY | ASSUMED NAME HISTORY

Service of Process on the Secretary of State as Agent

The Post Office address to which the Secretary of State shall mail a copy of any process against the corporation served upon the Secretary of State by personal delivery:

Name: KRISTEN O'NEIL

Address: C/O TURIN MANAGEMENT LLC, 69 MAIN STREET, 2ND FLOOR, SAG HARBOR, NY, UNITED STATES, 11963

Electronic Service of Process on the Secretary of State as agent: Permitted

Chief Executive Officer's Name and Address

Name:

Address:

Principal Executive Office Address

Address:

Registered Agent Name and Address

Name:

Address:

Entity Primary Location Name and Address

Name:

Address:

Farmcorpflag

Is The Entity A Farm Corporation: NO

Stock Information

Share Value	Number Of Shares	Value Per Share

An official website of New York State.
Here's how you know

Department of State
Division of Corporations

Entity Name History

Return to Results | Return to Search

Entity Details

ENTITY NAME: TURIN HOEFLER AVENUE LLC
DOS ID: 7583010
FOREIGN LEGAL NAME: TURIN HOEFLER AVENUE LLC
FICTITIOUS NAME:
ENTITY TYPE: FOREIGN LIMITED LIABILITY COMPANY
DURATION DATE/LATEST DATE OF DISSOLUTION:
SECTIONOF LAW: LIMITED LIABILITY COMPANY - 802 LIMITED LIABILITY COMPANY LAW - LIMITED LIABILITY COMPANY LAW
ENTITY STATUS: ACTIVE
DATE OF INITIAL DOS FILING: 04/09/2025
REASON FOR STATUS:
EFFECTIVE DATE INITIAL FILING: 04/09/2025
INACTIVE DATE:
FOREIGN FORMATION DATE: 02/20/2025
STATEMENT STATUS: CURRENT
COUNTY: SUFFOLK
NEXT STATEMENT DUE DATE: 04/30/2027
JURISDICTION: DELAWARE, UNITED STATES
NFP CATEGORY:

ENTITY DISPLAY | NAME HISTORY | FILING HISTORY | MERGER HISTORY | ASSUMED NAME HISTORY

Search

File Date	Document Type	Entity Name	File Number
04/09/2025	APPLICATION OF AUTHORITY	TURIN HOEFLER AVENUE LLC	250410001405

Rows per page: 5 1-1 of 1

An official website of New York State.
Here's how you know

Department of State
Division of Corporations

Entity Filing History

Return to Results | Return to Search

Entity Details

ENTITY NAME: TURIN HOEFLER AVENUE LLC
DOS ID: 7583010
FOREIGN LEGAL NAME: TURIN HOEFLER AVENUE LLC
FICTITIOUS NAME:
ENTITY TYPE: FOREIGN LIMITED LIABILITY COMPANY
DURATION DATE/LATEST DATE OF DISSOLUTION:
SECTIONOF LAW: LIMITED LIABILITY COMPANY - 802 LIMITED LIABILITY COMPANY LAW - LIMITED LIABILITY COMPANY LAW
ENTITY STATUS: ACTIVE
DATE OF INITIAL DOS FILING: 04/09/2025
REASON FOR STATUS:
EFFECTIVE DATE INITIAL FILING: 04/09/2025
INACTIVE DATE:
FOREIGN FORMATION DATE: 02/20/2025
STATEMENT STATUS: CURRENT
COUNTY: SUFFOLK
NEXT STATEMENT DUE DATE: 04/30/2027
JURISDICTION: DELAWARE, UNITED STATES
NFP CATEGORY:

ENTITY DISPLAY | NAME HISTORY | FILING HISTORY | MERGER HISTORY | ASSUMED NAME HISTORY

Search

File Date	Cert Code	Document Type	Description/Amended Information	Page Count	File Number
04/09/2025	01	APPLICATION OF AUTHORITY		4	250410001405

Rows per page: 5 1-1 of 1

An official website of New York State.
Here's how you know

Department of State
Division of Corporations

Entity Merger History

Return to Results | Return to Search

Entity Details

ENTITY NAME: TURIN HOEFLER AVENUE LLC
DOS ID: 7583010
FOREIGN LEGAL NAME: TURIN HOEFLER AVENUE LLC
FICTITIOUS NAME:
ENTITY TYPE: FOREIGN LIMITED LIABILITY COMPANY
DURATION DATE/LATEST DATE OF DISSOLUTION:
SECTIONOF LAW: LIMITED LIABILITY COMPANY - 802 LIMITED LIABILITY COMPANY LAW - LIMITED LIABILITY COMPANY LAW
ENTITY STATUS: ACTIVE
DATE OF INITIAL DOS FILING: 04/09/2025
REASON FOR STATUS:
EFFECTIVE DATE INITIAL FILING: 04/09/2025
INACTIVE DATE:
FOREIGN FORMATION DATE: 02/20/2025
STATEMENT STATUS: CURRENT
COUNTY: SUFFOLK
NEXT STATEMENT DUE DATE: 04/30/2027
JURISDICTION: DELAWARE, UNITED STATES
NFP CATEGORY:

ENTITY DISPLAY | NAME HISTORY | FILING HISTORY | MERGER HISTORY | ASSUMED NAME HISTORY

No merger History result.

An official website of New York State.
Here's how you know

Department of State
Division of Corporations

Entity Assumed Name History

Return to Results | Return to Search

Entity Details

ENTITY NAME: TURIN HOEFLER AVENUE LLC
DOS ID: 7583010
FOREIGN LEGAL NAME: TURIN HOEFLER AVENUE LLC
FICTITIOUS NAME:
ENTITY TYPE: FOREIGN LIMITED LIABILITY COMPANY
DURATION DATE/LATEST DATE OF DISSOLUTION:
SECTIONOF LAW: LIMITED LIABILITY COMPANY - 802 LIMITED LIABILITY COMPANY LAW - LIMITED LIABILITY COMPANY LAW
ENTITY STATUS: ACTIVE
DATE OF INITIAL DOS FILING: 04/09/2025
REASON FOR STATUS:
EFFECTIVE DATE INITIAL FILING: 04/09/2025
INACTIVE DATE:
FOREIGN FORMATION DATE: 02/20/2025
STATEMENT STATUS: CURRENT
COUNTY: SUFFOLK
NEXT STATEMENT DUE DATE: 04/30/2027
JURISDICTION: DELAWARE, UNITED STATES
NFP CATEGORY:

ENTITY DISPLAY | NAME HISTORY | FILING HISTORY | MERGER HISTORY | ASSUMED NAME HISTORY

No Assumed Name History result.

ATTACHMENT E
LLC Organization Chart

ORGANIZATION CHART

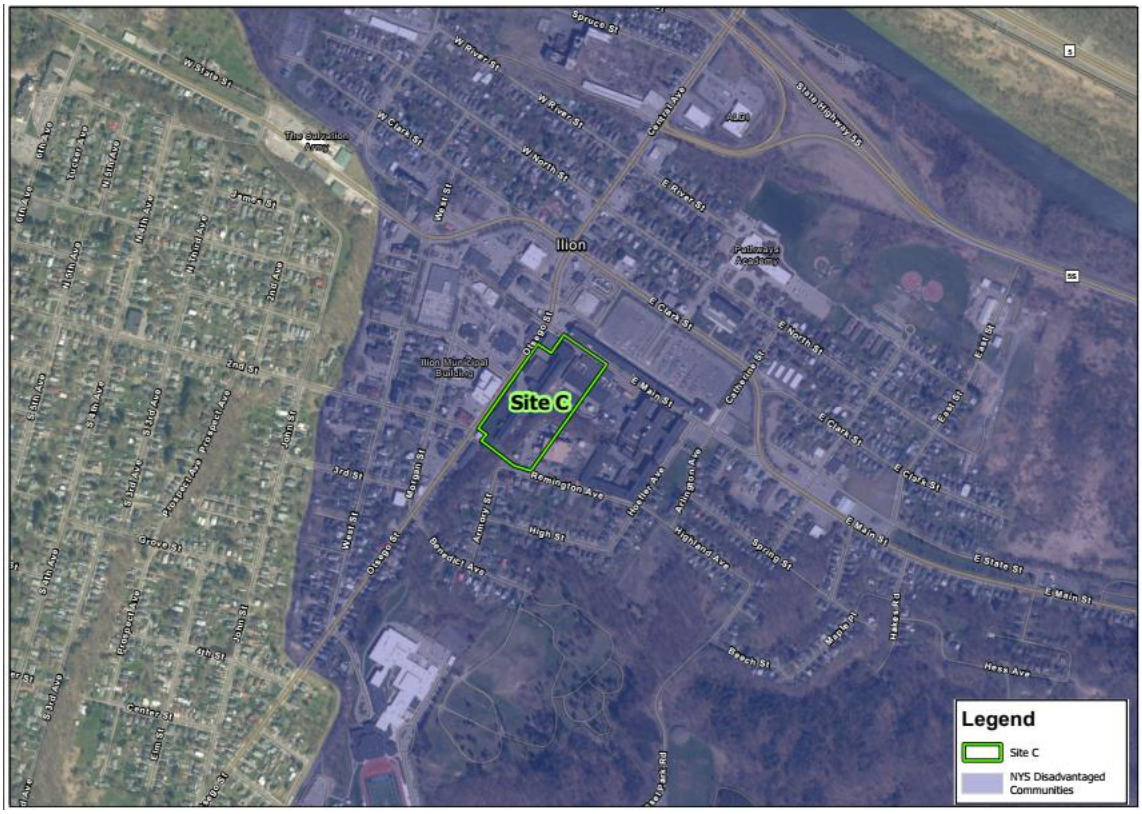


ATTACHMENT F
Application Fee Waiver Request

SECTION IX: DOCUMENTATION FOR PROGRAM FEE WAIVER REQUEST

The requestor/applicant is requesting a waiver of the $50,000 BCP Application Fee and provides the following as justification for the fee waiver.

Site C is located in a Disadvantaged Community (DAC), as noted in the DAC map provided below:



As part of its Brownfield Cleanup Program (BCP) application, Turin Hoefler Avenue LLC is seeking a waiver of the $50,000 application fee since the site (14 Hoefler Avenue, Ilion, NY) is located within a Disadvantaged Area as defined by the NYS Climate Justice Working Group and will create community benefits that are far greater than the State's application fee. If waived, the development team can use money to fund critical up-front project costs (i.e., remediation documents, legal services, site design, and permitting). Given the site's extensive environmental and building challenges (outdated buildings constructed in the early 1900s not meeting today's needs) which far exceed those of typical brownfield projects. Waiving the fee would not only ease the financial burden that often prevents projects from moving forward early in the development process, but also demonstrate state-level support for a project which will revive and restore the industrial pride of the Mohawk Valley by transforming a legacy 20th Century contaminated, gun manufacturing site into a 21st Century innovation hub, anchored by a data center facility for AI training and interference with advanced infrastructure. The site will be a fossil-fuel free 100% electric site supported by the region's clean energy resources. The redevelopment will also include housing, open space for community use, and commercial uses. The goal is to reverse the loss of Remington by creating higher-paying permanent jobs that will exceed the 274 lost in 2024, lifting regional incomes. 1,000+ construction jobs are projected. Each direct job estimated to support 5

additional local jobs. Additionally, Federal (EPA Brownfield Grant and EPA Technical Assistance), State (Empire State Development) and County (Herkimer County) funding support have been provided to the Remington site. Remington was deemed a Priority Brownfield Site by the community and included in Herkimer County IDA's EPA Brownfield Assessment Grant. The Brownfield Grant was used for hazardous materials assessment, Phase I ESA and Phase II ESA and EPA Technical Assistance funding was used to fund a supplemental Phase I site investigation and conceptual site redevelopment plan. NYS ESD funded a marketing study to review regulatory requirements, site infrastructure, environmental conditions, historical resources and market trends to identify the sites highest and best uses and Herkimer County funding was utilized to assist with the transfer of the site to the private developer.

A review of DAC information indicates that 14 Hoefler Avenue, Ilion is located in a DAC (**Final DAC Designated: 36043010400)** A summary of Individual Environmental & /Climate Change Risk and Population Characteristics & Health Vulnerabilities indicators that exceed the 50th percentiles are noted in Table 1, below.

TABLE 1
SUMMARY OF INDIVIDUAL DAC INDICATORS EXCEEDING 50 PERCENTILES

Individual Env & Climate Change Risk	Percentile	Individual Population Characteristics & Health Vulnerabilities	Percentile
Housing Vacancy rate	93	COPD ED visits	79
Agricultural land use	62	Heart Attack Hospitalization	55
Drive time to Urgent care	75	Low Birthweight	65
Proximity to Remediation Sites	92	Homes Built before 1960	70
Regulated management plan	72	% w/Disabilities	81
Wastewater Discharge	76	Housing Cost burden	61
Industrial/mining Land use	70	% Renter occupied Homes	52
		%<100% of Federal Poverty	76
		%<80% Area medium Income	85
		% w/o College Degree	91
		Unemployment Rate	90
		% Black or African American	55
		Home Energy Affordability	83

The noted Individual Indicators can be directly related to areas of disinvestment since the 1970s due to the closure of numerous manufacturing facilities resulting in the loss of thousands of jobs. The adverse impacts of these closures and ripple effects on the local businesses have been devasting to the area and its population from which it has not recovered. Ilion's population peaked in 1960 (Population 10,199) and decreased by 25% to today's population of 7,636. This disinvestment has hollowed out the DAC, with empty, dilapidated industrial buildings adjacent to rundown housing. Within the DAC, in addition to the numerus abandon dilapidated structures and numerous manufacturers closed. Notably, Remington (the subject of this application) closed in March 2024, eliminating 300 jobs, with thousands of jobs lost up to that point through downsizing, leaving behind 1M ft^2 of vacant buildings and Duofold closed in 1998 eliminating 200 jobs. These

closures eliminated hundreds of jobs, had devastating rippling impacts on surrounding small businesses and left abandoned former industrial sites which conducted metal plating, forging, stamping, parts washing, dying, etc. and potentially released PCBs, VOCs, SVOCs, PAHs and metals into the local community environment.

Redeveloping the former Remington brownfield site in Ilion, NY presents a significant financial hardship due to a combination of more than 1.1 M ft^2 of buildings whose configuration, mechanical systems and access constraints make them poor suited for modern reuse. Many buildings lack insulation and were historically dependent on a centralized single loop steam system that is now obsolete. Any reuse would require complete retrofits, including insulation and the installation of separate HVAC systems. The building layouts also present significant challenges. Floor plates are generally narrow and irregular, with topography causing floor levels to be misaligned between adjacent buildings. The site was designed for a single user with centralized staging, meaning most buildings lack independent loading areas. Tight clearances between buildings, narrow passageways, and misaligned elevations restrict modern truck access, sometimes preventing full-length tractor trailers from reaching potential dock areas. These conditions collectively make the buildings inflexible, inefficient, and ill-suited to the open layouts, modern building systems, and logistical access required for most contemporary commercial or industrial uses.

Despite these challenges, the redevelopment of the Remington site offers transformative potential for Ilion. The project would address long-standing economic issues by creating jobs, attracting new businesses, and increasing property values, which in turn would expand the local tax base. It would also improve public health by removing vacant buildings, hazardous materials and remediating environmental contamination that poses risks to residents. Additionally, the improvements to the property would enhance quality of life and help reverse population decline. By revitalizing this blighted property, the project would serve as a catalyst for broader community renewal, making Ilion a safer, healthier, and more economically vibrant place to live and work. This project offers the area a rare opportunity for investment that will not only remediate a brownfield and remove blight but also bring needed investment. The project, including the ultimate construction of $2-3B including demolition of existing structures, environmental cleanup, and new construction of a 200 MW data center, along with commercial and hospitality use will address many of the Environmental Burdens and Health Vulnerabilities including:

- Eliminating environmental hazards including metals, PAHs and VOCs that will assist in reducing the incidence of COPD Emergency Department visits, Heart Attack Hospitalizations, learning disabilities in youth and low birth weight. Studies have indicated that exposure to heavy metals (such as lead and arsenic which are present at concentrations above SCO's in surface soil on the Remington Site) contribute to heart attacks by causing inflammation, oxidative stress, vascular dysfunction, and exacerbating underlying cardiovascular conditions. In addition, exposure to these pollutants, which can enter the body through exposure to contaminated soil/fugitive dust, and food, increases the risk of heart attack and other cardiovascular diseases. In addition, low-birth-weight studies have determined that heavy metals (such as lead, which is present at concentrations above SCO's in surface soil on the Remington Site), contribute to these outcomes. Exposure to these substances, especially during pregnancy, can harm fetal development and increase the risk of adverse outcomes, including low birth weight. Lastly it has been reported that exposure to lead can contribute to learning disabilities in youth.

- It is estimated that the proposed project will provide 1000+ construction jobs and 300 new permanent high paying jobs to area residents that will provide much needed income to lift residents out of poverty, encourage the reuse of vacant homes and provide an economic boost to nearby businesses.

- The project will improve and increase infrastructure capacity to the site and immediate area encouraging additional investment in the area.

- Remove the site from the village's tax-exempt role to a private owner that will ultimately provide much needed tax revenue to Ilion once the site PILOT expires.

- Revitalizing a site that will have far-reaching positive impacts that extend beyond aesthetics foster community pride and safety; and attract new residents and businesses, which in turn stimulates local economic growth.

- Although the building is temporarily secured, site revitalization will remove a tempting building for the areas children to enter, exposing them to physical and environmental hazards.

- Reduce the potential for crime and vacancy that abandon buildings invite.

- Enhancing the overall quality of life for residents. Addressing abandoned buildings is a foundational step toward building a healthier, more vibrant, and economically resilient community, and

- Provides an example to the community and the surrounding area of how a site can be remediated and revitalized in an area that has not seen investment in decades.

In addition to the environmental and economic benefits to the area, the waiving of the application fee will encourage the use of private funds to remediate and redevelop the site rather than using millions of NYSDEC dollars and stressed staff which now can be allocated to other sites where there is no private interest to remediate the site.

In closing, it is our opinion that receiving a waiver for the $50,000 New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program application fee would significantly strengthen the feasibility of this project. These funds could instead be used to cover critical soft costs—such as remedial documentation preparation, legal services, and architectural planning—which the developer must front without reimbursement. Given Remington site's extensive environmental and structural challenges, which far exceed those of typical brownfield development projects, every dollar counts. Extensive upfront project expenses are likely to prevent this project from moving forward. Waiving the fee would not only ease the financial burden but also demonstrate state-level support, coupled with existing Federal and PILOT investments, for a project that aims to overcome extraordinary barriers and deliver lasting economic and health benefits to the Ilion community.

ATTACHMENT G
Document Repository Agreement

Herkimer County IDA
Industrial Development Agency

STAFF

JOHN J. PISECK, JR.
Chief Executive Officer

VICTORIA L. ADAMS
Operations Manager

NICOLE A. FARBER
Administrative Office Assistant

SAMANTHA CANARELLI
Marketing & Communications Specialist

BOARD OF DIRECTORS

VINCENT J. BONO
Chairman

CORY ALBRECHT
Vice Chairman

TIM DAY
Treasurer

ANN GAWORECKI
Director

FRANK MENDL
Director

Robert Davenport
Director

COUNSEL

ANTHONY G. HALLAK, Esq.
Felt Evans, LLP

Special:
CHARLES MALCOLM, Esq.
SHANNON WAGNER, Esq.
Hodgson Russ, LLP

October 22, 2025

To Whom It May Concern,

The Herkimer County Industrial Development Agency (HCIDA), located at 420 East German Street, Suite 101A, Herkimer NY 13350, understands that a document repository accessible to the public is required for the duration of the Former Remington Arms Facility (14 Hoefler Avenue, Ilion NY 13357) NYSDEC Brownfield Cleanup Program project.

Site A: Remington Site
Site B: Remington Site
Site C: Remington Site
Site D: Remington Site
Site E: Remington Site

The HCIDA hereby acknowledges that we will serve as the public repository for this project. We will maintain access to project-related documents at our office throughout the duration of the project to ensure they are available to the public during our normal operating hours.

Thank you for your attention to this matter.

Sincerely,

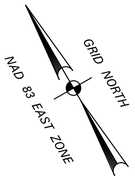
John J. Piseck, Jr.
Chief Executive Officer

ATTACHMENT H

Meets and Bounds Descriptions and Survey Map



LOCATION PLAN
NOT TO SCALE



REFERENCES:

1) "ALTA/ACSM LAND TITLE SURVEY, REMINGTON ARMS COMPANY, INC. VILLAGE OF ILION, HERKIMER COUNTY" SURVEY AND MAP BY LAFAVE, WHITE & McGIVERN, L.S. P.C., DATED JUNE 13, 2000.

2) "ILION URBAN RENEWAL AGENCY, TOPOGRAPHIC & UTILITY SURVEY" MADE BY STEARNS & WHELER CIVIL & SANITARY ENGINEERS, DATED MAY 22, 1974 AND REVISED JANUARY 7, 1991 BY W.S. TIEL P.E. & L.S.

3) "MAP OF PART OF ILION FOR E. REMINGTON & SONS" SURVEYED BY W.D. ARMSTRONG, DATED SEPTEMBER 1861 AND FILED IN THE HERKIMER COUNTY CLERKS OFFICE IN LIBER 80 PAGE 653

4) "MAP SHOWING PARCELS 1,2,3,4,5,6&7 TO BE ACQUIRED BY REMINGTON ARMS COMPANY, INC." VILLAGE OF ILION, N.Y. MADE BY MERRITT AND LABELLA P.E. & L.S. DATED JANUARY 28, 1972 AND FILED IN THE HERKIMER COUNTY CLERKS OFFICE AS MM7B37

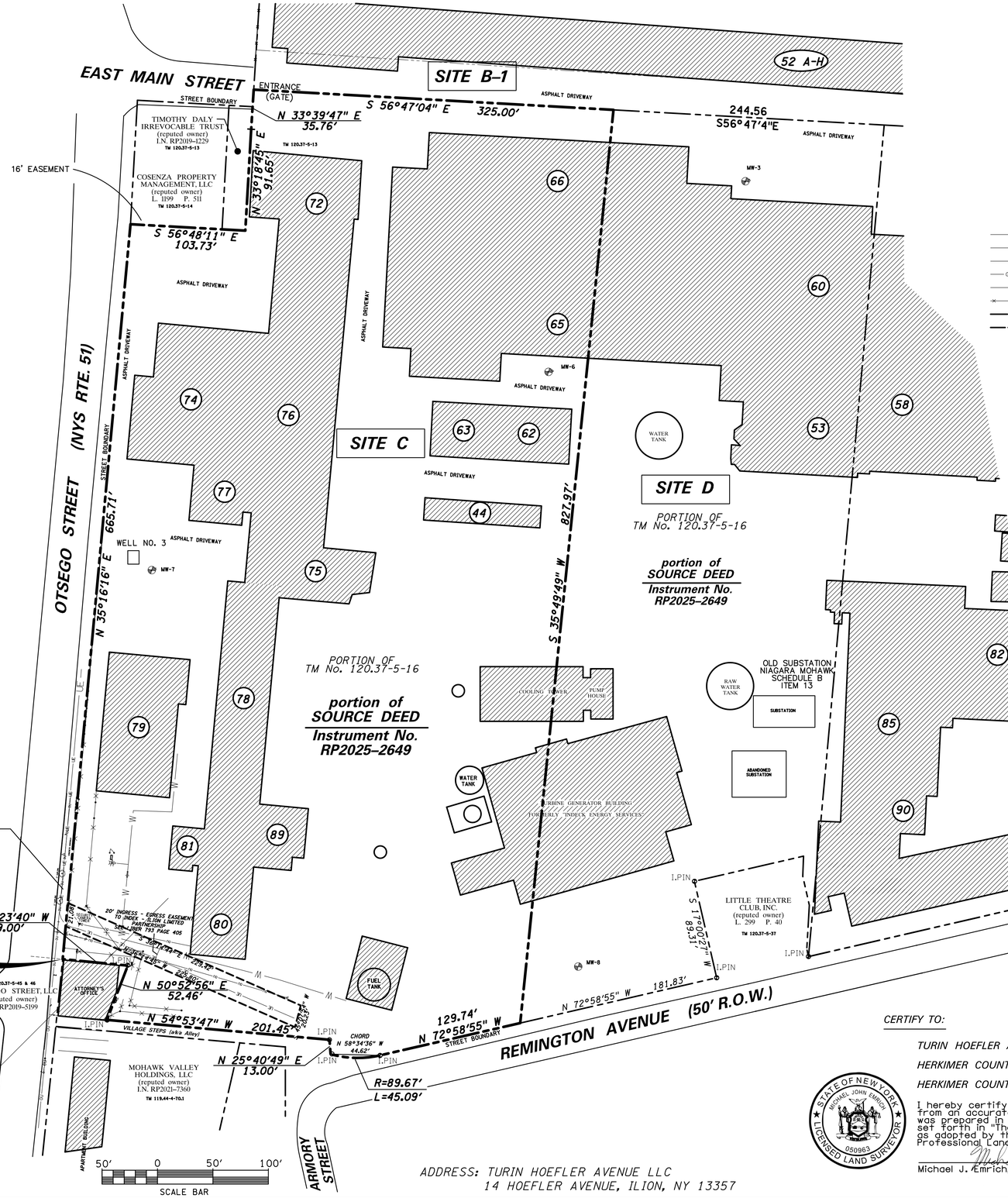
5) "PROPERTY MAP SHOWING LANDS TO BE CONVEYED TO COCCA ACQUISITIONS, LLC" SURVEY AND MAP BY EMRICH LAND SURVEYING, PLLC, DATED MAY 25, 2022.

6) "SURVEY MAP SHOWING A PORTION OF LANDS OWNED BY RCAI ACQUISITION CORPORATION TO BE CONVEYED TO 85 OTSEGO STREET, LLC" SURVEY AND MAP BY EMRICH LAND SURVEYING, PLLC, DATED MAY 6, 2016.

7) "SURVEY PLAT SHOWING PROPERTY BELONGING TO KAREN LASHER, KNOWN AS "57 HOEFLER AVE" SURVEY AND MAP BY EMRICH LAND SURVEYING, PLLC, DATED OCTOBER 30, 2023.

8) "SURVEY PLAT SHOWING PROPERTY BELONGING TO GAIL K. BRIGGS AND WENDEY E. BRIGGS, KNOWN AS "73 HOEFLER AVE" SURVEY AND MAP BY EMRICH LAND SURVEYING, PLLC, DATED MAY 22, 2024.

9) "PROPERTY MAP SHOWING LANDS BELONGING TO ROUNDHILL GROUP, LLC TO BE CONVEYED TO TURIN MANAGEMENT" SURVEY AND MAP BY EMRICH LAND SURVEYING, PLLC, DATED MAY 03, 2025.



RECENT TITLE REFERENCES:

INSTRUMENT No. RP2025-2649: OUTDOOR PROPERTIES LLC F/K/A ROUND HILL GROUP, LLC (GRANTOR) TO TURIN HOEFLER AVENUE LLC (GRANTEE) BY DEED DATED JUNE 20, 2025 AND RECORDED JULY 3, 2025.

INSTRUMENT No. RP2025-2650: TURIN HOEFLER AVENUE LLC (AS LANDLORD) TO HERKIMER COUNTY INDUSTRIAL DEVELOPMENT AGENCY (AS TENANT) BY LEASE AGREEMENT DATED JUNE 1, 2025 AND RECORDED JULY 3, 2025.

INSTRUMENT No. RP2025-2651: HERKIMER COUNTY INDUSTRIAL DEVELOPMENT AGENCY AND TURIN HOEFLER AVENUE LLC BY MISC. DEED FOR MEMORANDUM OF INSTALLMENT SALE AGREEMENT DATED JUNE 1, 2025 AND RECORDED JULY 3, 2025.

PORTION OF TAX PARCEL No. 120.37-5-16
VILLAGE OF ILION

LEGEND

⊙ LPIN	IRON PIN (FOUND)
● LPIN/MAG NAIL	IRON PIN/MAG NAIL (SET)
⊙ I.P.	IRON PIPE (FOUND)
	UTILITY POLE
	UTILITY POLE W/LIGHT
Ⓜ	SEWER MANHOLE
Ⓔ	ELECTRIC MANHOLE
	WATER VALVE
	GUY ANCHOR
CB	CATCH BASIN
CB	CATCH BASIN
	BUSH
	ELECTRIC METER
	GAS METER
	HYDRANT
	SIGN
LTP	LIGHT POLE
GV	GAS VALVE
OE	OVERHEAD ELECTRIC LINES
SA SA	SANITARY SEWER LINE
ST ST	STORM LINE
G G	GAS LINE
W W	WATER LINE
	FENCE LINE
	ROAD BOUNDARY
	PROPERTY LINE

ADDRESS: TURIN HOEFLER AVENUE LLC
14 HOEFLER AVENUE, ILION, NY 13357

CERTIFY TO:

TURIN HOEFLER AVENUE LLC
HERKIMER COUNTY INDUSTRIAL DEVELOPMENT AGENCY
HERKIMER COUNTY, NEW YORK

I hereby certify that this is an accurate map, made from an accurate field survey, and that this survey was prepared in accordance with the minimum standards set forth in "The Existing Code of Practice for Surveys" as adopted by the New York State Association of Professional Land Surveyors.

STATE OF NEW YORK · MICHAEL JOHN EMRICH · 050963 · LICENSED LAND SURVEYOR

Michael J. Emrich, P.L.S. No. 50963 — 12-30-2025 Date

IT IS A VIOLATION OF THE LAW FOR ANY PERSON UNLESS HE IS ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL LAND SURVEYOR TO ALTER THIS DRAWING IN ANY WAY. ALTERATIONS MUST HAVE THE SEAL AFFIXED ALONG WITH A DESCRIPTION OF THE ALTERATION, THE SIGNATURE AND DATE. COPYRIGHT 2025 ©

EMRICH Land Surveying
P.O. Box 27; 26 Pine Street, Ilion, NY 13357
315.866.6069 & 315.868.4535
emrichsurveying@gmail.com

SURVEY MAP

SHOWING A PORTION OF LANDS BELONGING TO
TURIN HOEFLER AVENUE LLC
for
BCP PROJECT
designated as
SITE C

COUNTY OF HERKIMER — STATE OF NEW YORK

PROJECT NO.	25-039

REVISION	DATE	BY
DATE	12-30-2025	
DRAWN BY	B. DAVIS	
CHECKED BY	M. EMRICH	
APPROVED	M. EMRICH	
SCALE	1" = 50'	

SHEET TITLE

PROJECT BOUNDARIES

SHEET NO.

3 of 5

EMRICH Land Surveying

January 6, 2026

ELS No. 25-039

PROPOSED DESCRIPTION

Site C

ALL THAT TRACT, PIECE OR PARCEL OF LAND situate within the Village of Ilion, County of Herkimer and State of New York, as shown on the map entitled "Survey Map Showing A Portion of Lands Belonging to Turin Hoefler Avenue LLC For BCP Project designated as Site C," dated December 30, 2025, prepared by Emrich Land Surveying, PLLC; said parcel more particularly described as follows:

BEGINNING at a point located on the southeasterly bounds of Otsego Street (New York State Route 51) at its intersection with the division line between the property of 85 Otsego Street, LLC (reputed owner) as described by deed as Instrument Number RP2019-5199 on the southwest and the property of Turin Hoefler Avenue LLC (reputed owner) as described by deed as Instrument Number RP2025-2649 on the northeast;

Thence North 35° 16' 16" East, along said boundary of Otsego Street, a distance of 665.71 feet to a point; said point located at the intersection of the last mentioned course with the division line between the herein described parcel on the southwest and the property of Cosenza Property Management, LLC (reputed owner) as described by deed L. 1199 P. 511 on the northeast;

Thence South 56° 48' 11" East, along the last mentioned division line and along lands of Timothy Daly Irrevocable Trust (I.N. RP2019-1229), a distance of 103.73 feet to a point; said point located at the intersection of the last mentioned division line with the division line between the herein described property on the southeast and said property of Timothy Daly Irrevocable Trust on the northwest;

Thence North 33° 18' 45" East, along the last mentioned division line, a distance of 91.65 feet to a point;

Thence North 33° 39' 47" East, continuing along the last mentioned division line and extending along the southeasterly terminus of East Main Street, a distance of 35.76 feet to a point;

Thence South 56° 47' 04" East, through the property of Turin Hoefler Avenue LLC (reputed owner) as described by deed as Instrument Number RP2025-2649 and being the division line between Site B-1 on the northeast and Site C on the southwest, a distance of 325.00 feet to a point;

P.O. Box 27
Ilion, New York 13357
Tel: 315.866-6069
emrichsurveying@gmail.com

Thence South 35° 49’ 49” West, continuing through said property of Turin Hoefler Avenue LLC and being the division line between Site C on the northwest and Site D on the southeast, a distance of 827.97 feet to a point at its intersection with the northerly bounds of Remington Avenue;

Thence North 72° 58’ 55” West, along said boundary of Remington Avenue, a distance of 129.74 feet to a point of curvature;

Thence westerly, continuing along said boundary of Remington Avenue, on a curve having a Radius of 89.67 feet curving to the right, with an Arc Length of 45.09 feet and having a chord of North 58° 34’ 36” West, a distance of 44.62 feet to the point of tangency marked by an iron pin (found);

Thence North 25° 40’ 49” East, continuing along said boundary of Remington Avenue, a distance of 13.00 feet to an iron pin (found);

Thence North 54° 53’ 47” West, continuing along said boundary of Remington Avenue and along the northerly bounds of a Village of Ilion owned alley way for steps, a distance of 201.45 feet to an iron pin (found); said pin located at the intersection of the last mentioned course with the division line between the herein described parcel on the southeast and the aforementioned property of 85 Otsego Street, LLC on the northwest;

Thence North 50° 52’ 56” East, along the last mentioned division line, a distance of 52.46 feet to an iron pin (found); said pin located at the intersection of the last mentioned division line with the aforementioned division line between the herein described parcel on the northeast and said property of 85 Otsego Street, LLC on the southwest;

Thence North 54° 23’ 40” West, along the last mentioned division line, a distance of 59.00 feet to the **point of beginning**, containing 341,359± square feet or 7.837 acres, more or less.

Bearings are based on Grid North, North American Datum (NAD 83), New York State Plane Coordinate System, East Zone.

APPENDIX A

Phase II Environmental Site Assessment, HRP Associates, February 3, 2025

APPENDIX B

Supplemental Phase II Environmental Site Assessment, HGL, October, 2025

APPENDIX C

Integrated Site Assessment Report, Remington Site, HRP Associates October 29, 2025