



April 30, 2026

Mr. Steve Colquhoun
New York State Department of Environmental Conservation
Division of Environmental Remediation
5786 Widewaters Parkway
Syracuse, New York 13214

**RE: Response to Comments
Remedial Investigation Work Plan Addendum Response Letter
GW Syracuse LLC
NYSDEC Site Number C734167
CHA Project No.: 086328.000**

Dear Mr. Colquhoun:

CHA Consulting, Inc (CHA) has reviewed the New York State Department of Environmental Conservation (NYSDEC) comment letter, dated April 29, 2026, regarding the Addendum to the Remedial Investigation Work Plan (RIWP) for the Gateway Syracuse Apartments site, dated March 25, 2026 and revised April 27, 2026. Please find the additionally revised Addendum to the RIWP within this correspondence and responses to each comment, below.

Section 2.4 Soil Vapor

Comment 1a: The construction protocol for soil vapor sampling installation will be provided and include reference to Section 2.7.1 of the October 2006 *Guidance for Evaluating Soil Vapor Intrusion in the State of New York*.

Response 1a: *CHA has revised this section to reference the guidance document and provide additional detail surrounding the anticipated procedures.*

Comment 1b: The soil vapor point will be located at least one foot above the groundwater table.

Response 1b: *The soil vapor point will be located below the silty clay soils and will be installed at least one foot above the groundwater table.*

Comment 1c: A description of the tracer gas used during sampling will be included.

Response 1c: *The report has been updated to state that a helium tracer gas will be utilized.*

Comment 1d: This section states, "...analyzed for toxic organics via EPA Method TO-15."

This statement is modified to, "...analyzed for volatile organic compounds (VOCs) via EPA-Method TO-15."

Response 1d: *This section has been updated to state that the samples will be analyzed for VOCs via EPA Method TO-15.*

CHA anticipates the revised RIWP addendum meets the satisfaction of NYSDEC based on responses to the comments above and modifications to the report. Should you have additional comments, please contact Samantha Miller, P.E. at (315) 257-7154.

Sincerely,

A handwritten signature in black ink that reads "Samantha J. Miller". The signature is fluid and cursive, with the first name being the most prominent.

Samantha Miller, P.E.
Senior Engineer V

SJM/

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ADDENDUM TO THE REMEDIAL INVESTIGATION WORK PLAN

Gateway Syracuse Apartments

NYSDEC Site No.: C734167

709 E. Fayette Street

Syracuse, New York 13210

CHA Project Number: 086328.000

March 25, 2026

Revised: April 27, 2026

Revised April 30, 2026

Prepared for:

GW Almond Associates LLC

2 Cooper Street, P.O. Box 90708

Camden, New Jersey 08102

Prepared by:

CHA Consulting, Inc.

300 South State Street, Suite 600

Syracuse, New York 13202

Phone: (315) 471-3920



CERTIFICATION

I, Samantha J. Miller, P.E., certify that I am currently a New York State registered professional engineer and that this Remedial Investigation Work Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with DER Technical Guidance for Site Investigation and Remediation (DER-10).

I certify that all information and statements in this certification form are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law. I, the undersigned, of CHA Consulting, Inc. have been designated by the Site owner to sign this certification for the Site.

For CHA Consulting, Inc.:

(Professional Seal)



Samantha J Miller, P.E.

Printed Name of Certifying Engineer

Samantha J Miller

Signature of Certifying Engineer

Senior Engineer V

Title

April 30, 2026

Date of Certification

103303

NYS Professional Engineer Registration Number

New York

Registration State

August 31, 2028

Registration Expiration Date

CHA Consulting, Inc.

Company

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LIST OF ACRONYMS & ABBREVIATIONS

ASP	Analytical Services Protocol
AWQS	Ambient Water Quality Standard
BCA	Brownfield Cleanup Agreement
BCP	Brownfield Cleanup Program
BGS	Below Ground Surface
CAMP	Community Air Monitoring Program
CHA	CHA Consulting, Inc.
CPP	Citizen Participation Plan
DER-10	Division of Environmental Remediation Technical Guidance for Site Investigation and Remediation
DER-23	Division of Environmental Remediation Citizen Participation Handbook for Remedial Programs
DUSR	Data Usability Summary Report
ELAP	Environmental Laboratory Approval Program
EPA	Environmental Protection Agency
FSP	Field Sampling Plan
GW ALMOND	GW Almond Associates LLC
GW SYRACUSE	GW Syracuse LLC
HASP	Health and Safety Plan
LCS	Lender Consulting Services, Inc.
NTU	Nephelometric Turbidity Units
NYCRR	New York Codes, Rules and Regulations
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
PCB	Polychlorinated Biphenyl
PFAS	Per and Polyfluoroalkyl Substances
PVC	Polyvinyl Chloride
QAPP	Quality Assurance Project Plan
QA/QC	Quality Assurance/Quality Control
RI	Remedial Investigation
RIWP	Remedial Investigation Work Plan
SCO	Soil Cleanup Objective
SVOC	Semivolatile Organic Compounds
TAL	Target Analyte List
TCL	Target Compound List
TIC	Tentatively Identified Compounds
TMP	Tax Map Parcel
TOGS	Technical and Operational Guidance Series
VOC	Volatile Organic Compounds

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1.0 INTRODUCTION

GW Syracuse LLC (GW Syracuse) initially entered into a Brownfield Cleanup Agreement (BCA) with the New York State Department of Environmental Conservation (NYSDEC) on February 10, 2025. A Remedial Investigation Work Plan (RIWP) was developed for the acreage approved in the original BCA. The investigation was completed in April 2025 and a Remedial Investigation Report (RI Report) was developed and submitted in October 2025. Subsequently, an amendment to this agreement was submitted to identify a new property owner and expand the acreage included within the BCA to encompass the entirety of tax map parcel (TMP) 030.-16-03.1 at the address 709 East Fayette Street in the City of Syracuse, New York (Site). The new owner is GW Almond Associates LLC (GW Almond) and the Site was expanded from 0.43 acres to 1.29 acres. Figure 1 identifies each of these areas.

Amendment No. 1 to the BCA was approved on March 20, 2026, and a supplemental investigation was deemed necessary to further delineate the extent of contamination for the 0.86 acres added to the BCA.

This Addendum to the Remedial Investigation Work Plan, herein referred to as the “addendum” or “the addendum to the RIWP”, was prepared by CHA Consulting, Inc. (CHA) to be consistent with the guidance provided in the NYSDEC Division of Environmental Remediation program policy 10 (DER-10) Technical Guidance for Site Investigation and Remediation, dated May 2010. The RIWP (CHA, April 2025) is referenced in this addendum as the project documents remain in effect.

The objective of a Remedial Investigation (RI) is to characterize the nature and extent of environmental impacts, provide sufficient information to evaluate remedial alternatives, as required, and identify potential source areas. Previous investigations conducted by CHA, including the RI on a portion of the Site, and Lender Consulting Services, Inc. (LCS) have been reviewed and incorporated into the RIWP to evaluate the areas of known contamination and close data gaps that remain after the completion of those investigations, to meet the requirements of an RI.

To facilitate RI activities in a manner consistent with NYSDEC protocols, CHA prepared the following site-specific documents that were submitted with the RIWP and apply to this addendum:

- Citizen Participation Plan (CPP) (submitted concurrently with the original BCP Application)
- Field Sampling Plan (FSP)
- Quality Assurance Project Plan (QAPP)
- Health and Safety Plan (HASP)
- Community Air Monitoring Plan (CAMP)

These documents are referred to in this addendum to the RIWP but are not appended. Revisions or additions to the QAPP and FSP, as appropriate, are incorporated into Section 3 of this addendum to the RIWP.

Proposed redevelopment of the Site includes demolition of all current structures to construct a mixed-use apartment building with retail and amenity space on the first floor. The building is proposed to be seven stories tall with 291 rental units. The tenant parking garage will be located on the first and second floors of the building with stormwater management systems below the parking garage. Significant removal of soil is expected for the stormwater management system and foundation construction. The structure will encompass the majority of the entire 1.29 acre parcel.

1.1 Reports of Previous Investigations

Previous investigations have been summarized in Section 2.5 of the RIWP. These include:

- Transaction Screen, LCS, August 5, 2026
- Geophysical Survey and Limited and Focused Subsurface Soil Investigation, LCS, September 22, 2019
- Phase I Environmental Site Assessment, CHA, February 22, 2024
- Subsurface Investigations, CHA, 2024

Additionally, as previously mentioned, the RI in accordance with the RIWP was completed in April 2025 and the RI Report was submitted prior to the amendment to the BCA. Following the investigation described in this addendum, the RI Report will be updated and resubmitted with the information gathered during this investigation.

1.2 Test Pit Evaluation

To evaluate the additional 0.86 acres added to the BCA, 16 test pits were excavated across the Site in June and December 2025. Results indicated subsurface soils are impacted by metals and semivolatile organic compounds (SVOCs). In addition to the soil investigation, in December 2025 CHA inspected the interior of the car wash building in areas that were not previously accessible. Upon investigation, a subsurface vault was observed near the south end of the building. Upon removal of the steel floor plate, CHA discovered product impacted liquid and collected a sample for analysis. Results identified significant diesel range organics, gasoline range organics, SVOCs and metals in the liquid sample. The results of these investigations are described in the Phase II Subsurface Investigation Report, dated December 17, 2025 which is included in the BCA Amendment application.

2.0 PROPOSED REMEDIAL INVESTIGATION

2.1 Surface Soils

Surface soils were evaluated during test pit investigations in June and December 2025 where test pits were excavated and sampled to provide data for the amendment to the BCA. Therefore, no supplemental surface soil samples are proposed.

2.2 Subsurface Soil

Subsurface soils across the Site are well characterized, particularly around the suspect source of contamination: the Former Gasoline Service Station. To fully evaluate the additional land area added to the BCA, supplemental soil borings will be installed in the approximate locations identified on Figure 1. Soil borings will be completed within the asphalt-paved areas of the Site because buildings (car wash and office building) are inaccessible for a drilling rig.

Soil borings will be installed using direct push technology and samples will be collected at the interval exhibiting field evidence of contamination, or the two-foot interval above the water table if no field evidence of contamination is identified.

One primary sample from each soil boring and monitoring well location will be collected.

Each sample will be analyzed for:

- Target Compound List (TCL) Volatile Organic Compounds (VOCs) via Environmental Protection Agency (EPA) Method 8260 + Tentatively Identified Compounds (TICs)
- TCL Semivolatile Organic Compounds (SVOCs) via EPA Method 8270 + TICs
- 1,4-Dioxane via EPA Method 8270-SIM
- Target Analyte List (TAL) Metals via EPA Method 6010/7471
- Per- and Polyfluoroalkyl Substances (PFAS) via EPA Method 1633

If field evidence of contamination is encountered, a second sample at that soil boring location will be collected in the two-foot interval below which field evidence of contamination is no longer observed. The secondary sample, if collected, will be analyzed for:

- TCL VOCs via EPA Method 8260 + TICs
- TCL SVOCs via EPA Method 8270 + TICs
- Target Analyte List (TAL) Metals via EPA Method 6010/7471

Excess soil generated from the investigation activities will be containerized in 55-gallon drums for off-site disposal.

Non-disposable equipment will be decontaminated between locations and field personnel will wear PFAS sampling compliant clothing and personal protective equipment in accordance with the FSP. Each sample will be placed in a decontaminated stainless-steel bowl, homogenized, and placed in laboratory-provided PFAS-free containers, with the exception of VOCs that will be collected from a discrete location exhibiting the most field evidence of contamination or within the two-foot interval above the groundwater table.

Quality assurance samples will be collected in accordance with the frequency described in DER-10, as presented in Section 3. The samples will be submitted under proper chain-of-custody to a New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP)-certified laboratory.

2.3 Groundwater

To confirm the presence or absence of contamination in the groundwater, two permanent, groundwater monitoring wells will be installed in the locations identified on Figure 1.

The monitoring wells will be installed to screen the shallow water bearing zone and will screen the interval from the bottom of the well to the top of the water table, previously identified at approximately 15 feet below ground surface (bgs).

Each monitoring well will be constructed with two-inch diameter polyvinyl chloride (PVC) riser pipe and well screen which will have a slot opening size of 0.010-inches. The screen will be installed within the groundwater zone of interest. A sand pack will be placed within the annulus between the borehole and the well screen. Two feet of bentonite will then be placed above the screen to seal the top of the sand pack and the remaining borehole between the bentonite seal and the ground surface will be backfilled with bentonite-cement grout. Steel protective casings will be installed at each well location to protect the PVC risers. The monitoring wells will be surveyed after installation to obtain the top of casing and riser elevations. Soil cuttings from drilling operations will not be used as backfill in any of the monitoring wells and will be containerized for off-site disposal.

Once the wells are installed, each well will be developed using a combination of pumping and surging techniques until the turbidity of the purged groundwater is less than 50 nephelometric turbidity unit (NTUs), or for a maximum of two hours each, whichever is achieved first.

All purging and sampling of the permanent wells will be conducted in accordance with the FSP. Quality assurance samples will be collected in accordance with the frequency described in DER-10, as presented in Section 3.

From the two monitoring well locations, samples will be collected for the following parameters, as described in Table 1:

- TCL VOCs via EPA Method 8260 +TICs
- TCL SVOCs via EPA Method 8270 + TICs
- 1,4-Dioxane via EPA Method 8270-SIM
- TAL Metals via EPA Method 6010/7471
- Total Polychlorinated Biphenyls (PCBs) via EPA Method 8082
- PFAS via EPA Method 1633

2.4 Soil Vapor

To evaluate for the potential for off-site soil vapor intrusion, two semi-permanent soil vapor probes will be installed. One probe will be installed along the eastern site boundary and the other will be along the southern site boundary (Figure 1). Soil vapor samples were previously unable to be collected as part of an initial investigation due to tight shallow subsurface soils extending to depths of approximately 10-feet bgs. The soil vapor points will be installed by drilling and installing semi-permanent sampling screens set to a depth approximately one foot above the groundwater table (approximately 10 to 15-foot interval), backfilled with inert material, fitted with inert tubing, and sealed with bentonite slurry in accordance with the New York State Department of Health (NYSDOH) *Guidance for Evaluating Soil Vapor Intrusion in the State of New York* (October 2006), specifically section 2.7. A tracer gas (e.g. Helium) will be used at each soil vapor sampling location to confirm outdoor air infiltration is not occurring.

At least 24 hours after the installation of the probes, one to three implant (screen and tubing) volumes will be purged. Soil vapor samples will be collected in 2.7-liter SUMMA canisters that are individually certified clean by the laboratory and will run for a 2-hour duration at a flow rate less than 0.2 liters per minute. Samples will be analyzed for volatile organic compounds via EPA Method TO-15.

Table 1. Sampling Rationale

Sample ID	Matrix	Sample Depth(s)	Sample Location	Analytical Parameters	Rationale
SOIL-105 through SOIL-110	Subsurface Soil	One sample collected from the interval exhibiting field evidence of contamination or the two-foot interval above the water table.	Locations identified on Figure 1.	TCL VOCs via EPA Method 8260+TICs TCL SVOCs via EPA Method 8270 + TICs 1,4-Dioxane via EPA Method 8270-SIM TAL Metals via EPA Method 6010/7471 PFAS via EPA Method 1633	Six additional subsurface soil sampling locations are proposed to evaluate site-wide subsurface soils on the acreage added to the BCA per the approved amendment. Two of these six sampling locations correspond to new monitoring wells to be installed and sampled.
MW-105 and MW-106	Groundwater	Shallow water bearing zone based on field determination.	Locations identified on Figure 1.	TCL VOCs via EPA Method 8260+TICs TCL SVOCs via EPA Method 8270 + TICs 1,4-Dioxane via EPA Method 8270-SIM TAL Metals via EPA Method 6010/7471 Total PCBs via EPA Method 8082 PFAS via EPA Method 1633	Two additional permanent monitoring wells are proposed to evaluate the upgradient and downgradient sides of the land added to the BCA per the approved amendment.
SV-101 and SV-102	Soil Vapor	Below silty clay soils (approx.. 10-15 ft bgs)	Locations identified on Figure 1.	EPA Method TO-15	Evaluation for potential off-site vapor migration.

2.5 Project Plans

2.5.1 Community Participation Plan

A CPP, prepared in accordance with DER-23 Citizen Participation Handbook for Remedial Programs, was submitted under separate cover concurrently with the BCP Application.

2.5.2 Field Sampling Plan

The proposed work described in this addendum to the RIWP will be performed in accordance with the FSP.

2.5.3 Quality Assurance Project Plan

A QAPP has been prepared for the RIWP. The QAPP presents the policies, organization, objectives, and specific activities designed to achieve the specific data quality goals associated with the RI. Additionally, the QAPP specifies data reporting, data validation, and electronic data deliverable requirements for this scope of work.

Quality Assurance (QA) is defined as the program for assuring the reliability of monitoring and measurement data which includes a system for integrating the planning, assessment, and improvement efforts to meet the data quality requirements.

Quality Control (QC) is defined as the routine application of procedures for attaining the prescribed standard of performance in the monitoring and measurement process.

2.5.4 Health and Safety Plan

A site-specific HASP was prepared for CHA personnel using the information from previous investigations into known physical and chemical hazards present at the Site and an evaluation of the risks associated with the investigations. Available Site information was examined and adequate warnings and safeguards for field personnel were selected. CHA field personnel are required to review and sign the HASP before entering the field. Subcontractors to CHA are required to develop and implement their own HASP.

2.5.5 Community Air Monitoring Plan

The purpose of a CAMP is to provide a measure of protection for the downwind community (i.e. off-site receptors including residences and businesses and on-site workers not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of the proposed remedial investigation activities.

CAMP is generally not required for investigation or delineation of site conditions which are not considered intrusive.

2.6 Data Usability

A data usability review will be completed for the analytical data generated as part of this investigation to assess for accurateness and defensibility. The review of analytical data provided by an ELAP-certified laboratory will include an Analytical Services Protocol (ASP) Category B deliverable consistent with the NYSDEC Data Usability Summary Report (DUSR) Guidance.

Third-party data validation will be conducted and a DUSR will be developed and submitted with the RI Report.

2.7 Qualitative Exposure Assessment

A Qualitative Exposure Assessment for human health is required to be completed during the RI to identify, evaluate, and document potential exposure to contaminants. The assessment includes the following items and will be developed in accordance with Appendix 3B of DER-10:

- A description of the contaminant source(s) including the location of the contaminant release to the environment (any waste disposal area or point of discharge) or if the original source is unknown, the contaminated environmental medium (soil, indoor or outdoor air, biota, water) at the point of exposure;
- An explanation of the contaminant release and transport mechanisms to the exposed population;
- Identification of all potential exposure point(s) where actual or potential human contact with a contaminated medium may occur;
- Description(s) of the route(s) of exposure (i.e., ingestion, inhalation, dermal adsorption); and,
- Characterization of the exposure setting, identifying current and reasonably foreseeable exposure pathways.

Note that GW Almond is accepted into the BCP as a Volunteer and is not required to investigate or remediate off-site impacts.

3.0 ADDENDUM TO THE QAPP AND FSP

The QAPP and FSP appended to the RIWP apply to this addendum. The following is incorporated for the additional sampling effort.

3.1 Sample Designation

Each sample will be uniquely defined by including the media type and sequential number. To avoid confusion with samples collected prior to the RIWP, CHA will continue the numbering sequence from the RI.

The following abbreviations will be used to identify media types:

Table 2. Primary Sample Identification

Sample Type	Abbreviation	Anticipated Sample IDs
Subsurface Soil	SOIL	SOIL-105 SOIL-106 SOIL-107 SOIL-108 SOIL-109
Groundwater	MW	MW-105 MW-106
Soil Vapor	SV	SV-101 SV-102

As stated in Section 2.3, should field evidence of contamination be encountered, a second sample at that soil boring location will be collected. The sample name will be differentiated by the inclusion of the sample depth.

3.2 List of Proposed Samples

Table 3 identifies the proposed sampling media, appropriate analysis, number of quality assurance samples collected for the media type, preservation, and anticipated sample container volume and holding times.

One waste characterization sample each for soil and containerized groundwater is anticipated to be collected for facilitating off-site disposal of the investigation derived waste.

Table 3. Quality Assurance Sampling Schedule

Media	Type of Sample	Analysis	Parameter	Total Primary Samples	Total Duplicates/MS/MSD	Total Trip Blanks	Total Field Blanks	Total Equipment Blanks	Sampling Locations	Minimum Sample Volume/ Container	Preservation	Technical Holding Time
Soil	Subsurface Soil	EPA Method 8260/5035	TCL VOCs + TICs	5	1/1/1	0	0	0	Five soil borings located on Figure 1. SOIL-105 through SOIL-109	Terracore	MeOH or H ₂ O, Cool to 4°C	14 days
		EPA Method 8270	TCL SVOCs + TICS	5	1/1/1	0	0	0		4 oz. glass wide	Cool to 4°C	14 days
		EPA Methods 6010/7471	TAL Metals	5	1/1/1	0	0	0		2 oz. glass wide	Cool to 4°C	180 days/28 days for Hg
		EPA Method 1633	PFAS	5	1/1/1	0	0	0		8 oz. HDPE plastic jar	Cool to 4°C	90 days
		EPA Method 8270E-SIM	1,4-Dioxane	5	1/1/1	0	0	0		4 oz. glass wide	Cool to 4°C	14 days
Water	Groundwater	EPA Method 8260	TCL VOCs + TICs	2	1/1/1	1	1	1	Two groundwater monitoring wells installed in the locations identified on Figure 1. MW-105 and MW-106	3- 40mL - Glass, Vial	1:1 HCl to pH<2; Cool to 4°C	14 days
		EPA Method 8270	TCL SVOCs + TICs	2	1/1/1	0	1	1		2- 250 mL amber	Cool to 4°C	14 days
		EPA Methods 6010/7471	TAL Metals	2	1/1/1	0	1	1		1- 250 mL plastic	HNO ₃ to pH<2; Cool to 4°C	180 days/28 days for Hg
		EPA Method 8082	Total PCBs	2	1/1/1	0	1	1		2- 250 mL amber	Cool to 4°C	7 days
		EPA Method 8270E-SIM	1,4-Dioxane	2	1/1/1	0	1	1		2-250 mL Glass	Cool to 4°C	7 days
		EPA Method 1633	PFAS	2	1/1/1	0	1	1		2-250 mL HDPE plastic	Cool to 4°C	28 days
Soil Vapor	Soil Vapor	EPA Method TO-15	TO-15	2	0/0/0	0	0	0	SV-101 and SV-102	2.7-liter SUMMA	None	30 days



4.0 REPORTING

An RI Report for the original 0.43 acres accepted into the BCP was last submitted on October 9, 2025. The results of the investigation described in this addendum will be incorporated into a revised RI Report to include the entire BCA site boundary. The report will be prepared in accordance with the New York State Department of Environmental Conservation's "DER-10 Technical Guidance for Site Investigation and Remediation" (May 2010).

The report will also include the following information and data pertaining to the Site:

1. A narrative that summarizes the results of the investigation including a discussion of the physical and analytical results.
2. A characterization of the soil, soil vapor, and groundwater of the site to allow for the confirmation of the source(s) of the contamination, movement of the contamination, and nature and extent of contamination.
3. Figures showing the locations of the surface and shallow subsurface samples, soil vapor points, and groundwater monitoring wells at the Site.
4. Tables and figures summarizing the analytical data for soil, soil vapor, and groundwater samples collected including comparisons to appropriate standards, criteria, and guidance (e.g., 6 NYCRR Part 375 Soil Cleanup Objectives for Restricted-Residential Use and NYSDEC TOGS 1.1.1. AWQS)
5. A qualitative exposure assessment for contamination, if any, emanating from the Site.
6. Conclusions and recommendations regarding the environmental status of the site.

5.0 SCHEDULE

The following table provides an estimated schedule for completion of the Gateway Syracuse Apartments project. The overall progress of the project will be dependent upon a number of factors including, but not limited to, NYSDEC review and approval timeframes, time of year at which the final design documents are complete, weather conditions at the time of remedial construction, etc.

Table 4. Proposed Schedule

Task	Estimated Month Complete
Approval of the Addendum to the RIWP	April 2026
Conduct the RIWP Field Work described herein	May 2026
Submit final Remedial Investigation Report to incorporate the investigation described herein with the RI previously performed.	June 2026
Submit Draft Remedial Design Work Plan with Alternatives Analysis	June 2026
Applicant Selects Proposed Remedy	June 2026
NYSDEC 45-Day Comment Period	August 2026
Public Meeting (optional)	August 2026
Finalize the Remedial Design Work Plan and Issue Construction Notice	September 2026
Construction Complete	June 2027
Submit Draft Final Engineering Report and Draft Site Management Plan	July 2027
NYSDEC Issues Certificate of Completion	September 2027
Begin Operations & Monitoring per requirements of Site Management Plan and Institutional and Engineering Controls	

6.0 REFERENCES

6 NYCRR Part 375, Environmental Remediation Programs. December 14, 2006.

Additional Subsurface Investigation Report, prepared by CHA Consulting, Inc., dated June 25, 2024.

Geologic Map of New York: Finger Lakes Sheet. USGS. Rickard and Fisher, 1970.

Geophysical Survey and Limited and Focused Subsurface Soil Investigation Report, prepared by Lender Consulting Services, Inc., dated September 22, 2016.

Limited Phase II Subsurface Investigation, prepared by CHA Consulting, Inc., dated February 22, 2024.

NYSDEC DER-10 – “Technical Guidance for Site Investigation and Remediation”, issued May 3, 2010.

Phase I Environmental Site Assessment, prepared by CHA Consulting, Inc., dated February 22, 2024.

Phase II Subsurface Investigation Report, prepared by CHA Consulting, Inc., dated December 17, 2025.

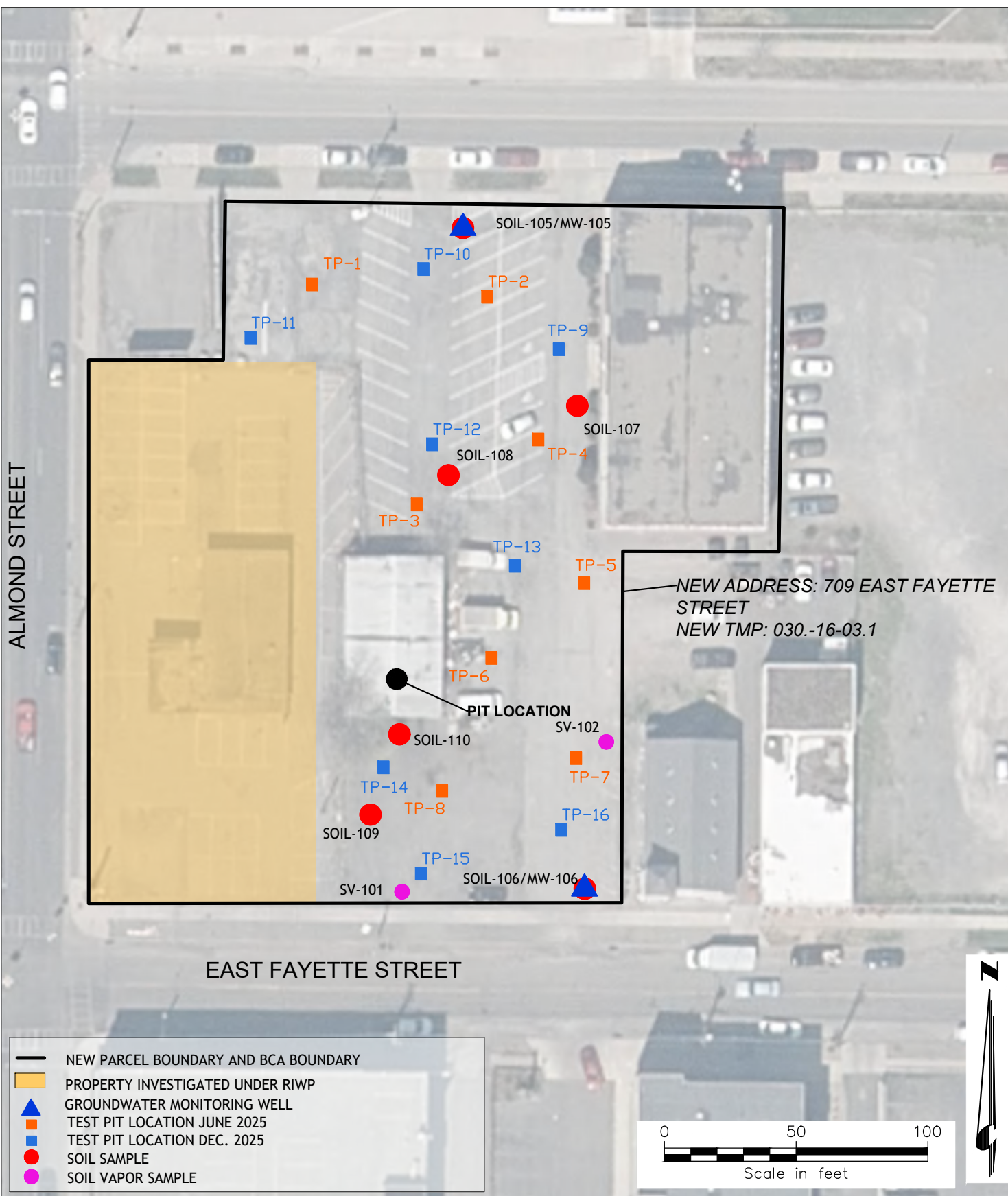
Remedial Investigation Work Plan, prepared by CHA Consulting, Inc., revised April 2025.

Surficial Geologic Map of New York: Finger Lakes Sheet. Cadwell 1986.

Transaction Screen, prepared by Lender Consulting Services, Inc., dated August 5, 2016.

FIGURE

File: V:\PROJECTS\ANY\K6\086328.000\09_DESIGN\DRAWINGS\ENV\2026-01-08_BCA AMENDMENT APPLICATION_RECOVERED.DWG
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