



ADVANCED SITE RESTORATION

ENVIRONMENTAL SERVICES
(A DIVISION OF LAUREL ENVIRONMENTAL GEOSCIENCES, D.P.C.)

February 4, 2025

New York State Department of Environmental Conservation
Superfund and Brownfield Cleanup Section, Region 2
Division of Environmental Remediation
Attention: Marlen Salazar
47-40 21st Street, Long Island City, NY 11101

Re: Nassau Metals, OU-2
Voluntary Cleanup Program Site No. V00159
Corrective Actions Work Plan Addendum, **ASR Project #A22-115**

Dear Ms. Salazar,

Advanced Site Restoration (“ASR”), a division of Laurel Environmental Geosciences (“Laurel”) has prepared this addendum to the Corrective Actions Work Plan to further investigation and address the items identified during the subsurface investigation conducted on October 21 and 22, 2024 at Nassau Metals OU-2 (the “Site”). All work proposed herein will comply with the requirements previously established in the approved Corrective Actions Work Plan, dated August 8, 2024, the site management plan (“SMP”), and excavation work plan (“EWP”).

158 Page Avenue

The subsurface investigation identified elevated levels of heavy metals, specifically copper and lead, within the topsoil and mulch composite samples collected from 158 Page Avenue. The topsoil and mulch were reportedly imported to the Site by Mammoth, Inc., around November 2022. To delineate this condition, **ASR** proposes to conduct six (6) delineation borings (designated DB-1 through DB-6) as shown in Figure 1, with two (2) borings advanced per approximately 500-square foot area of landscaping. The proposed soil borings will allow for discrete soil samples to be collected in each of the previously composited locations (e.g., DB-1 performed at historical SB-1 location), effectively determining what fractions of the composite sample contributed to the documented contamination.

The delineation borings will be performed via hand auger, which will be decontaminated with a laboratory grade detergent (e.g., Alconox) between each soil boring. One (1) soil sample will be collected from each soil boring in the 0”-12” interval for laboratory analysis. Any areas confirmed to contain contaminants above the applicable New York State Department of Environmental Conservation (“NYSDEC”) Soil Cleanup Objectives (“SCOs”) will be excavated, disposed of off-site at a regulated soil disposal facility, and the capping system will be restored with a demarcation barrier and a minimum of 1-foot of certified clean material. Any imported material will be sampled as required by the SMP and the NYSDEC notified in advance of any import as required by the SMP.

The subsurface investigation determined that the geosynthetic composite layer (“GCL”) capping system east of 158 Page Avenue had been damaged during construction activities. Based on publicly available satellite imagery, this area was disturbed in 2015 during construction of a pedestrian ramp and driveway, and again visibly disturbed in July 2022 during renovations to the building at 158 Page Avenue.





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To further investigate this issue, **ASR** proposes to hand excavate the area to determine the lateral extent of the missing GCL; test pits will be hand dug throughout the blue highlighted area on Figure 1 at 10-foot intervals in north/south and east/west cardinal directions. The GCL will be considered “damaged” if the demarcation barrier is not covered by at least 12-inches of material as specified in Appendix I of the Remedial Completion Report for the Site. The corresponding GCL design detail has been appended to this work plan as Attachment 1.

After the extent of the damaged GCL has been delineated, a new GCL cap with a minimum 1-foot thickness will be installed above the existing ground surface. An appropriately designed retaining wall may need to be installed to support the proposed remedy. Any imported material will be sampled as required by the SMP and the NYSDEC notified in advance of any import as required by the SMP.

286 Richmond Valley Road

In the gully fill and patio area, imported fill material was found up to depths of 6 feet below ground surface (“bgs”) and determined to contain semi-volatile organic compounds (“SVOCs”) and the heavy metal copper at concentrations above the applicable NYSDEC SCOs. Based on the available information, Design Landscapes, Inc., working on behalf of the “286 South Restaurant” tenant, is suspected of importing approximately 300 cubic yards of material to the site between March 15, 2024, and July 2024. This is further evidenced by a soil pile that is visible in the gully fill area in publicly available satellite imagery from April 2024. To remedy this issue, **ASR** proposes the construction of a new capping system across the gully fill area, extending to the pre-existing fence lines. The new capping system would be constructed of a minimum of 1-foot of certified clean material at ground surface underlain by a demarcation barrier. The new capping system would be installed to an elevation of approximately 21.5 feet, which matches the existing patio elevation. The lateral extent of the proposed capping system is shown in Figure 2. Any imported material will be sampled as required by the SMP and the NYSDEC notified in advance of any import as required by the SMP.

To the east of the building at 286 Richmond Valley Road, heavy metal contamination from historical industrial operations was discovered at approximately 3 feet bgs. To determine if the surface material in this area is suitable for designation as a capping system, **ASR** proposes to conduct four (4) delineation borings (DB-7 through DB-10) as shown in Figure 2. The delineation borings will be performed via hand auger, which will be decontaminated with a laboratory grade detergent (e.g., Alconox) between each soil boring. One (1) soil sample will be collected from each soil boring in the 0”-12” interval for laboratory analysis. If the material is suitable for use as a capping system, this area of the Site will be designated a new cap in the SMP. If the material is found to contain contaminants above the applicable NYSDEC SCOs, it will be excavated, disposed of off-site at a regulated soil disposal facility, and the capping system will be restored with a demarcation barrier and a minimum of 1” of certified clean material. Any imported material will be sampled as required by the SMP and the NYSDEC notified in advance of any import as required by the SMP.





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236 Richmond Valley Road

During implementation of the Corrective Actions Work Plan, it was noted that construction and demolition (“C&D”) debris had been illegally dumped west of the building at 236 Richmond Valley Road over an indeterminate period of time. *ASR* will sample this material for waste characterization parameters and arrange for disposal at an appropriate facility. The area of dumped material is shown in Figure 3.

Laboratory Analysis

All delineation soil samples collected will be transported to a New York State Department of Health (“NYSDOH”) certified Environmental Laboratory under chain of custody procedures and analyzed for NYSDEC Part 375 parameters including volatile organic compounds (“VOCs”) with tentatively identified compounds (“TICs”), Target Analyte List (“TAL”) SVOCs, TAL heavy metals, pesticides, herbicides, and polychlorinated biphenyls (“PCBs”).

Reporting and Scheduling

Daily reports will be prepared for each day of work that is performed by or overseen by *ASR*. Any received sampling results will be reported in the corresponding monthly report for NYSDEC review. Upon completion of the remedial actions, the Corrective Actions Subsurface Investigation report will be revised to document all work performed under this addendum.

This work will begin upon approval of the Corrective Actions Work Plan Addendum by NYSDEC and is anticipated to be completed by summer 2025.

Please let us know if you have any questions on this proposed work.

Respectfully submitted,

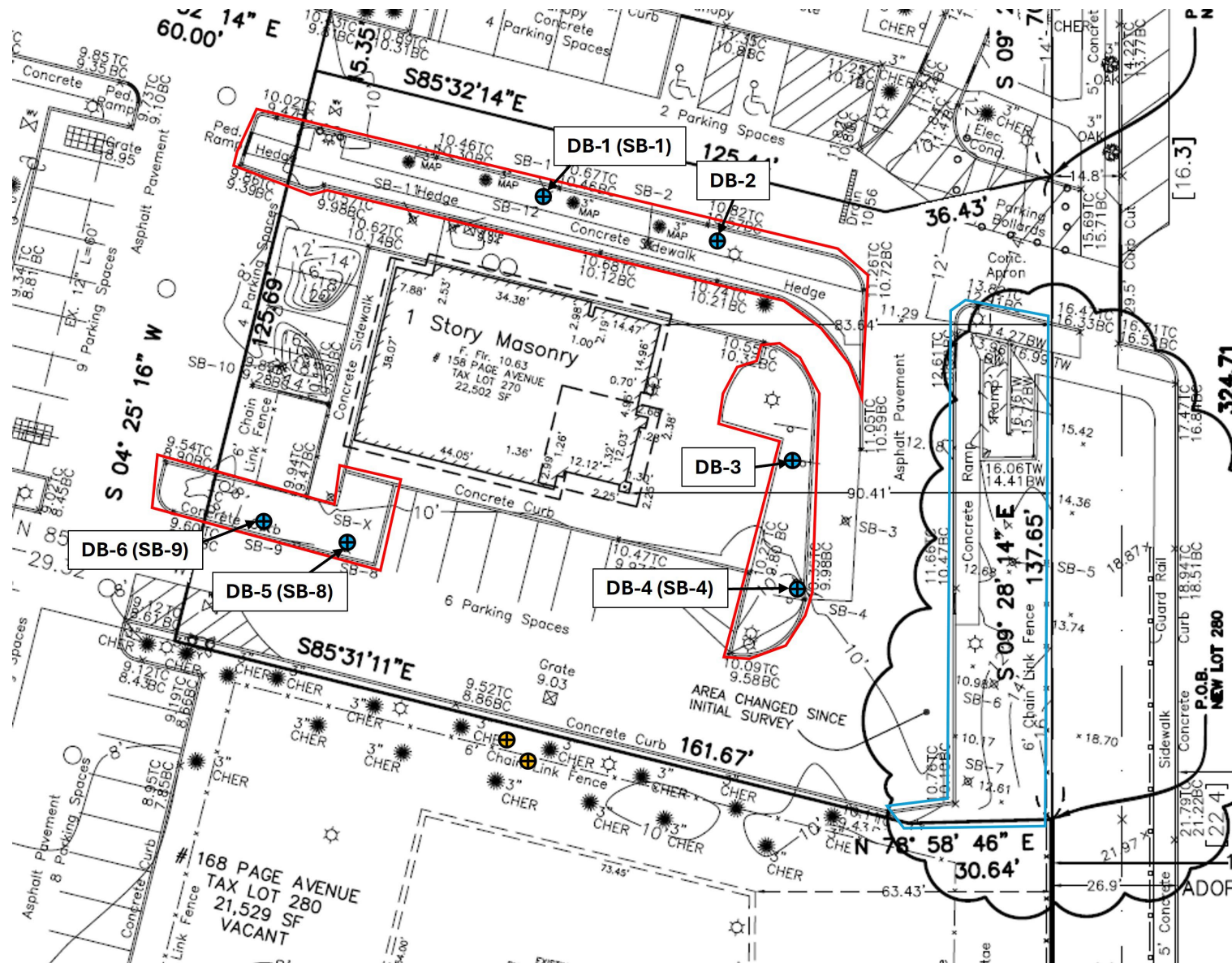
Jamie Burgher
Project Manager, Geologist III

Attachments:

- Figure 1.0: 158 Page Avenue Work to be Performed
- Figure 2.0: 286 Richmond Valley Road Work to be Performed
- Figure 3.0: 236 Richmond Valley Road Work to be Performed
- ATTACHMENT 1 – GCL Design Detail



FIGURES



53 West Hills Road
Huntington Station, NY 11746

PHONE: 631-673-0612
FAX: 631-427-5323

WWW.ASKASR.COM

FIGURE 1.0

158 Page Avenue Work to be Performed

Nassau Metals OU-2,
158 Page Avenue,
Staten Island, NY.

PROJECT: A22-115

DRAWING DATE: 12/13/24

DRAWN BY: CG

CHECKED BY: JB

REVISIONS: N/A

KEY



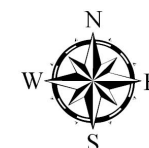
Proposed delineation location



Topsoil and mulch area



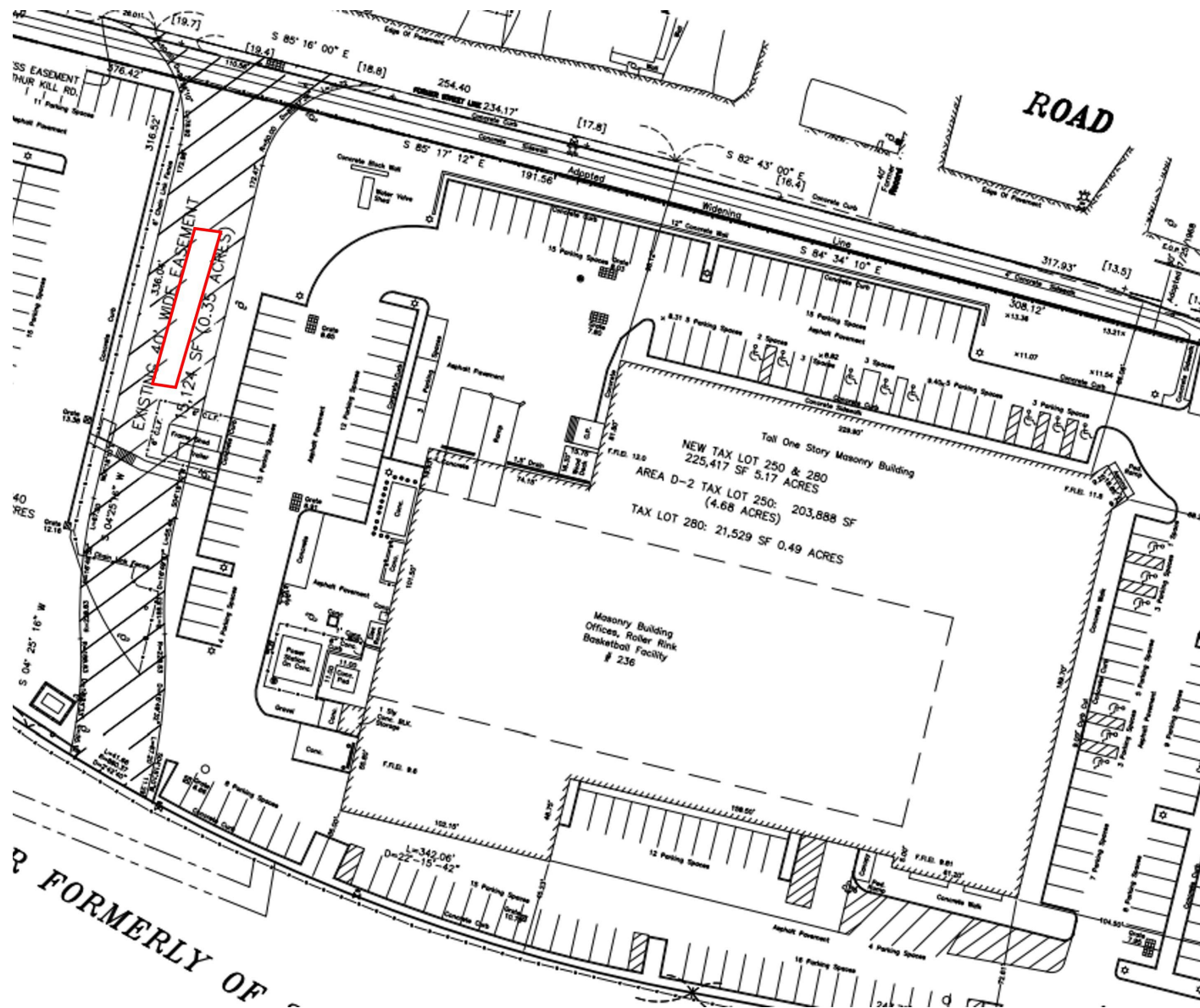
GCL area





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Huntington Station, NY 11746

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FIGURE 3.0

236 Richmond Valley Road Work to
be Performed

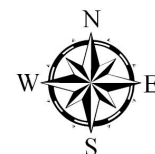
Nassau Metals OU-2,
286 Richmond Valley Road,
Staten Island, NY.

PROJECT: A22-115
DRAWING DATE: 12/13/24
DRAWN BY: CG
CHECKED BY: JB
REVISIONS: N/A

KEY

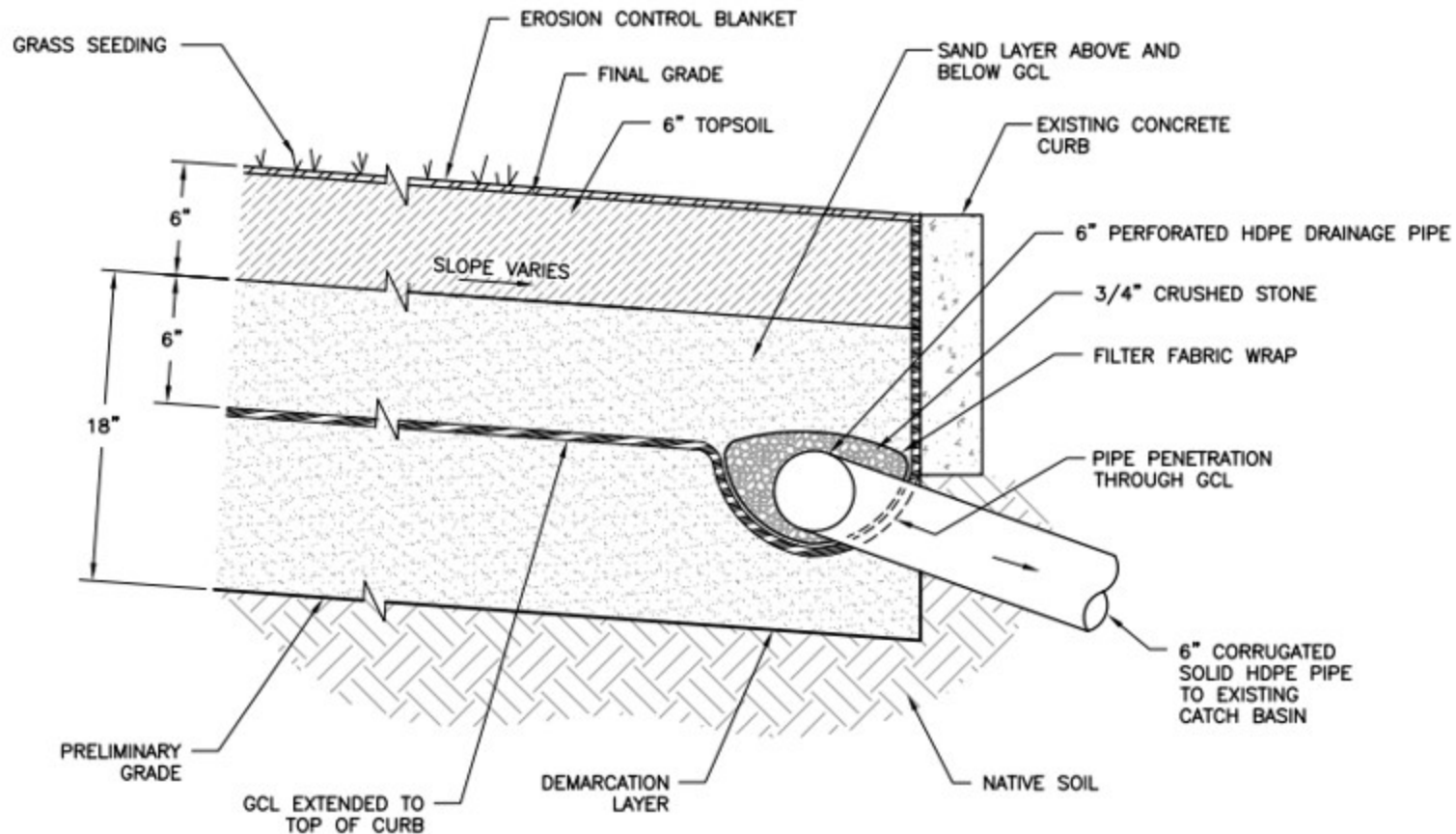


Dumped c&d debris area



ATTACHMENT 1

GCL Design Detail



NOTES

1. FILTER FABRIC WRAP IS 10oz NON WOVEN FILTER FABRIC.
2. 6-INCH PERFORATED DRAINAGE PIPING IS ADVANCED DRAINAGE SYSTEMS (ADS) CORRUGATED PERFORATED HDPE PIPE.
3. SOLID HDPE PIPE AND FITTINGS ARE MANUFACTURED BY ADVANCED DRAINAGE SYSTEMS.