

C.T. MALE ASSOCIATES

Engineering, Surveying, Architecture, Landscape Architecture & Geology, D.P.C.

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May 20, 2026

Mr. Justin Starr, Project Manager
New York State Department of Environmental Conservation
625 Broadway, 11th Floor
Albany, NY 12233-7020
Justin.Starr@dec.ny.gov

Re: *Corrective Measures Workplan*
Greyston Bakery (Site No. V00361), 104 Alexander Street, Yonkers, NY
Reporting Period: October 15, 2021 to October 15, 2024
C.T. Male Project No. 25.1315

Dear Mr. Starr:

On behalf of the Greyston Foundation, C.T. Male Associates Engineering, Surveying, Architecture, Landscape Architecture & Geology, D.P.C. (C.T. Male) presents this Corrective Measures Workplan (CMWP) to address comments in the April 20, 2026 Site Management Periodic Review Report Response Letter from the Department for the Greyston Bakery Site (the Site) (formerly 104 Ashburton Avenue) in the City of Yonkers, Westchester County, New York.

Background

As described in the Periodic Review Report (PRR) dated March 31, 2026, there were instances of non-compliance with Site Management Plan, specifically with the Soil Management Plan Institutional Control and Cover System Engineering Control, related to the following three (3) disturbances of the Cover System during the monitoring period:

- Installation of a building addition, re-routed emergency stairway, and sidewalk on the east side of the bakery.
- Disturbance of the Cover System related to installation of a concrete pad in the area of MW-3R.
- Disturbance of the concrete floor within the bakery building related to modifications to an existing dishwasher pit.

Based on these areas of non-compliance, the Department rejected the PRR and associated certification for the following reasons:

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- “Institutional controls could not be certified as being in-place and functioning as designed.”
- “The site cover, an engineering control, was disturbed in multiple instances without proper environmental oversight or regulatory notification.”
- The site building was modified such that the vapor mitigation system, an engineering control, may no longer be effective in addressing exposure pathways for the entire footprint of the building.”

Based on our discussions with the Department in a phone conference dated April 17, 2026, and the April 20, 2026, NYSDEC PRR rejection letter, the following actions are proposed to address the areas of non-compliance:

Site-Specific Training and Signage

To address the Departments first and second bullet points, specifically related to compliance with the Soil Management Plan Institutional Control and Cover System Engineering Control, it is proposed to conduct site-specific training with site management and facility personnel on the Site Management Plan requirements.

At a minimum, the training will explain that prior to any interior or exterior ground intrusive site disturbance, as well as any maintenance, repair, or construction work that could affect the Site’s cover system or vapor mitigation system components, management must be consulted so that a pre-work evaluation of the proposed scope can take place to determine if the project requires NYSDEC notification and involvement of a Qualified Environmental Professional to observe and document the activities, as required in the Site Management Plan.

It is also proposed to post signage at conspicuous locations around the exterior of the site and interior of the building, alerting personnel that all ground intrusive work must be reviewed with site management before any work begins.

Exterior signage will be posted at approximately four (4) locations around the site perimeter, and will be affixed to existing site features (e.g. fencing, or existing posts). Signs shall not be installed by penetrating the ground for support. Additionally, signage will be posted at each entry to the building, with the exception of the main entrance used by visitors. In place of signage on the main exterior entrance, signage is proposed to be placed on interior doorway entrance(s) to the production area because of more traffic by employees (i.e., not visitors who have no reason to disturb the site).

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Additionally, it is proposed to post signage/labels on or near the various vapor mitigation system components (Vapor-Pin monitoring points, above grade piping runs, and rooftop ventilation fans) explaining what the components are, that they are not to be disturbed, and what to do in the event a component is noted to be disturbed, damaged, or inoperable. Where reasonable, the above ground piping runs will be labeled in a manner to easily identify that the pipe is vapor mitigation system related.

An example of the proposed signage is included as Attachment A.

Vapor-Pin Installation

To address the Departments third bullet point, specifically regarding the efficacy of the vapor mitigation system in the new building addition on the east side of the bakery, an additional Vapor-Pin sub-slab monitoring point (to be identified as VP-6) is proposed to be installed in the concrete floor of the building addition. The Vapor-Pin will be installed following the manufacturer's installation instructions. The exact location of the Vapor-Pin installation will be determined on the day of installation, with the intent to be representative of the sub-slab conditions beneath the building addition but away from equipment in the room enough to be able to install it. After installation of the Vapor-Pin, a complete round of negative pressure vacuum measurements will be taken utilizing a Dwyer digital monometer at all six (6) monitoring points (VP-1 to VP-6). The Vapor-Pin will be installed earlier in the day so it can be checked shortly after installation (after at least 20 minutes), and again after approximately 4 hours to allow the sub-slab conditions to re-equilibrate. The approximate location of the new Vapor-Pin location is shown on the attached Figure 1 (Attachment B).

Site Observation

To address the Departments third bullet point, specifically regarding the efficacy of the vapor mitigation system related to the modifications to the dishwasher pit in the central portion of the bakery, a targeted observation of the flooring in this area will occur to observe the condition of the floor for cracks or other obvious potential pathways for vapor infiltration. This observation will also focus on listening for air movement at the transition from the repair to the existing floor as there could be a suction noise if not properly sealed. The approximate location of the modified dishwasher pit is shown on Figure 1 (Attachment B).

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Reporting

Following completion of an initial round of site-specific training, signage installation, vapor-pin installation/vacuum measurements, and site observation described above, a Corrective Measures Report (CMR) will be prepared describing the work performed, any deviations from the workplan, results of the monitoring and observations, and include conclusions and any recommendations.

Schedule

Implementation of this CMWP can be initiated within approximately one (1) month following the Departments approval of this plan. To minimize impact to the operations at the site, and allow for observations during a period where activity (and therefore noise) will be reduced within the building, if possible, the Vapor-Pin installation and site observation tasks may occur on a weekend.

Preparation of the CMR can be completed within approximately two (2) weeks following the completion of all the components of this plan.

Respectfully Submitted,

C.T. MALE ASSOCIATES



Daniel T. Achtyl, P.G.
Geologist III

Reviewed and Approved By



Jeffrey A. Marx, P.E.
Managing Environmental Engineer

cc: Stephen Bergel, First Choice Safety Solutions, LLC
Sharma Dwarka, Greyston Foundation
Andrew Yu, Greyston Foundation
Sarah Saucier, NYSDEC
Steven McCague, NYSDEC
Angela Martin, NYSDOH
Melissa Doroski, NYSDOH

Att. Attachment A: Proposed Signage
Attachment B: Figure 1

NOTICE — NYSDEC SITE MANAGEMENT AREA

This property is subject to a NYSDEC-approved Site Management Plan and Institutional/Engineering Controls.

No excavation, drilling, trenching, grading, pavement penetration, concrete slab or floor penetration, utility work, soil disturbance, or disturbance of the site cover system (asphalt, concrete, or soil) is permitted without prior authorization.

This restriction applies to the Property, both inside the building and outside.

All intrusive work must be reviewed before work begins and must be performed in accordance with the approved Site Management Plan, Excavation Work Plan, Health, and Safety Plan, and applicable NYSDEC notification requirements.

Contact Site Management before beginning any disturbance work.

Site Contact: _____

Phone: _____

NYSDEC Site No.: _____

Emergency Contact: _____

NOTICE — VAPOR MONITORING POINT

This vapor monitoring point (i.e., silver cap in floor) is part of the site's NYSDEC Site Management Plan / subslab vapor monitoring system.

Do not remove, cover, damage, drill, core, cut, or perform work on or near this monitoring point without prior authorization.

Contact Site Management before any work on or near this monitoring point.

Site Contact: _____

Phone: _____

NYSDEC Site No.: _____

Emergency Contact: _____

NOTICE — VAPOR MITIGATION FAN

This rooftop fan is part of the site's NYSDEC Site Management Plan / subslab vapor mitigation system.

Do not shut off, disconnect, alter, cover, obstruct, service, remove, or perform work on or near this equipment without prior authorization.

If the fan is not operating, appears damaged, is making unusual noise, or the alarm/indicator shows a problem, notify Site Management immediately.

Contact Site Management before any work on or near this equipment.

Site Contact: _____

Phone: _____

NYSDEC Site No.: _____

Emergency Contact: _____

NOTICE — VAPOR MITIGATION PIPING

This piping is part of the site's NYSDEC Site Management Plan / subslab vapor mitigation system.

Do not disconnect, alter, cover, obstruct, service, remove, or perform work on or near this piping without prior authorization.

If the piping appears damaged, notify Site Management immediately.

Contact Site Management before any work on or near this piping.

Site Contact: _____

Phone: _____

NYSDEC Site No.: _____

Emergency Contact: _____

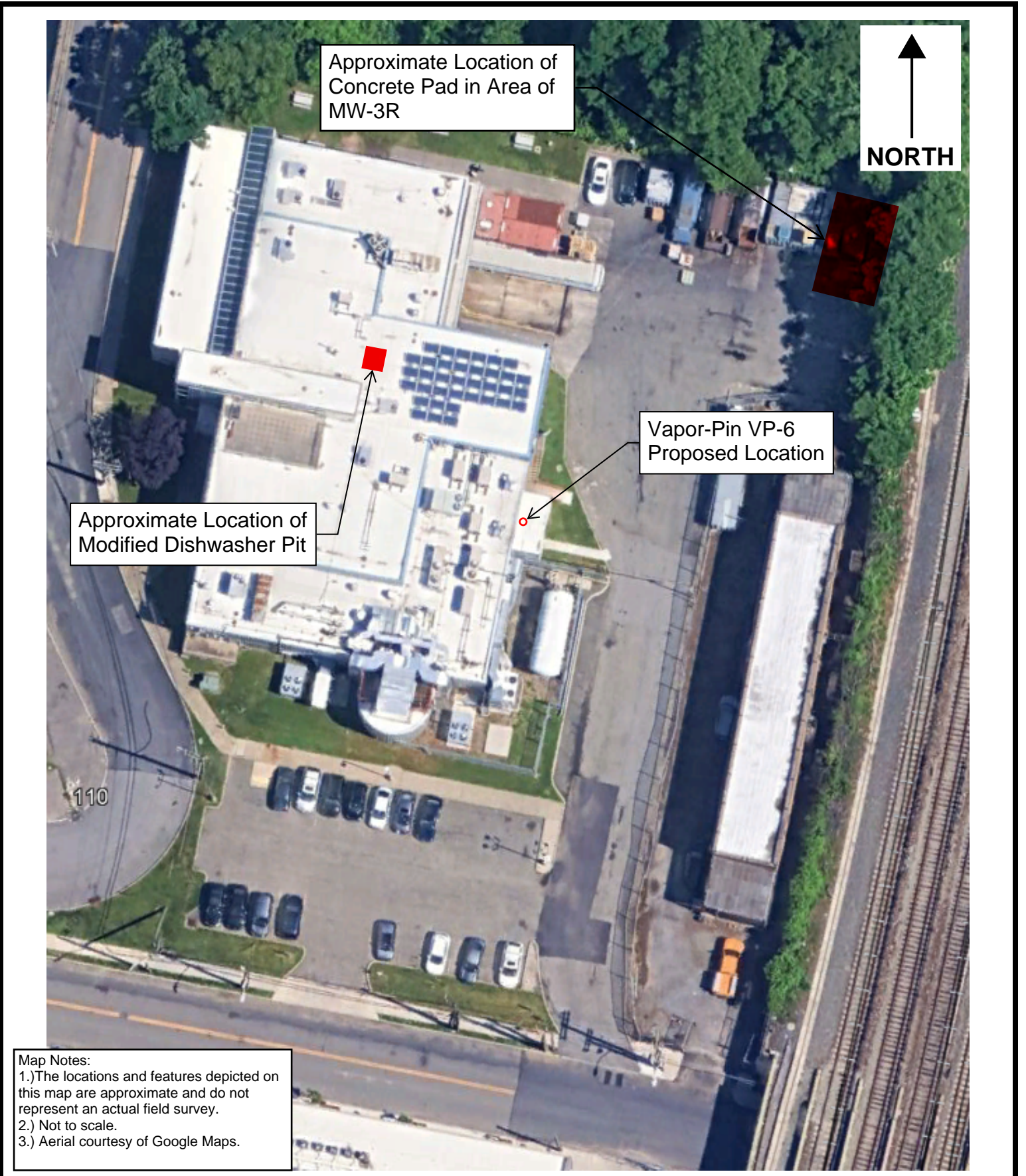


FIGURE 1 - CORRECTIVE MEASURES WORKPLAN PROPOSED LOCATIONS
Greyston Bakery Site
104 Alexander Street, Yonkers, New York
C.T. Male Project No. 25.1315