390 to 398 WALLABOUT STREET

BROOKLYN, NEW YORK

Remedial Action Report

NYC VCP Number: 12CVCP056K

Prepared for:

Throop Wallabout Realty, LLC

505 Flushing Avenue, Suite 1D

Brooklyn, NY 11205

Prepared by:

EBC

ENVIRONMENTAL BUSINESS CONSULTANTS

1808 Middle Country Road

Ridge, NY 11961

SEPTEMBER 2014

REMEDIAL ACTION REPORT
TABLE OF CONTENTS

LIST OF ACRONYMS

CERTIFICATION

EXECUTIVE SUMMARY i

REMEDIAL ACTION REPORT 1

1.0 SITE BACKGROUND 1

1.1 Site Location and Prior Usage 1

1.2 Proposed Redevelopment Plan 1

1.3 Description of Surrounding Property 2

1.4 Remedial Investigation 4

2.0 DESCRIPTION OF REMEDIAL ACTIONS 8

3.0 COMPLIANCE WITH REMEDIAL ACTION WORK PLAN 16

3.1 Construction Health & Safety Plan (CHASP) 10

3.2 Community Air Monitoring Plan (CAMP) 10

3.3 Soil/Materials Management Plan 10

3.4 Storm-Water Pollution Prevention 10

3.5 Deviations From the Remedial Action Work Plan 10

4.0 REMEDIAL PROGRAM 11

4.1 Project Organization 11

4.2 Site Controls 11

4.3 Materials Excavation and Removal 12

4.4 Materials Disposal 14

4.5 Backfill Import 15

5.0 ENGINEERING CONTROLS 16

6.0 INSTITUTIONAL CONTROLS 18

7.0 SITE MANAGEMENT PLAN 19

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FIGURES

Figure 1 - Site Location Map

Figure 2 - Site Plan

Figure 3 - Redevelopment Plan

Figure 4 - Surrounding Land Use

Figure 5 - Excavation Areas

Figure 6 - Endpoint Sample Locations

Figure 7 - Vapor Barrier and SSDS Layout

TABLES

Table 1 - Endpoint Sample Results - VOCs

Table 2 - Endpoint Sample Results - SVOCs

Table 3 - Endpoint Sample Results - Pesticides/PCBs

Table 4 - Endpoint Sample Results - Metals

Table 5 - List of SCOs

Table 6 - Disposal Quantities and Disposal Facilities

APPENDICES

Appendix A - Final Architectural Plans

Appendix B - Project Photographs

Appendix C - Community Air Monitoring Results

Appendix D - Daily Status Reports

Appendix E - Endpoint Laboratory Report

Appendix F - Soil Disposal Request Letters

Appendix G - Soil Disposal Acceptance Letters

Appendix H - Manifests and Scale Tickets - New Castle

Appendix I - Bills of Lading and Scale Tickets - 110 Landfill

Appendix J - Imported Backfill Documentation

Appendix K - Sustainability Report

Appendix L - SSDS Inspection Report

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LIST OF ACRONYMS

Acronym	Definition
CAMP	Community Air Monitoring Plan
DER-10	NYS DEC Division of Environmental Remediation Technical Guidance Manual 10
EC	Engineering Control
HASP	Health and Safety Plan
IC	Institutional Control
NYC VCP	New York City Voluntary Cleanup Program
NYC DEP	New York City Department of Environmental Protection
NYC DOHMH	New York City Department of Health and Mental Hygiene
NYC OER	New York City Office of Environmental Remediation
ORC	Oxygen Release Compound
PID	Photoionization Detector
QA/QC	Quality Assurance/Quality Control
QEP	Qualified Environmental Professional
RAR	Remedial Action Report
RAWP	Remedial Action Work Plan
SCG	Standards, Criteria and Guidance
SCO	Soil Cleanup Objective
SMMP	Soil/Materials Management Plan
SMP	Site Management Plan
SVOCs	Semi-Volatile Organic Compounds
UST	Underground Storage Tank
VOCs	Volatile Organic Compounds

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CERTIFICATION

I, Ariel Czemerinski, am currently a registered professional engineer licensed by the State of New York. I had primary direct responsibility for implementation of the remedial program for the Redevelopment Project located at 390 to 398 Wallabout Street in Brooklyn, New York, Site Number 12CVCP056K .

I certify that the active Sub-Slab Depressurization System (SSDS) was designed by me or under my supervision and installed in a manner that will achieve the goal of the Remedial Action Work Plan (RAWP) to prevent soil vapor intrusion and provide protection of public health for the occupants of the building.

I certify that the OER-approved Remedial Action Work Plan dated May 2012 and the associated Stipulation List dated May 29, 2012, was implemented and that all requirements in those documents have been substantively complied with. I certify that contaminated soil, fill, liquids or other material from the property were taken to facilities licensed to accept this material in full compliance with applicable laws and regulations.

Ariel Czemerinski

Name

076508

PE License Number

Signature

10/30/2014

DATE

EXECUTIVE SUMMARY

Site Location and Prior Usage

The Site is located at 390 to 398 Wallabout Street in the Williamsburg section in Brooklyn, New York and is identified as Block 2266, Lots 21, 22, 23, 24 and 25 on the New York City Tax Map. Figure 1 shows the Site location. The Site is 12,500-square feet and is bounded by Wallabout Street to the north, a vacant lot, 2 residential buildings, and a parking lot to the south, a 1-story commercial building and an undeveloped lot to the east, and a new 4-story apartment building to the west. A map of the site boundary is shown in Figure 2.

Prior to redevelopment, the undeveloped Site lots (Lots 21, 22, 23 and 24) were used as a parking lot for a car and truck rental company, and the lot developed with a one-story concrete block building (Lot 25) was used as a tire repair facility. Each of the five lots is rectangular, consisting of 25 feet of street frontage on Wallabout Street and a depth of 100 feet.

Summary of Proposed Redevelopment Plan

The proposed future use of the Site consisted of five identical 4-story apartment buildings. The current zoning designation for each of the Site Lots is R7A. R7A is a contextual district that allows residential and community facility buildings. The proposed use is consistent with existing zoning for the property.

The five 25 ft wide tax lots are being developed with identical residential four-story masonry buildings with full cellars. Each of the five buildings extends approximately 65 feet from front to rear, meeting both side lot lines. Therefore, the gross building square footage for each building is 8,125 ft^2. There is a rear cellar level walk-out court yard behind each building, that extends from the rear of the building to the rear property line. The concrete slab of the cellar is approximately 6 feet 4 inches below sidewalk level. The street front portion of the cellar consists of a boiler room, gas meter room, electric meter room and a large open cellar area. The remaining portions of the cellar for each building will be used for residential and accessory residential space.

Each building consists of three residential units. Unit 1 consists of the cellar level and first floor, Unit 2 is the second floor and Unit 3 is the third and fourth floors.

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Excavation for each new building and rear cellar-level courtyard extends to a depth of approximately 8 feet below grade for construction of the buildings' cellar levels and foundations. Assuming an excavation volume of approximately 25 feet (wide) by 100 feet long (length) and 8 feet (deep), a total of approximately 740 cubic yards (1,000 tons) of soil was planned for excavation per building. The total excavated volume of soil for the entire Site was estimated to be approximately 3,700 cubic yards (5,000 tons). The rear cellar level court yard is capped with concrete.

Summary of Past Uses of Site and Environmental Findings

Historical information (DOB records, Sanborn Maps and City Directory listings) reviewed for the Site identified the Site as being developed prior to 1887 with mixed use buildings. A description of the historic usage of each of the lots is provided below.

Lot 21 (390 Wallabout Street)

Developed prior to 1887 with a small 1½-story dwelling. By 1904, the property was redeveloped with a 3-story dwelling. By 1976, the entire lot was vacant/undeveloped and remained undeveloped.

Lot 22 (392 Wallabout Street)

Developed prior to 1887 with a small 2-story dwelling located in the front of the lot. A 1½-story building was located in the rear of the lot and a 2-story stable was located in the southwest corner of the lot. The rear buildings were replaced prior to 1918 with a larger 2-story storage building. The lot was undeveloped and vacant by 1965 and remained undeveloped.

Lot 23 (394 Wallabout Street)

Developed prior to 1887 with a small 3-story dwelling located in the front of the lot and a 2-story dwelling in the rear of the lot. In 1904, the 2-story dwelling in the rear yard was labeled as a “tailor”. The rear building was demolished by 1954 and the entire lot was drawn as vacant/undeveloped by 1979.

Lot 24 (396 Wallabout Street)

Developed prior to 1887 with a small 1½-story dwelling located in the front of the lot and a 2-story stable in the rear of the lot. By 1904, the lot was redeveloped with a 4-story dwelling that

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fronted Wallabout Street and a 1-story dwelling in the rear. In the 1950's, the 1-story dwelling in the rear yard was demolished and the 4-story dwelling in the front of the lot was demolished in late 1960's. The lot remained undeveloped.

Lot 25 (398 Wallabout Street)

Developed prior to 1887 with a small 3-story dwelling located in the front of the lot along Wallabout Street. A 2½-story stable was located in the rear of the lot. However, according to historic Sanborn maps, the lot was undeveloped by 1947. The property remained undeveloped until the 1960's, when a 1-story office/warehouse building was constructed. The building was converted for use as an auto repair facility in the early 1980's. Prior to redevelopment, the building was utilized as a tire repair center.

The AOCs identified for this Site include:
Historic fill layer is present at the site from grade to 6 to 8 feet below grade.

1. Elevation of the property is approximately 14 feet.
2. Depth to groundwater ranges from 8 to 9 feet at the Site.
3. Groundwater flow is generally from South to North beneath the Site.
4. Depth to bedrock is greater than 100 feet at the Site.
5. The stratigraphy of the Site, from the surface down, consists of 5 to 8 feet of urban fill underlain by a brown sand.
6. Soil/fill samples collected during the RI showed no PCBs at detectable concentrations. No VOCs were detected above Unrestricted Use SCOs, as only 1,2,4-trimethylbenzene was detected at a low level (11 ppb) in one sample. Ten SVOCs were detected above Restricted Residential SCOs in the shallow soil horizon, and one shallow soil sample showed relatively high levels of SVOCs (total SVOCs were found to be 1076 ppm) and is believed to be a hotspot. These SVOCs were all PAH compounds and their concentrations, with the exception of the SVOC hotspot, and distributions indicate that they are associated with historic fill material observed in shallow samples. Four pesticides (4,4,4-DDT, 4,4,4-DDE, chlordane, and dieldrin) were detected in shallow soil samples at concentrations above Unrestricted Use SCOs, but well below Restricted Residential SCOs. Six metals exceeded Unrestricted Use SCOs in shallow soil samples, and of these metals, barium (max of 1190

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ppm), mercury (max of 18.6 ppm), and lead (max of 863 ppm) also exceeded their respective Restricted Residential SCOs in shallow soil. No SVOCs, Pesticides, or Metals were detected above Unrestricted Use SCOs within the deeper soil samples. Overall, with the exceptions of the mercury and SVOC hotspots, the findings were consistent with observations for other historical fill sites in Brooklyn.

7. Groundwater samples collected during the RI showed chlorinated VOCs in three of four groundwater samples. Trichloroethene (TCE) at a maximum concentration of 18 µg/L and cis-1,2-dichloroethene at a maximum concentration of 41 µg/L were found above their GQSs, and tetrachloroethene (PCE) was found below its GQS at 1.8 µg/L in one sample. No chlorinated VOCs were identified in any of the soil samples collected on Site and are believed to be associated with off-Site impacts. Four SVOCs, all PAHs, were detected above their corresponding GQSs in three of four groundwater samples. The pesticide 4,4,4-DDT was detected in one groundwater sample slightly above its GQS. Magnesium, manganese, and sodium were the only metals identified in the dissolved groundwater sample from GW4. The three remaining samples were not filtered and also showed total concentrations of lead, arsenic, beryllium, chromium, and nickel above their GQSs. The levels of metals, SVOCs, and pesticides in groundwater may reflect the impact of turbid samples collected from within the historic fill layer, rather than dissolved groundwater quality. The RI indicates that groundwater is not impacted by Site conditions and did not reveal any sources of contaminants on-Site.
8. Soil vapor samples collected during the RI showed petroleum and chlorinated VOCs at low to moderate concentrations. Total petroleum VOCs were identified from 29 to 498 µg/m^3. PCE was identified in all samples at a maximum concentration of 183 µg/m^3. TCE was also identified at a maximum concentration of 14 µg/m^3. These results for TCE and PCE are within the monitoring level ranges of the State DOH soil vapor guidance matrix. Neither PCE nor TCE were detected within any of the soil samples collected at the Site and these levels suggest a possible off-Site origin.

Summary of the Remedy

A Pre-Application Meeting was held on June 24, 2011. A Remedial Investigation (RI) was performed between January and February 2012 and a RI Report dated May 2012 was prepared to

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evaluate data and information necessary to develop a Remedial Action Work Plan (RAWP). A Site Contact List was established and a RAWP dated May 2012 was prepared and released with a Fact Sheet on April 30, 2012, for a 30-day public comment period. The RAWP with a Stipulation List dated May 29 2012 was approved by the New York City Office of Environmental Remediation (OER) on June 21, 2012. A pre-construction meeting was held on June 27, 2012 and remedial action began in August of 2012 and completed in March 2013.

1. Prepared a Community Protection Statement and implemented a Citizen Participation Plan.
2. Performed a Community Air Monitoring Program for particulates and volatile organic carbon compounds.
3. Established Track 4 Soil Cleanup Objectives (SCOs). Excavation and removal of soil/fill exceeding Unrestricted Use SCOs and achieved Track 1 SCOs for soil.
4. Collected and analyzed end-point samples to determine the performance of the remedy with respect to attainment of SCOs.
5. Installed and operating an active sub-slab depressurization system in three sections, each equipped with a blower, a manometer to measure system pressure and an alarm.
6. Installed a vapor barrier system beneath the building slab and behind foundation walls.
7. Imported of materials to be used for backfill in compliance with this plan and in accordance with applicable laws and regulations.
8. Transported and disposed off-Site of all soil/fill material at permitted facilities in accordance with applicable laws and regulations for handling, transport, and disposal, and this plan. Collected, sampled and analyzed samples representative of excavated media as required by disposal facilities. Appropriately segregated excavated media on Site.
9. Screened excavated soil/fill during intrusive work for indications of contamination by visual means, odor, and monitoring with a PID.
10. Implemented storm-water pollution prevention measures in compliance with applicable laws and regulations.
11. Performed all activities required for the remedial action, including permitting requirements and pretreatment requirements, in compliance with applicable laws and regulations.

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12. Submitted a RAR that: certifies that the remedial requirements have been achieved; defines the Site boundaries: describes all Engineering and Institutional Controls applicable to the Site; and describes the remedial activities including any changes from the RAWP.
13. Submission of an approved Site Management Plan (SMP) in the RAR for long-term management of soil vapor, including plans for operation, maintenance, monitoring, inspection and certification of Engineering and Institutional Controls and reporting at a specified frequency.
14. Continued registration of the property as an E-Designated property at the NYC Department of Buildings.

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REMEDIAL ACTION REPORT

1.0 SITE BACKGROUND

Throop Wallabout Realty LLC has enrolled in the New York City Voluntary Cleanup Program (NYC VCP) to investigate and remediate a property located at 390 to 398 Wallabout Street in Williamsburg section of Brooklyn, New York. A Remedial Investigation (RI) was performed to compile and evaluate data and information necessary to develop a Remedial Action Work Plan (RAWP). A remedial action was performed pursuant to an OER-approved RAWP in a manner that has rendered the Site protective of public health and the environment consistent with the proposed use of the property. This RAR describes the remedial action performed under the RAWP. The remedial action described in this document provides for the protection of public health and the environment, complies with applicable environmental standards, criteria and guidance and applicable laws and regulations.

1.1 Site Location and Prior Usage

The Site is located at 390 to 398 Wallabout Street in the Williamsburg section in Brooklyn, New York and is identified as Block 2266, Lots 21, 22, 23, 24 and 25 on the New York City Tax Map. Figure 1 shows the Site location. The Site is 12,500-square feet and is bounded by Wallabout Street to the north, a vacant lot, 2 residential buildings, and a parking lot to the south, a 1-story commercial building and an undeveloped lot to the east, and a new 4-story apartment building to the west. A map of the site boundary is shown in Figure 2.

Prior to redevelopment, the undeveloped Site lots (Lots 21, 22, 23 and 24) were used as a parking lot for a car and truck rental company, and the lot developed with a one-story concrete block building (Lot 25) was used as a tire repair facility. Each of the five lots is rectangular, consisting of 25 feet of street frontage on Wallabout Street and a depth of 100 feet.

1.2 Proposed Redevelopment Plan

The proposed future use of the Site consisted of five identical 4-story apartment buildings. Layout of the proposed site redevelopment plan is presented in Figure 3. The current zoning designation for each of the Site Lots is R7A. R7A is a contextual district that allows

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residential and community facility buildings. The proposed use is consistent with existing zoning for the property.

The five 25 ft wide tax lots were to be developed with identical residential four-story masonry buildings with full cellars. Each of the five buildings were to extend approximately 65 feet, meeting both side lot lines. Therefore, the gross building square footage for each building was 8,125 ft^2. There was to be a rear cellar level walk-out court yard behind each building, that would extend from the rear of the building to the rear property line. The concrete slab of the cellar would be approximately 6 feet 4 inches below sidewalk level. The street front portion of the cellar was to consist of a boiler room, gas meter room, electric meter room and a large open cellar area. The remaining portions of the cellar for each building will be used for residential and accessory residential space.

Each building was to consist of three residential units. Unit 1 consists of the cellar level and first floor, Unit 2 is the second floor and Unit 3 is the third and fourth floors.

Excavation for each new building and rear cellar-level courtyard was to extend to a depth of approximately 8 feet below grade for construction of the buildings' cellar levels and foundations. Assuming an excavation volume of approximately 25 feet (wide) by 100 feet long (length) and 8 feet (deep), a total of approximately 740 cubic yards (1,000 tons) of soil would require excavation per building. The total excavated volume of soil for the entire Site was estimated to be approximately 3,700 cubic yards (5,000 tons). The rear cellar level court yard was to be capped with concrete.

1.3 Description of Surrounding Property

The area surrounding the Site consists of a mix of residential and commercial properties. Figure 4 shows the surrounding land usage of the adjacent properties listed below as well as additional properties located up to 500 feet away from the Site. No hospitals, daycare facilities or schools are located within a 250 ft radius of the Site.

Direction	Property Description
North – Opposite side of Wallabout Street	Block 2250, Lot 33 (66 Throop Avenue) – Developed with a 1-story brick industrial/manufacturing building built around 1993.

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	Block 2250, Lot 36 (313 Wallabout Street) – A 2,500 ft^2 undeveloped lot. The property is owned by John K. Vartoughian. Block 2250, Lot 37 (311 Wallabout Street) – Developed with a 2-story residential building located along Wallabout Street building around 1901. The building has 3 residential units. Block 2250, Lot 38 (307 Wallabout Street) – Developed with a 1-story brick industrial/manufacturing building occupying the entire lot. Built in 1993. The property is owned by A. Holding.
South – Adjacent properties	Block 2266, Lot 36 (99 Gerry Street) – A 2,500ft^2 lot that is undeveloped. The property is owned by the NYC Housing Preservation and Development. Block 2266, Lot 37 (97 Gerry Street) – Developed with a 3-story residential building. Built approximately 1968. Block 2266, Lot 38 (95 Gerry Street) – Developed with a 1-story industrial building occupying the entire lot. The building is used as a sheet metal workshop. Block 2266, Lot 39 (93 Gerry Street) – A 2,500 ft^2 undeveloped lot owned by Vinfield Realty Corporation. Lots 39, 40, and 41 are used as a coach bus parking area. Block 2266, Lot 40 (91 Gerry Street) – A 2,500 ft^2 undeveloped lot owned by Vinfield Realty Corporation. Lots 39, 40, and 41 are used as a coach bus parking area. Block 2266, Lot 41 (No # Gerry Street or 89 Gerry Street) – A 2,500 ft^2 undeveloped lot owned by Vinfield Realty Corporation. Lots 39, 40, and 41 are used as a coach bus parking area.
East – Adjacent properties	Block 2266, Lot 29 (72 Throop Street) – A 7,500 ft^2 lot currently being redeveloped with three new 4-story apartment building. The corner lot consists of 100 feet of frontage on Wallabout Street and 75 feet of frontage on Throop Avenue. Block 2266, Lots 30 and 31 (74-76 Throop Avenue) – Two 2,500 ft^2 lots developed with a single 1-story warehouse building that occupies the entire area of the two lots.
West – Adjacent properties	Block 2266, Lot 20 (388 Wallabout Street) – A 2,500 ft^2 lot currently being redeveloped with a new 4-story apartment building.

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1.4 Remedial Investigation

A remedial investigation was performed and the results are documented in a document called "*Remedial Investigation Report, 390 to 398 Wallabout Street*", dated April 2012 (RIR).

Summary of Past Uses of Site and Areas of Concern

A Phase I Environmental Site Assessment was performed by Environmental Business Consultants in January of 2012. Historical information (DOB records, Sanborn Maps and City Directory listings) reviewed for the Site identified the Site as being developed prior to 1887 with mixed use buildings. A description of the historic usage of each of the lots is provided below.

Lot 21 (390 Wallabout Street)

Developed prior to 1887 with a small 1½-story dwelling. By 1904, the property was redeveloped with a 3-story dwelling. By 1976, the entire lot was vacant/undeveloped and remained undeveloped.

Lot 22 (392 Wallabout Street)

Developed prior to 1887 with a small 2-story dwelling located in the front of the lot. A 1½-story building was located in the rear of the lot and a 2-story stable was located in the southwest corner of the lot. The rear buildings were replaced prior to 1918 with a larger 2-story storage building. The lot was undeveloped and vacant by 1965 and remained undeveloped.

Lot 23 (394 Wallabout Street)

Developed prior to 1887 with a small 3-story dwelling located in the front of the lot and a 2-story dwelling in the rear of the lot. In 1904, the 2-story dwelling in the rear yard was labeled as a "tailor". The rear building was demolished by 1954 and the entire lot was drawn as vacant/undeveloped by 1979.

Lot 24 (396 Wallabout Street)

Developed prior to 1887 with a small 1½-story dwelling located in the front of the lot and a 2-story stable in the rear of the lot. By 1904, the lot was redeveloped with a 4-story dwelling that fronted Wallabout Street and a 1-story dwelling in the rear. In the 1950's, the 1-story dwelling in the rear yard was demolished and the 4-story dwelling in the front of the lot was demolished in late 1960's. The lot remained undeveloped.

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Lot 25 (398 Wallabout Street)

Developed prior to 1887 with a small 3-story dwelling located in the front of the lot along Wallabout Street. A 2½-story stable was located in the rear of the lot. However, according to historic Sanborn maps, the lot was undeveloped by 1947. The property remained undeveloped until the 1960's, when a 1-story office/warehouse building was constructed. The building was converted for use as an auto repair facility in the early 1980's. Prior to redevelopment, the building was utilized as a tire repair center.

The AOCs identified for this Site include:

- Historic fill layer is present at the site from grade to 6 to 8 feet below grade.

Summary of the Work Performed under the Remedial Investigation

1. Conducted a Site inspection to identify AOCs and physical obstructions (i.e. structures, buildings, etc.);
2. Installed 8 soil borings across the entire project Site, and collected 17 soil samples for chemical analysis from the soil borings to evaluate soil quality;
3. Installed 4 groundwater monitoring wells throughout the Site to establish groundwater flow and collected 4 groundwater samples for chemical analysis to evaluate groundwater quality;
4. Installed 5 soil vapor probes around Site perimeter and collected 5 samples for chemical analysis.

Summary of Environmental Findings

1. Elevation of the property is approximately 14 feet.
2. Depth to groundwater ranges from 8 to 9 feet at the Site.
3. Groundwater flow is generally from South to North beneath the Site.
4. Depth to bedrock is greater than 100 feet at the Site.
5. The stratigraphy of the Site, from the surface down, consists of 5 to 8 feet of urban fill underlain by a brown sand.
6. Soil/fill samples collected during the RI showed no PCBs at detectable concentrations. No VOCs were detected above Unrestricted Use SCOs, as only 1,2,4-trimethylbenzene

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was detected at a low level (11 ppb) in one sample. Ten SVOCs were detected above Restricted Residential SCOs in the shallow soil horizon, and one shallow soil sample showed relatively high levels of SVOCs (total SVOCs were found to be 1076 ppm) and is believed to be a hotspot. These SVOCs were all PAH compounds and their concentrations, with the exception of the SVOC hotspot, and distributions indicate that they are associated with historic fill material observed in shallow samples. Four pesticides (4,4,4-DDT, 4,4,4-DDE, chlordane, and dieldrin) were detected in shallow soil samples at concentrations above Unrestricted Use SCOs, but well below Restricted Residential SCOs. Six metals exceeded Unrestricted Use SCOs in shallow soil samples, and of these metals, barium (max of 1190 ppm), mercury (max of 18.6 ppm), and lead (max of 863 ppm) also exceeded their respective Restricted Residential SCOs in shallow soil. No SVOCs, Pesticides, or Metals were detected above Unrestricted Use SCOs within the deeper soil samples. Overall, with the exceptions of the mercury and SVOC hotspots, the findings were consistent with observations for other historical fill sites in Brooklyn.

7. Groundwater samples collected during the RI showed chlorinated VOCs in three of four groundwater samples. Trichloroethene (TCE) at a maximum concentration of 18 µg/L and cis-1,2-dichloroethene at a maximum concentration of 41 µg/L were found above their GQSs, and tetrachloroethene (PCE) was found below its GQS at 1.8 µg/L in one sample. No chlorinated VOCs were identified in any of the soil samples collected on Site and are believed to be associated with off-Site impacts. Four SVOCs, all PAHs, were detected above their corresponding GQSs in three of four groundwater samples. The pesticide 4,4,4-DDT was detected in one groundwater sample slightly above its GQS. Magnesium, manganese, and sodium were the only metals identified in the dissolved groundwater sample from GW4. The three remaining samples were not filtered and also showed total concentrations of lead, arsenic, beryllium, chromium, and nickel above their GQSs. The levels of metals, SVOCs, and pesticides in groundwater are likely the impact of turbid samples, rather than dissolved groundwater quality. The RI indicates that groundwater is not impacted by Site conditions and did not reveal any sources of contaminants on-Site.

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8. Soil vapor samples collected during the RI showed petroleum and chlorinated VOCs at low to moderate concentrations. Total petroleum VOCs were identified from 29 to 498 µg/m^3. PCE was identified in all samples at a maximum concentration of 183 µg/m^3, TCE was also identified at a maximum concentration of 14 µg/m^3. These results for TCE and PCE are within the monitoring level ranges of the State DOH soil vapor guidance matrix. Neither PCE nor TCE were detected within any of the soil samples collected at the Site and these low levels suggest a possible off-Site origin.

For more detailed results, consult the RIR. Based on an evaluation of the data and information from the RIR and this RAWP, disposal of significant amounts of hazardous waste is not suspected at this Site.

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2.0 DESCRIPTION OF REMEDIAL ACTIONS

The factors considered during the selection of the remedial action included protection of human health, protection of the environment, compliance with standards, criteria, and guidelines (SCGs), short-term effectiveness and impacts, long-term effectiveness and permanence, reduction of toxicity, mobility, or volume of contaminated material, implementability, cost effectiveness, community acceptance, land use, and sustainability of the remedial action.

A Pre-Application Meeting was held on June 24, 2011. A Remedial Investigation (RI) was performed between January and February 2012 and a RI Report dated May 2012 was prepared to evaluate data and information necessary to develop a Remedial Action Work Plan (RAWP). A Site Contact List was established and a RAWP dated May 2012 was prepared and released with a Fact Sheet on April 30, 2012, for a 30-day public comment period. The RAWP and Stipulation List dated May 29, 2012, was approved by the New York City Office of Environmental Remediation (OER) on June 21, 2012. A pre-construction meeting was held on June 27, 2012 and remedial action began in August of 2012 and completed in March 2013.

The following remedial actions were completed in this program:

1. Prepared a Community Protection Statement and implemented a Citizen Participation Plan.
2. Performed a Community Air Monitoring Program for particulates and volatile organic carbon compounds.
3. Established Track 4 Soil Cleanup Objectives (SCOs). Excavation and removal of soil/fill exceeding Unrestricted Use SCOs and achieved Track 1 SCOs for soil.
4. Collected and analyzed end-point samples to determine the performance of the remedy with respect to attainment of SCOs.
5. Installed and operating an active sub-slab depressurization system in three sections, each equipped with a blower, a manometer to measure system pressure and an alarm.
6. Installed a vapor barrier system beneath the building slab and behind foundation walls.
7. Imported of materials to be used for backfill in compliance with this plan and in accordance with applicable laws and regulations.
8. Transported and disposed off-Site of all soil/fill material at permitted facilities in accordance with applicable laws and regulations for handling, transport, and disposal, and

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this plan. Collected, sampled and analyzed samples representative of excavated media as required by disposal facilities. Appropriately segregated excavated media on Site.

9. Screened excavated soil/fill during intrusive work for indications of contamination by visual means, odor, and monitoring with a PID.
10. Implemented storm-water pollution prevention measures in compliance with applicable laws and regulations.
11. Performed all activities required for the remedial action, including permitting requirements and pretreatment requirements, in compliance with applicable laws and regulations.
12. Submitted a RAR that: certifies that the remedial requirements have been achieved; defines the Site boundaries: describes all Engineering and Institutional Controls applicable to the Site; and describes the remedial activities including any changes from the RAWP.
13. Submission of an approved Site Management Plan (SMP) in the RAR for long-term management of soil vapor, including plans for operation, maintenance, monitoring, inspection and certification of Engineering and Institutional Controls and reporting at a specified frequency.
14. Continued registration of the property as an E-Designated property at the NYC Department of Buildings.

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3.0 COMPLIANCE WITH REMEDIAL ACTION WORK PLAN

3.1 Construction Health & Safety Plan (CHASP)

The remedial construction activities performed under this program were in compliance with the Construction Health and Safety Plan and applicable laws and regulations. The Site Safety Coordinator was Kevin Waters - EBC.

3.2 Community Air Monitoring Plan (CAMP)

The Community Air Monitoring Plan provided for the collection and analysis of air samples during remedial construction activities to ensure proper protections were employed to protect workers and the neighboring community. Monitoring was performed in compliance with the Community Air Monitoring Plan in the approved RAWP. The results of Community Air monitoring are shown in Appendix C.

3.3 Soil/Materials Management Plan

The Soil/Materials Management Plan in the RAWP provided detailed plans for managing all soils/materials that were disturbed at the Site, including excavation, handling, storage, transport and disposal. It also included a series of controls to assure effective, nuisance free remedial activity in compliance with applicable laws and regulations. Remedial construction activities performed under this program were in full compliance with the SMMP in the approved RAWP.

3.4 Storm-Water Pollution Prevention

Storm water pollution prevention included physical methods and processes to control and/or divert surface water flows and to limit the potential for erosion and migration of Site soils, via wind or water. Remedial construction activities performed under this program were in full compliance with methods and processes defined in the RAWP for storm water prevention and applicable laws and regulations.

3.5 Deviations From the Remedial Action Work Plan

No significant deviations from the Remedial Action Work Plan occurred during implementation of the Remedial Action Work Plan.

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4.0 REMEDIAL PROGRAM

4.1 Project Organization

The PE responsible for implementation of the remedial action for this project was Ariel Czmerinski P.E., AMC Engineering. On-Site air monitoring in accordance with the CHASP and CAMP, soil screening and soil sampling was performed by either Dominick Mosca and Kevin Waters of EBC or Sara Babyatsky of AMC Engineering. The Qualified Environmental Professional which implemented the remedial action was Kevin Brussee, Project Manager-EBC.

The excavation and foundation contractor was All Island Masonry and Concrete, and the developer was HSD Construction, LLC.

4.2 Site Controls

Site Preparation

Plans for the five new buildings (NYC DOB Job numbers NB-320354086, NB-320426017, NB-320426053, NB-320426035, and NB-320426044) were approved on June 25, 2012. Waste characterization soil sampling was performed on July 16, 2012, prior to mobilization to obtain soil disposal approval and to minimize the need for on-Site soil stockpiles. On August 13, 2012, equipment was mobilized to the Site to begin excavation of on-Site soil.

Soil Screening

All intrusive soil excavation activities were overseen by an EBC qualified environmental professional (QEP). In addition to extensive sampling and chemical testing of soils on the Site, excavated soil was screened continuously using hand-held instruments, by sight, and by smell to ensure proper material handling and management, and community protection. Excavation at the Site commenced with the removal of historic fill which varied in depth across the Site. EBC visually determined the boundary of historic fill and clean native soil. Historic fill at the Site was a darker brown soil with brick and concrete fragments, and clean native soil was a coarse brown sand. No physical or olfactory evidence of a spill was observed during Site excavation.

Stockpile Management

For the majority of the project, soil was excavated from the ground and live loaded into trucks to eliminate the need for stockpiling. However, any soil stockpiles that were generated and kept

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overnight were covered with 6-mil poly-sheeting to prevent dust. Stockpile covers were inspected by the EBC QEP.

Truck Inspection

A stabilized construction entrance was constructed at the front of the Site, which exited and entered from Wallabout Street. The stabilized entrance was constructed of a bed of crushed concrete which was sloped back toward the interior of the Site. The stabilized entrance was inspected on a daily basis during soil loading activities and reinforced as needed with additional concrete material to prevent the accumulation of ruts, mud or soil and to minimize the potential for impacted soil to be dispersed beyond the Site boundary. Before exiting the Site, trucks were examined for evidence of contaminated soil on the undercarriage, body, and wheels. If soil/debris was observed, it was removed utilizing brooms or shovels.

Site Security

An 8-ft high construction fence was constructed around the perimeter of the property. The fence was locked with a chain and padlock during non-working hours/days.

Nuisance Controls

No petroleum or other odors were detected during soil screening and no complaints were reported. Dust was minimized by excavating and live-loading directly into trucks, and covering stockpiles with 6-mil poly sheeting overnight during off-work hours.

Reporting

Daily status reports were prepared and forwarded to the OER project manager for construction days in which soil disturbance activities were performed (soil excavation/loading). A copy of each of the daily status reports is included in Appendix D.

Digital photographs of the remedial action are included in Appendix B.

4.3 Materials Excavation and Removal

Historic Fill with large amounts of trash and construction and demolition debris was encountered across the Site from grade to a depth of 8ft. Excavation and removal of the soil to a depth of approximately 8.5 feet across the majority of the Site was performed in August and September of

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2012. In March of 2013, the remaining soil in the rear of the lots that required excavation for the rear courtyard retaining wall was excavated and removed. A total of 5,027.68 tons of soil was removed and transported to Clean Earth of New Castle. A map showing the location where excavations were performed is shown in Figure 5. No material was reused on-Site.

End Point Sample Results

Following excavation for the new buildings, EBC collected five endpoint soil samples and one duplicate endpoint soil sample. The location of each of the endpoint soil samples as well as each of the soil samples collected at the final excavation depth during the RI is shown on Figure 6. Dedicated disposable sampling equipment was utilized to collect each endpoint sample, eliminating the need for field equipment (rinsate) blanks.

The endpoint soil samples were appropriately packaged, placed in a cooler and picked up by laboratory courier for transport to the analytical laboratory. The samples were containerized in laboratory provided glassware and shipped in plastic coolers preserved utilizing ice or "cold-paks" to maintain a temperature of 4^{o}C.

Endpoint samples EP1, EP2, EP3, EP4 and EP5 and the duplicate were submitted to Phoenix Environmental Laboratories, Inc. located at 587 East Middle Turnpike, in Manchester, CT 06040 (NYS ELAP Certification No. 11301).

Each of the endpoint samples and the duplicate were submitted for laboratory analysis utilizing the following methodology:

- Volatile organic compounds by EPA Method 8260;
- Semi-volatile organic compounds by EPA Method 8270;
- Target Analyte List metals; and
- Pesticides/PCBs by EPA Method 8081/8082.

A copy of each of the laboratory reports for the endpoint soil samples is attached in Appendix E. A tabular and map summary of end-point sampling results is included in Tables 1 through 4 and Figure 6, respectively. As shown in Tables 2 through 5, no VOCs, SVOCs, pesticides, PCBs or metals were detected above Unrestricted Use or Groundwater Protection SCOs, with the exception of the following metals detected at a concentration slightly above SCOs:

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- Lead at 131 ppm in EP2;
- Mercury at 0.52 ppm in EP2;
- Copper at 63.9 ppm in EP4;
- Copper at 67.3 ppb in EP5.

4.4 Materials Disposal

Waste characterization soil sampling was performed on July 16, 2012. Historic fill (brown silty sand with large amounts brick, concrete, wood) was encountered from grade to a depth of approximately 8 feet below grade. EBC formed two 5-pt composite soil samples representing the interval 0 to 4 feet below grade, and two 5-pt composite soil samples representing the interval 4 to 8 feet below grade. The laboratory results, profile form and a formal letter describing the sampling process and material type, was forwarded to Clean Earth to obtain soil disposal approval at Clean Earth of New Castle for the historic fill material. A copy of the soil disposal request letter with the sampling plan and laboratory results is attached in Appendix F. A copy of the soil disposal acceptance letter issued by Clean Earth is attached in Appendix G.

From August 13, 2012 to September 5, 2012, a total 4,550.60 tons of historic fill was excavated and loaded into 10-wheel dump trucks for transport to Clean Earth of New Castle. An additional 657.08 tons of soil was removed on March 5, 2013 and March 6, 2013 from the rear yard to construct the cellar level rear courtyard's retaining wall. Copies of each of the non-hazardous manifests and associated scale tickets are included in Appendix H.

On August 27, 2013, one 30 cubic yard roll-off container of garbage separated from the soil was transported to the 110 Sand Company Landfill located at 136 Spagnolli Road in Melville, NY. A copy of the bill of lading and associated scale tickets are included in Appendix I.

The volume/tonnage and destination of material removed and disposed off-Site is presented below:

Table 6 - Disposal Quantities and Disposal Facilities

Destination	Type of Material	Quantity
Clean Earth of Carteret	Historic Fill	5,027.68 tons
110 Solid Waste Landfill	Trash	30 yd^3

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4.5 Backfill Import

From August 29, 2012 to September 6, 2012, 14 truck loads (approximately 440 tons) of 3/4 inch crushed concrete (RCA) was imported for use beneath the cellar slab from Evergreen Recycling of Corona, Inc. located at 127-50 Northern Boulevard, Flushing, New York 11368. Evergreen Recycling of Corona, Inc. is a NYSDEC Active Registered C&D Debris Processing Facility. The crushed concrete was spread across the entire basement area to a depth of approximately 8 to 12 inches. No other backfill was imported to the Site. A copy of the import trucking tickets and source invoices for the RCA is attached in Appendix J.

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5.0 ENGINEERING CONTROLS

Engineering Controls were employed in the remedial action to address residual contamination remaining at the Site. The Site has two primary Engineering Control Systems. These are:

Vapor Barrier

Migration of soil vapor is mitigated with a combination of building slab and vapor barrier. A high density polyethylene vapor barrier liner (HPDE) was installed over the SSDS prior to pouring the building's concrete slab. The vapor barrier consists of a 20 mil HDPE geomembrane liner manufactured by Inline Plastics Corp. The vapor barrier extends throughout the area occupied by the footprint of the new building and extends upward behind the side and front walls of the building. All vapor barrier seams, penetrations, and repairs were sealed utilizing the tape method, in accordance with to the manufacturer's installation instructions. Photos of the vapor barrier being installed are included in Appendix B and the approximate layout is shown on Figure 7. The vapor barrier was installed by the foundation contractor, All Island Masonry and Concrete.

Active Sub-Slab Depressurization System

Migration of soil vapor is mitigated with an active sub-slab depressurization system. The SSDS installed beneath the basement slab of the buildings (total of 12,500 sf) consists of three venting zones (loops) in accordance with USEPA sub-slab depressurization design specifications which recommend a separate vent loop for every 4,000 sf of slab area. Each of the three venting zones is constructed of a continuous loop of perforated 4-inch HDPE smooth interior pipe fitted with a filter sock and installed within the 6" layer of crushed concrete installed below the concrete building slab. Horizontal pipes connected to each of the three loops extends to the rear of the building where they connect to three 6-inch schedule 40 pvc riser pipes that extend to the roof to discharge. A blower (Radonaway model No. RP265) is fitted to the top of each of the 6-inch PVC discharge pipes at the roof. The system is hardwired to an electric source. The exhaust from each of the blowers is located a minimum of 10 feet from windows and ventilation inlets.

Three Dwyer 0-5 inches of water manometers and three Radonaway alarms are installed immediately below the SSDS blower within the roof access stairwell. Following initial start up of the active SSDS, an initial vacuum gauge reading using a Magnahelic Manometer was

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recorded. The system is designed to establish a vacuum of 0.4 inches of water or higher.

The approximate layout of the SSDS piping is shown on Figure 7 and photos of the SSDS piping being installed are included in Appendix B. Inspection details and inspection frequency are specified below in Section 7.0. The active SSDS was installed by HSD Construction, LLC.

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6.0 INSTITUTIONAL CONTROLS

A series of Institutional Controls are required under this Remedial Action to implement, maintain inspect and certify Engineering Controls and prevent future exposure to residual contamination by controlling disturbances of the subsurface soil. Adherence to these Institutional Controls is required under this remedial action and will be implemented under the Site Management Plan included in this RAR. These Institutional Controls for the Site are:

(1) The property will continue to be registered with an E-Designation with the NYC Department of Buildings. Property owner and property owner's successors and assigns are required to comply with the approved SMP;
(2) Compliance with an OER-approved Site Management Plan including procedures for appropriate operation, maintenance, inspection, and certification of performance of EC's and IC's. The property owner and property owner's successors and assigns will inspect EC's and IC's and submit to OER a written certification that evaluates their performance in a manner and at a frequency to be determined by OER;
(3) Engineering Controls will not be discontinued without prior OER approval;
(4) OER has the right to enter the Site upon notice for the purpose of evaluating the performance of EC's and IC's;
(5) The Site will be used for restricted residential use and will not be used for a higher level of use without prior approval by OER.

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7.0 SITE MANAGEMENT PLAN

Site management is the last phase of the remedial process and begins after the approval of the Remedial Action Report (RAR) and issuance of the Notice of Completion (NOC) by OER. It is the responsibility of the property owner to ensure that all Site management responsibilities are performed. The penalty for failure to implement the SMP includes revocation of the Notice of Completion and all associated certifications and liability protections. The five buildings are commonly owned by Throop Wallabout Realty LLC and the Site Management Plan will be implemented by Rabsky Management, a subsidiary of Throop Wallabout Realty LLC. If the buildings are sold, the new owners will be notified of the SMP requirements.

Engineering Controls (ECs) and Institutional Controls (ICs) have been incorporated into this remediation to ensure that the Site remains protective of public health and the environment. EC's provide physical protective measures. ICs provide restrictions on Site usage and provide operation, maintenance, inspection and certification measures. This SMP includes all methods necessary ensure compliance with ECs and ICs required for the property.

The SMP provides a detailed description of procedures required to manage residual material at the Site following the completion of remedial construction in accordance with the NYC Voluntary Cleanup Agreement with OER. This includes: (1) operation and maintenance of Engineering Controls (2) periodic inspections and (3) certification of Engineering Controls and Institutional Controls.

ENGINEERING AND INSTITUTIONAL CONTROLS

Engineering Controls

Engineering Controls are employed in the remedial action to address residual materials remaining at the site. The Site has a two Engineering Controls. These are:

- Soil Vapor Barrier System;
- Active Sub-Slab Depressurization System.

Operation and Maintenance of Vapor Barrier System

Chapter 5 describes the Vapor Barrier System utilized in this Remedial Action and provides as-built design details and the system location. The Vapor Barrier System is a permanent

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Engineering Control for the Site. The system will be inspected and its performance certified at specified intervals defined in this SMP.

The Vapor Barrier System does not require any special operation or maintenance activities. If the system is breached during future construction activities, the system will be rebuilt by reconstructing the vapor barrier layers and sealing the newly constructed materials with equivalent barrier materials in accordance with manufacturer specifications.

Operation and Maintenance of Active Sub-Slab Depressurization System

Chapter 5 describes the Active SSDS utilized in this Remedial Action. The system will be inspected and its performance certified at specified intervals defined in this SMP. The Active SSDS will be operated and maintained as prescribed below. SSD system components to be evaluated include, but are not limited to, the following:

- Three Radonaway blowers (Model No. RP265);
- Exposed system piping;
- Three Radonaway Alarms; and
- Three Dwyer 0-5 inches of water manometers.

The manometer and alarms are installed immediately below the SSDS blower within the roof access stairwell. Following initial start up of the active SSDS, an initial vacuum gauge reading using a Magnahelic Manometer shall be recorded on the Inspection Checklist. The system is designed to establish a vacuum of 0.4 inches of water or higher. If the blower is found to be non-operational by the building superintendent during a monthly inspection, or if the blower is operating, but no vacuum reading is observed on the vacuum gauge, the blower must be replaced or repaired. The Owner's representative(s) shall immediately contact the appropriate parties from the contact list provided below. These emergency contact lists will be maintained by the building superintendent and in a package secured to the SSDS discharge pipe.

A complete list of components to be checked is provided in the Inspection Checklist, presented in Appendix L.

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Institutional Controls

A series of Institutional Controls are required under this Remedial Action to assure permanent protection of public health by elimination of exposure to residual materials. These IC's define the program to operate, maintain, inspect and certify the performance of Engineering Controls and Institutional Controls on this property. These Institutional Controls will be implemented in accordance with the Site Management Plan included in this RAR.

Institutional Controls for this property are:

(1) The property will continue to be registered with an E-Designation with the NYC Department of Buildings. Property owner and property owner's successors and assigns are required to comply with the approved SMP;

(2) Compliance with an OER-approved Site Management Plan including procedures for appropriate operation, maintenance, inspection, and certification of performance of EC's and IC's. The property owner and property owner's successors and assigns will inspect EC's and IC's and submit to OER a written certification that evaluates their performance in a manner and at a frequency to be determined by OER;

(3) Engineering Controls will not be discontinued without prior OER approval;

(4) OER has the right to enter the Site upon notice for the purpose of evaluating the performance of EC's and IC's;

(5) The Site will be used for restricted residential use and will not be used for a higher level of use without prior approval by OER.

INSPECTIONS

Engineering Controls and Institutional Controls will be inspected by a qualified environmental professional and certification of inspection shall be submitted by July 31, 2015 (for calendar year 2014) and every three years thereafter. In addition to these inspections, Sal Lichtman (building superintendent for Rabsky Management) will inspect condition of the operation of the blower and the vacuum gauges on a monthly basis. The superintendent will fill out a log established by the QEP following SSDS operational inspections. EBC will provide training for building superintendent staff on the methods for proper monthly inspection of the operation of the blower and the vacuum gauges and proper contacts in case a malfunction is identified.

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The QEP inspections will evaluate the following:

- If Engineering Controls or Institutional Controls employed at the Site continue to perform as designed and continue to be protective of human health and the environment;
- If anything has occurred that impairs the ability of the Engineering Controls or Institutional Controls to protect public health and the environment;
- If changes are needed to the remedial systems or controls;
- If compliance with this SMP has been maintained;
- If site records are complete and up to date; and
- General Site conditions at the time of inspection.

In an addition, if an emergency occurs, such as a natural disaster, or if an unforeseen failure of any of the Engineering Controls occurs, an inspection of the Site will be performed within 14 days to evaluate the Engineering Controls and a letter report of findings will be submitted to OER.

Engineering Control Inspection

Inspection of Vapor Barrier System

The vapor barrier system will be inspected by a qualified environmental professional to assure that it is functioning properly. The vapor barrier system is not visible and cannot be directly inspected. However, it can be inspected in concert with inspection of the building slab and foundation walls. If the inspector observes a failure in the slab or foundation walls that exposes the vapor barrier, then the underlying vapor barrier will be inspected for any damage, including tears or perforations, which would prevent the vapor barrier from completing its intended purpose. Cracks, holes, perforations or slab disturbances shall be recorded on the Inspection Checklist (Appendix L).

Active SSDS

The components of the Active SSDS will be inspected by a qualified environmental professional to assure that the Active SSDS is functioning properly. Unscheduled inspections and/or sampling may take place when a suspected failure of the SSD system has been reported or an emergency occurs that is deemed likely to affect the operation of the system.

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A visual inspection of the complete system will be conducted. SSD system components to be monitored include, but are not limited to, the following:

- Three Radonaway blowers (Model No. RP265);
- Exposed system piping;
- Three Radonaway Alarms; and
- Three Dwyer 0-5 inches of water manometers.

The vacuum gauge should have a minimum vacuum of 0.4 inches of water. If any equipment readings are not above this minimum range, maintenance and repair will be performed to reestablish required vacuum levels in the system. A complete list of components to be checked is provided in the Inspection Checklist, presented in Appendix L. Inspection frequency is subject to change by NYC OER.

Site Use Prohibitions

Inspections to evaluate the status of site use prohibitions will include an evaluation of whether the Site has been used for a higher level of use other than the restricted residential use addressed by the Remedial Action.

INSPECTION AND CERTIFICATION LETTER REPORT

Results of inspections performed during a reporting period and certification of performance of all Engineering Controls and Institutional Controls will be included in an Inspection and Certification Letter Report to be submitted by July 31, 2015 (for calendar year 2014) and by July 31 every third year thereafter. Inspection and Certification Letter Reports will be submitted to OER in digital format. The letter report will include, at a minimum:

- Date of inspections;
- Personnel conducting inspections;
- Description of the inspection activities performed;
- Any observations, conclusions, or recommendations;
- Copy of any inspection forms;
- Certification of the performance of Engineering Controls and Institutional Controls, as discussed below; and

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- Confirmation of regular periodic inspection of engineering controls by building superintendent.

The certification of the performance of EC's and IC's will establish:

- If Engineering Controls or Institutional Controls employed at the Site continue to be in place and perform as designed and continue to be protective of human health and the environment;
- If anything has occurred that impairs the ability of Engineering Controls or Institutional Controls to protect public health and the environment;
- If changes are needed to the remedial systems or controls;
- If compliance with this Site Management Plan has been maintained;
- If the Site has been used for a higher level of use other than the restricted residential use addressed by the Remedial Action;
- If site records are complete and up to date;
- If the Site continues to be registered as an E-Designated property by the NYC Department of Buildings;

OER may enter the Site upon notice for the purpose of evaluating the performance of EC's & IC's.

NOTIFICATIONS

Notifications are to be submitted by the property owner to OER as described below:

- 60-day advance notice of any proposed changes in Site use to Unrestricted Use that is not contemplated is the Remedial Action.
- Notice within 10 days of any emergency, such as a fire, flood, or earthquake that reduces or has the potential to reduce the effectiveness of Engineering Controls in place at the Site.

SOIL/MATERIALS MANAGEMENT PLAN

The remedial action achieved Track 1 SCOs. A Soil/Materials Management Plan is not required for this property.

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CONTINGENCY PLAN

Emergency Telephone Numbers

In the event of any emergency condition pertaining to this remedial system, or if the building slab is disturbed, removed or altered, the Owner's representative(s) should contact the appropriate parties from the contact list below. Prompt contact should also be made to Environmental Business Consultants. These emergency contact lists must be maintained in an easily accessible location at the Site.

Contact Numbers

Environmental Business Consultants	(631) 504-6000
Office of Environmental Remediation	(212) 788-8841; 311

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TABLES

TABLE 1
390 to 398 Walllabout Street, Brooklyn, New York
Soil Analytical Results
Volatile Organic Compounds

COMPOUND	NYSDEC Part 375.6 Unrestricted Use Soil Cleanup Objectives	NYDEC Part 375.6 Restricted Residential Soil Cleanup Objectives*	REMEDIAL INVESTIGATION RESULTS (January 2, 2012)									EP1		EP2		EP3		EP4		EP5	
			B1	B2		B3	B4	B5	B6	B7	B8	(8ft)		(8ft)		(8ft)		(8ft)		(8ft)	
			(10-12')	(7-9')	(10-12')	(10-12')	(10-12')	(10-12')	(8-10')	(8-10')	(8-10')	µg/Kg		µg/Kg		µg/Kg		µg/Kg		µg/Kg	
			µg/Kg	µg/Kg	µg/Kg	µg/Kg	µg/Kg	µg/Kg	µg/Kg	µg/Kg	µg/Kg	Result	RL	Result	RL	Result	RL	Result	RL	Result	RL
1,1,1,2-Tetrachlorothane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
1,1,1-Trichloroethane	680	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
1,1,2,2-Tetrachloroethane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	2.5	ND	2.3
1,1,2-Trichloroethane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
1,1-Dichloroethane	270	26,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
1,1-Dichloroethene	330	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
1,1-Dichloropropene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
1,2,3-Trichlorobenzene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
1,2,3-Trichloropropane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
1,2,4-Trichlorobenzene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
1,2,4-Trimethylbenzene	3,600	52,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
1,2-Dibromo-3-chloropropane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
1,2-Dichlorobenzene	1,100	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
1,2-Dichloroethane	20	3,100	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
1,2-Dichloropropane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
1,3,5-Trimethylbenzene	8,400	52,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
1,3-Dichlorobenzene	2,400	4,900	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
1,3-Dichloropropane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
1,4-Dichlorobenzene	1,800	13,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
2,2-Dichloropropane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
2-Chlorotoluene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
2-Hexanone (Methyl Butyl Ketone)			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
2-Isopropyltoluene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	29	ND	29	ND	30	ND	20	ND	19
4-Chlorotoluene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
4-Methyl-2-Pentanone			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Acetone	50	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	29	ND	29	ND	30	ND	20	ND	19
Acrylonitrile			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	29	ND	29	ND	30	ND	4	ND	38
Benzene	60	4,800	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	12	ND	12	ND	12	ND	4.1	ND	3.8
Bromobenzene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Bromochloromethane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Bromodichloromethane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Bromoform			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Bromomethane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Carbon Disulfide			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Carbon tetrachloride	760	2,400	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Chlorobenzene	1,100	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Chloroethane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Chloroform	370	49,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Chloromethane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
cis-1,2-Dichloroethene	250	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
cis-1,3-Dichloropropene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Dibromochloromethane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Dibromoethane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	2.5	ND	2.3
Dibromomethane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Dichlorodifluoromethane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Ethylbenzene	1,000	41,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Hexachlorobutadiene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Isopropylbenzene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
m&p-Xylenes	260		ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Methyl Ethyl Ketone (2-Butanone)	120	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	29	ND	29	ND	30	ND	25	ND	23
Methyl t-butyl ether (MTBE)	930	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	12	ND	12	ND	12	ND	8.2	ND	7.6
Methylene chloride	50	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Naphthalene			ND	**12**	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
n-Butylbenzene	12,000	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
n-Propylbenzene	3,900	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
o-Xylene	260	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
p-Isopropyltoluene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
sec-Butylbenzene	11,000	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Styrene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
tert-Butylbenzene	5,900	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Tetrachloroethene	1,300	19,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Tetrahydrofuran (THF)			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	12	ND	12	ND	12	ND	8.2	ND	7.6
Toluene	700	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Total Xylenes			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
trans-1,2-Dichloroethene	190	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
trans-1,3-Dichloropropene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
trabs-1,4-dichloro-2-butene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	12	ND	12	ND	12	ND	8.2	ND	7.6
Trichloroethene	470	21,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Trichlorofluoromethane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Trichlorotrifluoroethane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8
Vinyl Chloride	20	900	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.9	ND	5.9	ND	6	ND	4.1	ND	3.8

Notes:

** - 6 NYCRR Part 375-6 Remedial Program Soil Cleanup Objectives

ND - Not-detected

Bold/highlighted- Indicated exceedance of the NYSDEC UUSCO Guidance Value

Bold/highlighted- Indicated exceedance of the NYSDEC RRSCO Guidance Value

TABLE 2
390 to 398 Wallabout Street, Brooklyn, New York
Soil Analytical Results
Semi-Volatile Organic Compounds

COMPOUND	NYSDEC Part 375.6 Unrestricted Use Soil Cleanup Objectives	NYDEC Part 375.6 Restricted Residential Soil Cleanup Objectives*	REMEDIAL INVESTIGATION RESULTS (January 2, 2012)									EP1		EP2		EP3		EP4		EP5	
			B1	B2		B3	B4	B5	B6	B7	B8	(8ft)		(8ft)		(8ft)		(8ft)		(8ft)	
			(10-12')	(7-9')	(10-12')	(10-12')	(10-12')	(10-12')	(8-10')	(8-10')	(8-10')	µg/Kg		µg/Kg		µg/Kg		µg/Kg		µg/Kg	
			µg/Kg	µg/Kg	µg/Kg	µg/Kg	µg/Kg	µg/Kg	µg/Kg	µg/Kg	µg/Kg	Result	RL	Result	RL	Result	RL	Result	RL	Result	RL
1,2,4,5-Tetrachlorobenzene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
1,2,4-Trichlorobenzene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
1,2-Dichlorobenzene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
1,3-Dichlorobenzene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	38	ND	380
1,4-Dichlorobenzene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
2,4,5-Trichlorophenol			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
2,4,6-Trichlorophenol			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
2,4-Dichlorophenol			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
2,4-Dimethylphenol			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
2,4-Dinitrophenol			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	620	ND	61	ND	630	ND	26	ND	260
2,4-Dinitrotoluene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	60	ND	600
2,6-Dinitrotoluene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
2-Chloronaphthalene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
2-Chlorophenol			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
2-Methylnaphthalene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
2-Methylphenol (o-cresol)	330	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
2-Nitroaniline			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	820	ND	81	ND	830	ND	26	ND	260
2-Nitrophenol			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	60	ND	600
3&4-Methylphenol (m&p-cresol)	330	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	360	ND	36	ND	400	ND	26	ND	260
3,3'-Dichlorobenzidine			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	38	ND	380
3-Nitroaniline			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	620	ND	61	ND	630	ND	26	ND	260
4,6-Dinitro-2-methylphenol			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1,100	ND	1,100	ND	1,200	ND	60	ND	600
4-Bromophenyl phenyl ether			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	360	ND	36	ND	400	ND	1,10	ND	1,100
4-Chloro-3-methylphenol			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	38	ND	380
4-Chloroaniline			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
4-Chlorophenyl phenyl ether			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
4-Nitroaniline			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	820	ND	81	ND	830	ND	26	ND	260
4-Nitrophenol			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1,100	ND	1,100	ND	1,200	ND	60	ND	600
Acenaphthene	20,000	100,000	ND	**390**	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	1,10	ND	1,100
Acenaphthylene	100,000	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Acetophenone			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Aniline			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1,100	ND	1,100	ND	1,200	ND	26	ND	260
Anthracene	100,000	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	1,10	ND	1,100
Azobenzene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	360	ND	36	ND	400	ND	26	ND	260
Benzo(a)anthracene	1,000	1,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Benzidine			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	460	ND	46	ND	480	ND	45	ND	450
Benzo(a)pyrene	1,000	1,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Benzo(b)fluoranthene	1,000	1,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Benzo(g,h,i)perylene	100,000	100,000	ND	ND	ND	ND	ND	ND	ND	**290**	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Benzo(k)fluoranthene	800	3,900	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Benzoic Acid			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1,100	ND	1,10	ND	1,200	ND	1,10	ND	1,100
Butyl benzyl phthalate			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Bis(2-chloroethoxy)methane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Bis(2-chloroethyl)ether			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	360	ND	36	ND	400	ND	38	ND	380
Bis(2-chloroisopropyl)ether			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Bis(2-ethylhexyl)phthalate			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Carbazole			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	580	ND	57	ND	590	ND	57	ND	570
Chrysene	1,000	3,900	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Dibenzo(a,h)anthracene	330	330	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Dibenzofuran			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Diethyl phthalate			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Dimethyl phthalate			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Di-n-butylphthalate			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Di-n-octylphthalate			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Fluoranthene	100,000	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Fluorene	30,000	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Hexachlorobenzene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Hexachlorobutadiene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Hexachlorocyclopentadiene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Hexachloroethane			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Indeno(1,2,3-cd)pyrene	500	500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Isophorone			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Naphthalene	12,000	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Nitrobenzene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
N-Nitrosodimethylamine			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	360	ND	36	ND	400	ND	38	ND	380
N-Nitrosodi-n-propylamine			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
N-Nitrosodiphenylamine			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	360	ND	36	ND	400	ND	38	ND	380
Pentachloronitrobenzene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	360	ND	36	ND	400	ND	38	ND	380
Pentachlorophenol	800	6,700	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	360	ND	36	ND	400	ND	38	ND	380
Phenanthrene	100,000	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Phenol	330	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Pyrene	100,000	100,000	ND	**280**	ND	ND	ND	ND	ND	ND	ND	ND	270	ND	27	ND	280	ND	26	ND	260
Pyridine			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	360	ND	36	ND	400	ND	38	ND	380

Notes:

* - 6 NYCRR Part 375-6 Remedial Program Soil Cleanup Objectives

ND - Not-detected

NA - Guidance value not available

Bold/highlighted- Indicated exceedance of the NYSDEC UUSCO Guidance Value

Bold/highlighted- Indicated exceedance of the NYSDEC RRSCO Guidance Value

TABLE 3
390 to 398 Wallabout Street, Brooklyn, New York
Soil Analytical Results
Pesticides / PCBs

COMPOUND	NYSDEC Part 375.6 Unrestricted Use Soil Cleanup Objectives	NYDEC Part 375.6 Restricted Residential Soil Cleanup Objectives*	REMEDIAL INVESTIGATION RESULTS (January 2, 2012)									EP1		EP2		EP3		EP4		EP5	
			B1	B2		B3	B4	B5	B6	B7	B8	(8ft)		(8ft)		(8ft)		(8ft)		(8ft)	
			(10-12')	(7-9')	(10-12')	(10-12')	(10-12')	(10-12')	(8-10')	(8-10')	(8-10')	µg/Kg		µg/Kg		µg/Kg		µg/Kg		µg/Kg	
			µg/Kg	µg/Kg	µg/Kg	µg/Kg	µg/Kg	µg/Kg	µg/Kg	µg/Kg	µg/Kg	Result	RL	Result	RL	Result	RL	Result	RL	Result	RL
PCB-1016	1,000	1,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	380	ND	380	ND	400	ND	76	ND	76
PCB-1221	1,000	1,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	380	ND	380	ND	400	ND	76	ND	76
PCB-1232	1,000	1,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	380	ND	380	ND	400	ND	76	ND	76
PCB-1242	1,000	1,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	380	ND	380	ND	400	ND	76	ND	76
PCB-1248	1,000	1,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	380	ND	380	ND	400	ND	76	ND	76
PCB-1254	1,000	1,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	380	ND	380	ND	400	ND	76	ND	76
PCB-1260	1,000	1,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	380	ND	380	ND	400	ND	76	ND	76
PCB-1262	1,000	1,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	380	ND	380	ND	401	ND	76	ND	76
PCB-1268	1,000	1,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	380	ND	380	ND	400	ND	76	ND	76
4,4-DDD	3.3	13,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	37	ND	36	ND	39	ND	2.3	ND	2.3
4,4-DDE	3.3	8,900	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	37	ND	36	ND	38	ND	2.3	ND	2.3
4,4-DDT	3.3	7,900	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	37	ND	36	ND	39	ND	2.3	ND	2.3
a-BHC	20	480	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	18	ND	18	ND	19	ND	3.6	ND	3.6
Alachlor			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	18	ND	18	ND	19	ND	3.6	ND	3.6
Aldrin	5	97	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.8	ND	5.7	ND	5.9	ND	1.1	ND	1.1
b-BHC	36	360	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	18	ND	18	ND	19	ND	3.6	ND	3.6
Chlordane	94	4,200	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	58	ND	57	ND	59	ND	11	ND	11
d-BHC	40	100,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	18	ND	18	ND	19	ND	3.6	ND	3.6
Dieldrin	5	200	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.8	ND	5.7	ND	5.9	ND	1.1	ND	1.1
Endosulfan I	2,400	24,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	18	ND	18	ND	19	ND	3.6	ND	3.6
Endosulfan II	2,400	24,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	37	ND	36	ND	39	ND	7.3	ND	7.2
Endosulfan Sulfate	2,400	24,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	37	ND	36	ND	39	ND	7.3	ND	7.2
Endrin	14	11,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	37	ND	36	ND	39	ND	7.3	ND	7.2
Endrin aldehyde			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	37	ND	36	ND	39	ND	7.3	ND	7.2
Endrin ketone			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	37	ND	36	ND	39	ND	7.3	ND	7.2
gamma-BHC			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	5.8	ND	5.7	ND	5.9	ND	1.1	ND	1.1
Heptachlor	42	2,100	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	12	ND	11	ND	12	ND	2.3	ND	2.3
Heptachlor epoxide			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	18	ND	18	ND	19	ND	3.6	ND	3.6
Methoxychlor			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	180	ND	180	ND	190	ND	36	ND	36
Toxaphene			ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	180	ND	180	ND	191	ND	36	ND	36

Notes:

* - NYSDEC Technical and Administative Guidance Memorandum 4046, 1994

** - 6 NYCRR Part 375-6 Remedial Program Soil Cleanup Objectives

ND - Not-detected

NA - Guidance value not available

Bold/highlighted- Indicated exceedance of the NYSDEC UUSCO Guidance Value

Bold/highlighted- Indicated exceedance of the NYSDEC RRSCO Guidance Value

TABLE 4
390 to 398 Wallabout Street, Brooklyn, New York
Soil Analytical Results
Metals

COMPOUND	NYSDEC Part 375.6 Unrestricted Use Soil Cleanup Objectives*	NYDEC Part 375.6 Restricted Residential Soil Cleanup Objectives*	REMEDIAL INVESTIGATION RESULTS (January 2, 2012)									EP1		EP2		EP3		EP4		EP5	
			B1 (10-12') mg/Kg	B2 (7-9') mg/Kg	B2 (10-12') mg/Kg	B3 (10-12') mg/Kg	B4 (10-12') mg/Kg	B5 (10-12') mg/Kg	B6 (8-10') mg/Kg	B7 (8-10') mg/Kg	B8 (8-10') mg/Kg	(8ft) mg/Kg Result	RL	(8ft) mg/Kg Result	RL	(8ft) mg/Kg Result	RL	(8ft) mg/Kg Result	RL	(8ft) mg/Kg Result	RL
Aluminum			55	8970	8470	6370	9170	4260	8530	16600	8000	13,300	61	11,200	62	8,380	63	6,730	57	9,180	62
Antimony			<3.7	<3.8	<3.6	<4.2	<3.6	<4.2	<3.5	<4.3	<3.8	BRL	4.1	BRL	4.1	BRL	4.2	BRL	3.8	BRL	4.1
Arsenic	13	16	0.74	<0.76	<0.72	<0.83	<0.73	<0.83	0.85	2.8	1.58	1.8	0.8	2.7	0.8	1.2	0.8	1.3	0.8	1.8	0.8
Barium	350	400	12.3	25.9	26.5	13.6	31	14.2	29.9	33.2	43.3	61.3	0.41	91.8	0.41	33.4	0.42	28.2	0.38	40	0.41
Beryllium	7.2	72	<0.29	<0.30	<0.29	<0.33	<0.29	<0.33	0.32	0.38	0.48	0.41	0.33	0.4	0.33	0.54	0.33	0.4	0.3	0.51	0.33
Cadmium	2.5 c	4.3	<0.37	<0.38	<0.36	<0.42	<0.36	<0.42	<0.35	<0.43	<0.38	BRL	0.41	BRL	0.41	BRL	0.42	BRL	0.38	BRL	0.41
Calcium			414	893	730	635	841	736	856	1080	7.39	997	6.1	2,730	6.2	1,090	63	848	5.7	1,150	6.2
Chromium	30 c	180 - trivalent	10.3	15	10.6	12.2	15.3	10.9	13.3	22.6	16.5	21.6	0.41	18.2	0.41	19.2	0.42	17.9	0.38	25.6	0.41
Cobalt			4.75	4.84	8.38	3.1	6.72	2.88	3.79	2.82	7.34	3.77	0.41	5.01	0.41	7.06	0.42	5.17	0.38	7.17	0.41
Copper	50	270	5.89	11.9	16.9	9.3	14.8	6.11	14.7	10.4	12.1	15.5	0.41	29	0.41	14.6	0.42	63.9	0.38	67.3	0.41
Iron			6560	8960	6740	4180	8040	5260	7490	15600	11500	12,400	61	14,700	62	12,400	63	11,100	57	14,300	62
Lead	63 c	400	3.81	6.25	5.51	4.34	8.36	2.69	3.86	9.42	5.77	8.15	0.41	131	0.41	14.8	0.42	41.7	0.38	30.7	0.41
Magnesium			890	1640	2310	1590	1850	1240	1480	1680	1720	1,980	6.1	2,200	6.2	2,120	63	1,510	5.7	2,150	6.2
Manganese	1,600 c	2,000	69.5	74.1	206	39.6	81.7	39.5	60.2	45.3	51.5	52.3	0.41	87.9	0.41	138	4.2	68.7	0.38	65.2	0.41
Mercury	0.18 c	0.81	<0.08	<0.07	<0.08	<0.1	<0.09	<0.10	<0.08	0.15	<0.08	BRL	0.08	0.52	0.08	BRL	0.1	BRL	0.07	0.13	0.09
Nickel	30	310	6.35	14.6	23.4	13.8	12.1	10.9	12.3	9.02	12.3	10.2	0.41	14	0.41	11.8	0.42	15.7	0.38	22.5	0.41
Potassium			583	680	581	494	767	367	647	704	798	791	6.1	695	6.2	831	6.3	387	5.7	658	6.2
Selenium	3.9c	180	<1.5	<1.5	<1.4	<1.7	<1.5	<1.7	<1.4	<1.7	<1.5	BRL	1.6	BRL	1.7	BRL	1.7	BRL	1.5	BRL	1.6
Silver	2	180	<0.37	<0.38	<0.37	<0.42	<0.36	<0.42	<0.35	<0.43	<0.38	BRL	0.41	BRL	0.41	BRL	0.42	BRL	0.38	BRL	0.41
Sodium			67.1	50.2	42.7	33.6	46	36.4	48.8	50.4	44.3	55.1	6.1	66.4	6.2	50.1	6.3	74.8	5.7	96.5	6.2
Thallium			<3.3	<3.4	<3.2	<3.8	<3.3	<3.8	<3.1	<3.8	<3.5	BRL	0.7	BRL	0.7	BRL	0.7	BRL	0.6	BRL	0.7
Vanadium			15.5	15.5	15.6	9.11	21.9	7.39	13.7	47	17.2	17.8	0.41	24.2	0.41	24.4	0.42	18.2	0.38	54.1	0.41
Zinc	109 c	10,000	18.7	27.6	21.7	16.3	30.6	15.2	19.6	41.7	38.3	34.8	0.41	89.3	0.41	29.5	0.42	29.5	0.38	45.1	0.41

Notes:

* - 6 NYCRR Part 375-6 Remedial Program Soil Cleanup Objectives

ND - Not-detected

NA - Guidance value not available

Bold/highlighted- Indicated exceedance of the NYSDEC UUSCO Guidance Value

Bold/highlighted- Indicated exceedance of the NYSDEC RRSCO Guidance Value

TABLE 5
Soil Cleanup Objectives

Contaminant	CAS Number	Protection of Public Health				Protection of Ecological Resources	Protection of Ground-water
		Residential	Restricted-Residential	Commercial	Industrial		
METALS							
Arsenic	7440-38 -2	16[f]	16[f]	16[f]	16[f]	13[f]	16[f]
Barium	7440-39 -3	350[f]	400	400	10,000 [d]	433	820
Beryllium	7440-41 -7	14	72	590	2,700	10	47
Cadmium	7440-43 -9	2.5[f]	4.3	9.3	60	4	7.5
Chromium, hexavalent [h]	18540-29-9	22	110	400	800	1[e]	19
Chromium, trivalent[h]	16065-83-1	36	180	1,500	6,800	41	NS
Copper	7440-50 -8	270	270	270	10,000 [d]	50	1,720
Total Cyanide [h]		27	27	27	10,000 [d]	NS	40
Lead	7439-92 -1	400	400	1,000	3,900	63[f]	450
Manganese	7439-96 -5	2,000[f]	2,000[f]	10,000 [d]	10,000 [d]	1600[f]	2,000[f]
Total Mercury		0.81[j]	0.81[j]	2.8[j]	5.7[j]	0.18[f]	0.73
Nickel	7440-02 -0	140	310	310	10,000 [d]	30	130
Selenium	7782-49 -2	36	180	1,500	6,800	3.9[f]	4[f]
Silver	7440-22 -4	36	180	1,500	6,800	2	8.3
Zinc	7440-66 -6	2200	10,000 [d]	10,000 [d]	10,000 [d]	109[f]	2,480
PESTICIDES / PCBs							
2,4,5-TP Acid (Silvex)	93-72-1	58	100[a]	500[b]	1,000[c]	NS	3.8
4,4'-DDE	72-55-9	1.8	8.9	62	120	0.0033 [e]	17
4,4'-DDT	50-29-3	1.7	7.9	47	94	0.0033 [e]	136
4,4'-DDD	72-54-8	2.6	13	92	180	0.0033 [e]	14
Aldrin	309-00-2	0.019	0.097	0.68	1.4	0.14	0.19
alpha-BHC	319-84-6	0.097	0.48	3.4	6.8	0.04[g]	0.02
beta-BHC	319-85-7	0.072	0.36	3	14	0.6	0.09
Chlordane (alpha)	5103-71 -9	0.91	4.2	24	47	1.3	2.9
delta-BHC	319-86-8	100[a]	100[a]	500[b]	1,000[c]	0.04[g]	0.25
Dibenzofuran	132-64-9	14	59	350	1,000[c]	NS	210
Dieldrin	60-57-1	0.039	0.2	1.4	2.8	0.006	0.1
Endosulfan I	959-98-8	4.8[i]	24[i]	200[i]	920[i]	NS	102
Endosulfan II	33213-65-9	4.8[i]	24[i]	200[i]	920[i]	NS	102
Endosulfan sulfate	1031-07 -8	4.8[i]	24[i]	200[i]	920[i]	NS	1,000[c]
Endrin	72-20-8	2.2	11	89	410	0.014	0.06
Heptachlor	76-44-8	0.42	2.1	15	29	0.14	0.38
Lindane	58-89-9	0.28	1.3	9.2	23	6	0.1
Polychlorinated biphenyls	1336-36 -3	1	1	1	25	1	3.2
SEMI-VOLATILES							
Acenaphthene	83-32-9	100[a]	100[a]	500[b]	1,000[c]	20	98
Acenapthylene	208-96-8	100[a]	100[a]	500[b]	1,000[c]	NS	107
Anthracene	120-12-7	100[a]	100[a]	500[b]	1,000[c]	NS	1,000[c]
Benz(a)anthracene	56-55-3	1[f]	1[f]	5.6	11	NS	1[f]
Benzo(a)pyrene	50-32-8	1[f]	1[f]	1[f]	1.1	2.6	22
Benzo(b) fluoranthene	205-99-2	1[f]	1[f]	5.6	11	NS	1.7
Benzo(g,h,i) perylene	191-24-2	100[a]	100[a]	500[b]	1,000[c]	NS	1,000[c]
Benzo(k) fluoranthene	207-08-9	1	3.9	56	110	NS	1.7
Chrysene	218-01-9	1[f]	3.9	56	110	NS	1[f]
Dibenz(a,h) anthracene	53-70-3	0.33[e]	0.33[e]	0.56	1.1	NS	1,000[c]
Fluoranthene	206-44-0	100[a]	100[a]	500[b]	1,000[c]	NS	1,000[c]
Fluorene	86-73-7	100[a]	100[a]	500[b]	1,000[c]	30	386
Indeno(1,2,3-cd) pyrene	193-39-5	0.5[f]	0.5[f]	5.6	11	NS	8.2
m-Cresol	108-39-4	100[a]	100[a]	500[b]	1,000[c]	NS	0.33[e]
Naphthalene	91-20-3	100[a]	100[a]	500[b]	1,000[c]	NS	12
o-Cresol	95-48-7	100[a]	100[a]	500[b]	1,000[c]	NS	0.33[e]
p-Cresol	106-44-5	34	100[a]	500[b]	1,000[c]	NS	0.33[e]
Pentachlorophenol	87-86-5	2.4	6.7	6.7	55	0.8[e]	0.8[e]
Phenanthrene	85-01-8	100[a]	100[a]	500[b]	1,000[c]	NS	1,000[c]
Phenol	108-95-2	100[a]	100[a]	500[b]	1,000[c]	30	0.33[e]
Pyrene	129-00-0	100[a]	100[a]	500[b]	1,000[c]	NS	1,000[c]

TABLE 5
Soil Cleanup Objectives

Contaminant	CAS Number	Protection of Public Health				Protection of Ecological Resources	Protection of Ground-water
		Residential	Restricted-Residential	Commercial	Industrial		
VOLATILES							
1,1,1-Trichloroethane	71-55-6	100[a]	100[a]	500[b]	1,000[c]	NS	0.68
1,1-Dichloroethane	75-34-3	19	26	240	480	NS	0.27
1,1-Dichloroethene	75-35-4	100[a]	100[a]	500[b]	1,000[c]	NS	0.33
1,2-Dichlorobenzene	95-50-1	100[a]	100[a]	500[b]	1,000[c]	NS	1.1
1,2-Dichloroethane	107-06-2	2.3	3.1	30	60	10	0.02[f]
cis-1,2-Dichloroethene	156-59-2	59	100[a]	500[b]	1,000[c]	NS	0.25
trans-1,2-Dichloroethene	156-60-5	100[a]	100[a]	500[b]	1,000[c]	NS	0.19
1,3-Dichlorobenzene	541-73-1	17	49	280	560	NS	2.4
1,4-Dichlorobenzene	106-46-7	9.8	13	130	250	20	1.8
1,4-Dioxane	123-91-1	9.8	13	130	250	0.1[e]	0.1[e]
Acetone	67-64-1	100[a]	100[b]	500[b]	1,000[c]	2.2	0.05
Benzene	71-43-2	2.9	4.8	44	89	70	0.06
Butylbenzene	104-51-8	100[a]	100[a]	500[b]	1,000[c]	NS	12
Carbon tetrachloride	56-23-5	1.4	2.4	22	44	NS	0.76
Chlorobenzene	108-90-7	100[a]	100[a]	500[b]	1,000[c]	40	1.1
Chloroform	67-66-3	10	49	350	700	12	0.37
Ethylbenzene	100-41-4	30	41	390	780	NS	1
Hexachlorobenzene	118-74-1	0.33[e]	1.2	6	12	NS	3.2
Methyl ethyl ketone	78-93-3	100[a]	100[a]	500[b]	1,000[c]	100[a]	0.12
Methyl tert-butyl ether	1634-04 -4	62	100[a]	500[b]	1,000[c]	NS	0.93
Methylene chloride	75-09-2	51	100[a]	500[b]	1,000[c]	12	0.05
n-Propylbenzene	103-65-1	100[a]	100[a]	500[b]	1,000[c]	NS	3.9
sec-Butylbenzene	135-98-8	100[a]	100[a]	500[b]	1,000[c]	NS	11
tert-Butylbenzene	98-06-6	100[a]	100[a]	500[b]	1,000[c]	NS	5.9
Tetrachloroethene	127-18-4	5.5	19	150	300	2	1.3
Toluene	108-88-3	100[a]	100[a]	500[b]	1,000[c]	36	0.7
Trichloroethene	79-01-6	10	21	200	400	2	0.47
1,2,4-Trimethylbenzene	95-63-6	47	52	190	380	NS	3.6
1,3,5-Trimethylbenzene	108-67-8	47	52	190	380	NS	8.4
Vinyl chloride	75-01-4	0.21	0.9	13	27	NS	0.02
Xylene (mixed)	1330-20 -7	100[a]	100[a]	500[b]	1,000[c]	0.26	1.6

All soil cleanup objectives (SCOs) are in parts per million (ppm). NS=Not specified. See Technical Support Document (TSD). Footnotes

a The SCOs for residential, restricted-residential and ecological resources use were capped at a maximum value of 100 ppm. See TSD section 9.3.

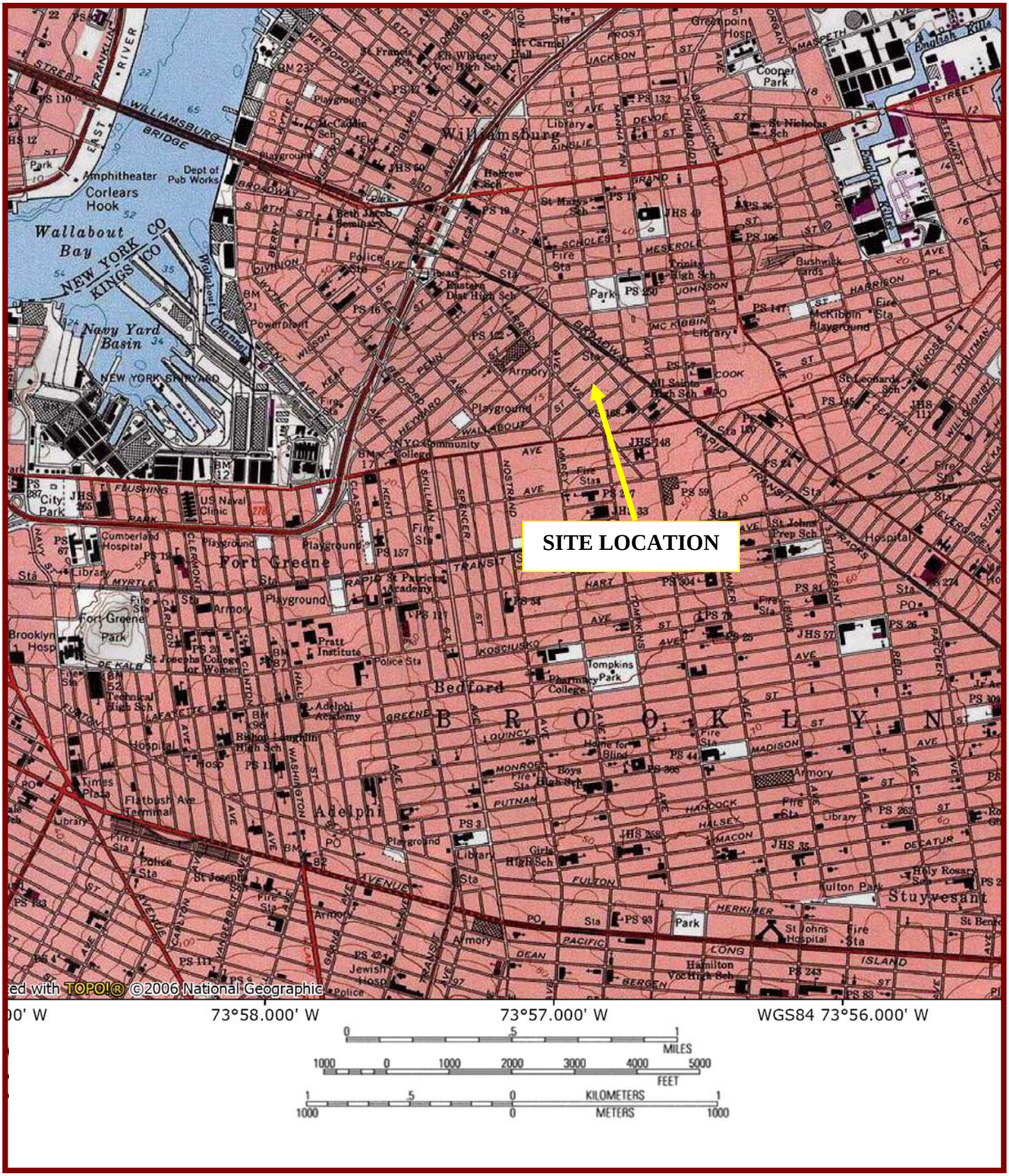
b The SCOs for commercial use were capped at a maximum value of 500 ppm. See TSD section 9.3.

c The SCOs for industrial use and the protection of groundwater were capped at a maximum value of 1000 ppm. See TSD section 9.3.

d The SCOs for metals were capped at a maximum value of 10,000 ppm. See TSD section 9.3.

e For constituents where the calculated SCO was lower than the contract required quantitation limit (CRQL), the CRQL is used as the SCO value.

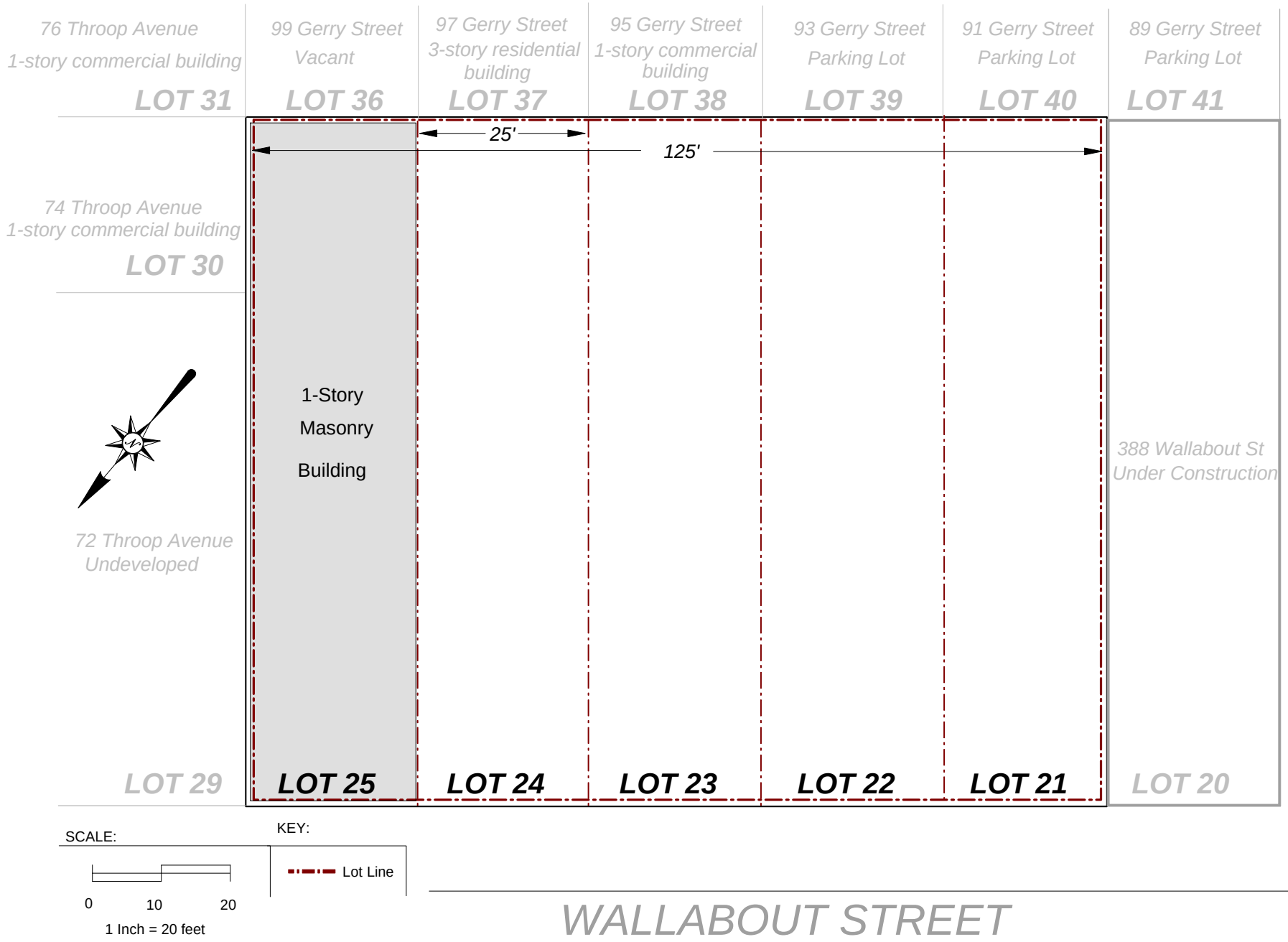
FIGURES



EBC
ENVIRONMENTAL BUSINESS CONSULTANTS
Phone 631.504.6000
Fax 631.924.2870

390-398 WALLABOUT STREET
BROOKLYN, NEW YORK 11206

FIGURE 1 – SITE LOCATION MAP



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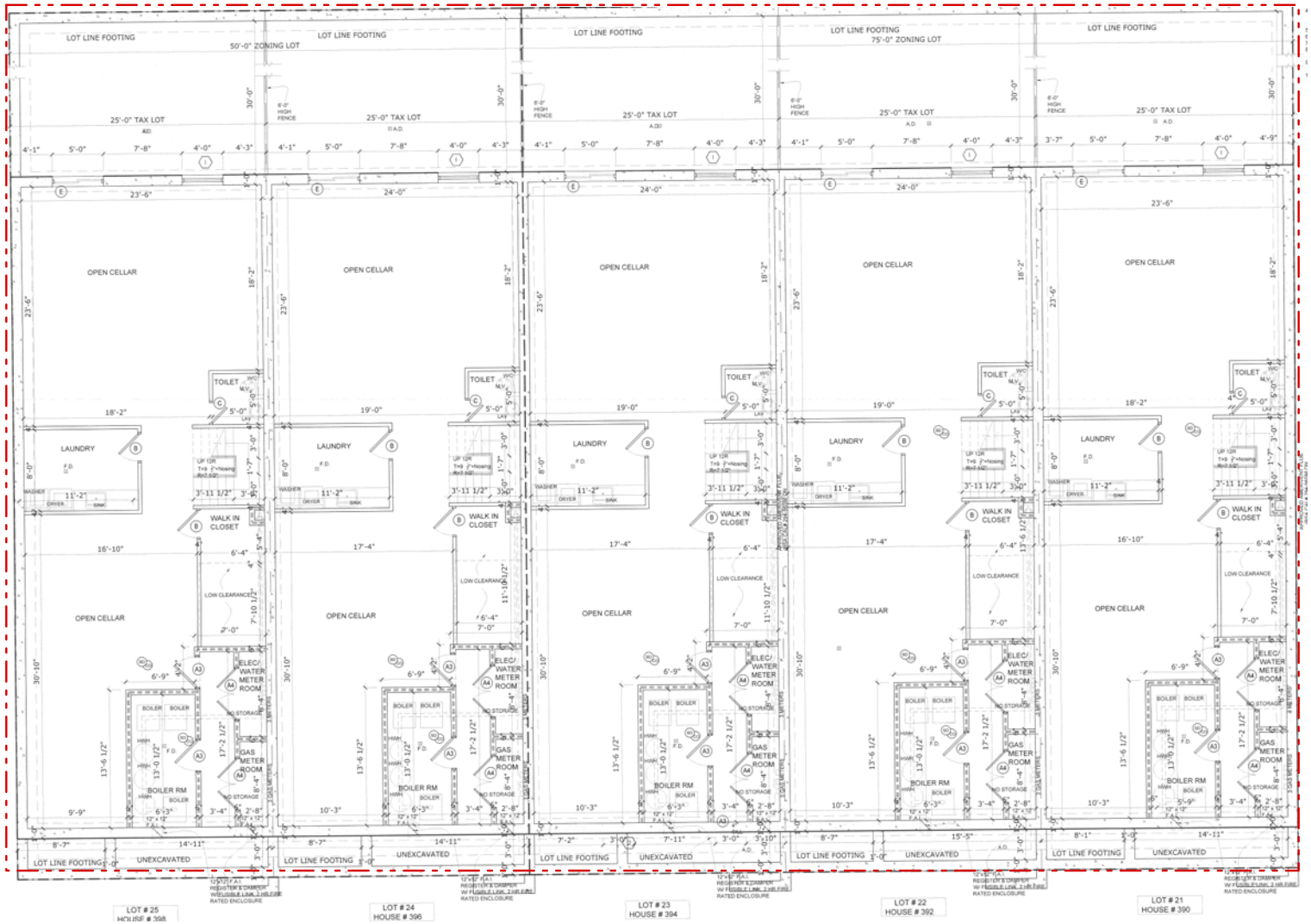
BROOKLYN, NY 11206

FIGURE 2 SITE BOUNDARY



KEY:

Lot Line

SCALE:

0 10 20

1 Inch = 30 feet

WALLABOUT STREET

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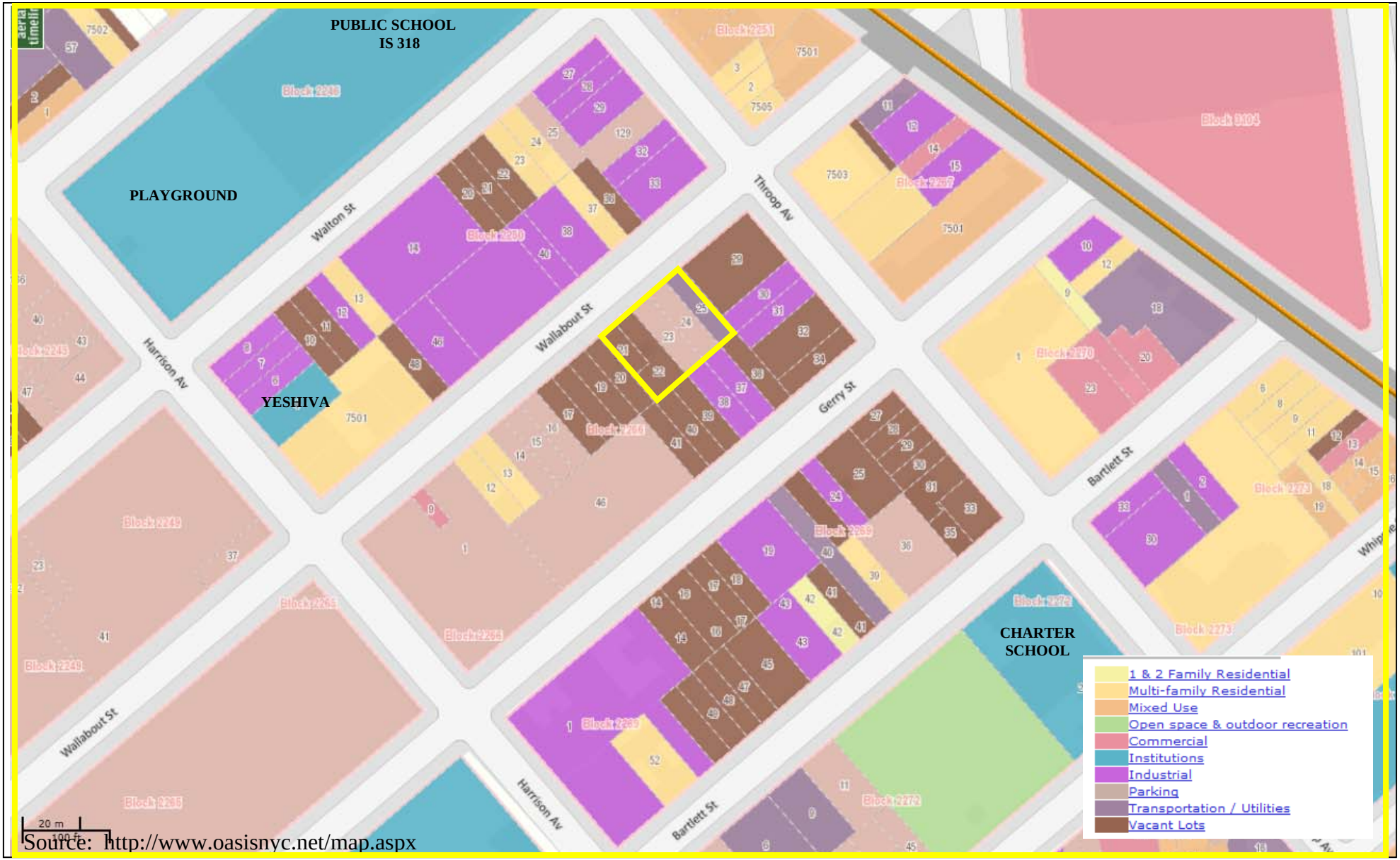
FIGURE 3 REDEVELOPMENT LAYOUT



Source: http://www.oasisnyc.net/map.aspx

FIGURE 4
SURROUNDING LAND USE MAP

390-398 WALLABOUT STREET, BROOKLYN NY

HAZARDOUS MATERIALS REMEDIAL INVESTIGATION REPORT

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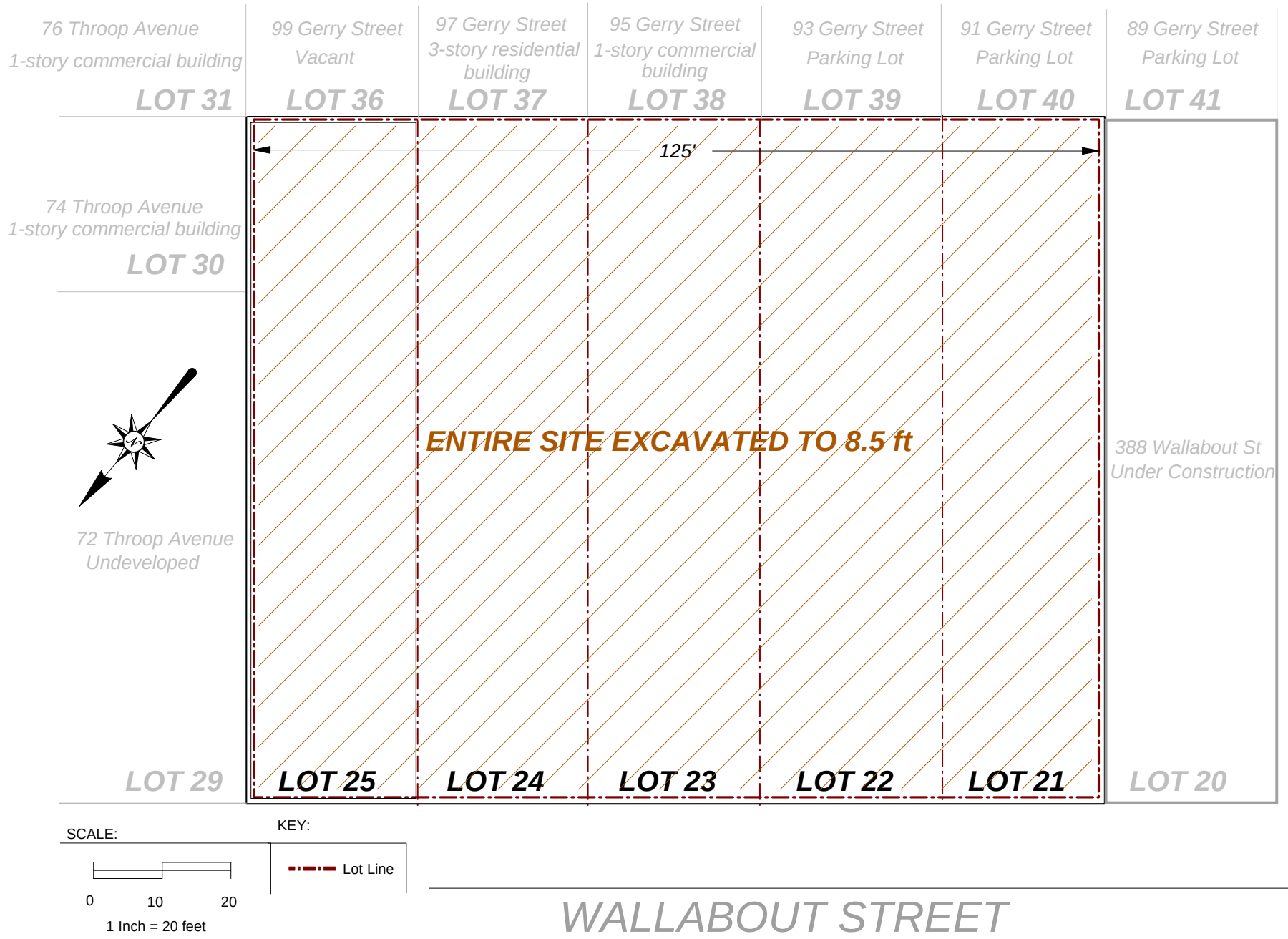
PHONE: (631) 504-6000 FAX: (631) 924-2870



WALLABOUT STREET

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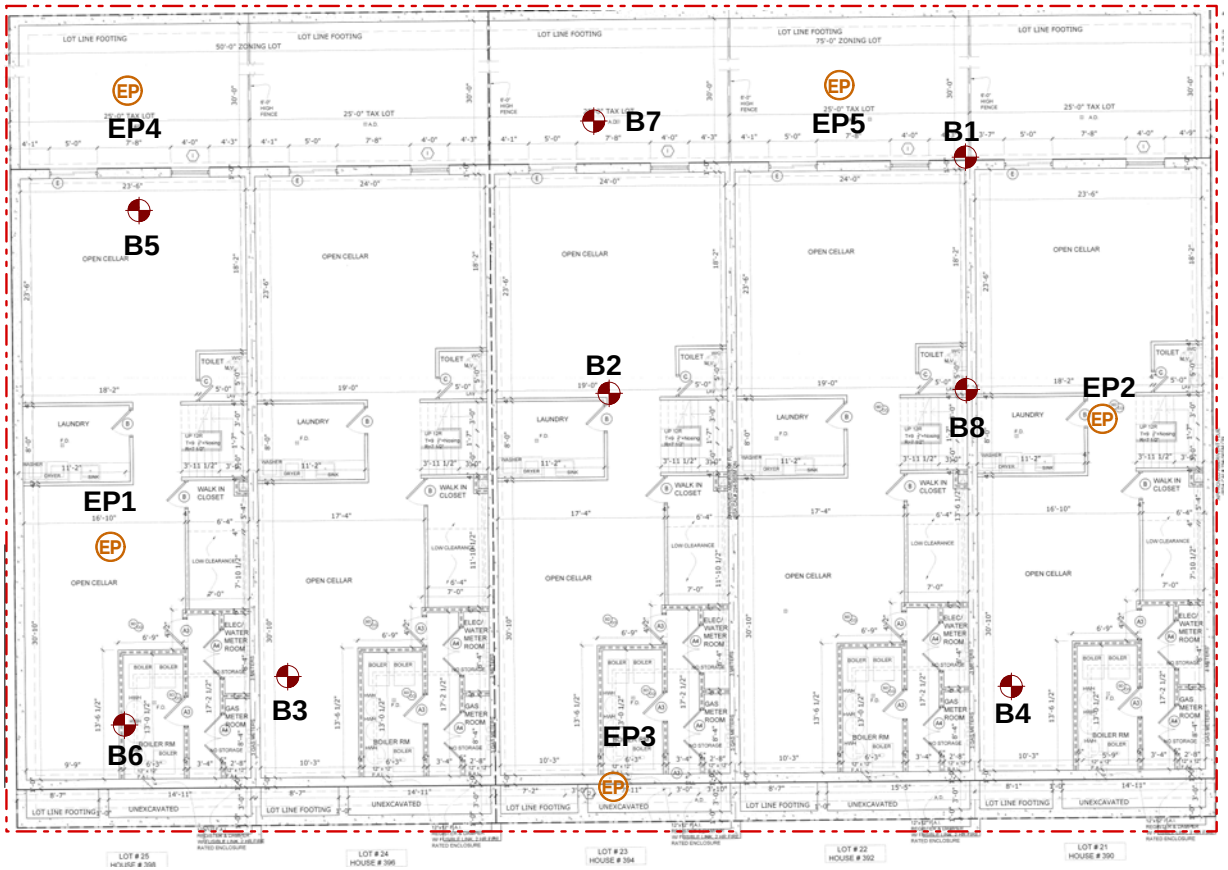
FIGURE 5 EXCAVATION AREAS



KEY:

- Property Boundary
- Endpoint Sample Location
- RI Soil Boring Location

SCALE:

0 10 20

1 Inch = 30 feet

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FIGURE 6 ENDPOINT SAMPLING LOCATIONS