

**537 Grand Street**  
**BROOKLYN, NEW YORK**

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# **Remedial Action Work Plan**

**NYC VCP Project Number 17CVCP071K**  
**OER Project Number 17EH-N226K**

**Prepared For:**

Elite Properties NYC  
108-18 Queens Boulevard, Suite 906  
Forest Hills, NY 11375  
(917) 658 - 8804  
saul@elitepropertiesny.com

**Prepared By:**

Structural Engineering Technologies, P.C.  
40-12 28<sup>th</sup> Street  
Long Island City, NY 11101  
(718) 706-7196  
structuralet@aol.com

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**MAY 2017**

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## LIST OF ACRONYMS

<b>Acronym</b>	<b>Definition</b>
AOC	Area of Concern
AS/SVE	Air Sparging/Soil Vapor Extraction
BOA	Brownfield Opportunity Area
CAMP	Community Air Monitoring Plan
C&D	Construction and Demolition
CEQR	City Environmental Quality Review
CFR	Code of Federal Regulations
CHASP	Construction Health and Safety Plan
COC	Certificate of Completion
CQAP	Construction Quality Assurance Plan
CSOP	Contractors Site Operation Plan
DCR	Declaration of Covenants and Restrictions
ECs/ICs	Engineering Controls and Institutional Controls
ELAP	Environmental Laboratory Accreditation Program
HASP	Health and Safety Plan
HAZWOPER	Hazardous Waste Operations Emergency Response
IRM	Interim Remedial Measure
MNA	Monitored Natural Attenuation
NOC	Notice of Completion
NYS DEC	New York State Department of Environmental Conservation
NYC DEP	New York City Department of Environmental Protection
NYC DOHMH	New York State Department of Health and Mental Hygiene
NYC OER	New York City Office of Environmental Remediation
NYC VCP	New York City Voluntary Cleanup Program
NYCRR	New York Codes Rules and Regulations
NYS DEC	New York State Department of Environmental Conservation

NYS DEC DER	New York State Department of Environmental Conservation Division of Environmental Remediation
NYS DOH	New York State Department of Health
NYS DOT	New York State Department of Transportation
ORC	Oxygen-Release Compound
OSHA	United States Occupational Health and Safety Administration
PCBs	Polychlorinated Biphenyls
PE	Professional Engineer
PID	Photo Ionization Detector
QEP	Qualified Environmental Professional
QHHEA	Qualitative Human Health Exposure Assessment
RAOs	Remedial Action Objectives
RAR	Remedial Action Report
RAWP	Remedial Action Work Plan or Plan
RCA	Recycled Concrete Aggregate
RD	Remedial Design
RI	Remedial Investigation
RMZ	Residual Management Zone
SCOs	Soil Cleanup Objectives
SCG	Standards, Criteria and Guidance
SMP	Site Management Plan
SPDES	State Pollutant Discharge Elimination System
SSDS	Sub-Slab Depressurization System
SVOC	Semi-Volatile Organic Compound
TAL	Target Analyte List
TCL	Target Compound List
USGS	United States Geological Survey
UST	Underground Storage Tank
VCA	Voluntary Cleanup Agreement
VOC	Volatile Organic Compound

## CERTIFICATION

I, George J. Cambourakis, am currently a registered professional engineer licensed by the State of New York. I performed professional engineering services and had primary direct responsibility for designing the remedial program for the 537 Grand Street, Brooklyn, NY site, site number 17CVCP071K. I certify to the following:

- I have reviewed this document and the Stipulation List, to which my signature and seal are affixed.
- Engineering Controls developed for this remedial action were designed by me or a person under my direct supervision and designed to achieve the goals established in this Remedial Action Work Plan for this site.
- The Engineering Controls to be constructed during this remedial action are accurately reflected in the text and drawings of the Remedial Action Work Plan and are of sufficient detail to enable proper construction.
- This Remedial Action Work Plan (RAWP) has a plan for handling, transport and disposal of soil, fill, fluids and other materials removed from the property in accordance with applicable City, State and Federal laws and regulations. Importation of all soil, fill and other material from off-Site will be in accordance with all applicable City, State and Federal laws and requirements. This RAWP has provisions to control nuisances during the remediation and all invasive work, including dust and odor suppression.

George J. Cambourakis

Name

060234

PE License Number

Signature

06/13/17

Date



I, Mark E. Robbins, am a qualified Environmental Professional. I will have primary direct responsibility for implementation of the remedial program for the 537 Grand Street, Brooklyn, NY site, site number 17CVCP071K. I certify to the following:

- This Remedial Action Work Plan (RAWP) has a plan for handling, transport and disposal of soil, fill, fluids and other materials removed from the property in accordance with applicable City, State and Federal laws and regulations. Importation of all soil, fill and other material from off-Site will be in accordance with all applicable City, State and Federal laws and requirements. This RAWP has provisions to control nuisances during the remediation and all invasive work, including dust and odor suppression.

QEP Name

QEP Signature

Date

## **EXECUTIVE SUMMARY**

Elite Properties NYC is working with the NYC Office of Environmental Remediation (OER) in the New York City Voluntary Cleanup Program to investigate and remediate a 2,250-square foot site located at 537 Grand Street in Brooklyn, New York. A remedial investigation (RI) was performed to compile and evaluate data and information necessary to develop this Remedial Action Work Plan (RAWP). The remedial action described in this document provides for the protection of public health and the environment consistent with the intended property use, complies with applicable environmental standards, criteria and guidance and conforms to applicable laws and regulations.

### **Site Location and Background**

The Site is located at 537 Grand Street in the Williamsburg section of Brooklyn, New York and is identified as Block 2779 and Lot 38 on the New York City Tax Map. **Figure 1** shows the Site location. The Site is approximately 2,250-square feet and is bounded by 2-story and 3-story residential building to the north, a Public Facility/ Institution “Mission Pentecostal” to the south, a 3-story commercial and residential building to the east, and a 3-story commercial and residential building to the west. A map of the site boundary is shown in **Figure 1**. Currently the Site is developed with a 2-story mixed-use commercial and residential structure with a partial cellar. The structure covers the entire footprint of the site. The commercial unit is currently vacant. The vacant commercial space was formerly occupied by a church and is currently used for storage.

### **Summary of Redevelopment Plan**

The proposed construction at the Site will consist of the enlargement of the existing 2-story building with a partial basement to be used as a residence. The proposed partial basement will be extended 30 feet to the rear of the building. The basement will be utilized for utility rooms including electric, gas, water and water heater, refuse storage, commercial refuse, bike storage, bathroom and accessory use. The horizontal expansion includes the addition of approximately 678 square feet along the structure’s northern boundary. The vertical expansion includes addition of two (2) new story with twice the existing height of total 19 feet each. The first floor covers

entire lot area and will consist of public hall and retail; the remaining floors will have total five apartments. There is an elevator in the southern portion of the building that is accessible to the basement only. The current basement area will be further excavated to 2.5 feet below the existing slab across the entire existing basement. The remainder of the proposed basement to 30 feet in rear portion will be excavated to 10 feet 5 inches below grade to increase the cellar foot print. Approximately 500 tons of soil will be removed from the Site and properly disposed at an appropriately licensed or permitted facility. The entire building slab will be 5 inches in thickness and will be installed on top of a 6-inch crushed stone base.

Layout of the proposed site development is presented in **Figure 2**. The current zoning designation is R7A - Residential. The proposed use is consistent with existing zoning for the property. The remedial action contemplated under this RAWP may be implemented independently of the proposed redevelopment plan.

**Appendix 1** provides the proposed development plans.

### **Summary of Surrounding Property**

The Site is located in the Williamsburg section of Brooklyn. The Site vicinity consists of residential and commercial properties. Within 500 – foot radius of the Site, there are six (6) sensitive receptors present including St. Nicholas Union Ave, Youth and Family Center, DBL Rocio and three (3) residences. **Figure 3** shows the surrounding land usage.

### **Summary of Past Site Uses and Areas of Concern**

Based upon the review the Phase I Environmental Site Assessment (ESA) Reports prepared by Hydro Tech Environmental Corp. (Hydro Tech) in May 2016 a Site history was established. According to the of the Sanborn Fire Insurance Maps and Regulatory Agency documents, the Site was developed prior to 1887 with a 2-story unspecified commercial building under the address 425 Grand Street, Brooklyn, NY. As per the Sanborn Maps of 1905 – 1951, there exists a 2-story store in the southern portion and a 1-story commercial area in the northern portion at the address 537 Grand Street. In 1965 to 1995, the Site was a 2-story building with a furniture store (Alfredo's Furniture) and residential unit. The Site consists of 2-story building with a commercial unit and residential unit from 1996 until today.

The AOCs identified for this site include:

- The presence of a Hazardous Materials and Noise “E” Designation at the Site.

### **Summary of Work Performed under the Remedial Investigation**

The following work was performed as part of the Phase II Subsurface Investigation by Hydro Tech in July 2016:

1. Conducted a Site inspection to identify AOCs and physical obstructions (i.e. structures, buildings, etc.);
2. Performed a Ground Penetrating Radar (GPR) survey throughout the entire Site;
3. Installed four (4) soil borings in the partial basement and northern portion of the Site and collected eight (8) soil samples for chemical analysis from the soil borings to evaluate soil quality; and
4. Installed three (3) soil vapor probe the partial basement and northern portion of the Site and collected three (3) soil vapor samples for chemical analysis.
5. Collected one (1) indoor and one (1) outdoor air sample collected one (1) indoor and one (1) outdoor air sample for chemical analysis.

### **Summary of Findings of Remedial Investigation**

1. Elevation of the property is approximately 27 feet.
2. Depth to groundwater is approximately 20 feet at the Site. No groundwater was encountered at the maximum depth of 17 feet at the Site.
3. The GPR survey identified no anomaly indicative of a suspect UST beneath the Site.
4. Groundwater flow is towards the northwest in the direction of East River.
5. The stratigraphy of the Site, from the surface down to 19 feet below grade, consists of medium to coarse grained yellow sand. No evidence of historic fill material was identified at the Site.
6. Soil/fill samples collected during the July 2016 Phase II were compared to the NYSDEC 6NYCRR Part 375-6.8 Unrestricted Use Soil Cleanup Objectives (SCOs) as well as to Restricted Residential Use SCOs. Soil sampling results showed no volatile organic

compounds (VOCs) were detected at concentrations exceeding Unrestricted Use SCOs. Acetone (max 0.79 mg/kg) was detected in all the soil samples at concentrations below Unrestricted Use SCOs. Acetone is a common laboratory artifact. No SVOCs, pesticides and total PCBs were detected at concentrations exceeding Unrestricted Use SCOs. Four (4) metals including copper (max. 151 mg/kg), lead (221 mg/kg), mercury (max 2.39 mg/kg) and zinc (max. 196 mg/kg) were detected above Unrestricted Use SCOs. Among these detections, mercury also exceeded Restricted Residential Use SCOs in two shallow samples.

7. Soil vapor samples collected during the 2016 Phase II were compared to the compounds listed in Table 3.1 Air Guideline Values Derived by the New York State Department of Health (NYSDOH) located in the NYSDOH Final Guidance for Evaluating Soil Vapor Intrusion dated October 2006. Soil vapor results show a wide range of petroleum related VOCs (BTEX and their associated derivatives) in all soil vapor samples. The total concentration of BTEX compounds range from 4211 µg/m<sup>3</sup> to 8550 µg/m<sup>3</sup>. One chlorinated VOCs including tetrachloroethene (max. 54 µg/m<sup>3</sup>) was detected in all the 3 soil vapor samples at elevated levels. Other chlorinated VOCs such as 1,1,1 trichloroethane (1,1,1-TCA), carbon tetrachloride and trichloroethylene (TCE) were not detected in any soil vapor samples.

## **Summary of the Remedial Action**

The proposed remedial action achieves protection of public health and the environment for the intended use of the property. The proposed remedial action achieves all of the remedial action objectives established for the project and addresses applicable standards, criterion, and guidance; is effective in both the short-term and long-term and reduces mobility, toxicity and volume of contaminants; is cost effective and implementable; and uses standards methods that are well established in the industry.

The proposed remedial action will consist of:

1. Preparation of a Community Protection Statement and performance of all required NYC VCP Citizen Participation activities according to an approved Citizen Participation Plan.

2. Performance of a Community Air Monitoring Program for particulates and volatile organic carbon compounds.
3. Establishment of Site-specific (Track 4) Soil Cleanup Objectives (SCOs).
4. Site mobilization involving Site security setup, equipment mobilization, utility mark outs and marking & staking excavation areas.
5. Completion of a Waste Characterization Study prior to excavation activities. Waste characterization soil samples will be collected at a frequency dictated by disposal facility(s). A Waste Characterization Report documenting sample procedures, location, analytical results shall be submitted to NYCOER prior to start of remedial action.
6. Excavation and removal of soil/fill exceeding Track 4 Site Specific SCOs.  
The current cellar area will be further excavated to 2.5 feet below the existing slab. The remainder of the proposed basement to 30 feet in rear portion will be excavated to 10 feet 5 inches below grade to increase the cellar foot print. Approximately 500 tons of soil will be removed from the Site and properly disposed at an appropriately licensed or permitted facility.
7. Screening of excavated soil/fill during intrusive work for indications of contamination by visual means, odor, and monitoring with a PID.
8. Management of excavated materials including temporarily stockpiling and segregating in accordance with defined material types and to prevent co-mingling of contaminated material and non-contaminated materials.
9. Removal of all USTs that are encountered during soil/fill removal actions. Registration of tanks and reporting of any petroleum spills associated with UST's and appropriate closure of these petroleum spills in compliance with applicable local, State and Federal laws and regulations.
10. Transportation and off-Site disposal of all soil/fill material at licensed or permitted facilities in accordance with applicable laws and regulations for handling, transport, and disposal, and this plan. Sampling and analysis of excavated media as required by disposal facilities. Appropriate segregation of excavated media on-Site.
11. Collection and analysis of end-point samples to determine the performance of the remedy with respect to attainment of SCOs.

12. Collection of one additional RI sample in the area of the lot that is currently at grade, but will be excavated to extend the basement.
13. Import of materials to be used for backfill and cover in compliance with this plan and in accordance with applicable laws and regulations.
14. Construction of an engineered composite cover consisting of a five-inch thick concrete building slab with a minimum 6-inch clean crushed stones.
15. Installation of a vapor barrier system consisting of vapor barrier beneath the building slab and outside of sub-grade foundation sidewalls to mitigate soil vapor migration into the building. The slab will not be disturbed and the vapor barrier is installed on the exterior for the entire lot. The vapor barrier system will consist of a 20-mil vapor barrier manufactured by Raven Industries (Vapor Block Plus) below the slab throughout the full building area and outside all sub-grade foundation sidewalls. All welds, seams and penetrations will be properly sealed to prevent preferential pathways for vapor migration. The vapor barrier system is an Engineering Control for the remedial action. The remedial engineer will certify in the RAR that the vapor barrier system was designed and properly installed to mitigate soil vapor migration into the building.
16. Performance of all activities required for the remedial action, including acquisition of required permits and attainment of pretreatment requirements, in compliance with applicable laws and regulations.
17. Implementation of storm-water pollution prevention measures in compliance with applicable laws and regulations.
18. Submission of a RAR that describes the remedial activities, certifies that the remedial requirements have been achieved, defines the Site boundaries, lists any changes from this RAWP, and describes all Engineering and Institutional Controls to be implemented at the Site.
19. Submission of an approved Site Management Plan (SMP) in the Remedial Action Plan (RAP) for long-term management of residual contamination, including plans for operation, maintenance, monitoring, inspection and certification of Engineering and Institutional Controls and reporting at a specified frequency.

20. The property will continue to be registered with an E-Designation at the NYC Buildings Department. Establishment of Engineering Controls and Institutional Controls in this RAWP and a requirement that management of these controls must be in compliance with an approved SMP. Institutional Controls will include prohibition of the following: (1) vegetable gardening and farming; (2) use of groundwater without treatment rendering it safe for the intended use; (3) disturbance of residual contaminated material unless it is conducted in accordance with the SMP; and (4) higher level of land usage without OER-approval.

## COMMUNITY PROTECTION STATEMENT

The NYC Office of Environmental Remediation (OER) provides governmental oversight for the cleanup of contaminated property in NYC. This Remedial Action Work Plan (“cleanup plan”) describes the findings of prior environmental studies, shows the location of identified contamination at the site, and describes the plans to clean up the site to protect public health and the environment.

This cleanup plan provides a very high level of protection for neighboring communities and also includes many other elements that address common community concerns, such as community air monitoring, odor, dust and noise controls, hours of operation, good housekeeping and cleanliness, truck management and routing, and opportunities for community participation. The purpose of this Community Protection Statement is to explain these community protection measures in non-technical language to simplify community review.

### **Project Information:**

- Site Address: 537 Grand Street, Brooklyn, NY
- NYC Voluntary Cleanup Program Project Number: 17CVCP071K

### **Project Contacts:**

- OER Project Manager: Kate Glass, 212-788-8841
- Site Project Manager: Komal Dixit, 718-636-0800
- Site Safety Officer: Komal Dixit, 718-636-0800
- Online Document Repository:

<http://www.nyc.gov/html/oer/html/repository/RBrooklyn.shtml>

**Remedial Investigation and Cleanup Plan:** Under the oversight of the NYC OER, a thorough study of this property (called a remedial investigation) has been performed to identify past property usage, to sample and test soils, groundwater and soil vapor, and to identify contaminant sources present on the property. The cleanup plan has been designed to address all contaminant sources that have been identified during the study of this property.

**Identification of Sensitive Land Uses:** Prior to selecting a cleanup, the neighborhood was evaluated to identify sensitive land uses nearby, such as schools, day care facilities, hospitals and residential areas. The cleanup program was then tailored to address the special conditions of this community.

**Qualitative Human Health Exposure Assessment:** An important part of the cleanup planning for the Site is a study to find all of the ways that people might come in contact with contaminants at the Site now or in the future. This study is called a Qualitative Human Health Exposure Assessment (QHHEA). A QHHEA was performed for this project. This assessment has considered all known contamination at the Site and evaluated the potential for people to come in contact with this contamination. All identified public exposures will be addressed under this cleanup plan.

**Health and Safety Plan:** This cleanup plan includes a Construction Health and Safety Plan (CHASP) that is designed to protect community residents and on-Site workers. The elements of this RAWP are in compliance with applicable safety requirements of the United States Occupational Safety and Health Administration (OSHA). This RAWP includes many protective elements including those discussed below.

**Site Safety Coordinator:** This project has a designated Site safety coordinator to implement the CHASP. The safety coordinator maintains an emergency contact sheet and protocol for management of emergencies. The Site safety coordinator is identified at the beginning of this Community Protection Statement.

**Worker Training:** Workers participating in cleanup of contaminated material on this project are required to be trained in a 40-hour hazardous waste operators training course and to take annual refresher training. This pertains to workers performing specific tasks including removing contaminated material and installing cleanup systems in contaminated areas.

**Community Air Monitoring Plan:** Community air monitoring will be performed during this cleanup project to ensure that the community is properly protected from contaminants, dust and odors. Air samples will be tested in accordance with a detailed plan called the Community Air Monitoring Plan or CAMP. Results will be regularly reported to the NYC Office of Environmental Remediation. This cleanup plan also has a plan to address any unforeseen problems that might occur during the cleanup (called a ‘Contingency Plan’).

**Odor, Dust and Noise Control:** This cleanup plan includes actions for odor and dust control. These actions are designed to prevent off-Site odor and dust nuisances and includes steps to be taken if nuisances are detected. Generally, dust is managed by application of physical covers and by water sprays. Odors are controlled by limiting the area of open excavations, physical covers, spray foams and by a series of other actions (called operational measures). The project is also required to comply with applicable NYC noise control standards. If you observe problems in these areas, please contact the onsite Project Manager or NYC Office of Environmental Remediation Project Manager listed on the first page of this Community Protection Statement document.

**Quality Assurance:** This cleanup plan requires that evidence be provided to illustrate that all cleanup work required under the plan has been completed properly. This evidence will be summarized in the final report, called the Remedial Action Report. This report will be submitted to the NYC Office of Environmental Remediation and will be thoroughly reviewed.

**Stormwater Management:** To limit the potential for soil erosion and discharge, this cleanup plan has provisions for stormwater management. The main elements of the stormwater management include physical barriers such as tarp covers and erosion fencing, and a program for frequent inspection.

**Hours of Operation:** The hours for operation of cleanup will comply with the NYC Department of Buildings construction code requirements or according to specific variances

issued by that agency. For this cleanup project, the hours of operation will conform to requirements of the NYC Department of Buildings.

**Signage:** While the cleanup is in progress, a placard will be prominently posted at the main entrance of the property with a laminated project Fact Sheet that states that the project is in the NYC Voluntary Cleanup Program and provides project contact names and numbers, and a link to the document repository where project documents can be viewed.

**Complaint Management:** The contractor performing this cleanup is required to address all complaints. If you have any complaints, you can call the facility Project Manager or the NYC Office of Environmental Remediation Project Manager listed on the first page of this Community Protection Statement document, or call 311 and mention the Site is in the NYC Voluntary Cleanup Program.

**Utility Mark-outs:** To promote safety during excavation in this cleanup, the contractor is required to first identify all utilities and must perform all excavation and construction work in compliance with NYC Department of Buildings regulations.

**Soil and Liquid Disposal:** All soil and liquid material removed from the Site as part of the cleanup will be transported and disposed of in accordance with all applicable City, State and Federal regulations, and required permits will be obtained.

**Soil Chemical Testing and Screening:** All excavations will be supervised by a trained and properly qualified environmental professional. In addition to extensive sampling and chemical testing of soils on the Site, excavated soil will be screened continuously using hand-held instruments, by sight, and by smell to ensure proper material handling and management, and community protection.

**Stockpile Management:** Soil stockpiles will be kept covered with tarps to prevent dust, odor and erosion. Stockpiles will be frequently inspected. Damaged tarp covers will be

promptly replaced. Stockpiles will be protected with silt fences. Hay bales will be used, as needed, to protect storm water catch basins and other discharge points.

**Trucks and Covers:** Loaded trucks leaving the Site will be covered in compliance with applicable laws and regulations to prevent dust and odor. Trucks will be properly recorded in logs and records and placarded in compliance with applicable City, State and Federal laws, including those of the New York State Department of Transportation. If loads contain wet material that can leak, truck liners will be used. All transport of materials will be performed by licensed truckers and in compliance with applicable laws and regulations.

**Imported Material:** All fill materials proposed to be brought onto the Site will comply with rules outlined in this cleanup plan and will be inspected and approved by a qualified worker located on the Site. Waste materials will not be brought onto the Site. Trucks entering the Site with imported clean materials will be covered in compliance with applicable laws and regulations.

**Equipment Decontamination:** All equipment used for cleanup work will be inspected and washed, if needed, before it leaves the Site. Trucks will be cleaned at a truck inspection station on the property before leaving the Site.

**Housekeeping:** Locations where trucks enter or leave the Site will be inspected every day and cleaned regularly to ensure that they are free of dirt and other materials from the Site.

**Truck Routing:** Truck routes have been selected to: (a) limit transport through residential areas and past sensitive nearby properties; (b) maximize use of city-mapped truck routes; (c) limit total distance to major highways; (d) promote safety in entry to highways; (e) promote overall safety in trucking; and (f) minimize off-Site line-ups (queuing) of trucks entering the property. Operators of loaded trucks leaving the Site will be instructed not to stop or idle in the local neighborhood.

**Final Report:** The results of all cleanup work will be fully documented in a final report (called the Remedial Action Report) that will be available for public review online. A link to the online document repository and the public library with Internet access nearest the Site are listed on the first page of this Community Protection Statement document

**Long-Term Site Management:** If long-term protection is needed after the cleanup is complete, the property owner will be required to comply with an ongoing Site Management Plan that calls for continued inspection of protective controls, such as Site covers. The Site Management Plan is evaluated and approved by the NYC Office of Environmental Remediation. Requirements that the property owner must comply with are defined either in the property's deed or established through a city environmental designation registered with the Department of Buildings. A certification of continued protectiveness of the cleanup will be required from time to time to show that the approved cleanup is still effective.

# REMEDIAL ACTION WORK PLAN

## 1.0 Project Background

Elite Properties NYC is working with the NYC Office of Environmental Remediation (OER) in the New York City Voluntary Cleanup Program and/or in the “E” Designation Program to investigate and remediate a property located at 537 Grand Street in the Williamsburg section of Brooklyn, New York (the “Site”). A Remedial Investigation (RI) was performed to compile and evaluate data and information necessary to develop this Remedial Action Work Plan (RAWP) in a manner that will render the Site protective of public health and the environment consistent with the contemplated end use. This RAWP establishes remedial action objectives, provides a remedial alternatives analysis that includes consideration of a permanent cleanup, and provides a description of the selected remedial action. The remedial action described in this document provides for the protection of public health and the environment, and complies with applicable environmental standards, criteria and guidance and applicable laws and regulations.

## 1.1 Site Location and Background

The Site is located at 537 Grand Street in the Williamsburg section of Brooklyn, New York and is identified as Block 2779 and Lot 38 on the New York City Tax Map. **Figure 1** shows the Site location. The Site is approximately 2,250-square feet and is bounded by 2-story and 3-story residential building to the north, a Public Facility/ Institution “Mission Pentecostal” to the south, a 3-story commercial and residential building to the east, and a 3-story commercial and residential building to the west. A map of the site boundary is shown in **Figure 1**. Currently the Site is developed with a 2-story mixed-use commercial and residential structure with a partial cellar. The structure covers the entire footprint of the site. The commercial unit is currently vacant. The vacant commercial space was formerly occupied by a church and is currently used for storage.

## 1.2 Redevelopment Plan

The proposed construction at the Site will consist of the enlargement of the existing 2-story building with a partial basement to be used as a residence. The proposed partial basement will be extended 30 feet to the rear of the building. The basement will be utilized for utility rooms

including electric, gas, water and water heater, refuse storage, commercial refuse, bike storage, bathroom and accessory use. The horizontal expansion includes the addition of approximately 678 square feet along the structure's northern boundary. The vertical expansion includes addition of two (2) new story with twice the existing height of total 19 feet each. The first floor covers entire lot area and will consist of public hall and retail; the remaining floors will have total five apartments. There is an elevator in the southern portion of the building that is accessible to the basement only. The current basement area will be further excavated to 2.5 feet below the existing slab across the entire exiting basement. The remainder of the proposed basement to 30 feet in rear portion will be excavated to 10 feet 5 inches below grade to increase the cellar foot print. Approximately 500 tons of soil will be removed from the Site and properly disposed at an appropriately licensed or permitted facility. The entire building slab will be 5 inches in thickness and will be installed on top of a 6-inch crushed stone base.

Layout of the proposed site development is presented in **Figure 2**. The current zoning designation is R7A - Residential. The proposed use is consistent with existing zoning for the property. The remedial action contemplated under this RAWP may be implemented independently of the proposed redevelopment plan.

**Appendix 1** provides the proposed development plans.

### **1.3 Description of Surrounding Property**

The Site is located in the Williamsburg section of Brooklyn. The Site vicinity consists of residential and commercial properties. Within 500 – foot radius of the Site, there are six (6) sensitive receptors present including St. Nicholas Union Ave, Youth and Family Center, DBL Rocio and three (3) residences. **Figure 3** shows the surrounding land usage.

### **1.4 Summary of Past Site Uses and Areas of Concern**

Based upon the review the Phase I Environmental Site Assessment (ESA) Reports prepared by Hydro Tech Environmental Corp. (Hydro Tech) in May 2016 a Site history was established. According to the of the Sanborn Fire Insurance Maps and Regulatory Agency documents, the Site was developed prior to 1887 with a 2-story unspecified commercial building under the address 425 Grand Street, Brooklyn, NY. As per the Sanborn Maps of 1905 – 1951, there exists a 2-story store in the southern portion and a 1-story commercial area in the northern portion at

the address 537 Grand Street. In 1965 to 1995, the Site was a 2-story building with a furniture store (Alfredo's Furniture) and residential unit. The Site consists of 2-story building with a commercial unit and residential unit from 1996 until today.

The AOCs identified for this site include:

- The presence of a Hazardous Materials and Noise "E" Designation at the Site.

## **1.5 Summary of Work Performed under the Remedial Investigation**

The following work was performed as part of the Phase II Subsurface Investigation by Hydro Tech in July 2016:

1. Conducted a Site inspection to identify AOCs and physical obstructions (i.e. structures, buildings, etc.);
2. Performed a Ground Penetrating Radar (GPR) survey throughout the entire Site;
3. Installed four (4) soil borings in the partial basement and northern portion of the Site and collected eight (8) soil samples for chemical analysis from the soil borings to evaluate soil quality; and
4. Installed three (3) soil vapor probe the partial basement and northern portion of the Site and collected three (3) soil vapor samples for chemical analysis.
5. Collected one (1) indoor and one (1) outdoor air sample collected one (1) indoor and one (1) outdoor air sample for chemical analysis.

## **1.6 Summary of Findings of Remedial Investigation**

A remedial investigation was performed and the results are documented in a companion document called "Phase II Subsurface Investigation Report, 537 Grand Street", dated July 2016.

1. Elevation of the property is approximately 27 feet.
2. Depth to groundwater is approximately 20 feet at the Site. No groundwater was encountered at the maximum depth of 17 feet at the Site.
3. The GPR survey identified no anomaly indicative of a suspect UST beneath the Site.
4. Groundwater flow is towards the northwest in the direction of East River.

5. The stratigraphy of the Site, from the surface down to 19 feet below grade, consists of medium to coarse grained yellow sand. No evidence of historic fill material was identified at the Site.
6. Soil/fill samples collected during the July 2016 Phase II were compared to the NYSDEC 6NYCRR Part 375-6.8 Unrestricted Use Soil Cleanup Objectives (SCOs) as well as to Restricted Residential Use SCOs. Soil sampling results showed no volatile organic compounds (VOCs) were detected at concentrations exceeding Unrestricted Use SCOs. Acetone (max 0.79 mg/kg) was detected in all the soil samples at concentrations below Unrestricted Use SCOs. Acetone is a common laboratory artifact. No SVOCs, pesticides and total PCBs were detected at concentrations exceeding Unrestricted Use SCOs. Four (4) metals including copper (max. 151 mg/kg), lead (221 mg/kg), mercury (max 2.39 mg/kg) and zinc (max. 196 mg/kg) were detected above Unrestricted Use SCOs. Among these detections, mercury also exceeded Restricted Residential Use SCOs in two shallow samples.
7. Groundwater was not encountered to depths of 17 feet below grade.
8. Soil vapor samples collected during the 2016 Phase II were compared to the compounds listed in Table 3.1 Air Guideline Values Derived by the New York State Department of Health (NYSDOH) located in the NYSDOH Final Guidance for Evaluating Soil Vapor Intrusion dated October 2006. Soil vapor results show a wide range of petroleum related VOCs (BTEX and their associated derivatives) in all soil vapor samples. The total concentration of BTEX compounds range from 4211  $\mu\text{g}/\text{m}^3$  to 8550  $\mu\text{g}/\text{m}^3$ . One chlorinated VOC, tetrachloroethene (max. 54  $\mu\text{g}/\text{m}^3$ ) was detected in 2 of 3 soil vapor samples. Other chlorinated VOCs such as 1,1,1 trichloroethane (1,1,1-TCA), carbon tetrachloride and trichloroethylene (TCE) were not detected in any soil vapor samples. PCE concentrations are below the guidance Matrix established by NYSDOH and requires no further monitoring/mitigation action.

For more detailed results, consult the Phase II report. Based on an evaluation of the data and information from the Phase II and this RAWP, disposal of significant amounts of hazardous

waste is not suspected at this site.

## **2.0 Remedial Action Objectives**

Based on the results of the RI, the following Remedial Action Objectives (RAOs) have been identified for this Site:

### **Soil**

- Prevent direct contact with contaminated soil.
- Prevent exposure to contaminants volatilizing from contaminated soil.
- Prevent migration of contaminants that would result in groundwater or surface water contamination.

### **Groundwater**

- Prevent direct exposure to groundwater.

### **Soil Vapor**

- Prevent exposure to contaminants in soil vapor.
- Prevent migration of soil vapor into dwelling and other occupied structures.

### **3.0 Remedial Alternatives Analysis**

The goal of the remedy selection process is to select a remedy that is protective of human health and the environment taking into consideration the current, intended and reasonably anticipated future use of the property. The remedy selection process begins by establishing RAOs for media in which chemical constituents were found in exceedance of applicable standards, criteria and guidance values (SCGs). Remedial alternatives are then developed and evaluated based on the following ten criteria:

- Protection of human health and the environment;
- Compliance with 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.

As required, a Track 1 Unrestricted Use scenario is evaluated for the remedial action. The following is a detailed description of the alternatives analyzed to address impacted media at the Site:

#### **Alternative 1:**

- Selection of NYSDEC 6NYCRR Part 375 Unrestricted Use (Track 1) Soil Cleanup Objectives (SCOs).
- Removal of all soil/fill exceeding Track 1 Unrestricted Use SCOs throughout the Site and confirmation that Track 1 Unrestricted Use SCOs have been achieved with post-excavation endpoint sampling. If soil/fill containing analytes at concentrations above Unrestricted Use SCOs is still present at the base of the excavation after removal of all soil required for construction of the new building's cellar level is complete, additional

excavation would be performed to ensure complete removal of soil/ fill that does not meet Track 1 Unrestricted Use SCOs.

- No Engineering or Institutional Controls are required for a Track 1 cleanup. A concrete slab covering the entire site and vapor barrier system would be installed as part of standard building development and are not considered components of the remedy.

**Alternative 2:**

- Establishment of Site-Specific (Track 4) SCOs.
- Removal of all soil/fill exceeding Track 4 Site-specific SCOs and confirmation that Track 4 Site-specific SCOs have been achieved with post-excavation end point sampling. Based on the results of the Remedial Investigation, it is expected that this alternative would be achieved by excavating to a depth of about 2.5 feet below the current cellar and further excavating if any hotspots identified at this location. As part of development, the excavation across the site will be 10 feet 5 inches below grade across 30 feet to the rear portion of existing building and 2 feet 5 inches below the existing basement slab. If soil/fill containing analytes at concentrations above Track 4 Site-specific SCOs is still present at the base of the excavation, additional excavation would be performed to meet Track 4 Site-Specific SCOs.
- Placement of a composite cover system over the entire Site to prevent exposure to remaining soil/fill;
- Installation of a vapor barrier (or) waterproofing/vapor barrier system beneath the building slab and along foundation side walls to prevent potential exposures from soil vapor;
- Establishment of use restrictions including prohibitions on the use of groundwater from the Site; prohibitions of restricted Site uses, such as farming or vegetable gardening, to prevent future exposure pathways; and prohibition of a higher level of land use without OER approval;
- Establishment of an approved Site Management Plan (SMP) to ensure long-term management of these Engineering and Institutional Controls including the performance of periodic inspections and certification that the controls are performing as they were intended. The SMP will note that the property owner and property owner's successors and assigns must comply with the approved SMP; and

- The property will continue to be registered with an E-Designation at the NYC Buildings Department.

### **3.1 Threshold Criteria**

#### **Protection of Public Health and the Environment**

This criterion is an evaluation of the remedy's ability to protect public health and the environment, and an assessment of how risks posed through each existing or potential pathway of exposure are eliminated, reduced or controlled through removal, treatment, and implementation of Engineering Controls or Institutional Controls. Protection of public health and the environment must be achieved for all approved remedial actions.

Alternative 1 would be protective of human health and the environment by removing all soil/fill exceeding Track 1 Unrestricted Use SCO's and groundwater protection standards, thus eliminating potential for direct contact with contaminated soil/fill once construction is complete and eliminating the risk of contaminants leaching into groundwater.

Alternative 2 would achieve comparable protections of human health and the environment by excavation and removal of most of the historic fill at the Site and by ensuring that remaining soil/fill on-Site meets Track 4 Site-Specific SCO's, as well as by placement of Institutional and Engineering Controls, including a composite cover system and vapor barrier system. The composite cover system would prevent direct contact with any remaining on-Site soil/fill. The vapor barrier would prevent any vapor from entering the building. Implementing Institutional Controls including a Site Management Plan and continuing the E-designation on the property would ensure that the composite cover system remains intact and protective of public health. Establishment of Track 4 Site-Specific SCO's would minimize the risk of contamination leaching into groundwater.

For both Alternatives, potential exposure to contaminated soils or groundwater during construction would be minimized by implementing a Construction Health and Safety Plan, an approved Soil/Materials Management Plan, and Community Air Monitoring Plan (CAMP). Potential contact with contaminated groundwater would be prevented as its use is prohibited by

city laws and regulations. Potential future migration of off-Site soil vapors into the new building would be prevented by installing a vapor barrier below the building slab and outside foundation walls below grade.

## **3.2 Balancing Criteria**

### **Compliance with Standards, Criteria and Guidance (SCGs)**

This evaluation criterion assesses the ability of the alternative to achieve applicable standards, criteria and guidance.

Alternative 1 would achieve compliance with the remedial goals, chemical-specific SCGs and RAOs for soil through removal of soil to achieve Track 1 Unrestricted Use SCO's and Protection of Groundwater SCO's. Compliance with SCGs for soil vapor would also be achieved by installing a waterproofing/vapor barrier system below the new building's basement slab and continuing the vapor barrier outside of subgrade foundation walls, as part of development.

Alternative 2 would achieve compliance with the remedial goals, chemical-specific SCG's and RAOs for soil through removal of soil to meet Track 4 Site-Specific SCO's. Compliance with SCG's for soil vapor would also be achieved by installing a waterproofing/vapor barrier system below the new building's basement slab and continuing the vapor barrier outside of subgrade foundation walls. A Site Management Plan would ensure that these controls remained protective for the long term.

Health and safety measures contained in the CHASP and Community Air Monitoring Plan (CAMP) will be implemented during Site redevelopment under this RAWP. For both Alternatives, focused attention on means and methods employed during the remedial action would ensure that handling and management of contaminated material would be in compliance with applicable SCGs. These measures will protect on-site workers and the surrounding community from exposure to Site-related contaminants.

### **Short-Term Effectiveness and Impacts**

This evaluation criterion assesses the effects of the alternative during the construction and implementation phase until remedial action objectives are met. Under this criterion, alternatives

are evaluated with respect to their short term effects during the remedial action on public health and the environment during implementation of the remedial action, including protection of the community, protection of onsite workers and environmental impacts.

Both Alternative 1 and 2 have similar short-term effectiveness during their implementation, as each requires excavation of historic fill material. Both alternatives would result in short-term dust generation impacts associated with excavation, handling, load out of materials, and truck traffic. Short-term impacts could potentially be higher for Alternative 1 since excavation of greater amounts of historical fill material would take place. However, focused attention to means and methods during a Track 1 removal action, including community air monitoring and appropriate truck routing, would minimize the overall impact of these activities.

An additional short-term adverse impact and risk to the community associated with both remedial alternatives is increased truck traffic. Truck traffic will be routed on the most direct course using major thoroughfares where possible and flag persons will be used to protect pedestrians at Site entrances and exits.

The potential adverse impact to the community, workers and the environment for both alternatives would be minimized through implementation of control plans including a Construction Health and Safety Plan, a Community Air Monitoring Plan (CAMP) and a Soil/Materials Management Plan (SMMP), during all on-Site soil disturbance activities and would minimize the release of contaminants into the environment. Both alternatives provide short-term effectiveness in protecting the surrounding community by decreasing the risk of contact with on-Site contaminants. Construction workers operating under appropriate management procedures and a Construction Health and Safety Plan (CHASP) would provide protection from on-Site contaminants by using personal protective equipment would be worn consistent with the documented risks within the respective work zones.

### **Long-term effectiveness and permanence**

This evaluation criterion addresses the results of a remedial action in terms of its permanence and quantity/nature of waste or residual contamination remaining at the Site after response objectives have been met, such as permanence of the remedial alternative, magnitude of

remaining contamination, adequacy of controls including the adequacy and suitability of Engineering Controls/Institutional Controls (ECs/ICs) that may be used to manage contaminant residuals that remain at the Site and assessment of containment systems and ICs that are designed to eliminate exposures to contaminants, and long-term reliability of ECs.

Alternative 1 would achieve long-term effectiveness and permanence related to on-Site contamination by permanently removing all impacted soil/fill above Track 1 Unrestricted Use SCO's. Removal of on-Site contaminant sources will also prevent future groundwater contamination.

Alternative 2 would provide long-term effectiveness by removing most on-Site contamination and attaining Track 4 Site-Specific SCOs; installing a composite cover system across the Site; maintaining use restrictions; establishing an SMP to ensure long-term management of ICs and ECs; and maintaining registration as an E-designated property to memorialize these controls for the long term. The SMP would ensure long-term effectiveness of all ECs and ICs by requiring periodic inspection and certification that these controls and restrictions continue to be in place and are functioning as they were intended, assuring that protections designed into the remedy continue to provide the required level of protection.

Both alternatives would result in removal of soil contamination exceeding the SCOs providing the highest level, most effective and permanent remedy over the long-term with respect to a remedy for contaminated soil, which will eliminate any migration to groundwater. Potential sources of soil vapor and groundwater contamination will also be eliminated as part of the remedy.

### **Reduction of toxicity, mobility, or volume of contaminated material**

This evaluation criterion assesses the remedial alternative's use of remedial technologies that permanently and significantly reduce toxicity, mobility, or volume of contaminants as their principal element. The following is the hierarchy of source removal and control measures that are to be used to remediate a Site, ranked from most preferable to least preferable: removal and/or treatment, containment, elimination of exposure and treatment of source at the point of exposure. It is preferred to use treatment or removal to eliminate contaminants at a Site, reduce

the total mass of toxic contaminants, cause irreversible reduction in contaminants mobility, or reduce of total volume of contaminated media.

Alternative 1 will permanently eliminate the toxicity, mobility, and volume of contaminants from on-Site soil by removing all soil in excess of Track 1 Unrestricted Use SCO's.

Alternative 2 would remove most of the contamination at the Site, and all remaining on-Site soil beneath the new building will meet Track 4 Site-Specific SCO's.

Alternative 1 would remove a greater total mass of contaminants from the Site. The removal of soil to 10 feet 5 inches and 2 feet below the existing basement slab for the new development in both scenarios would lessen the difference in contaminant mass removal between these two alternatives.

## **Implementability**

This evaluation criterion addresses the technical and administrative feasibility of implementing an alternative and the availability of various services and materials required during its implementation, including technical feasibility of construction and operation, reliability of the selected technology, ease of undertaking remedial action, monitoring considerations, administrative feasibility (e.g. obtaining permits for remedial activities), and availability of services and materials.

The techniques, materials and equipment to implement both Alternatives 1 and 2 are readily available and have been proven to be effective in remediating the contaminants present on the Site. They use standard equipment and technologies that are well established in the industry. The reliability of each remedy is also high. There are no special difficulties associated with any of the activities proposed.

## **Cost effectiveness**

This evaluation criterion addresses the cost of alternatives, including capital costs (such as construction costs, equipment costs, and disposal costs, engineering expenses) and site management costs (costs incurred after remedial construction is complete) necessary to ensure the continued effectiveness of a remedial action.

The new building requires excavation to a depth of 10 feet 5 inches and 2 feet below the existing basement slab. The costs associated with Alternative 1 could potentially be higher than Alternative 2 if soil with analytes above Track 1 Unrestricted Use SCOs is encountered below the excavation depth required for development. Additional costs would include installation of additional shoring/underpinning, disposal of additional soil, and import of clean soil for backfill. However, long-term costs for Alternative 2 are likely higher than Alternative 1 based on implementation of a Site Management Plan as part of Alternative 2.

The remedial plan would couple the remedial action with the redevelopment of the Site, lowering total costs. The remedial plan will also consider the selection of the most appropriate disposal facilities to reduce transportation and disposal costs during cleanup and redevelopment of the Site.

## **Community Acceptance**

This evaluation criterion addresses community opinion and support for the remedial action. Observations here will be supplemented by public comment received on the RAWP.

This RAWP will be subject to a public review under the NYC VCP and will provide the opportunity for detailed public input on the remedial alternatives and the selected remedy. This public comment will be considered by OER prior to approval of this plan. The Citizen Participation Plan for the project is provided in **Appendix 2**. Observations here will be supplemented by public comment received on the RAWP. Under both alternatives, the overall goals of the remedial program, to protect public health and the environment and eliminate potential contaminant exposures, have been broadly supported by citizens in NYC communities.

## **Land use**

This evaluation criterion addresses the proposed use of the property. This evaluation has considered reasonably anticipated future uses of the Site and takes into account: current use and historical and/or recent development patterns; applicable zoning laws and maps; NYS Department of State's Brownfield Opportunity Areas (BOA) pursuant to section 970-r of the

general municipal law; applicable land use plans; proximity to real property currently used for residential use, and to commercial, industrial, agricultural, and/or recreational areas; environmental justice impacts, Federal or State land use designations; population growth patterns and projections; accessibility to existing infrastructure; proximity of the site to important cultural resources and natural resources, potential vulnerability of groundwater to contamination that might emanate from the site, proximity to flood plains, geography and geology; and current Institutional Controls applicable to the site.

The current, intended, and reasonably anticipated future land use of the Site and its surroundings are compatible with the selected remedy of soil remediation. The proposed future use of the Site includes a 4 – story residential building with a retail on the first floor. Following remediation, the Site will meet either Track 1 Unrestricted Use or Track 4 Site-Specific SCOs, both of which are protective of public health and the environment for its planned residential use. The proposed use is compliant with the property’s zoning and is consistent with recent development patterns. The areas surrounding the site is urban and consists of predominantly mixed residential and commercial buildings in zoning districts designated for commercial and residential uses. The development would remediate a vacant contaminated lot and provide a modern residential building. The proposed development would clean up the property and make it safer, create new employment opportunities, and other economic benefits from land revitalization.

Temporary short-term project impacts are being mitigated through site management controls and truck traffic controls during remediation activities. Following remediation, the Site will meet either Track 1 Unrestricted Use SCOs or Track 4 Site-Specific SCOs, both of which are protective of public health and the environmental for its planned use.

The Site is not in close proximity to important cultural resources, including federal or state historic or heritage sites or Native American religious sites, natural resources, waterways, wildlife refuges, wetlands, or critical habitats of endangered or threatened species. The Site is located in an urban area and not in proximity to fish or wildlife and neither alternative would result in any potential exposure pathways of contaminant migration affecting fish or wildlife. The remedial action is also protective of groundwater natural resources. The Site does not lie in a Federal Emergency Management Agency (FEMA)-designated flood plain. Both alternatives are equally protective of natural resources and cultural resources. Improvements in the current

environmental condition of the property achieved by both alternatives considered in this plan are consistent with the City's goals for cleanup of contaminated land.

### **Sustainability of the Remedial Action**

This criterion evaluates the overall sustainability of the remedial action alternatives and the degree to which sustainable means are employed to implement the remedial action including those that take into consideration NYC's sustainability goals defined in PlaNYC: A Greener, Greater New York. Sustainability goals may include: maximizing the recycling and reuse of non-virgin materials; reducing the consumption of virgin and non-renewable resources; minimizing energy consumption and greenhouse gas emissions; improving energy efficiency; and promotion of the use of native vegetation and enhancing biodiversity during landscaping associated with Site development.

While Alternative 2 would potentially result in lower energy usage based on reducing the volume of material transported off-Site, both remedial alternatives are comparable with respect to the opportunity to achieve sustainable remedial action. The remedial plan for either alternative would take into consideration the shortest trucking routes during off-Site disposal of historic fill and other soils, which would reduce greenhouse gas emissions and conserve energy used to fuel trucks. The New York City Clean Soil Bank program is available for reuse of any clean native soils under either alternative. A complete list of green remedial activities considered as part of the NYC VCP is included in the Sustainability Statement, included as **Appendix 3**.

### **Selection of the Preferred Remedy**

The preferred remedy for the site is Alternative 2, Track 4 Site-Specific Use SCOs. Data generated during the site investigation support the conclusion that Alternative 1 is only achievable with confirmed post-excavation sampling. The Alternative 2 remedy will remove all soil/fill exceeding Track 4 Site-Specific SCOs throughout the Site, which will be confirmed with post-excavation sampling.

Engineering Controls are required for a Track 4 cleanup. A concrete slab covering the entire site, and a vapor barrier in the areas of the new building would be installed as part of standard building development.

Use restrictions will be imposed on the site (including prohibitions on any use higher than Restricted Residential, e.g. the use of groundwater from the Site; prohibitions of restricted Site uses, such as farming or vegetable gardening, to prevent future exposure pathways. The Site would continue to be encumbered with an E-Designation for hazardous material and noise.

## **4.0 Remedial Action**

### **4.1 Summary of Preferred Remedial Action**

The preferred remedial action alternative is Alternative 2, the Track 4. The preferred remedial action achieves protection of public health and the environment for the intended use of the property. The preferred remedial action will achieve all of the remedial action objectives established for the project and addresses applicable SCGs. The preferred remedial action is effective in both the short-term and long-term and reduces mobility, toxicity and volume of contaminants. The preferred remedial action alternative is cost effective and implementable and uses standards methods that are well established in the industry.

The proposed remedial action will consist of:

21. Preparation of a Community Protection Statement and performance of all required NYC VCP Citizen Participation activities according to an approved Citizen Participation Plan.
22. Performance of a Community Air Monitoring Program for particulates and volatile organic carbon compounds.
23. Establishment of Site-specific (Track 4) Soil Cleanup Objectives (SCOs).
24. Site mobilization involving Site security setup, equipment mobilization, utility mark outs and marking & staking excavation areas.
25. Completion of a Waste Characterization Study prior to excavation activities. Waste characterization soil samples will be collected at a frequency dictated by disposal facility(s). A Waste Characterization Report documenting sample procedures, location, analytical results shall be submitted to NYCOER prior to start of remedial action.
26. Excavation and removal of soil/fill exceeding Track 4 Site Specific SCOs.

The current cellar area will be further excavated to 2.5 feet below the existing slab. The remainder of the proposed basement to 30 feet in rear portion will be excavated to 10 feet 5 inches below grade to increase the cellar foot print. Approximately 500 tons of soil will be removed from the Site and properly disposed at an appropriately licensed or permitted facility.

27. Screening of excavated soil/fill during intrusive work for indications of contamination by visual means, odor, and monitoring with a PID.
28. Management of excavated materials including temporarily stockpiling and segregating in accordance with defined material types and to prevent co-mingling of contaminated material and non-contaminated materials.
29. Removal of all USTs that are encountered during soil/fill removal actions. Registration of tanks and reporting of any petroleum spills associated with UST's and appropriate closure of these petroleum spills in compliance with applicable local, State and Federal laws and regulations.
30. Transportation and off-Site disposal of all soil/fill material at licensed or permitted facilities in accordance with applicable laws and regulations for handling, transport, and disposal, and this plan. Sampling and analysis of excavated media as required by disposal facilities. Appropriate segregation of excavated media on-Site.
31. Collection and analysis of end-point samples to determine the performance of the remedy with respect to attainment of SCOs.
32. Collection of one additional RI sample in the area of the lot that is currently at grade, but will be excavated to extend the basement.
33. Import of materials to be used for backfill and cover in compliance with this plan and in accordance with applicable laws and regulations.
34. Construction of an engineered composite cover consisting of a five-inch thick concrete building slab with a minimum 6-inch clean crushed stones.
35. Installation of a vapor barrier system consisting of vapor barrier beneath the building slab and outside of sub-grade foundation sidewalls to mitigate soil vapor migration into the building. The slab will not be disturbed and the vapor barrier is installed on the exterior for the entire lot. The vapor barrier system will consist of a 20-mil vapor barrier manufactured by Raven Industries (Vapor Block Plus) below the slab throughout the full building area and outside all sub-grade foundation sidewalls. All welds, seams and penetrations will be properly sealed to prevent preferential pathways for vapor migration. The vapor barrier system is an Engineering Control for the remedial action. The remedial engineer will certify in the RAR that the vapor

barrier system was designed and properly installed to mitigate soil vapor migration into the building.

36. Performance of all activities required for the remedial action, including acquisition of required permits and attainment of pretreatment requirements, in compliance with applicable laws and regulations.
37. Implementation of storm-water pollution prevention measures in compliance with applicable laws and regulations.
38. Submission of a RAR that describes the remedial activities, certifies that the remedial requirements have been achieved, defines the Site boundaries, lists any changes from this RAWP, and describes all Engineering and Institutional Controls to be implemented at the Site.
39. Submission of an approved Site Management Plan (SMP) in the Remedial Action Plan (RAP) for long-term management of residual contamination, including plans for operation, maintenance, monitoring, inspection and certification of Engineering and Institutional Controls and reporting at a specified frequency.
40. The property will continue to be registered with an E-Designation at the NYC Buildings Department. Establishment of Engineering Controls and Institutional Controls in this RAWP and a requirement that management of these controls must be in compliance with an approved SMP. Institutional Controls will include prohibition of the following: (1) vegetable gardening and farming; (2) use of groundwater without treatment rendering it safe for the intended use; (3) disturbance of residual contaminated material unless it is conducted in accordance with the SMP; and (4) higher level of land usage without OER-approval.

## **4.2 Soil Cleanup Objectives and Soil/ Fill Management**

The following Track 4 Site-Specific SCO's will be utilized for this project:

<b><u>Contaminant</u></b>	<b><u>Site-Specific SCO's</u></b>
Copper	270 ppm
Lead	800 ppm
Mercury	2.5 ppm

Soil and materials management on-Site and off-Site, including excavation, handling and disposal, will be conducted in accordance with the Soil/Materials Management Plan in **Appendix 3**. No over-excavation beyond the cut is anticipated. Discrete contaminant sources (such as hotspots) identified during the remedial action will be identified by GPS or surveyed. This information will be provided in the Remedial Action Report.

### **Soil/Fill Excavation and Removal**

The rear of the building across 30 feet will be excavated down to 10 feet 5 inches below grade and the existing basement will be excavated down to 2 feet below the slab. The slab will not be disturbed in the eat-grade section of the building. The location of planned excavations is shown in **Figure 4**. The total quantity of soil expected to be excavated and disposed off-Site is 500 tons. For each disposal facility to be used in the remedial action, a letter from the developer/QEP to the receiving facility requesting approval for disposal and a letter back to the developer/QEP providing approval for disposal will be submitted to OER prior to any transport and disposal of soil at a facility.

Disposal facilities will be reported to OER when they are identified and prior to the start of remedial action.

### **End-point Sampling**

End-point samples will be analyzed for compounds and elements as described below 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.

New York State ELAP certified labs will be used for all end-point sample analyses. Labs performing end-point sample analyses will be reported in the RAR. The RAR will provide a tabular and map summary of all end-point sample results and will include all data including non-detects and applicable standards and/or guidance values.

## **Additional Sampling**

One (1) additional sample will be taken from the area that will be excavated from grade down to 10 feet 5 inches in the rear portion of the existing basement. This will be taken from the new portion of the basement. **Appendix 7** includes endpoint sampling diagram.

## **Confirmation End-point Sampling**

Removal actions for development purposes under this plan will be performed in conjunction with confirmation end-point soil sampling. Confirmation samples will be collected from the base of the excavation at locations to be determined by OER. To evaluate attainment of Track 4 Site-specific SCOs, analytes will include those for which SCOs have been developed, including metals according to analytical methods described above. If Track 1 Unrestricted Use SCOs are pursued, samples will be analyzed for VOCs, SVOCs, pesticides, PCBs and metals according to analytical methods described above.

## **Hotspot End-point Sampling**

For any hotspots identified during this remedial program, including any hotspots identified during the remedial action, hotspot removal actions will be performed to ensure that hotspots are fully removed and end-point samples will be collected at the following frequency:

1. For excavations less than 20 feet in total perimeter, at least one bottom sample and one sidewall sample biased in the direction of surface runoff.
2. For excavations 20 to 300 feet in perimeter:
  - For surface removals, one sample from the top of each sidewall for every 30 linear feet of sidewall and one sample from the excavation bottom for every 900 square feet of bottom area.
  - For subsurface removals, one sample from each sidewall for every 30 linear feet of sidewall and one sample from the excavation bottom for every 900 square feet of bottom area.
3. For sampling of volatile organics, bottom samples should be taken within 24 hours of excavation, and should be taken from the zero to six-inch interval at the excavation floor. Samples taken after 24 hours should be taken at six to twelve inches.

4. For contaminated soil removal, post remediation soil samples for laboratory analysis should be taken immediately after contaminated soil removal. If the excavation is enlarged horizontally, additional soil samples will be taken pursuant to bullets 1-3 above.

Post-remediation end-point sample locations and depth will be biased towards the areas and depths of highest contamination identified during previous sampling episodes unless field indicators such as field instrument measurements or visual contamination identified during the remedial action indicate that other locations and depths may be more heavily contaminated. In all cases, post-remediation samples should be biased toward locations and depths of the highest expected contamination.

If either LNAPL and/or DNAPL are detected, appropriate samples will be collected for characterization and “finger print analysis” and required regulatory reporting (i.e. spills hotline) will be performed.

### **Quality Assurance/Quality Control**

Quality Assurance/Quality control sampling will consist of collecting field equipment blanks. Hydro Tech will perform a completeness check of the analytical data packages and review the QA/QC observations and deficiencies.

Collected samples will be appropriately packaged, placed in coolers, and shipped via overnight courier or delivered directly to the analytical laboratory by field personnel. Samples will be containerized in appropriate laboratory provided glassware and shipped in plastic coolers. Samples will be preserved through the use of ice or “cold-paks” to maintain a temperature of 4°C.

Dedicated disposable sampling materials will be used for the collection of endpoint samples, eliminating the need to prepared field equipment (rinsate) blanks. However, if non-disposable equipment is used (stainless steel scoop, etc.), field rinsate blanks will be prepared at a rate of 1 for every eight samples collected. Decontamination of non-dedicated sampling equipment will consist of the follow:

- Gently tap or scrape to remove adhered soil,
- Rinse with tap water,

- Wash with Alconox detergent solution and scrub,
- Rinse with tap water, and
- Rinse with distilled or deionized water.

Prepare field blanks by pouring distilled or deionized water over decontaminated equipment and collecting the water in laboratory provided containers. Trip blanks will be used whenever samples are transported to the laboratory for analysis of VOCs. Trip blanks will not be used for samples to be analyzed for metals, SVOCs, pesticides, and PCBs.

## **Import of Soils**

Import of soils onto the property will be performed in conformance with the Soil/Materials Management Plan in **Appendix 4**. Imported soil will meet the lower of:

- Track 2 Restricted Residential Use SCO's, and
- Groundwater Protection Standards in Part 375-6.8.

The estimated quantity of soil to be imported into the Site for backfill and cover soil is 0 tons.

## **Reuse of Onsite Soils**

Reuse of onsite soils already onsite will be performed in conformance with the Soil/Materials Management Plan in **Appendix 4**. The estimated quantity of onsite soil/fill expected to be reused/relocated on Site is 0 tons.

### **4.3 Engineering Controls**

Engineering Controls will be employed in the remedial action to address residual contamination remaining at the site. The Site has two (2) primary Engineering Control Systems. These are:

- (1) Composite Cover System and
- (2) Soil Vapor Barrier System

#### **Composite Cover System**

Exposure to residual soil/fill will be prevented by an engineered, composite cover system to be built on the Site. This composite cover system will be comprised of a five-inch thick concrete building slab with a minimum 6-inch clean crushed stones. **Figure 5** shows the typical design for each remedial cover type used on this Site.

The composite cover system will be a permanent engineering control. The system will be inspected and its performance certified at specified intervals as required by this RAWP and the Site Management Plan. A Soil and Materials Management Plan will be included in the Site Management Plan and will outline the procedures to be followed in the event that the composite cover system and underlying residual soil/fill is disturbed after the remedial action is complete. Maintenance of this composite cover system will be described in the Site Management Plan in the Remedial Action Report.

## **Vapor Barrier System**

**Migration of soil vapor from onsite or offsite sources into the building will be mitigated with a combination of building slab and vapor barrier. The vapor barrier system will consist of a 20-mil vapor barrier manufactured by Raven Industries (Vapor Block Plus). The vapor barrier will extend below the slab throughout the full building area and outside all sub-grade foundation sidewalls. The installation will occur** in accordance with manufacturer specifications. The vapor barrier installed prior to pouring the building's concrete slab behind and alongside the existing foundation slab. The vapor barrier will up the foundation sidewalls in accordance with manufacturer specifications. The specifications for installation will be provided to the construction management company and the foundation contractor or installer of the liner. The specifications state that all vapor barrier seam, penetrations, and repairs will be sealed either by the tape method or weld method, according to the manufacturer's recommendations and instructions

A plan view showing the location of the proposed vapor barrier system is provided in **Figure 5**. Typical design sections for the vapor barrier on slab and sidewalls are provided in **Figure 5**. Product specification sheets are provided in **Appendix 5**. The Remedial Action Report will include as-built drawings and diagrams; manufacturer documentation; and photographs. The Remedial Action Report will include a PE-certified letter (on company letterhead) from the primary contractor responsible for installation oversight and field inspections and a copy of the manufacturer's certificate of warranty.

The Vapor Barrier System is a permanent engineering control and will be inspected and its performance certified at specified intervals as required by this RAWP and the Site Management Plan. A Soil and Materials Management Plan will be included in the Site Management Plan and

will outline the procedures to be followed in the event that the composite cover system and underlying vapor barrier system is disturbed after the remedial action is complete. Maintenance of these systems will be described in the Site Management Plan in the Remedial Action Report.

#### **4.4 Institutional Controls**

A series of Institutional Controls (IC's) 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. Institutional Controls would be implemented in accordance with a Site Management Plan included in the final Remedial Action Report (RAR). Institutional Controls would be:

- The property will continue to be registered with an E-Designation. This RAWP includes a description of all ECs and ICs and summarizes the requirements of the SMP which will note that the property owner and property owner's successors and assigns must comply with the approved SMP;
- Submittal of a SMP in the RAR for approval by OER that provides procedures for appropriate operation, maintenance, inspection, and certification of ECs and IC's. SMP will require that the property owner and property owner's successors and assigns will submit to OER a periodic written statement that certifies that: (1) controls employed at the Site are unchanged from the previous certification or that any changes to the controls were approved by OER; and, (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP. OER retains the right to enter the Site in order to evaluate the continued maintenance of any controls. This certification shall be submitted at a frequency to be determine by OER in the SMP and will comply with RCNY §43-1407(1)(3).
- Vegetable gardens and farming on the Site are prohibited in contact with residual soil materials;
- Use of groundwater underlying the Site is prohibited without treatment rendering it safe for its intended use;

- All future activities on the Site that will disturb residual material must be conducted pursuant to the soil management provisions in an approved SMP;
- The Site will be used for residential use and will not be used for a higher level of use without prior approval by OER.

#### **4.5 Site Management Plan**

Site Management is the last phase of remediation and begins with the approval of the Remedial Action Report and issuance of the Notice of Completion (NOC) for the Remedial Action. The Site Management Plan (SMP) describes appropriate methods and procedures to ensure implementation of all ECs and ICs that are required by this RAWP. The Site Management Plan is submitted as part of the RAR but will be written in a manner that allows its use as an independent document. Site Management continues until terminated in writing by OER. The property owner is responsible to ensure that all Site Management responsibilities defined in the Site Management Plan are implemented.

The SMP will provide a detailed description of the procedures required to manage residual soil/fill left in place following completion of the remedial action in accordance with the Voluntary Cleanup Agreement with OER. This includes a plan for: (1) implementation of EC's and ICs; (2) operation and maintenance of EC's; (3) inspection and certification of IC's and EC's.

Site management activities and EC/IC certification will be scheduled by OER on a periodic basis to be established in the RAR and the SMP and will be subject to review and modification by OER. The Site Management Plan will be based on a calendar year and certification reports will be due for submission to OER by July 30 of the year following the reporting period.

#### **4.6 Qualitative Human Health Exposure Assessment**

The objective of the qualitative exposure assessment is to identify potential receptors and pathways for human exposure to the contaminants of concern (COC) that are present at, or migrating from, the Site. The identification of exposure pathways describes the route that the COC takes to travel from the source to the receptor. An identified pathway indicates that the potential for exposure exists; it does not imply that exposures actually occur.

Data and information reported in the Remedial Investigation Report (RIR) are sufficient to complete a Qualitative Human Health Exposure Assessment (QHHEA) for this project. As part of the VCP process, a QHHEA was performed to determine whether the Site poses an existing or future health hazard to the Site's exposed or potentially exposed population. The sampling data from the RI were evaluated to determine whether there is any health risk under current and future conditions by characterizing the exposure setting, identifying exposure pathways, and evaluating contaminant fate and transport. This QHHEA was prepared in accordance with Appendix 3B and Section 3.3 (b) 8 of the NYSDEC Draft DER-10 Technical Guidance for Site Investigation and Remediation.

### **Known and Potential Contaminant Sources**

Based on the results of the RIR, the contaminants of concern are:

#### Soil:

- Metals including mercury exceeding Restricted Residential SCOs and lead, copper and zinc exceeding Unrestricted SCOs.

#### Soil Vapor:

- Petroleum-related VOCs (total BTEX) present at elevated concentrations.
- Chlorinated VOCs including Tetrachloroethylene (PCE) present at moderate concentrations.

### **Nature, Extent, Fate and Transport of Contaminants**

Metals are present in the soil below the slab in the existing basement at concentrations exceeding their Unrestricted Use SCOs with one of the metal compound also exceeding their Restricted Residential Use SCOs. Chlorinated VOCs including PCE was found at elevated concentrations. These compounds were not detected in soil.

As the Site will be excavated, the source of metals could be eliminated. The chlorinated VOCs, due to lack of its presence in the soil indicates off-site source. Petroleum VOCs identified in soil gas at elevated levels will also be eliminated during site construction/remedial activities.

## **Receptor Populations**

*On-Site Receptors:* The site is currently developed with a 2-story building and access to the Site will be restricted by an 8 foot high, chained and locked, perimeter fence. Onsite receptors are limited to residents, trespassers, site representatives and visitors granted access to the property. During construction, potential on-site receptors include construction workers, site representatives, and visitors. Under proposed future conditions, potential on-site receptors include adult and child building residents, workers and visitors.

*Off-Site Receptors:* Potential off-site receptors within a 500 foot radius of the Site include adult and child residents; commercial and construction workers; pedestrians; and trespassers based on the following land uses within 500 feet of the Site:

1. Commercial Businesses – existing and future
2. Residential Buildings – existing and future
3. Building Construction/ Renovation – existing and future
4. Pedestrians, Trespassers, Cyclists – existing and future
5. Schools – existing and future

## **Potential Routes of Exposure**

Three potential primary routes exist by which chemicals can enter the body: ingestion, inhalation, and dermal absorption. Exposure can occur based on the following potential media:

- Ingestion of groundwater or fill/ soil;
- Inhalation of vapors or particulates; and
- Dermal absorption of groundwater or fill/ soil.

## **Potential Exposure Points**

*Current Conditions:* The site is currently capped with asphalt there are no potential exposure pathways from ingestion, inhalation, or dermal absorption of soil/ fill. Groundwater is not exposed at the site. The site is served by the public water supply and groundwater is not used at the site for potable supply and there is no potential for exposure. The Site is currently developed with a 2- story building. According to the remedial investigation data, there is no on-site vapor intrusion at the Site. The likely sources are off-site and no potential for soil vapor to accumulate.

*Construction/ Remediation Conditions:* Once redevelopment activities begin, onsite workers will come into direct contact with surface and subsurface soils as a result of on-Site construction and excavation activities. On-Site construction workers potentially could ingest, inhale or have dermal contact with exposed impacted soil and fill. Similarly, off-Site receptors could be exposed to dust and vapors from on-Site activities. Due to the depth of groundwater, direct contact with groundwater is not expected. During construction, on-Site and off-Site exposures to contaminated dust from on-Site will be addressed through the Soil/Materials Management Plan, dust controls, and through the implementation of the Community Air-Monitoring Program and a Construction Health and Safety Plan.

*Proposed Future Conditions:* Under future remediated conditions, all soils in excess of Track 4 SCOs will be removed. The site will be fully capped, preventing potential direct exposure to soil and groundwater remaining in place, and engineering controls (vapor barrier) will prevent any potential exposure due to inhalation by preventing soil vapor intrusion. The site is served by the public water supply, and groundwater is not used at the site. There are no plausible off-site pathways for oral, inhalation, or dermal exposure to contaminants derived from the site.

## **Overall Human Health Exposure Assessment**

There are potential complete exposure pathways for the current site condition. There are potential complete exposure pathways that require mitigation during implementation of the remedy. There are no complete exposure pathways under future conditions after the site is developed. This assessment takes into consideration the reasonably anticipated use of the site, which includes a residential structure, site-wide surface cover, and a subsurface vapor barrier system for the building. Under current conditions, on-Site exposure pathways exist for those with access to the Site and trespassers. During remedial construction, on-Site and off-Site exposures to contaminated dust from historic fill material will be addressed through dust controls, and through the implementation of the Community Air Monitoring Program, the Soil/Materials Management Plan, and a Construction Health and Safety Plan. Potential post-construction use of groundwater is not considered an option because groundwater in this area of New York City is not used as a potable water source. There are no surface waters in close proximity to the Site that could be impacted or threatened.

## **5.0 Remedial Action Management**

### **5.1 Project Organization and Oversight**

Principal personnel who will participate in the remedial action include Komal Dixit (Assistant Project Manager) and Erica Johnston (Sr. Project Manager). The Professional Engineer (PE) for this project is George J. Cambourakis and Qualified Environmental Professional (QEP) is Mark E. Robbins.

### **5.2 Site Security**

Site access will be controlled by DOB approved construction fence. For work areas of limited size, barrier tape will be sufficient to delineate and restrict access.

### **5.3 Work Hours**

The hours for operation of cleanup will comply with the NYC Department of Buildings construction code requirements or according to specific variances issued by that agency. The hours of operation will be conveyed to OER during the pre-construction meeting.

### **5.4 Construction Health and Safety Plan**

The Health and Safety Plan is included in **Appendix 6**. The Site Safety Coordinator will be Komal Dixit. Remedial work performed under this RAWP will be in full compliance with applicable health and safety laws and regulations, including Site and OSHA worker safety requirements and HAZWOPER requirements. Confined space entry, if any, will comply with OSHA requirements and industry standards and will address potential risks. The parties performing the remedial construction work will ensure that performance of work is in compliance with the HASP and applicable laws and regulations. The HASP pertains to remedial and invasive work performed at the Site until the issuance of the Notice of Completion.

All field personnel involved in remedial activities will participate in training required under 29 CFR 1910.120, such as 40-hour hazardous waste operator training and annual 8-hour refresher training. Site Safety Officer will be responsible for maintaining workers training records.

Personnel entering any exclusion zone will be trained in the provisions of the HASP and will comply with all requirements of 29 CFR 1910.120. Site-specific training will be provided to field personnel. Additional safety training may be added depending on the tasks performed. Emergency telephone numbers will be posted at the site location before any remedial work begins. A safety meeting will be conducted before each shift begins. Topics to be discussed include task hazards and protective measures (physical, chemical, environmental); emergency procedures; PPE levels and other relevant safety topics. Meetings will be documented in a log book or specific form.

An emergency contact sheet with names and phone numbers is included in the CHASP. That document will define the specific project contacts for use in case of emergency.

## **5.5 Community Air Monitoring Plan**

Real-time air monitoring for volatile organic compounds (VOCs) and particulate levels at the perimeter of the exclusion zone or work area will be performed. Continuous monitoring will be performed for all ground intrusive activities and during the handling of contaminated or potentially contaminated media. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pit excavation or trenching, and the installation of soil borings or monitoring wells.

Periodic monitoring for VOCs will be performed during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. Periodic monitoring during sample collection, for instance, will consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or overturning soil, monitoring during well bailing/purging, and taking a reading prior to leaving a sample location. Depending upon the proximity of potentially exposed individuals, continuous monitoring may be performed during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence. Exceedance of action levels observed during performance of the Community Air Monitoring Plan (CAMP) will be reported to the OER Project Manager and included in the Daily Report.

## **VOC Monitoring, Response Levels, and Actions**

Volatile organic compounds (VOCs) will be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a continuous basis during invasive work. Upwind concentrations will be measured at the start of each workday and periodically thereafter to establish background conditions. The monitoring work will be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment will be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment will be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

- If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities will be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities will resume with continued monitoring.
- If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities will be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities will resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.
- If the organic vapor level is above 25 ppm at the perimeter of the work area, activities will be shutdown.

All 15-minute readings must be recorded and be available for OER personnel to review.

Instantaneous readings, if any, used for decision purposes will also be recorded.

## **Particulate Monitoring, Response Levels, and Actions**

Particulate concentrations will be monitored continuously at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations. The particulate monitoring will be performed using real-time monitoring equipment capable of measuring

particulate matter less than 10 micrometers in size (PM-10) and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level. The equipment will be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration should be visually assessed during all work activities.

- If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m<sup>3</sup>) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques will be employed. Work will continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m<sup>3</sup> above the upwind level and provided that no visible dust is migrating from the work area.
- If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m<sup>3</sup> above the upwind level, work will be stopped and a re-evaluation of activities initiated. Work will resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m<sup>3</sup> of the upwind level and in preventing visible dust migration.

All readings will be recorded and be available for OER personnel to review.

## **5.6 Agency Approvals**

All permits or government approvals required for remedial construction have been or will be obtained prior to the start of remedial construction. Approval of this RAWP by OER does not constitute satisfaction of these requirements and will not be a substitute for any required permit.

## **5.7 Site Preparation**

### **Pre-Construction Meeting**

OER will be invited to attend the pre-construction meeting at the Site with all parties involved in the remedial process prior to the start of remedial construction activities.

### **Mobilization**

Mobilization will be conducted as necessary for each phase of work at the Site. Mobilization includes field personnel orientation, equipment mobilization (including securing all sampling

equipment needed for the field investigation), marking/staking sampling locations and utility mark-outs. Each field team member will attend an orientation meeting to become familiar with the general operation of the Site, health and safety requirements, and field procedures.

### **Utility Marker Layouts, Easement Layouts**

The presence of utilities and easements on the Site will be fully investigated prior to the performance of invasive work such as excavation or drilling under this plan by using, at a minimum, the One-Call System (811). Underground utilities may pose an electrocution, explosion, or other hazard during excavation or drilling activities. All invasive activities will be performed in compliance with applicable laws and regulations including NYC Building Code to assure safety. Utility companies and other responsible authorities will be contacted to locate and mark the locations, and a copy of the Mark-Out Ticket will be retained by the contractor prior to the start of drilling, excavation or other invasive subsurface operations. Overhead utilities may also be present within the anticipated work zones. Electrical hazards associated with drilling in the vicinity of overhead utilities will be prevented by maintaining a safe distance between overhead power lines and drill rig masts.

Proper safety and protective measures pertaining to utilities and easements, and compliance with all laws and regulations will be employed during invasive and other work contemplated under this RAWP. The integrity and safety of on-Site and off-Site structures will be maintained during all invasive, excavation or other remedial activity performed under the RAWP.

### **Dewatering**

Dewatering is not anticipated during remediation and construction.

### **Equipment and Material Staging**

Equipment and materials will be stored and staged in a manner that complies with applicable laws and regulations.

### **Stabilized Construction Entrance**

Steps will be taken to ensure that trucks departing the site will not track soil, fill or debris off-Site. Such actions may include use of cleaned asphalt or concrete pads or use of stone or other

aggregate-based egress paths between the truck inspection station and the property exit. Measures will be taken to ensure that adjacent roadways will be kept clean of project related soils, fill and debris.

### **Truck Inspection Station**

An outbound-truck inspection station will be set up close to the Site exit. Before exiting the Site, trucks will be required to stop at the truck inspection station and will be examined for evidence of contaminated soil on the undercarriage, body, and wheels. Soil and debris will be removed. Brooms, shovels and clean water will be utilized for the removal of soil from vehicles and equipment, as necessary.

### **Extreme Storm Preparedness and Response Contingency Plan**

Damage from flooding or storm surge can include dislocation of soil and stockpiled materials, dislocation of site structures and construction materials and equipment, and dislocation of support of excavation structures. Damage from wind during an extreme storm event can create unsafe or unstable structures, damage safety structures and cause downed power lines creating dangerous site conditions and loss of power. In the event of emergency conditions caused by an extreme storm event, the enrollee will undertake the following steps for site preparedness prior to the event and response after the event.

### **Storm Preparedness**

Preparations in advance of an extreme storm event will include the following: containerized hazardous materials and fuels will be removed from the property; loose materials will be secured to prevent dislocation and blowing by wind or water; heavy equipment such as excavators and generators will be removed from excavated areas, trenches and depressions on the property to high ground or removed from the property; an inventory of the property with photographs will be performed to establish conditions for the site and equipment prior to the event; stockpile covers for soil and fill will be secured by adding weights such as sandbags for added security and worn or ripped stockpile covers will be replaced with competent covers; stockpiled hazardous wastes will be removed from the property; stormwater management systems will be inspected and

fortified, including, as necessary: clean and reposition silt fences, hay bales; clean storm sewer filters and traps; and secure and protect pumps and hosing.

## **Storm Response**

At the conclusion of an extreme storm event, as soon as it is safe to access the property, a complete inspection of the property will be performed. A site inspection report will be submitted to OER at the completion of site inspection and after the site security is assessed. Site conditions will be compared to the inventory of site conditions and material performed prior to the storm event and significant differences will be noted. Damage from storm conditions that result in acute public safety threats, such as downed power lines or imminent collapse of buildings, structures or equipment will be reported to public safety authorities via appropriate means such as calling 911. Petroleum spills will be reported to NYS DEC within 2 hours of identification and consistent with State regulations. Emergency and spill conditions will also be reported to OER. Public safety structures, such as construction security fences will be repaired promptly to eliminate public safety threats. Debris will be collected and removed. Dewatering will be performed in compliance with existing laws and regulations and consistent with emergency notifications, if any, from proper authorities. Eroded areas of soil including unsafe slopes will be stabilized and fortified. Dislocated materials will be collected and appropriately managed. Support of excavation structure will be inspected and fortified as necessary. Impacted stockpiles will be contained and damaged stockpile covers will be replaced. Stormwater control systems and structures will be inspected and maintained as necessary. If soil or fill materials are discharged off site to adjacent properties, property owners and OER will be notified and corrective measure plan designed to remove and clean dislocated material will be submitted to OER and implemented following approval by OER and granting of site access by the property owner. Impacted offsite areas may require characterization based on site conditions, at the discretion of OER. If onsite petroleum spills are identified, a qualified environmental professional will determine the nature and extent of the spill and report to NYS DEC's spill hotline at DEC 800-457-7362 within statutory defined timelines. If the source of the spill is ongoing and can be identified, it should be stopped if this can be done safely. Potential hazards will be addressed immediately, consistent with guidance issued by NYS DEC.

## **Storm Response Reporting**

A site inspection report will be submitted to OER at the completion of site inspection. An inspection report established by OER is available on OER's website ([www.nyc.gov/oer](http://www.nyc.gov/oer)) and will be used for this purpose. Site conditions will be compared to the inventory of site conditions and material performed prior to the storm event and significant differences will be noted. The site inspection report will be sent to the OER project manager and will include the site name, address, tax block and lot, site primary and alternate contact name and phone number. Damage and soil release assessment will include: whether the project had stockpiles; whether stockpiles were damaged; photographs of damage and notice of plan for repair; report of whether soil from the site was dislocated and whether any of the soil left the site; estimates of the volume of soil that left the site, nature of impact, and photographs; description of erosion damage; description of equipment damage; description of damage to the remedial program or the construction program, such as damage to the support of excavation; presence of onsite or offsite exposure pathways caused by the storm; presence of petroleum or other spills and status of spill reporting to NYS DEC; description of corrective actions; schedule for corrective actions. This report should be completed and submitted to OER project manager with photographs within 24 hours of the time of safe entry to the property after the storm event.

### **5.8 Traffic Control**

Drivers of trucks leaving the Site with soil/fill will be instructed to proceed without stopping in the vicinity of the Site to prevent neighborhood impacts. The planned route on local roads for trucks leaving the site is shown on **Figure 6**.

### **5.9 Demobilization**

Demobilization will include:

- As necessary, restoration of temporary access areas and areas that may have been disturbed to accommodate support areas (e.g., staging areas, decontamination areas, storage areas, temporary water management areas, and access area);
- Removal of sediment from erosion control measures and truck wash and disposal of materials in accordance with applicable laws and regulations;
- Equipment decontamination, and;

- General refuse disposal.

Equipment will be decontaminated and demobilized at the completion of all field activities. Investigation equipment and large equipment (e.g., soil excavators) will be washed at the truck inspection station as necessary. In addition, all investigation and remediation derived waste will be appropriately disposed.

## **5.10 Reporting and Record Keeping**

### **Daily reports**

Daily reports providing a general summary of activities for each day of active remedial work will be emailed to the OER Project Manager by the end of the following business day. Those reports will include:

- Project number and statement of the activities and an update of progress made and locations of excavation and other remedial work performed;
- Quantities of material imported and exported from the Site;
- Status of on-Site soil/fill stockpiles;
- A summary of all citizen complaints, with relevant details (basis of complaint; actions taken; etc.);
- A summary of CAMP results noting all excursions. CAMP data may be reported;
- Photograph of notable Site conditions and activities.

The frequency of the reporting period may be revised in consultation with OER project manager based on planned project tasks. Daily email reports are not intended to be the primary mode of communication for notification to OER of emergencies (accidents, spills), requests for changes to the RAWP or other sensitive or time critical information. However, such information will be included in the daily reports. Emergency conditions and changes to the RAWP will be communicated directly to the OER project manager by personal communication. Daily reports will be included as an Appendix in the Remedial Action Report.

### **Record Keeping and Photo Documentation**

Job-site record keeping for all remedial work will be performed. These records will be maintained on-Site during the project and will be available for inspection by OER staff.

Representative photographs will be taken of the Site prior to any remedial activities and during major remedial activities to illustrate remedial program elements and contaminant source areas. Photographs will be submitted at the completion of the project in the RAR in digital format (i.e. jpeg files).

### **5.11 Complaint Management**

All complaints from citizens will be promptly reported to OER. Complaints will be addressed and outcomes will also be reported to OER in daily reports. Notices to OER will include the nature of the complaint, the party providing the complaint, and the actions taken to resolve any problems.

### **5.12 Deviations from the Remedial Action Work Plan**

All changes to the RAWP will be reported to, and approved by, the OER Project Manager and will be documented in daily reports and reported in the Remedial Action Report. The process to be followed if there are any deviations from the RAWP will include a request for approval for the change from OER noting the following:

- Reasons for deviating from the approved RAWP;
- Effect of the deviations on overall remedy; and
- Determination with basis that the remedial action with the deviation(s) is protective of public health and the environment.

## **6.0 Remedial Action Report**

A Remedial Action Report (RAR) will be submitted to OER following implementation of the remedial action defined in this RAWP. The RAR will document that the remedial work required under this RAWP has been completed and has been performed in compliance with this plan. The RAR will include:

- Information required by this RAWP;
- Text description with thorough detail of all engineering and institutional controls (if Track 1 remedial action is not achieved)
- As-built drawings for all constructed remedial elements;
- Manifests for all soil or fill disposal;

- Photographic documentation of remedial work performed under this remedy;
- Site Management Plan (if Track 1 remedial action is not achieved);
- Description of any changes in the remedial action from the elements provided in this RAWP and associated design documents;
- Tabular summary of all end point sampling results (including all soil test results from the remedial investigation for soil that will remain on site) and all soil/fill waste characterization results, QA/QC results for end-point sampling, and other sampling and chemical analysis performed as part of the remedial action;
- Test results or other evidence demonstrating that remedial systems are functioning properly;
- Account of the source area locations and characteristics of all soil or fill material removed from the Site including a map showing the location of these excavations and hotspots, tanks or other contaminant source areas;
- Full accounting of the disposal destination of all contaminated material removed from the Site. Documentation associated with disposal of all material will include transportation and disposal records, and letters approving receipt of the material;
- Account of the origin and required chemical quality testing for material imported onto the Site;
- Continue registration of the property with an E-Designation by the NYC Department of Buildings (if Track 1 remedial action is not achieved);
- The RAWP and Remedial Investigation Report will be included as appendices to the RAR;
- Reports and supporting material will be submitted in digital form and final PDF's will include bookmarks for each appendix.

## Remedial Action Report Certification

I, George J. Cambourakis, am currently a registered professional engineer licensed by the State of New York. I performed professional engineering services and had primary direct responsibility for implementation of the remedial program for the 537 Grand Street site, site number 17CVCP071K. I certify to the following:

- I have reviewed this document, to which my signature and seal are affixed.
- Engineering Controls implemented during this remedial action were designed by me or a person under my direct supervision and achieve the goals established in the Remedial Action Work Plan for this site.
- The Engineering Controls constructed during this remedial action were professionally observed by me or by a person under my direct supervision and (1) are consistent with the Engineering Control design established in the Remedial Action Work Plan and (2) are accurately reflected in the text and drawings for as-built design reported in this Remedial Action Report.
- The OER-approved Remedial Action Work Plan dated [date] and Stipulations in a letter dated [date] were 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.

Name

PE License Number

Signature

Date

PE Stamp

I, Mark E. Robbins, am a Qualified Environmental Professional. I had primary direct responsibility for implementation of the remedial program for the 537 Grand Street site, site number 17CVCP071K. I certify to the following:

- The OER-approved Remedial Action Work Plan dated August 15, 2012 and Stipulations in a letter dated September 10, 2014 were 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.

QEP Name

QEP Signature

Date

## 7.0 Schedule

The table below presents a schedule for the proposed remedial action and reporting. If the schedule for remediation and development activities changes, it will be updated and submitted to OER. Currently, a six months remediation period is anticipated.

<b>Schedule Milestone</b>	<b>Weeks from Remedial Action Start</b>	<b>Duration (weeks)</b>
OER Approval of RAWP	0	2
Fact Sheet 2 announcing start of remedy	0	2
Mobilization	1	1
Remedial Excavation	2	8
Demobilization	8	1
Submit Remedial Action Report	0	2