

January 12, 2024

Mr. Aaron Fischer
Project Manager
Division of Remediation, Bureau B, Section B
New York State Department of Environmental Conservation
625 Broadway, 12th Floor
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Re: Former Fulton Manufactured Gas Plant (MGP) Parcel III and Portion of Parcel IV
Well Abandonment Work Plan
Brooklyn, New York

Dear Mr. Fischer:

Roux Environmental Engineering and Geology, D.P.C. (Roux), on behalf of 545 Sackett LLC (the Developer), has prepared this Well Abandonment Work Plan for Parcel III (545 Sackett Street) and a portion of Parcel IV (551 Sackett Street) to discuss the work that will be completed to abandon the previously installed and/or proposed onsite deep dewatering and monitoring wells. The approved February 2022 Remedial Action Work Plan (RAWP) and the Interim Work Excavation Plan, dated October 4, 2023, are currently being implemented at the Site.

On December 5, 2023, Addendum No. 3 to the RAWP (In-Situ Stabilization/Solidification [ISS] Work Plan) was submitted for review by the New York State Department of Environmental Conservation (NYSDEC) and comments were received via email on December 26, 2023. A revised Addendum No. 3 is expected to be submitted to the NYSDEC in January 2024 to address comments and concerns. Under the ISS Work Plan, any soils not removed during pre-excavation will be amended to various depths using ISS technology to render contaminants less mobile, less soluble, chemically inactive, and less toxic. The terminal elevations in which ISS will be completed range from -19' to -28' NAVD88. In accordance with the telephone discussion held with NYSDEC on November 21, 2023, wells that are deeper than terminal elevations of ISS will be grouted and decommissioned prior to the ISS work to ensure the former wells do not present a potential pathway of impacts to groundwater. Wells that are shallower than terminal elevations of the ISS will be destroyed during the ISS work. There are 10 such shallow wells included on Table 1 and approximately 75 shallow wellpoints that were installed (or will be installed) inside the cofferdams surrounding each of the onsite gas holder foundations and will be utilized during dewatering operations.

When implementation of the RAWP began in August 2022, one of the first onsite activities performed was to decommission all existing onsite monitoring wells. On August 25, 2022, four onsite monitoring wells (PZ-302, PZ-306, PZ-310, and PZ-314) were grouted and had their PVC casing/cover removed. Monitoring well PZ-312 could not be located at that time and it was determined that the well had been previously destroyed. Currently, there are 21 onsite wells deeper than the terminal elevations in which ISS is proposed: 15 wells related to dewatering activities and 6 monitoring wells installed in accordance with Pre-Design Investigation (PDI) Work Plan Addendum No. 2, Revision 2. The locations of the onsite dewatering and monitoring wells proposed for grouting are shown on Figure 1. Table 1 lists the all current wells, the bottom of well screen elevation, the proposed ISS work area, the corresponding bottom of ISS for that well location, and the resulting expected grout interval for the wells (as applicable). A New York State licensed driller will be hired to tremie grout each well below the terminal depth of the


proposed ISS mass. Well abandonment will be performed in accordance with NYSDEC CP-43 for Groundwater Monitoring Well Decommissioning Procedures.

It is anticipated that the ISS work will occur in phases, starting in the northwest corner of the site and concluding in the northeast corner. The well abandonment work will generally precede the ISS phasing plan in the same order. Wells will be abandoned after pre-ISS excavation work is completed, dewatering and/or monitoring wells are no longer required in a specific area, and the area is prepared for ISS work. This phasing is subject to change based on Site logistics and scheduling restraints. This Well Abandonment Work Plan may be adjusted based on field conditions and well construction. The NYSDEC will be notified prior to the start of any well abandonment activity.

Please contact us with questions.

Sincerely,

ROUX ENVIRONMENTAL ENGINEERING AND GEOLOGY, D.P.C.



Matthew Smith
Project Scientist



MaryBeth Lyons
Senior Scientist



Charlie McGuckin, P.E.
Principal Engineer/Vice President

Table 1. Well Abandonment Summary, Former Fulton Manufactured Gas Plant (MGP) Parcel III and Portion of Parcel IV

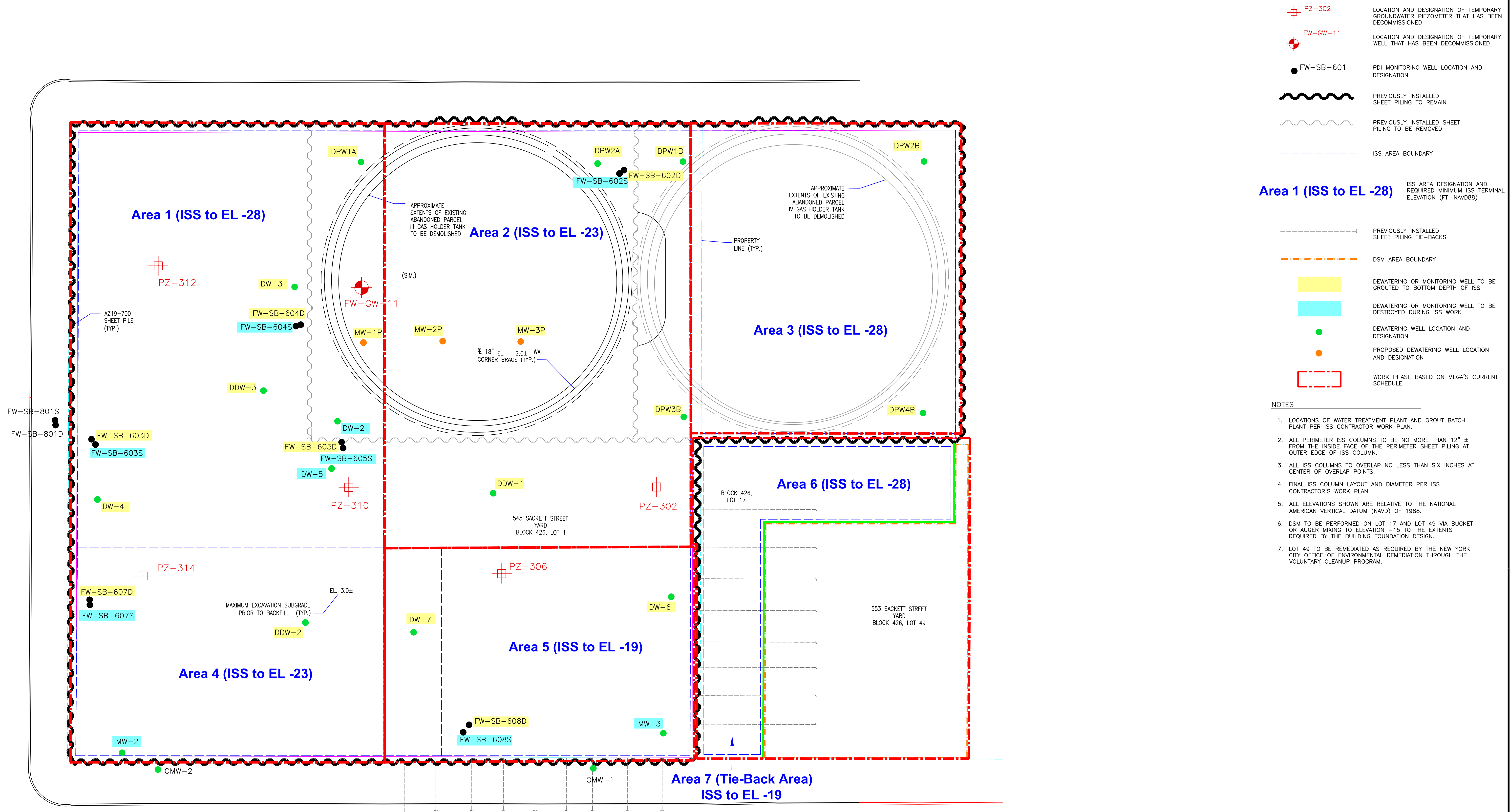
Monitoring Wells Associated with PDI				
Well ID	Area	Bottom of Screen (Elevation)	Bottom of ISS (Elevation)	Expected Grout Interval
603D	1	-59.67	-28	-28 - -60
603S	1	-8.84	-28	NA
604D	1	-38.18	-28	-28 - -38
604S	1	-8.12	-28	NA
605D	1	-46.83	-28	-28 - -47
605S	1	-6.72	-28	NA
602D	2	-72.12	-23	-23 - -72
602S	2	-12.15	-23	NA
607D	4	-39.75	-23	-23 - -40
607S	4	-10.11	-23	NA
608D	5	-85.22	-19	-19 - -85
608S	5	-9.16	-19	NA

Wells Associated with Dewatering Activities				
Well ID	Area	Bottom of Screen (Elevation)	Bottom of ISS (Elevation)	Expected Grout Interval (Elevation)
DW-3	1	-35.63	-28	-28 - -36
DDW-3	1	-56.82	-28	-28 - -57
DW-2	1	-27.06	-28	NA
DW-5	1	-26.77	-28	NA
DW-4	1	-30.36	-28	-28 - -30
DPW1A	1	-47*	-28	-28 - -47
DPW2A	2	-47*	-23	-23 - -47
MW-1P	2	-30**	-23	-23 - -30
MW-2P	2	-30**	-23	-23 - -30
MW-3P	2	-30**	-23	-23 - -30
DPW1B	2	-47*	-23	-23 - -47
DPW3B	2	-47*	-23	-23 - -47
DPW2B	3	-47*	-28	-28 - -47
DPW4B	3	-57*	-28	-28 - -57
DDW-2	4	-56.32	-23	-23 - -56
DW-7	4	-26.98	-23	-23 - -27
MW-2	4	-10.99	-23	NA
DW-6	5	-26.76	-19	-19 - -27
DDW-1	5	-47.2	-19	-19 - -47
MW-3	5	-8.39	-19	NA

*No top of PVC elevation, assumed to be +13 elevation.

**Not installed, bottom of screen elevation assumed to be -30.

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15' 0 15'