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26 March 2024
Revised 1 April 2024

Mr. Javier Perez-Maldonado
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233

Re: Waste Characterization and Soil Disposal Work Plan
23-30 Borden Avenue Development
Long Island City, New York
NYSDEC BCP Site No. C241238
Langan Project No.: 100766601

Dear Mr. Perez-Maldonado,

Langan has prepared this letter work plan for the proposed sampling and subsequent disposal of soil generated from the 23-30 Borden Avenue Site (NYSDEC BCP Site No. C241238) (Figure 1). The soil is currently staged at the 683 Court Street Site, a former major oil storage facility (Buckeye Terminals-MOSF License No. 2-1520) that is currently under redevelopment as the Red Hook Logistics Center.

On 20 March 2024, AJ Contracting, a subcontractor to the general construction manager March Construction, exported 9 truckloads of material generated from the western portion of the 23-30 Borden Avenue Site (see site map provided as Figure 2) to 683 Court Street Site in the Red Hook neighborhood of Brooklyn, New York. On 21 March 2024 Langan inspected the Court Street Site. Video surveillance provided of the Court Street Site was also reviewed and verified that 9 truckloads (approximately 180 cubic yards) of material exported from the Borden Avenue Site arrived at the Court Street Site and was commingled with material in an existing stockpile of soil at the Court Street Site. The construction manager and owner of the Court Street site were notified and instructed not to further disturb the stockpile of material. After this transfer, the commingled portion of the stockpile was not disturbed and is currently covered with polyethylene sheeting and surrounded with haybales. Based on information noted above, it is estimated that approximately half of the exiting stockpile has been commingled with the 23-30 Borden Avenue material. Photographs showing the original extent of the Court Street stockpile and the results of the commingling of the stockpile that occurred are provided in Attachment 1.

Proposed Waste Characterization Sampling

In order to characterize and dispose of all commingled soil currently staged at the 683 Court Street site, collection of four waste characterization samples is proposed. Although the exact volume of material to be removed is unknown, the collection of four waste characterization samples should be sufficient to characterize up to 3,200 cubic yards of material. The volume being assumed includes the over-excavation of the footprint of the commingled stockpile to a minimum of 1 foot beyond the current existing grade, in order to remove all comingled material from the Site. A field engineer, scientist, or geologist under the supervision of the remedial engineer (RE) will conduct the proposed waste characterization sampling. All waste characterization sampling work will be

completed in accordance with the 23-30 Borden Avenue NYSDEC-approved Remedial Action Work Plan (RAWP), including the provisions of community air monitoring plan (CAMP) and construction health and safety plan (CHASP). The CAMP will include continuous perimeter monitoring of dust and organic vapor using DustTrak aerosol monitors and photoionization detectors (PIDs) (or equivalent) capable of recording data and calculating 15-minute averages. A field engineer, scientist, or geologist will monitor Site perimeters for visible dust and odors. Soil/fill will be screened continuously during sample collection.

Each waste characterization sample will be composited from 5 discrete locations within the stockpile, with exception of the sample collected for volatile organic compound (VOC) analysis, which will be collected from one discrete location. Waste characterization soil samples will be submitted to a laboratory certified by the New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP) under standard chain-of-custody procedures. The soil samples will be analyzed for VOCs, semi-volatile organic compounds (SVOCs), pesticides, herbicides, polychlorinated biphenyls (PCBs), target analyte list (TAL) metals (including hexavalent chromium and cyanide), extractable petroleum hydrocarbons (spiked for fractionation), full toxicity characteristic leaching procedure (TCLP) analyses, and Resource Conservation and Recovery Act (RCRA) hazardous characteristics. This suite of analyses and the sampling frequency was selected based on our experience with disposal facilities typically used by New York City subcontractors. Field blank samples will be analyzed for VOCs, SVOCs, pesticides, herbicides, PCBs, TAL metals (including cyanide), and EPH (spiked for fractionation). In addition, one trip blank will be submitted for VOC analysis only on each day of sampling. A QA deliverable data package will be requested from the laboratory.

Proposed Soil Disposal

A field engineer, scientist, or geologist under the supervision of the remedial engineer (RE), will monitor the proposed the proposed excavation and load-out of commingled portion of the soil stockpile and a minimum of 1 foot of underlying soils. Over-excavation within the footprint of the commingled material stockpile will occur such that all commingled material is removed from the site. The extents of the over-excavation will be based on visual evidence of subgrade disturbance and the presence of commingled material but will at minimum extend 1 foot beyond the current existing grade. All soil loading and disposal will be completed in accordance with the 23-30 Borden Avenue NYSDEC-approved RAWP, including the provisions of CAMP and CHASP. The CAMP will include continuous perimeter monitoring of dust and organic vapor using DustTrak aerosol monitors and PIDs (or equivalent) capable of recording data and calculating 15-minute averages. A field engineer, scientist, or geologist will monitor Site perimeters for visible dust and odors. Soil/fill will be screened continuously during the removal of the stockpiled material.

Following receipt of waste characterization analytical results, Langan will coordinate with the NYSDEC, March Construction and AJ Contracting to identify an appropriate NYSDEC-approved disposal facility licensed and permitted to accept the material. The selected disposal facility will be reported to the NYSDEC Project Manager prior to off-Site transport. Soil/fill/solid waste removed from the 683 Court Street Site will be handled, transported, and disposed in accordance with local, State (including 6 NYCRR Part 360) and Federal regulations.

The following documentation will be obtained and reported by the qualified environmental professional (QEP) for each disposal location used in this project to fully demonstrate and document that the disposal of this material conforms to applicable laws:

1. A letter from the QEP or BCP Volunteer to the receiving facility describing the material to be disposed and requesting formal written acceptance of the material. This letter will state that material to be disposed is contaminated material generated at an environmental remediation Site in New York State. The letter will provide the project identity and the name and phone number of the QEP. The letter will include as an attachment a summary of all chemical data for the material being transported (including waste characterization data).

2. Letters from all receiving facilities stating they are in receipt of the correspondence (above) and are approved to accept the material.

Loaded vehicles leaving the Court Street Site will be securely covered, manifested, and placarded in accordance with the appropriate federal, state, and local requirements, including applicable transportation requirements (i.e., New York State Department of Transportation [NYSDOT] and NYCDOT requirements). Appropriately licensed haulers, in compliance with applicable local, state, and federal regulations, will be used to transport the material removed from this Site. Material transported by trucks exiting the 683 Court Street Site will be secured with tight-fitting covers. Loose fitting canvas-type truck covers are prohibited. If loads contain wet material capable of producing free liquid, truck liners must be used.

A truck inspection/wash area will be operated at the Court Street site during the disposal activities. The RE will be responsible for documenting that outbound trucks will be inspected to ensure that they are free of any residual soils from the Court Street site prior to entering the public roadways. Any trucks determined to still contain residual soils will be washed at the truck wash, as necessary, before leaving the Site until the soil disposal activities are complete. Locations where vehicles enter or exit the Site will be inspected during the disposal activities for evidence of off-Site sediment tracking.

The RE will be responsible for documenting that egress points for truck and equipment transport from the Site will be clean of dirt and other materials derived from the site during load out. AJ Contracting will clean adjacent streets as necessary to maintain a clean condition with respect to off-site sediment tracking.

A "Bill of Lading" system or equivalent will be used for off-Site movement of non-hazardous wastes and contaminated soils. Field photographs of the disposal manifests will be provided in daily reports. Counter signed manifests will be included in the Final Engineering Report (FER).

Assuming, that the material within the commingled stockpiled is characterized as Non-hazardous contaminated historic fill material, it will be handled, at a minimum, as a solid waste per 6 NYCRR Part 360. Contaminated historic fill material to be disposed of from the commingled stockpile are prohibited from being disposed of at Part 360 Registered Recycling Facilities (also known as Soil Recycling Facilities).

Please do not hesitate to contact the undersigned if you have any issues or concerns, or if you have any questions regarding the above.

Sincerely,
Langan Engineering, Environmental, Surveying, Landscape Architecture and Geology, D.P.C.

Christopher McMahon, CHMM
Associate Principal / Vice President

Steven Ciambruschini, PG
Senior Principal / Senior Vice President

Satyajit A. Vaidya, PE
Principal / Vice President

STATE OF NEW YORK
SATYAJIT A. VAIDYA
089797
LICENSED PROFESSIONAL ENGINEER

AK:CM:kn
Attachments: Figure 1 – 23-30 Borden Ave Site Location Plan
Figure 2 – 2024-03-21 Site Map
Attachment 1 – Photographic Log

cc: Jane O'Connell, William Bennett – NYSDEC
Stephen Kim, Steven Talay – Innovo Property Group
David Freeman, Matthew Sinkman - Gibbons
Brian Kriedberg – Sterling Project Development
Amanda Forsburg, Allyson Kritzer - Langan

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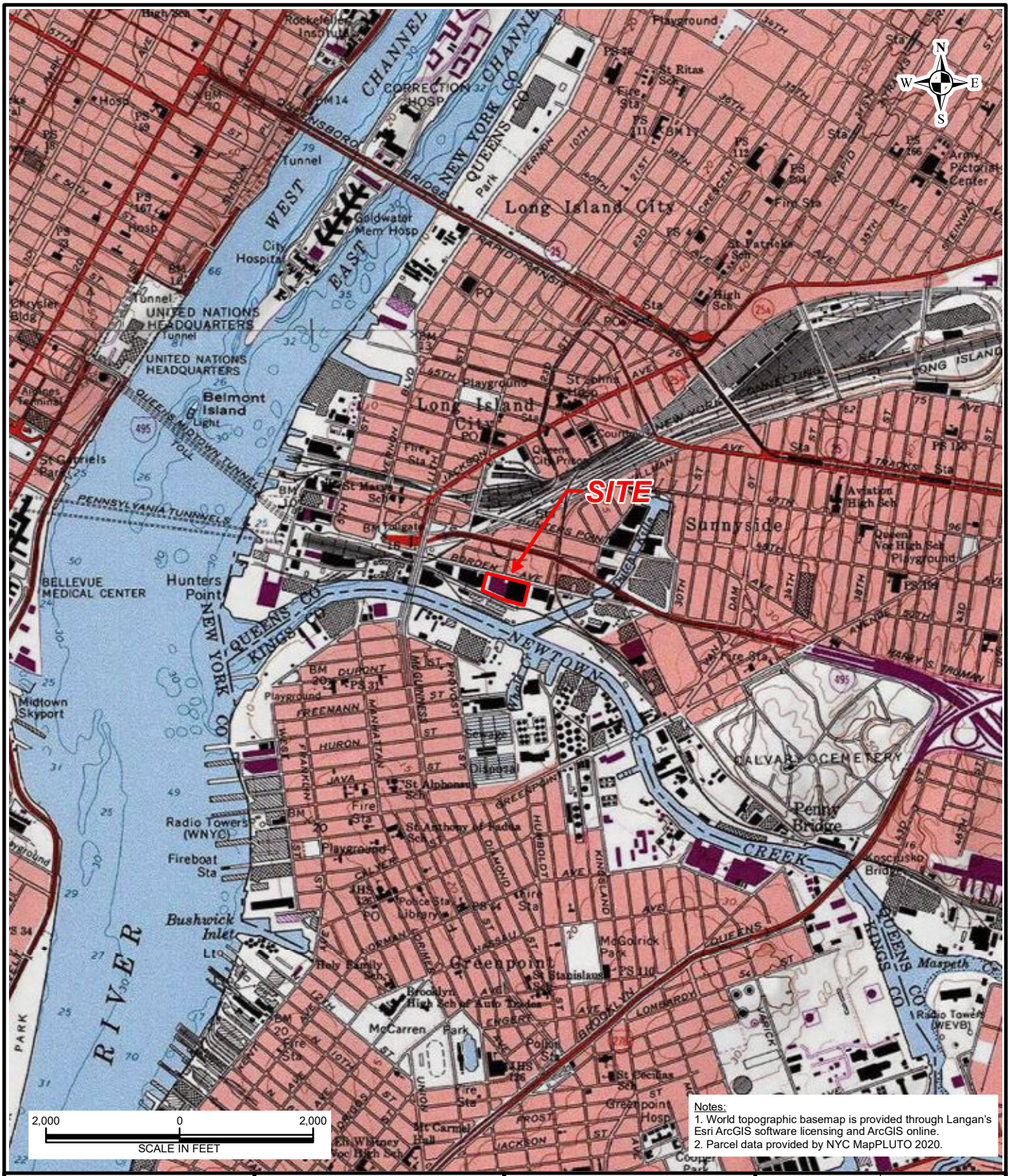
FIGURES



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Langan Engineering & Environmental Services, Inc.
Langan Engineering, Environmental, Surveying, Landscape Architecture and Geology, D.P.C.
Langan International LLC
Collectively known as Langan
NJ CERTIFICATE OF AUTHORIZATION No. 24GA27996400

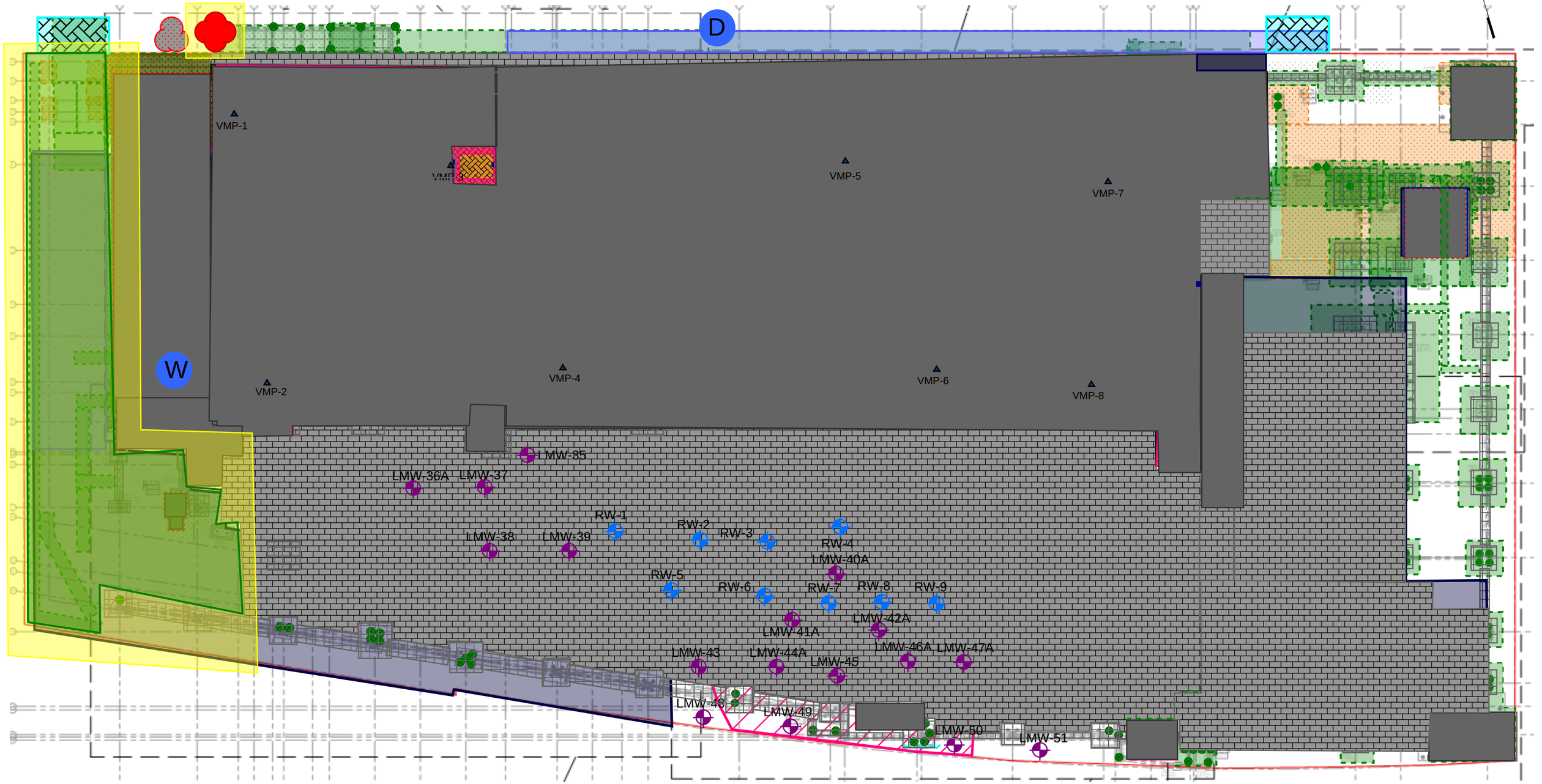
Project
23-30 BORDEN AVENUE DEVELOPMENT
NYSDEC BCP SITE No.: C241238
BLOCK No. 68, LOT No. 38
LONG ISLAND CITY
QUEENS COUNTY NEW YORK

Drawing Title
USGS SITE LOCATION MAP

Project No.	100766601
Date	10/20/2020
Scale	1"=2,000'
Drawn By	IHB
Last Revised	5/20/2021
Figure	1

Path: \\Langan.com\data\PAR\data6\100766601\Project Data\ArcGIS\MXD\Environmental_Figures\2021-05 - BCP RAWP\Figure 1 - Site Location Map.mxd Date: 5/20/2021 User: ibaker Time: 4:28:56 PM

SITE MAP



- BCP Site Boundary
- Spill No. 1812799 Remediation Area
- PAH Remediation Area
- Metals Remediation Area
- Heavy Petroleum Distillate Impacts Area (AOC-4)
- Stabilized Construction Entrance
- Recovery Well
- Performance Monitoring Well
- Crane Road
- Vinyl Chloride Groundwater Plume
- 1,1,1-Trichloroethane Groundwater Plume
- Work Zone Air Monitoring Station
- Downwind Perimeter Air Monitoring Station
- Work Completed Today
- NAPL Impacts Observation Area
- Soil Reuse Stockpile
- Excavation Previously Completed
- Excavation Completed Today
- Test Pit Previously Completed
- Smoke Test Locations
- Concrete Poured Before Vapor Barrier
- Concrete Poured After Vapor Barrier
- RCA Sub-Base
- Horizontal Drago Wrap Installed
- Horizontal Henry Company Blueskin Preseal 435 Installed
- Vertical Henry Company Blueskin WP 200 Installed
- Caisson Previously Installed
- Soil-Mixed Load Transfer Platform
- 3/4-inch Stone Stockpile
- Concrete/Asphalt Poured Outside Building Extents (no vapor barrier)
- 3/4-inch Stone
- SSDS 4-inch Header
- SSDS 4-inch Screen
- Vapor Monitoring Point (VMP)
- RCA Stockpile
- End Point Sample Location
- Sand Stockpile

1. Basemap taken from Pile Load Test Location Plan prepared by Mueser Rutledge Consulting Engineers dated 19 August 2021.
2. Site features are approximate and not to scale.
3. Remediation areas obtained from Figure 9 - Proposed Endpoint Documentation/Confirmation Sampling prepared by Langan dated 20 May 2021.

Attachment 1 – Photographic Log

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Attachment 1
Photographic Log
23-30 Borden Avenue
Long Island City, Queens, New York

Photo 1: Soil excavation within the western portion of 23-30 Borden Avenue, facing north. 03/20/2024.

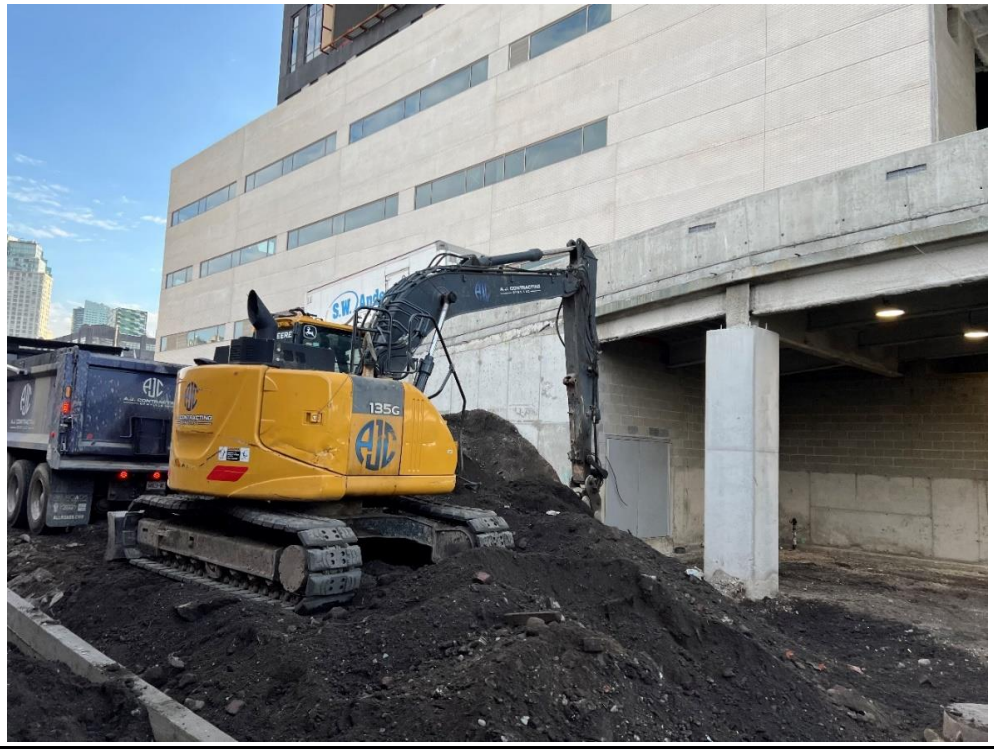

Photo 2: Excavator loading a truck with soil, facing northeast. Soil was not approved for off-site disposal. 03/20/2024

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Attachment 1
Photographic Log
23-30 Borden Avenue
Long Island City, Queens, New York

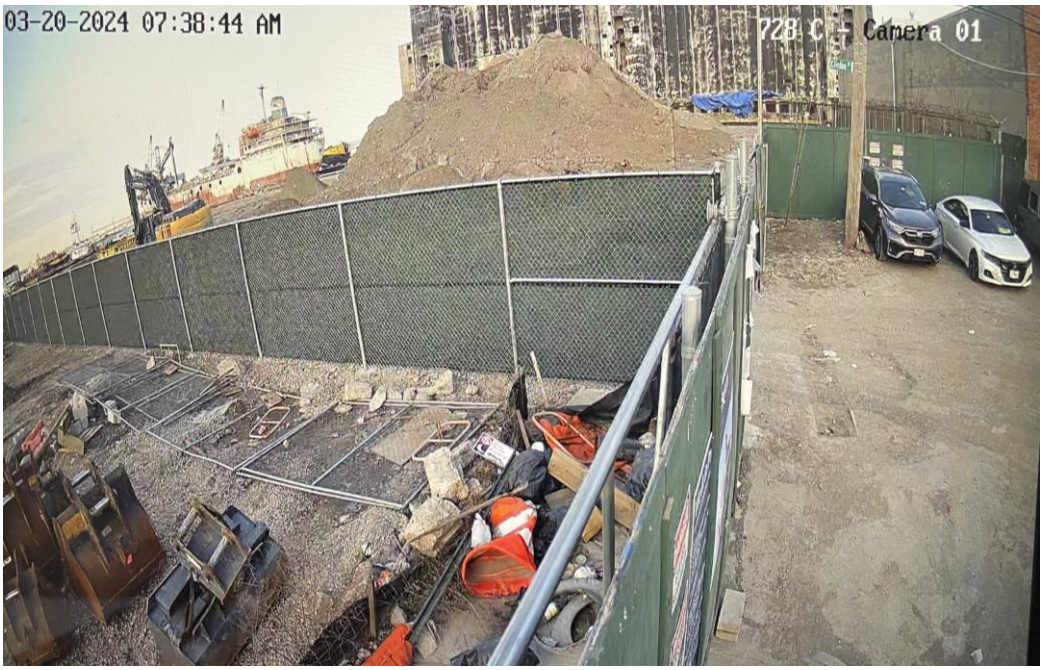

Photo 3: Stockpile conditions prior to import, facing west. Morning of 03/20/2024.

Photo 4: Stockpile conditions at the unapproved receiving site 683 Court Street, facing north. 03/21/2024.

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Attachment 1
Photographic Log
23-30 Borden Avenue
Long Island City, Queens, New York

Photo 5: Approximate extents of comingled soil at the 683 Court Street site, facing north. 03/21/2024.

Photo 6: Stockpile conditions at the unapproved receiving site 683 Court Street, facing northwest. 03/21/2024.

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Attachment 1
Photographic Log
23-30 Borden Avenue
Long Island City, Queens, New York

Photo 7: Approximate extents of comingled soil at the 683 Court Street site, facing northwest. 03/21/2024.

Photo 8: Approximate extents of comingled soil at the 683 Court Street site, facing west. 03/21/2024.

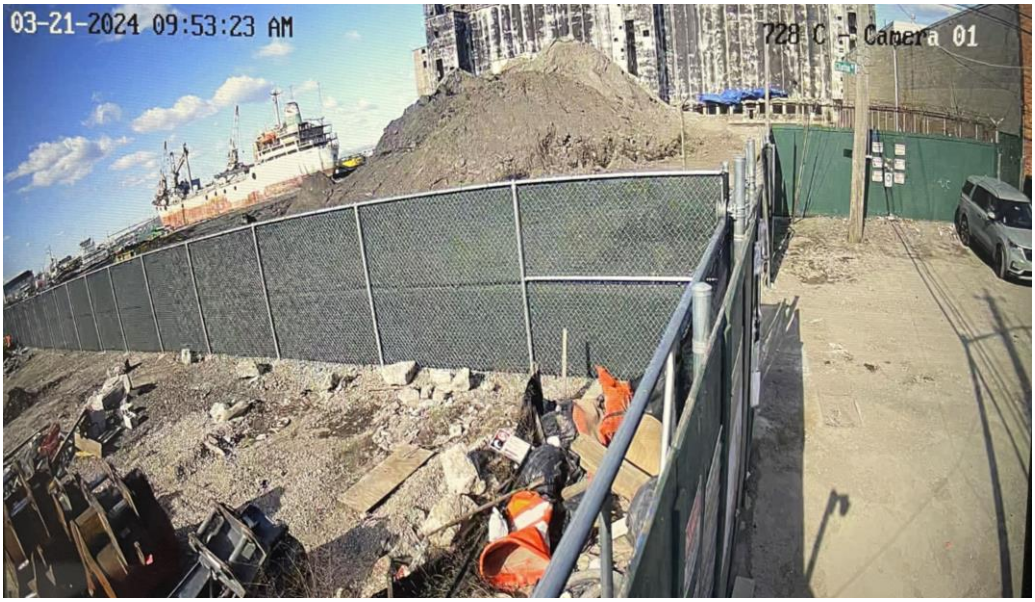

Photo 9: Stockpile conditions following soil import, facing west. Morning of 03/21/2024.

Photo 10: Stockpile covered with polyethylene sheeting and surrounded with hay bales, facing west. 03/21/2024.