

October 20, 2014

Via Electronic Mail

Mr. Javier Pérez-Maldonado
Division of Environmental Remediation
Remedial Bureau B, Section B
New York State Department of Environmental Conservation
625 Broadway, 12th Floor
Albany, NY 12233-7020

**Re: Supplemental Remedial Investigation Work Plan Addendum
SUN/DIC Acquisition Corp.
441-443 Tompkins Avenue
Staten Island, New York
Site #C243024**

Dear Mr. Pérez:

On behalf of Sun Chemical Corporation (Sun Chemical), ENVIRON International Corporation (ENVIRON) prepared this Supplemental Remedial Investigation Work Plan Addendum (SRIWPA) to propose additional soil sampling of certain regraded/reworked and exposed soil areas at 441-443 Tompkins Avenue (i.e., the Site). The scope of this supplemental work plan is based on the analytical results of soil sampling completed at the site on September 11, 2014 in accordance with the August 28, 2014 RIWPA approved by NYSDEC on September 4, 2014.

Background

NYSDEC has noted during recent discussions with Sun Chemical and ENVIRON that data were not available to evaluate current conditions and enable comparison to the Restricted Residential SCOs for shallow soils in areas that had been subject to regrading/reworking following completion of the 2008 – 2009 initial remedial actions. As outlined in the September 2010 Remedial Investigation Work Plan, following remediation of impacted soils to the commercial-use SCOs (the SCOs being used at that time), soils were regraded to prevent the accumulation of storm water, control soil erosion and prevent the overland migration of soil to the storm water drainage system and/or to neighboring properties.

Additionally, exposed soils are present at the former Warehouse/Office/Laboratory (WOL) following removal of the building slab. As sub-slab soil sampling was not completed prior to the building demolition, and as this area was subject to only limited soil remediation during the initial remedial actions, NYSDEC noted that current shallow soil conditions had not been evaluated to the same degree as at other locations across the site.

Accordingly, to address these concerns, Sun Chemical implemented a supplemental phase of remedial investigation. On September 11, ENVIRON collected soil samples at the 12 additional on-site sampling locations in accordance with the NYSDEC-approved August 28, 2014 SRIWP. As approved, two soil samples were collected from each location, one from the upper 2 inches, then the second from the 2-24-inch interval. All soil samples were analyzed for TCL SVOC+15, TCL Pesticides/PCBs and TAL metals including total cyanide, with the analysis for TCL VOC+30 performed on soils obtained from 12-24 inches.

September 11, 2014 Sampling Results

Summarized analytical data from the September 11 soil sampling program are provided on the attached Plate 1. As shown, certain suites of constituents were not detected above SCO (i.e., VOCs, PCBs, pesticides). These data also confirmed that no soil contamination was identified at the former Powerhouse and at locations RW4-RW8 in the regraded area. At locations RW1-RW3, several constituents were detected above restricted residential SCOs, including four PAHs in the surface soil at RW1, lead and nickel in the deeper interval at RW2, and cadmium in both intervals at RW3. Last, mercury was present slightly above the SCO in one of the duplicate samples from location WOL1 in the WOL.

Proposed Supplemental Remedial Investigation work Plan Addendum

As shown on Plate 1, Sun Chemical proposes to collect additional shallow soil samples to delineate the impacts at locations RW1-RW3 and to further evaluate mercury conditions at and near WOL1. The sampling will be completed as outlined on Table 1 and includes the following components:

- Delineation soil sampling is proposed near RW1, RW2 and RW3. The proposed soil sample(s) will be collected from the same depth(s) at which the associated exceedances were detected as well as well from at least one deeper interval for contingency vertical delineation should the results from the overlying sample(s) exceed the restricted residential SCOs. Additionally, vertical delineation sampling will be completed at RW2 and RW3 given that exceedances were identified at 2-24". Although remediation to achieve the restricted residential SCOs pursuant to a Track 4 cleanup does not need to extend to depths greater than 2 feet, consistent with the overall remedial approach for the site, Sun Chemical proposes that vertical delineation sampling will be extend below 2 feet if needed as it intends to remediate exceedances of these SCOs present below 2 feet.
- Confirmatory surface soil sampling is proposed at WOL1 (at new location WOL1A) at which an additional soil sample will be collected from 0-2" for mercury analysis. If mercury is not detected above the restricted residential SCO of 0.81 mg/kg, Sun Chemical would propose that no further investigation is warranted at this location and that no remedial action be required. Alternately, if the surface soil mercury concentration at WOL1A exceeds 0.81 mg/kg, the contingency sample from 2-24" would be analyzed for vertical delineation. Contingency delineation samples will also be collected at locations WOL3-WOL5 for lateral delineation. At each location, soil samples will be collected from 0-.2" and 2-24" for mercury analysis. The surface soil samples would be analyzed only if the surface-soil mercury concentration at WOL1A exceeds 0.81 mg/kg, and any deeper soil samples analyzed only if the mercury concentration in the corresponding surface sample exceeds 0.81 mg/kg.

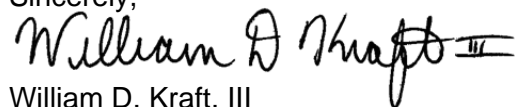
All soil samples will be immediately placed in laboratory-provided sample containers and stored on ice to maintain a maximum sample temperature of 4°C until sample delivery at the laboratory. ENVIRON will follow appropriate chain of custody procedures. All soil and groundwater analyses proposed herein will be conducted by Integrated Analytical Laboratories, Inc. (IAL) of Randolph, New Jersey, a laboratory certified by the State of New York to perform the proposed analyses (New York ELAP Certification #11402), or another appropriately NYSDEC-certified laboratory.

Sun Chemical understands that based on the analytical findings of this proposed sampling, additional delineation sampling may be required to define the extent of constituent concentrations above the applicable SCOs. For example, if exceedances are identified at the proposed locations near RW2 and RW3, it might be appropriate to conduct additional sampling in the area between those locations as well as at points to the east, west and/or south. As the scope of such sampling cannot be determined at this time, however, instead of preparing any additional work plans for review and

approval, Sun Chemical requests that NYSDEC agree as part of its approval of this SRIWPA that Sun Chemical can proceed with additional lateral and/or vertical delineation consistent with the methodologies proposed herein, as may be needed to define the boundaries. As the delineation goal is well established, and the result will be submitted in the next revised draft Remedial Investigation Report for NYSDEC review and approval, we believe this approach is the most efficient both in terms of time and allocation of NYSDEC resources.

Sun Chemical and ENVIRON are prepared to proceed with the soil sampling upon NYSDEC approval of this proposal. Accordingly, Sun Chemical and ENVIRON would appreciate NYSDEC approval of this SRIWPA as soon as feasible. If NYSDEC has any questions regarding this SRIWPA, please do not hesitate to contact me.

Sincerely,



William D. Kraft, III
Principal Consultant

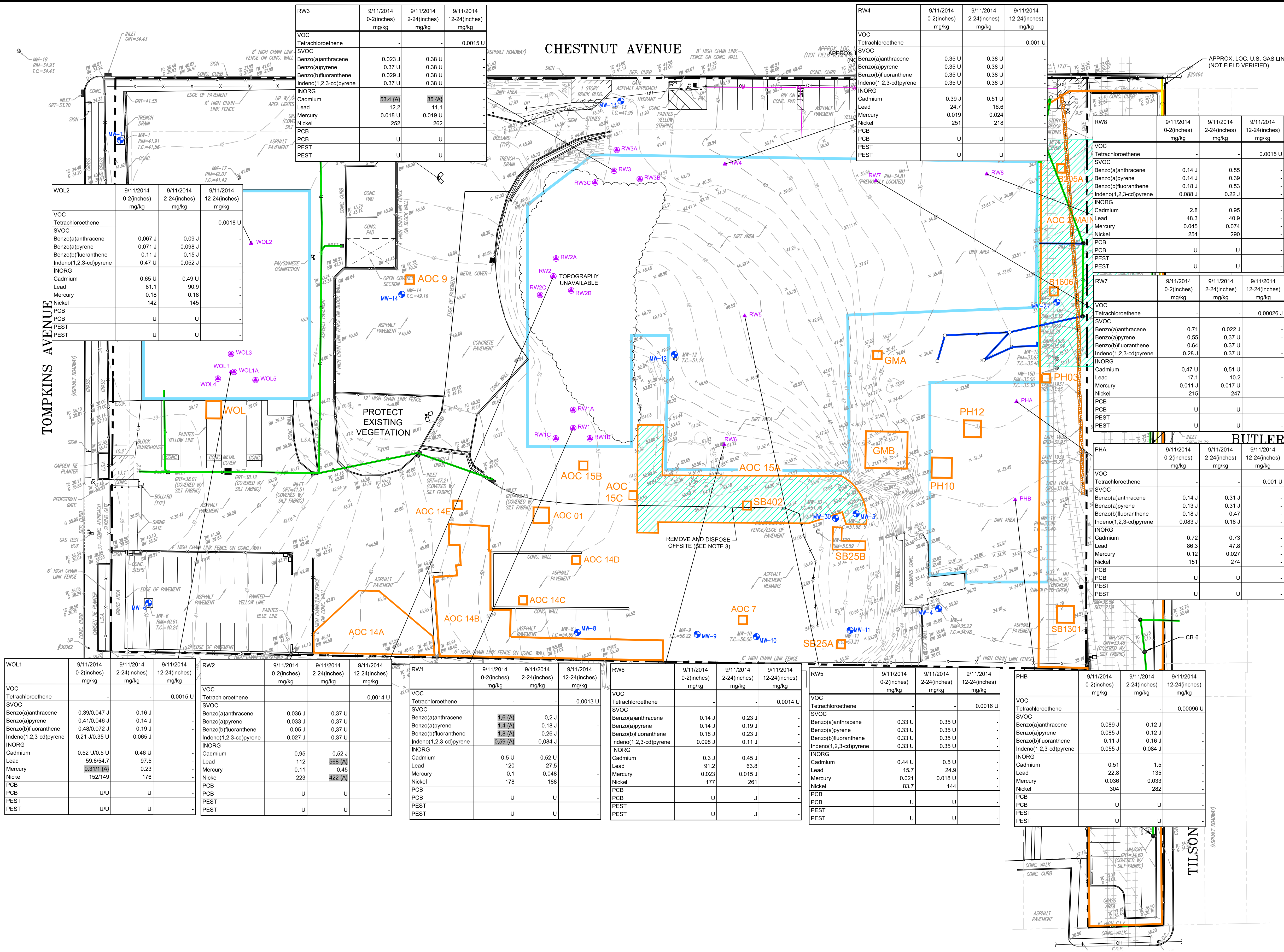
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Enclosures

cc: G. Andrzejewski, Sun Chemical Corporation
J. Brown, NYSDEC
W. Faure, Esq., Sun Chemical Corporation
C. Doroski, NYSDOH
D. Schlott, ENVIRON Int'l Corporation
G. Walker, U.S. Ink
T. Wolff, Esq., Manatt, Phelps & Phillips, LLP

Table 1**Proposed Sampling for Supplemental Remedial Investigation work Plan Addendum****Sun Chemical Corporation, 441-443 Tompkins Avenue, Staten Island, NY****Site #C243024**

Location	Proposed Sampling Intervals	Proposed Analyses
RW1A-C	<ul style="list-style-type: none">• 0-2"• 2-24"	PAHs
RW2	<ul style="list-style-type: none">• 24-30"• 30-36" (Contingency HOLD)	Lead, nickel
RW2A-C	<ul style="list-style-type: none">• 2-24"• 24-30" (Contingency HOLD)• 30-36" (Contingency HOLD)	Lead, nickel
RW3A	<ul style="list-style-type: none">• 24-30"• 30-36" (Contingency HOLD)	Cadmium
RW3A-C	<ul style="list-style-type: none">• 2-24"• 24-30" (Contingency HOLD)• 30-36" (Contingency HOLD)	Cadmium
WOL1A	<ul style="list-style-type: none">• 0-2"• 2-24" (Contingency HOLD)	Mercury
WOL3-WOL5	<ul style="list-style-type: none">• 0-2" (Contingency HOLD)• 2-24" (Contingency HOLD)	Mercury



NYSDEC Soil Cleanup Objectives	
Chemical	Residential Restricted SCO (mg/kg)
VOC	
Tetrachloroethene	19
SVOC	
Benzo(a)anthracene	1
Benzo(a)pyrene	1
Benzo(b)fluoranthene	1
Indeno(1,2,3-cd)pyrene	0.5
INORG	
Cadmium	4.3
Lead	400
Mercury	0.81
Nickel	310

U -- Not Detected.
J -- Estimated Concentration.
SCO -- Soil Cleanup Objective.

NOTES:
All concentrations are presented in mg/kg.

LEGEND	
	APPROX. PROPERTY BOUNDARY
	EXISTING ELEVATION CONTOUR
	FENCE
	GAS LINE
	SEWER/STORMWATER LINE - TO REMAIN
	SEWER/STORMWATER LINE - SEE NOTE 5
	FIRE LOOP
	OVER HEAD WIRES
	EXISTING MONITORING WELL TO REMAIN
	EXISTING INTERCEPTOR CHANNEL (INSTALLED FEBRUARY - MARCH 2011)
	PROPOSED EXCAVATION AREA
	AREA OF POTENTIAL RCRA HAZARDOUS WASTE FOR LEAD
	REGRADED/UNEXCAVATED SOILS AREA
	SEPTEMBER 2014 SOIL SAMPLE LOCATION
	PROPOSED SOIL SAMPLE LOCATION

- NOTE:
- THE SITE IS NOT ACCESSIBLE FROM ST. MARY'S AVENUE OR CHESTNUT AVENUE.
 - CONTRACTOR SHALL REMOVE AND DISPOSE OF INTERIOR FENCE, CURB AND PAVEMENT AS NEEDED TO COMPLETE THE WORK.
 - CONTRACTOR SHALL MAINTAIN PROTECT AND IF WARRANTED REPAIR THE PERIMETER FENCE AND ANY CURBS DESIGNATED TO REMAIN.
 - CONTRACTOR SHALL MAINTAIN, PROTECT AND IF WARRANTED REPAIR THE INTERCEPTOR CHANNEL SO IT DOES NOT LOSE FUNCTIONALITY OR INTEGRITY.
 - CONTRACTOR SHALL MAINTAIN, PROTECT AND IF WARRANTED REPAIR ALL UTILITIES (E.G. SEWER / STORMWATER LINES, GAS LINES) SO THEY DO NOT LOSE FUNCTIONALITY OR INTEGRITY. AT THE DIRECTION OF ENVIRON, THE CONTRACTOR SHALL REMOVE AND DISPOSE OFF SITE SEWER / STORMWATER PIPING NOT DESIGNATED TO REMAIN WITHIN EXCAVATIONS. MANHOLE CONNECTIONS SHALL BE SEALED IN ACCORDANCE WITH LOCAL AND STATE REQUIREMENTS.

SOURCE:
BASEMAP PROVIDED BY CONTROL POINT ASSOCIATES, INC. ENTITLED "BOUNDARY AND TOPOGRAPHIC SURVEY", DATED 9/12/2008 AND REVISED 3/17/2009.



RESULTS FOR SUPPLEMENTAL REMEDIAL INVESTIGATION SOIL SAMPLES

SUN CHEMICAL CORPORATION-ROSEBANK FACILITY
441 TOMPKINS AVE.
STATEN ISLAND, NY

PREPARED BY: LD	DATE: 10/08/2014	PLATE
DRAFTED BY: BJL/KMT/SP	SCALE: AS SHOWN	
APPROVED BY: JS	PROJECT: 2116443A	