HydroEnvironmental
SOLUTIONS, INC.

May 3, 2013

Mr. Todd Ghiosay
New York State Department of Environmental Conservation
100 Hillside Avenue-Suite 1W
White Plains, New York 10603-2860

RE: Backfill Excavation and Removal
2101 and 2103 Palmer Avenue
Larchmont, New York
NYSDEC Spill Number 1006787

Dear Mr. Ghiosay:

As per our meeting, the following letter will serve as an addendum to the Remedial Action Work Plan (RAW) for the above referenced site (**Figure 1**) that was submitted to your office on April 4th, 2013, which addressed residual impacted soil bordering the property owned by Larchmont, LLC and to adjacent property owned by the Metro North Railroad (MNR). Soil samples collected in October, 2011 indicated that the backfill material placed at that time exceeded NYSDEC Commissioner's Policy No. 51 (CP-51) Soil Cleanup Levels (SCLs) for petroleum hydrocarbons (PHCs). A summary of the laboratory analytical results and the compounds that exceeded their respective NYSDEC-SCLs is shown on **Table 1**. As you are aware, the NYSDEC will not allow the backfill material in the former excavation area to be kept in place due to the accessibility of the impacted soil and the proposed future residential development at the site. In this regard, HES proposes the following work plan to remove the backfill material placed at the site in October, 2011, in addition to the proposed April 4th, 2013 RAW submitted under separate cover.

One Deans Bridge Road • Somers, New York 10589

914.276.2560 • FAX 914.276.2664

Scope of Work

Dewatering Wells

The first course of action will be to investigate the condition of the 19 dewatering wells that are currently at the site. HES will confirm that the dewatering wells are in good condition and suitable for dewatering use during backfill removal activities. If the existing dewatering wells are deemed hydrogeologically unsuitable, then new wells will have to be installed. If required, new dewatering wells will be constructed to a depth of 15 ftbg (feet below grade). The wells will be constructed of 2-inch 20 slot Schedule 40 PVC well screen from 10 to 15 ftbg and solid riser pipe from +3 to 10 ftbg. The annular space around each well will be backfilled with No. 2 filter sand to approximately 3 ftbg and a bentonite seal will be placed from approximately 3 ftbg to 1 ftbg. As outlined in the RAW (April 4th, 2013), all pumped water will be treated and discharged to the Village of Larchmont sanitary or combined sewer system. The Permit with the Westchester County Department of Environmental Facilities (WCDEF) to discharge treated groundwater to this sewer system was recently renewed prior to the submittal of the RAW.

Backfill Removal

The extent of the backfill that was emplaced in October 2011 is outlined on **Figure 2**, a generalized site plan of the subject site. After the site is dewatered to an acceptable depth (approximately 9 ftbg), the backfill will be removed to depths ranging from 5 to 9 ftbg, depending on the exact location. Backfill was not uniformly placed into the excavation in October 2011 and the extent of backfill vertically was deepest at the eastern end (approximately 9 ftbg) and shallowest at the western end (approximately 5 ftbg) of the original excavation.

During soil removal activities, the backfill will be screened in the field by an HES environmental scientist or hydrogeologist using a calibrated photoionization detector (PID) and the headspace method to determine the presence of PHCs. The on-site representative from HES will visually screen the soil to determine the vertical and horizontal extent of the backfill material. Field screened areas that indicate a PID reading of 50 ppm (parts per million) will be disposed of off site at a NYSDEC approved soil processing facility. Field screened areas that indicate a PID reading of less than 50 ppm will be allowed to remain in place. Upon completion of backfill excavation activities, HES will collect 6-8 bottom samples as endpoints. Due to the sidewall soil sampling results of October 2011, no sidewall samples will be collected. The sidewall

samples that were previously collected were compliant with NYSDEC-SCLs and the extent of the backfill boundary is readily apparent.

All excavation endpoint soil samples will be collected in accordance with NYSDEC CP-51. The samples will be placed in appropriately labeled glassware and placed in a cooler on ice and transported to a New York State certified laboratory, where they will be analyzed for the presence of volatile organic compounds (VOCs) using EPA Method 8021 modified to include MTBE (methyl tertiary butyl ether), semi-volatile organic compounds (SVOCs) using EPA Method 8270, and Total RCRA Metals in accordance with NYSDEC Guidelines. The proposed soil sampling locations are shown on **Figure 2**.

Once laboratory analytical data are obtained, HES will review the results and compare them to NYSDEC-SCLs (Table 2 and Table 3 of CP-51) for VOCs and SVOCs and to Unrestricted Use Soil Cleanup Objectives (SubPart 375-6.8[a]) for Total RCRA Metals. If post-excavation soil samples are compliant with NYSDEC-SCLs, the site will then be backfilled with material that will be excavated from a bedrock knob located on site. As discussed at the previous meeting, the bedrock is located to the east of the backfill excavation area. A rock crusher will be brought on site to pulverize the rock into a suitable size for backfill. Prior approval from the NYSDEC will be required in order to utilize this on-site material as backfill. If an insufficient quantity of rock is available on site, then certified clean fill will be brought to the site from an off-site source. If post-excavation soil samples are not compliant with NYSDEC-SCLs, then additional excavation will be needed in the non-compliant areas, and additional endpoint samples will be collected until compliance is achieved. The excavation area will not be backfilled until soil laboratory analytical data is received and HES has confirmed that all soil samples are compliant with NYSDEC standards.

HES anticipates that a total of approximately 900 cubic yards of backfill will be removed from the site; the amount equivalent to the backfill volume that was used to fill the October 2011 excavation. HES estimates that approximately 10 to 15 business days will be required to complete the dewatering and soil excavation activities both on site and on MNR property. Following completion of dewatering, backfill soil excavation activities, and implementation of the RAW, HES will compile a comprehensive spill remediation and closure report to be submitted to the NYSDEC. The report will be submitted approximately four weeks following the completion of proposed remedial action.

HES can initiate startup of this project within one week following NYSDEC approval of the original April 4, 2013 RAW and this RAW Addendum. Please contact me if you have any questions regarding this Scope of Work at (914) 276-2560.

Very truly yours,
HydroEnvironmental Solutions, Inc.

William A. Canavan, CPG, PG
President

Enclosures

cc: Mr. Richard Esposito
Mr. Douglas Esposito
Jonathan Murphy, Esq.
Catherine Andreycak, Esq.
File

Table 1

2101-2103 PALMER AVENUE
LARCHMONT, NEW YORK
NYSDEC SPILL No.: 1006787

Summary of Backfill Soil Quality Results

Summary of Soil Laboratory Analytical Results Compiled by HydroEnvironmental Solutions, Inc.

Sample	Sample Date	Benzene	Toluene	Ethylbenzene	Total Xylenes	n-Butylbenzene	MTBE	Total VOCs
EPA Method 8260								
Overburden SS-1	10/14/2011	ND	ND	ND	ND	ND	ND	42b
Overburden SS-2	10/14/2011	ND	ND	ND	ND	ND	ND	42b
B-1, 3.5-7.5 ftbg	4/19/2012	ND	ND	ND	ND	ND	ND	43
B-2, 4-7 ftbg	4/19/2012	ND	ND	ND	ND	ND	ND	190.3
GB-18, 4-8 ftbg	6/11/2012	ND	ND	ND	ND	360	ND	1,120
GB-19, 4-8 ftbg	6/11/2012	ND	17	ND	17	ND	ND	34
GB-22, 4-8 ftbg	6/11/2012	ND	ND	ND	ND	770	ND	2,480
CP-51 SCL		**60**	**700**	**1,000**	**260**	**12,000**	**930**	**NA**

EPA Method 8270	Sample Date	Acenaphthene	Acenaphthylene	Anthracene	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	Chrysene	Dibenzo(a,h)anthracene	Indeno(1,2,3-cd)pyrene	Fluoranthene	Fluorene	Naphthalene	Phenanthrene	Pyrene	Total SVOCs
Overburden SS-1	10/14/2011	ND	1,020	1,590	**10,500**	**8,260**	**8,090**	**5,960**	**8,490**	**1,210**	**4,410**	12,800	ND	ND	3,950	11,900	78,180
Overburden SS-2	10/14/2011	ND	276	345	**1,350**	**949**	922	**912**	**1,060**	ND	**609**	1,770	ND	ND	756	2,100	11,049
Split Samples with Tectonic Engineering, Inc.																	
B-1, 3.5-7.5 ftbg	4/19/2012	ND	ND	246	785	715	865	**908**	772	ND	ND	1,350	ND	ND	649	1,210	7,503
B-2, 4-7 ftbg	4/19/2012	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
GB-18	6/11/2012	NS	NS	ND	NS	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
GB-19	6/11/2012	NS	NS	ND	ND	170	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	170
GB-22	6/11/2012	NS	NS	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
CP-51 SCL		**20,000**	**100,000**	**100,000**	**1,000**	**1,000**	**1,000**	**800**	**1,000**	**330**	**500**	**100,000**	**30,000**	**12,000**	**100,000**	**100,000**	**NA**

Tectonic Engineering, Inc. Soil Sampling Results		Benzene	Toluene	Ethylbenzene	Total Xylenes	n-Butylbenzene	MTBE	Total VOCs
EPA Method 8260	**Sample Date**							
B-1, 3.5	4/19/2012		ND	ND	ND	ND	ND	ND
B-1, 6.5	4/19/2012		ND	ND	ND	110	ND	456
B-2, 4	4/19/2012		ND	ND	ND	ND	ND	ND
B-3, 3.5	4/19/2012		ND	ND	ND	ND	ND	ND
B-4, 3.5	4/19/2012		ND	ND	ND	ND	ND	ND
CP-51 SCL			**60**	**700**	**1,000**	**260**	**12,000**	**930**	**NA**

EPA Method 8270	Sample Date	Acenaphthene	Acenaphthylene	Anthracene	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	Chrysene	Dibenzo(a,h)anthracene	Indeno(1,2,3-cd)pyrene	Fluoranthene	Fluorene	Naphthalene	Phenanthrene	Pyrene	Total SVOCs
B-1, 3.5	4/19/2012	ND	ND	ND	**1,500**	**1,400**	**2,100**	ND	**1,400**	ND	ND	4,000	ND	ND	2,300	3,700	16,400
B-1, 6.5	4/19/2012	ND	ND	ND	260	ND	400	ND	320	ND	ND	570	ND	ND	490	540	2,580
B-2, 4	4/19/2012	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
B-3, 3.5	4/19/2012	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	390	ND	ND	ND	400	790
B-4, 3.5	4/19/2012	ND	ND	ND	980	**1,000**	**1,600**	480	**1,200**	ND	430	2,300	ND	ND	1,300	2,000	11,290
CP-51 SCL		**20,000**	**100,000**	**100,000**	**1,000**	**1,000**	**1,000**	**800**	**1,000**	**330**	**500**	**100,000**	**30,000**	**12,000**	**100,000**	**100,000**	**NA**

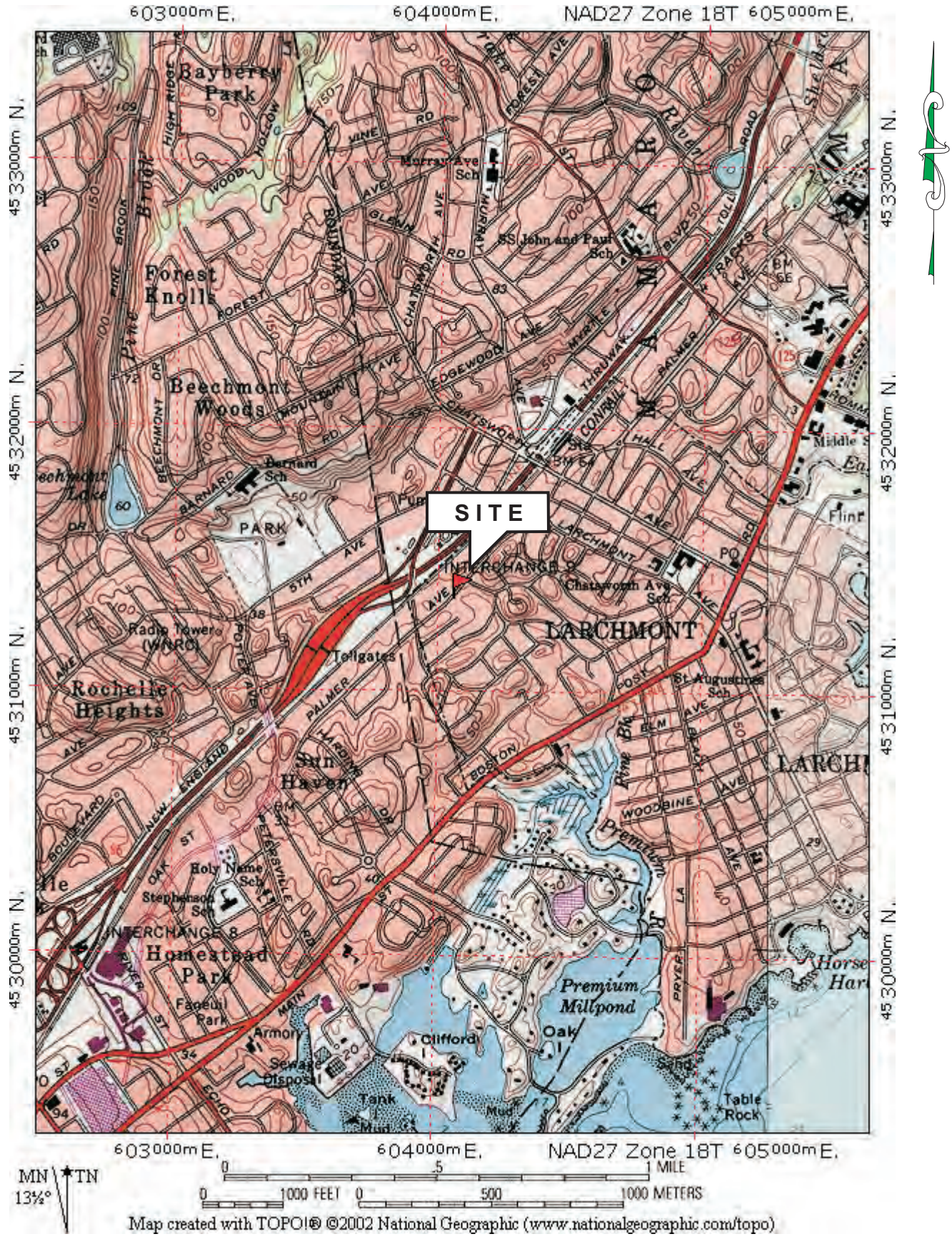
Total RCRA Metals: EPA Method 200.7

Sample	Arsenic	Barium	Cadmium	Chromium	Lead	Selenium	Silver	Mercury
Overburden SS-1	7.46	159	ND	**36**	333	1.2	ND	ND
Overburden SS-2	5.74	163	ND	32.1	142	0.702	ND	ND
B-2, 4-7 ftbg	16.7	230	ND	**259**	**666**	ND	ND	NA
NYSDEC Restricted Use Recommended Soil Cleanup Objectives	**16**	**350**	**2.5**	**36**	**400**	**36**	**36**	**1**

Results in ppb (parts per billion)
SB = Site Background
RCRA Metals results in parts per million
ND = Not detected
NS = Not Sampled

FIGURE 1
SITE LOCATION MAP

2101 and 2103 Palmer Avenue
Larchmont, New York



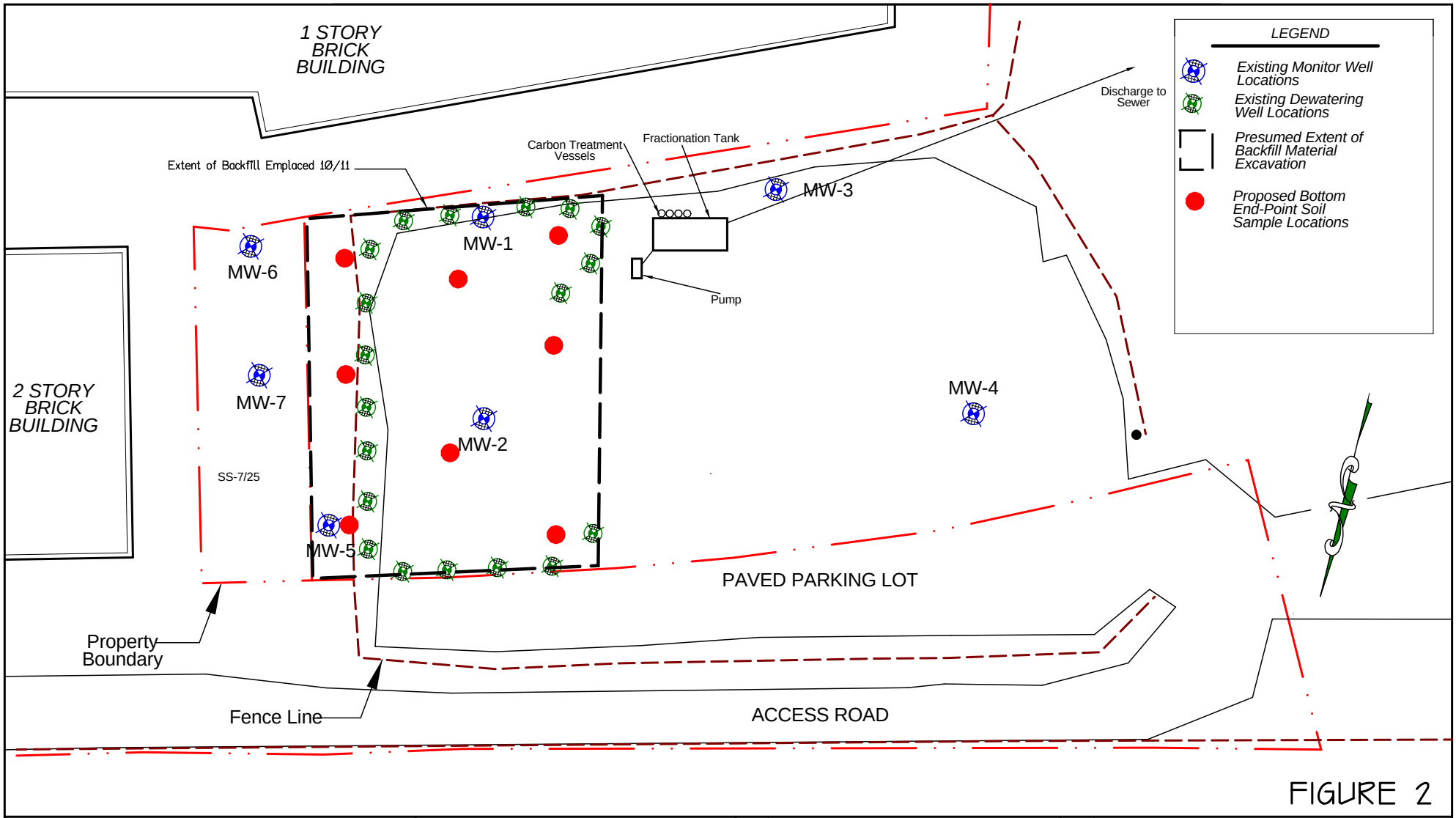


FIGURE 2

2101 & 2103 PALMER AVENUE LARCHMONT, NEW YORK	GENERALIZED SITE PLAN SHOWING PROPOSED BACKFILL EXCAVATION AREA AND DEWATERING WELL LOCATIONS	0' 20' 40'	HydroEnvironmental SOLUTIONS, INC. One Deans Bridge Road Somers, New York 10589
		SPILL REMEDIATION	APRIL 2013