

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau B

625 Broadway, 12th Floor, Albany, NY 12233-7016

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[www.dec.ny.gov](http://www.dec.ny.gov)

SENT VIA EMAIL

March 29, 2022

250 Seaport District, LLC  
Saul Scherl  
c/o The Howard Hughes Corporation  
199 Water Street, 28<sup>th</sup> Floor  
New York, NY 10038

Re: 250 Water Street (Site No. C231127)  
Remedial Action Work Plan Schedule

Dear Mr. Scherl,

The New York State Department of Conversation (NYSDEC) has reviewed the 250 Water Street Remedial Action Work Plan (RAWP) Schedule Change Notification dated March 15, 2022 and hereby approve the RAWP schedule change. Per the notification, the mercury hotspot removal (originally scheduled as the first remedial element) will start late June/early July 2022 after the local schools have closed for the summer break. The remedial action will now begin in the southwestern portion of the site in conjunction with installation of a foundation pile cap to satisfy the affordable housing 421-A program deadline requirements.

All remedial work must be completed in accordance with the approved 250 Water Street RAWP (November 2021). Please provide the NYSDEC 7-days notice prior to start of remedial activities.

Please contact the Department's Project Manager, Rafi Alam at [rafi.alam@dec.ny.gov](mailto:rafi.alam@dec.ny.gov) or Heidi Dudek at [heidi.dudek@dec.ny.gov](mailto:heidi.dudek@dec.ny.gov) if you have any questions or concerns.

Sincerely,



Heide-Marie Dudek  
Chief, Remedial Bureau B Section D  
Department of Environmental Remediation

EC:

S. Edwards – NYSDEC

J. O'Connell – RHWRE

R. Alam – NYSDEC

K. McCarthy - NYSDEC

R. Rivera – NYSDEC

C. Vooris – NYSDOH

S. McLaughlin – NYSDOH

S. Selmer – NYSDOH

S. Wagh – NYSDOH

P. McMahon – Langan

M. Raygorodetsky – Langan

M. Au – Langan

M. Chertok – Requestor's Attorney

March 15, 2022

Rafi Alam  
Division of Remediation  
New York State Department of Environmental Conservation  
625 Broadway  
Albany, New York 12233

**Re: Schedule Change Notification  
250 Water Street  
New York, NY  
BCP Site No. C231127  
Langan Project No. 170381202**

Dear Mr. Alam:

This letter serves as notification, on behalf of 250 Seaport District, LLC (the Volunteer), of a proposed schedule change to the start of the remedial action at the 250 Water Street site. The schedule included in the NYSDEC-approved November 15, 2021 Remedial Action Work Plan (RAWP) indicates that the first remedial task to be completed following Remedial Design is removal of the mercury-impacted soil hotspot. In response to requests from the community and schools surrounding the site, the Volunteer would delay the removal of the mercury-impacted hotspot until schools are closed for the summer session in late June/early July 2022 provided that, due to this delay of the hotspot removal, the Volunteer can commence remedial activities in conjunction with installation of a foundation pile cap to satisfy the affordable housing 421-A program deadline requirements. The proposed work is anticipated to begin on or about April 15, 2022, and is expected to require up to 45 to 60 calendar days to complete. A revised remediation schedule is included as Attachment A.

The proposed location and scope of this work is detailed below and is summarized in Figure 1:

- Installation of perimeter fencing to restrict unauthorized access to the work area. Fencing would consist of an 8-foot-high New York City Department of Buildings (NYCDOB)-approved plywood fence, placed either along the western and southern boundaries of the site and within the central part of the site, or around the entire property boundary. Placement of fencing is dependent on NYCDOB approval. The fenced area shown on Figure 1 will be adjusted as needed in accordance with NYCDOB approval.
- Installation of four, 13.375-inch-diameter steel piles to a depth of about 65 feet below grade surface (bgs) in the southwestern part of the site and placement of reinforcement and grout within each installed pile.
- Excavation and off-site disposal of historic fill and soil in an about 50-foot-long by 50-foot-wide area to a depth of about 8 feet bgs. Sloping and benching of the excavation area is

anticipated to facilitate installation of the pile cap in accordance with safety standards.

- Deeper localized excavation and off-site disposal of fill/soil from about 8 to 18.5 feet bgs and installation of formwork, steel reinforcement and concrete for construction of the pile cap.
- Excavation dewatering and treatment, as required, to accommodate construction of the pile cap. Prior to mobilization, the contractor would follow the Rules of the City of New York (RCNY) Title 15, Chapter 19, Use of the Public Sewers and the New York City Department of Environmental Protection (NYCDEP) "Procedure for Obtaining Letter of Approval for Groundwater Discharge to Sanitary or Combined Sewer" and will use the approval to obtain a Temporary Discharge of Groundwater into the City Sewer System Permit. The dewatering and treatment system will be designed, operated and maintained by a New York State-licensed Professional Engineer.

Work will be completed in accordance with the approved RAWP, including the Construction Health and Safety Plan (CHASP) and Community Air Monitoring Plan (CAMP).

Removal of the mercury-impacted soil hotspot and installation of associated support of excavation installation are anticipated to follow completion of the scope of work outlined above.

Please confirm Department approval of the above change.

Sincerely,

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



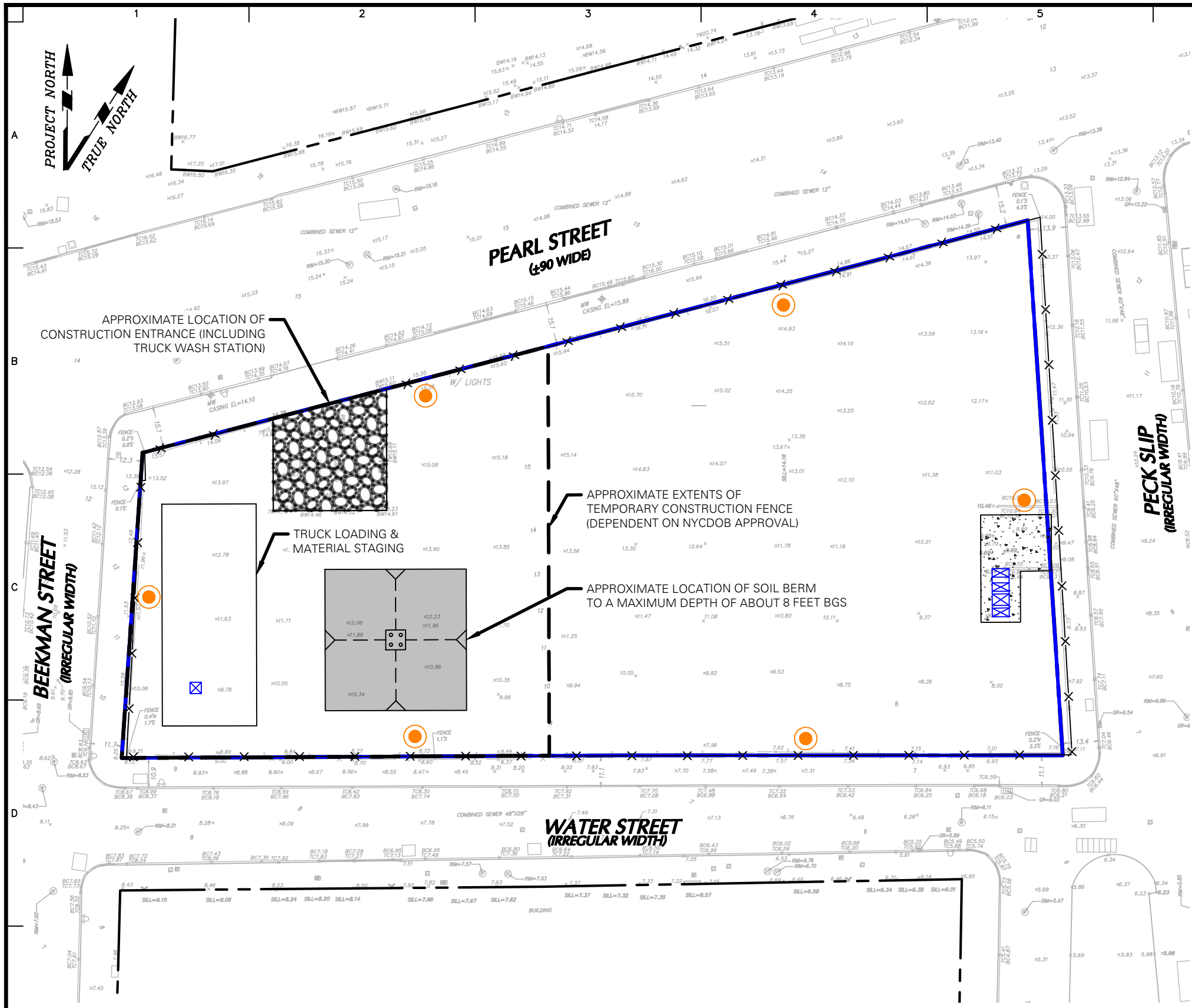
Mimi S. Raygorodetsky  
Principal/Vice President

Enclosure(s): Figure 1      Approximate Work Area


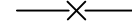




Attachment A      Remediation Schedule

cc: P. McMahon, M. Au

## Figures



**LEGEND**

-  SITE BOUNDARY
-  APPROXIMATE LOCATION OF SITE FENCE
-  APPROXIMATE EXTENTS OF TEMPORARY CONSTRUCTION FENCE
-  APPROXIMATE PERIMETER AIR MONITORING LOCATION
-  APPROXIMATE UST LOCATION
-  APPROXIMATE EXCAVATION AREA TO A MAXIMUM DEPTH OF ABOUT 8 FEET BGS

**NOTES:**

1. BASE MAP IS FROM THE SURVEY DRAWING ALTA/NSPS LAND TITLE SURVEY, COMPLETED BY LANGAN, DATED JUNE 07, 2018.
2. ELEVATIONS ARE REFERENCED TO THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD88).
3. UST = UNDERGROUND STORAGE TANK
4. BGS = BELOW GRADE SURFACE
5. NYCDOB = NEW YORK CITY DEPARTMENT OF BUILDINGS

**WARNING:** IT IS A VIOLATION OF THE NYS EDUCATION LAW ARTICLE 145 FOR ANY PERSON, UNLESS HE IS ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER, TO ALTER THIS ITEM IN ANY WAY.



**LANGAN**  
 Langan Engineering, Environmental, Surveying,  
 Landscape Architecture and Geology, D.P.C.  
 21 Penn Plaza, 360 West 31st Street, 8th Floor  
 New York, NY 10001  
 T: 212.479.5400 F: 212.479.5444 www.Langan.com

Project  
**250 WATER STREET**  
 BLOCK No. 98, LOT No. 1  
 CITY NEW YORK

Figure Title  
**APPROXIMATE WORK AREA**

Project No.  
 170381202  
 Date  
 02/24/2022  
 Drawn By  
 MA  
 Checked By  
 PM

Figure No.  
**1**

**Attachment A**  
**Remediation Schedule**

**Attachment A - Remediation Schedule  
Schedule Change Notification**

**250 Water Street  
New York, NY  
Langan Project No. 170381202  
BCP No.: C231127**

Item	Action	2021		2022												2023												
		NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	
1	NYSDEC Issues DD																											
2	RDIWP - NYSDEC Review																											
3	Remedial Design Investigation and Reporting																											
4	Mobilization/RAWP Implementation (421-A Foundation Construction Only)																											
5	RAWP Implementation (Mercury-Impacted Hotspot and Underground Storage Tank Removal)																											
6	Remainder of RAWP Implementation																											
7	FER/SMP/EE																											
8	Certificate of Completion																											

1. FER - Final Engineering Report
2. SMP - Site Management Plan
3. EE - Environmental Easement
4. RAWP - Remedial Action Work Plan
5. RDIWP - Remedial Design Investigation Work Plan