Randolph Houses RFP Addendum 2

RFP issue date: August 22, 2011

Addendum 2 issue date: October 5, 2011

Contents of the Addendum

A. Question and Answers – Enclosed is a summary of questions and answers discussed at the Mixed Finance Seminar that took place on September 15, 2011. Additional questions related to operating subsidy will be issued shortly in Addendum 3. Also included are questions and answers that have been sent to the Randolph email address through September 30, 2011. **Please note that all questions must be received no later than October 17.**

B. PowerPoint Slides from the Mixed-Finance Seminar held on September 15, 2011

C. Phase II Report – Enclosed is a Phase II Report from 2008 for the South Side of Randolph Houses in response to Question 33 in this Addendum.

D. Correspondence with SHPO – Enclosed is additional correspondence with SHPO (via NYCHA's Historic Preservation consultant AKRF). This is in response to Question 34.

E. Resident Data Book Statistics of Randolph Houses – In response to Question 35, more detailed information about the existing Randolph Houses residents on the North Side is included from NYCHA's 2011 Resident Data Book.

F. Revised D1 and D2 Forms – The original D1 and D2 forms for submission requested development and management experience within the past 7 years. These forms have been corrected to request information for the past 10 years (Question 37).

A. Questions and Answers

Questions received at the 9/15/11 mixed finance seminar and others received by email (through September 30) are included below.

Program Description

Q1: How many former Randolph Houses residents should we assume will return?
A1: Based on rates of return for previous projects where NYCHA tenants had been relocated, NYCHA expects that the 140 public housing units will be adequate to accommodate all returning households.

Q2: Should we assume any over income public housing residents returning?
A2: For purposes of this proposal, applicants should underwrite Randolph South assuming that all Public Housing units will be occupied by residents who are eligible for tax credit units. Should this not be the case, NYCHA will work with the selected developer to achieve a financially feasible plan.

Q3: How married is NYCHA to the unit distribution proposed in the RFP?
A3: Proposals should comply with the size distribution for the public housing units provided on page 15 of the RFP. For the non-public housing units, there is no prescribed size distribution, though family-sized units (2-bedrooms or larger) are encouraged.

Q4: Do the affordable units have to be intermixed in the North and South sides?
A4: Public Housing and other affordable units must be intermixed on the South Side as described on page 15 of the RFP. The North Side is all affordable units and no Public Housing. All affordable income tiers proposed for the North Side should be intermixed.

Q5: How will the mixing of public/non-public units in different phases affect the use of Federal Funds?
A5: The HUD capital funds will be used during the first phase of the development because that's where the public housing units will be located. The second phase will not include public housing and will not receive HUD capital funds.

Pro-Forma Calculations and Capital Subsidies

Q6: What should we assume for public housing unit AMIs?
A6: Proposals should assume that household income for Public Housing tenants will average 38% of AMI. Refer to page 16 of the RFP for details.

Q7: What is the total rent for the public housing units?
A7: For the purposes of this proposal, tenant rents for public housing units will be 30% of tenant's income. Legally, tenants are entitled to rents that are equal to the lesser of 30% of the tenant's income or NYCHA flat rents which are calculated based on household size and household income for the year that units are being leased. NYCHA updates the flat rents on an annual basis. Rents for 2012 and 2013 have not yet been calculated. In the absence of this information, developer should assume tenant rents equal to 30% of public housing tenant incomes. Assuming that incomes of public housing tenants average 38% AMI, then rents for public housing units would be 30% of 38% of AMI. Should the tenant rent for public housing units be insufficient to cover the maintenance and operating expenses of those units, the owner may receive operating subsidy, up to the amount of HUD determined limits, to cover operating shortfalls of the public housing units.

Q8: Are you expecting that the non-public housing units will need to subsidize the public housing units because the operating expenses on the public units may exceed the tenant rent plus operating subsidy? Are there any legal barriers restricting the public units from draining the non-public units in that circumstance?
A8: Based on the assumed average household incomes of NYCHA residents and typical operating costs we do not necessarily expect cross-subsidization to be required, but applicants are responsible for running their own analyses. Generally there are no legal barriers preventing non-public housing units from cross-subsidizing public housing units.

Q9: Should we include the public housing units in sizing our debt and if so should we include both the tenant portion and operating subsidy? It does not appear that the pro-forma model is including the public housing rents.
A9: No, neither public housing tenant rents nor operating subsidies should be used for sizing debt. The pro-forma attached to the RFP excludes tenant rents and operating subsidy from public housing units in calculating NOI.

Q10: Will NYCHA use program income (i.e. developer fees, repayment of principal and interest?) generated from the HUD funded public housing units being built in the first stage of this project for affordable units in the second phase?
A10: NYCHA does not expect to contribute program income to the second phase of this development. Proposals should not include program income as a source of funding.

Q11: Are there any Part B expenses (i.e. transaction fees, relocation fees) that would reduce the available amount of the $40 million in HUD capital funds?
A11: NYCHA will require an Administration Fee and a Development Fee to cover its administrative and transaction costs, including relocation costs. Refer to page 23 of the RFP for details on the fees. The Administration Fee may be paid from HUD Capital Funds. The Development Fee must be paid from other sources.

Q12: What is the structure of the HUD capital funds and how are they accessed? What are the tax ramifications?
A12: The capital funds will be structured as a soft loan with no interest or nominal interest but, in any case, structured so that the loan constitutes true debt under Section 42 of the IRS Code in order to generate tax credit basis. The funds can be drawn down as construction costs are incurred.

Ownership and Related Parties, Affordability Term

Q13: Is there an expectation that NYCHA is going to own the public housing units?
A13: No, the public housing units will be owned by the developer. NYCHA will be the land owner on the South Side, but developer will own the improvements.

Q14: HUD's mixed finance guidelines require the PHA to play one of several specified roles in a project. Which role would NYCHA play in this project? Is NYCHA expecting to step in at the end of the 15 year tax credit restriction, and if so what role would they play?
A14: In this project NYCHA is providing HUD capital and operating funds. Additionally, for Randolph South, and contrary to statements made earlier, NYCHA may retain a purchase option and right of first refusal at the conclusion of the 15-year tax credit period. In any case, this project qualifies for the mixed finance program under the "Otherwise in accordance with HUD regulations", which allows projects to receive HUD funding if they demonstrate a commitment to long term affordability.

Q15: Does the 50 year affordability restriction on this project satisfy HUD's concerns for long term affordability?
A15: HUD requires a "Declaration of Restrictive Covenant" on projects that use its capital funding. The covenant specifies the number and size of units that must be operated as public housing and requires affordability for the longer of 20 years for a rehab project (40 years for new construction) from when the first unit becomes available for occupancy, or 10 years after the last fiscal year in which an operating subsidy is provided. The Randolph RFP actually requires a 50 year affordability restriction on the entire project, which will run concurrently with the HUD restriction, and could extend beyond it.

Q16: If the developer and general contractor are related parties does NYCHA need to show HUD that the general contractor was the lowest bidder under their guidelines?
A16: Procurement rules do not apply if the PHA has competitively selected its developer partner and the PHA does not exercise significant functions in managing development of the project. The developer will assemble its own team for the project, including a general contractor. If, however, the general contractor is related to the developer, the developer must either (a) demonstrate to HUD that the related GC's bid is the lowest submitted in response to a public

request for bids or (b) obtain a waiver from HUD which requires a certification that the prices charged are reasonable and appropriate.

Disposition, Real Estate Taxes, Property Management and Marketing Responsibility

Q17: Has the disposition application been submitted to HUD yet?
A17: The Section 18 disposition application will be submitted by NYCHA after a developer has been selected.

Q18: When the property is ground leased does it trigger city and state real estate taxes?
A18: Yes, real estate taxes will apply but exemptions and/or abatements may be available. Please refer to pages 26-27 of the RFP for details.

Q19: Are there restrictions in the RFP or by HUD regarding the management company entity or the fees they can charge?
A19: The cost controls in the Mixed Finance program limit property management fees to either 6% of effective gross income, a flat fee per unit per month (PUM) for occupied units per HUD Field Office guidelines, or 6% of imputed tax credit rent. There are no HUD restrictions on the property management entity as long as the pricing is considered fair. HUD may impose additional scrutiny on the use of a related property management company to ensure costs controls are in place.

Q20: Which entity -- NYCHA or the property manager -- will be determining eligibility of public housing tenants and conducting income certification?
A20: At initial occupancy of the project, NYCHA will provide a list of current and former Randolph residents who are eligible to return. The developer must accept these residents. For public housing units not filled by current or former residents, NYCHA will provide a pool of qualified applicants from the public housing waiting list. For these NYCHA will conduct the initial screening (including income certification). The developer will have the right to screen and select tenants from this pool. Please refer to pages 17 and 25 in the RFP.

Q21: Is there an annual recertification requirement for public housing units? Could there be a disruption in the operating subsidy if a tenant does not re-certify their income? Which entity (NYCHA, property manager, developer) is responsible?
A21: The project owner and property manager are responsible for annual tenant income re-certifications, both for tax credit purposes and for public housing requirements. Public housing rents are based on tenants' incomes, and may be adjusted as incomes change. Tenant leases should contain enforcement provisions in the event tenants fail to cooperate with the recertification process. The owner, through the property manager, will be required to obtain all the necessary public housing income certifications such that NYCHA is able to provide a related, overall certification to HUD that the individual tenant certifications have been completed. HUD may seek confirmation through its audit process. There are no definitive remedial actions HUD must take, although it may be possible that HUD would seek to recapture previously paid subsidy or to adjust future payments should a HUD audit find that the tenant certifications have not been completed as required. The obligation of NYCHA to provide subsidy will be distinct from such remedial actions and will be set forth in the Regulatory and Operating Agreement between NYCHA and owner in a manner that ensures owner meets its obligations related to tenant certification such that NYCHA is able to provide the corresponding certifications to HUD.

Additional Questions (September 20 – September 30)

Please note that all questions must be received no later than October 17.

Q22: Although not physically part of the development, can the NYCHA-owned lots on 113th and 115th Streets be included in the zoning lot calculation even though they would remain separate tax lots?
A22: Proposals should assume that these two lots would remain separate zoning lots from the project site and that no development rights from the lots would be transferred to the proposed project.

Q23: Are firms that worked on the Rehabilitation Feasibility Study as subconsultants to Rogers Marvel allowed to be part of applicant teams?

A23: While all applicants must identify an architect as part of their team, the roles of the various types of firms that may report to the architect in the Randolph Houses proposal need not be identified at this time. Proposals will not be judged based on firms such as engineers and code consultants that would support the project's architect. In light of this, firms that participated in the feasibility study as subconsultants will not be prohibited from participating in the rehabilitation of Randolph Houses.

Q24: Is AKRF (who has worked as a historic resources consultant to NYCHA on Randolph Houses) allowed to be part of applicant teams?
A24: AKRF may not take the role of historic resources consultant on an applicant team.

Q25: Would it be permissible to demolish some of the buildings so that a new building could be constructed?
A25: As described in the RFP, proposals must meet the conditions in SHPO's letter of "no adverse effect." The facades of the existing buildings may not be demolished.

Q26: Will there be another site tour?
A26: No.

Q27: In the code review it was mentioned that a "pre-consideration" conference with the Department of Buildings (DOB) should be held regarding the 50% replacement value question as it relates to the refined scope. Was there a meeting held on this issue? If so, was there a conclusion?
A27: NYCHA did not undertake consultation with DOB regarding the test fit plans as part of the Rehabilitation Feasibility Study. The selected developer should consult with DOB as the building designs are developed.

Q28: Where the test fit plans dimensions do not meet the HPD unit guidelines should it be assumed that the test fit plans are still acceptable to HPD?
A28: The test fit plans illustrate one approach to redeveloping the site given a variety of constraints. Architects should feel free to develop alternate solutions. Regardless of their approach to the rehab, they should try to comply with HPD design guidelines to the greatest extent possible, even as they balance physical and operational viability, financial feasibility and seeking the maximum number of units.

Q29: Can NYCHA provide the test fit drawings of the buildings in CAD?
A29: CAD files of the test fit plans will not be made available. Neither HPD nor NYCHA have or own the CAD files. Additionally, the existing conditions drawings are not available in CAD.

Q30: Is there a survey of the property/buildings that can be sent out?
A30: Surveys of the property and buildings are not available. However, some data regarding building elevations can be found on the existing conditions drawings available for download via the Image Viewer software as described in Addendum 1. Originally, drawings for 7 buildings representing the various building types at Randolph Houses were posted. Existing conditions drawings for additional buildings have been made available for download via the Image Viewer software. The additional documents can be downloaded at:
https://assets.nycha.info/8c45304d223cc535648d3a71c02b7185/additionalQwebDrawings.zip

Q31: Will information regarding grade elevations, ground floor heights, typical floor heights and total building heights be made available?
A31: Exhibit B of the RFP includes section and elevation drawings that show floor to floor heights and stoop elevations. As noted above, additional drawings have been made available for download.

Q32: Measured elevations are requested in the RFP for Tab 1. Is the consultant expected to measure the facades for this purpose? Presumably the facades included with the RFP are accurate enough for this proposal.
A32: Applicant teams are not expected to measure the facades. Measurements on the applicants' elevation drawings may come from the existing conditions sectional and elevation drawings provided by NYCHA.

Q33: The Phase I mentions some environmental testing may have been done in the past. Are there any reports that you can distribute? Any information about the amount of ACM in the buildings and/or a Phase II will be helpful.
A33: Phase II testing was done in 2008 for the south side of the street for the previous plans for demolition and new construction. That Phase II report is Attachment C to Addendum 2 to the RFP. Based on the age of the buildings, the presence of lead and asbestos containing materials should be assumed. Detailed testing results for lead and asbestos cannot be provided at this time.

A34: Are there historic documents (photos, plans, etc.) that can be sent out? We are particularly interested in reviewing any documents that SHPO may have used to make its determination regarding the project and the National Register may have used in designating the West 114th Street historic district.
Q34: At the start of work on NYCHA's Rehabilitation Feasibility Study, NYCHA (via its consultant AKRF) requested a re-evaluation of the buildings' eligibility for the State and National Registers of Historic Places. That correspondence, including SHPO's response, is included as Attachment D to Addendum 2.

Q35: Can you provide more detailed information about the existing Randolph Houses residents on the North side, and those previously living on the South side who may return? Specifically, we are looking for: the age of family members; employment status (employed or unemployed); number/percentage of single-parent headed households, broken down by gender (female or male); number/percentage of households headed by adults aged 62 or older.
A35: The Randolph Houses entry from NYCHA's 2011 Resident Data Book is attached to this addendum as Attachment E. Information in the Resident Data Book is current as of January 1, 2011.

Q36: Should the resident services provided be limited only to public housing residents (like at other NYCHA developments), or may they be open to the other low-income apartment residents on-site, as well as local community members (provided the proper security measures are in place)?
A36: Any proposed resident services should be available to all residents of the rehabilitated development.

Q37: Regarding Form D-1 and Form D-2 – since the Threshold Requirements are 100 units gut rehabbed and 100 units managed within the past 10 years, why do these forms ask for the information for only the past 7 years? Shouldn't the information be provided for the past 10 years?
A37: The forms have been updated to request information for the past 10 years. The updated Forms D-1 and D-2 are attached to this addendum as Attachment F.

ATTACHMENT B:
PowerPoint Presentation for HUD Mixed-Finance Seminar
September 15, 2011

Overview of Mixed-Finance Development of Public Housing

24 CFR 941, subpart F

CSG | advisors

Ballard Spahr LLP

Hallmarks

- The primary option for public housing modernization or development
- Combines federal public-housing funds with state, local and/or private funds
- Private entities central to development; often include developer, investor and/or manager of public housing

Benefits

- Private funds fill unmet housing need and bolster housing authorities
- Mixing incomes can bring social benefits
- Projects remove distressed real estate, reduce crime, poverty, stigma
- Involvement of private developers investors, lenders, and/or state and local governments fosters quality, capacity

Revenue Sources

- HUD Capital and Operating Funds, including Replacement Housing Factor (RHF) and Capital Fund Finance Program (CFFP) funds
- HOPE VI and Choice Neighborhoods
- Community Development Block Grants (CDBG)
- HOME
- Public Housing Mortgage Program (PHMP)
- Low-Income Housing Tax Credits (LIHTC)
- Tax-exempt bonds
- State and local funds
- Conventional financing

Legal Authority

- HOPE VI initially authorized through annual appropriations (FY 1993-1999)
- In the FY 1999 appropriations, Congress authorized the HOPE VI program at Section 24 of the US Housing Act of 1937, which was reauthorized as part of the American Dream Downpayment Act of 2003
- Section 35 of the US Housing Act authorizes mixed-finance development, generally

Regulations

- 24 CFR 941, subpart F
- Other requirements are applicable to mixed-finance development, including, for example:
  - 24 CFR part 85 – Procurement (unless the PHA has competitively procured its developer partner and does not exercise significant functions in managing development of the project)
  - 24 CFR 941.202 – Site and Neighborhood Standards
  - 24 CFR 941.203 – Design and Construction Standards
  - 24 CFR 941.207 – Relocation and Acquisition
  - 24 CFR 941.306 – Maximum Development Cost
  - 24 CFR parts 50 & 58 – NEPA/Environmental Clearance (depending on the source of funds)
  - Section 12(a) of the US Housing Act of 1937 - Davis-Bacon Wage Rates

Mixed-Finance Statute: Project Types

- Developed by a PHA or affiliated entity
- Developed by an entity in which a PHA is the general partner/managing member
- Developed by an entity that grants a PHA first option to purchase at close of LIHTC compliance period
- Otherwise in accordance with HUD regulations

Salient Considerations

- Public housing **indistinguishable** from non-public housing in project
- Cost Controls
- Ratio of Public Housing Funds to Other Sources
- Limitations on Uses of Public Housing Funds
- ACC Operations
- Program Income

Mixed-Finance Regulations: Equivalency of Units

"[P]ublic housing units that are built in a mixed-finance development must be comparable in size, location, external appearance, and distribution to the non-public housing units within the development."

Cost Controls and Safe Harbor Standards

- Issued April 9, 2003 (available at www.hud.gov/offices/pih/programs/ph/hope6/grants/admin/safe_harbor.pdf)
- Developer Fee – 9% (up to 12% w/sufficient justification)
- Pay Out Schedule for Developer Fee/Overhead
- Contractor Fee (Overhead – 2%; Profit – 6%; General Conditions 6%)
- PHA Administrative/Consultant Costs – 3% of all project costs (hard and soft costs, excluding Community Supportive Services expenses)

Cost Controls and Safe Harbor Standards

(continued)

- Third-Party Predevelopment Costs – in non-PHA developed situations, the PHA is not to cover more than 75% of predevelopment costs

- Property Management Fees (6% of effective gross income; a flat PUM fee supported by local project-based Section 8 program (refer to Field Office guidelines); or 6% of imputed tax credit rent for public housing units).

Total Development Costs/Housing Construction Costs

- Required by Section 6(b) of the U.S. Housing Act of 1937 and 24 CFR 941.306
- TDC and HCC limits vary by location and building type (single family, elevator building, etc)
- TDC and HCC limits do not actually limit development costs; rather they limit the amount of public housing funds that can be used based on the number and type of public housing units in a development.
- Ratio of public housing funds to total sources cannot be greater than the ratio of public housing units to total units

Ineligible Uses of Public Housing Funds

- Reserves
  - (initial capitalization not permitted, but may be replenished from public housing rents and/or public housing operating subsidy)
- Developer fee
- Debt service
  - Section 9(e)(1)(I) of the US Housing Act of 1937 identifies among the permissible uses of operating funds, “the costs of repaying, together with rent contributions, debt incurred to finance the rehabilitation and development of public housing units, which shall be subject to such reasonable requirements as the Secretary may establish.”
  - Debt repayments for Capital Fund and Energy Performance Contract borrowings are permitted under separate legal authority.
- Development of units over the “Faircloth” limit
  - the number of units within a PHA’s portfolio as of October 1, 1999 (provided certain, limited exceptions apply)

ACC Operating Considerations

- Tenant Incomes
  - household incomes for public housing tenants must be below 80% of AMI
  - Average income of NYCHA public housing residents is 40% of AMI
- Tenant Rents
  - unlike requirements governing tax credit units, tenant rents (including utilities) cannot exceed 30% of household income and are often lower due to PHA policies.
- Operating Subsidy – operating subsidies provided by HUD may be well below the cost of operating the public housing units.
  - Total rent plus subsidy is often at or below 30% tax credit rents and well below Section 8 rents and subsidy.

ACC Operating Considerations

(continued)

- Operating Losses
  - public housing units often operate at a loss, so unsubsidized tax credit units and project-based Section 8 (PBS8) units often used to cross-subsidize public housing units
  - PBS8 units limited to maximum of 25% of development, except for senior/ special needs

Program Income Rules

- Program income includes revenues received by the PHA from developer fee, repayments of public housing-funded loans, and other fees paid to a PHA or its affiliates.
- HUD requires that the PHA agree to use these funds for affordable housing purposes, preferably at the public housing site or subsequent phases of redevelopment.

Mixed-Finance Regulations: Project Proposal Contents

- Activities and parties
- Financing
- Operating subsidy-distribution methodology
- Development, site, market, facilities
- Relocation plans
- Operating feasibility
- HVAC life cycle
- Local-government comments
- Construction cost
- PHA certifications and assurances to HUD:
  - Authority to act
  - Procurement process
  - Responsibility for public-housing requirements

Mixed-Finance Proposal/Approvals

Rental Term Sheet and Mixed-Finance Proposal
(24 CFR 941.606)

- Submission required 90 days prior to anticipated closing
- HUD's form of a lender term sheet; follows form HUD 50030
- A construction and development budget (F-1)
- Total Development Cost calculation
- Unit breakdown

Mixed-Finance Proposal/Approvals

Rental Term Sheet and Mixed-Finance Proposal Submittal (continued)

- Certifications and Assurances executed by the PHA Executive Director (or, in NYCHA's case, the GM)
- Development draw schedule
- Operating pro-forma
- Project Expense Level (PEL) calculator

Mixed-Finance Evidentiary Submission

- Must be made 45-60 days prior to anticipated closing date
- All documents must be in final, unexecuted form
- Reviewed by HUD grant manager, field office staff, HUD Office of General Counsel

HUD-Required Evidentiaries

- Development Agreement
- Mixed-Finance ACC Amendment
- Owner organizational documents
- Regulatory and Operating Agreement
- Management Agreement
- Ground Lease or land disposition
- Purchase Option/ROFR
- Declaration of Restrictive Covenants in favor of HUD
- Title Policy and Survey
- Agreement with local government/Cooperation Agreement or certification
- Financing documents
- HA Certifications and Assurances
- Legal Opinions

Proposal Approval

- Initial screening for completeness
- Technical processing:
  - PHA authority
  - Eligibility and reasonableness of funding
  - Viability of development
  - Protection of federal investment
  - Equivalency of units
  - Proportion funded by public-housing funds
  - Environmental review
- Approval, subject to total development cost limits
- ACC Amendment and/or grant agreement

Other HUD Approvals

- Section 18 Demolition/Disposition – Mixed-Finance Streamlined Method
- Environmental Clearance
- Project-Based Vouchers (if applicable) requires Subsidy Layering Review and additional HUD review if units are considered PHA-owned units

Mixed-Finance Amendment

Essential PHA Obligations and Certifications

- Obligation to take steps necessary to enforce the provisions of the ACC
- Amendment and the implementation of the development proposal
- Irrevocable commitment of funds
- Timing of pay-in of public housing funds (typically 30-60 days after closing)
- Disbursements from LOCCS must be applied to incurred costs within 3 days of draw down

Mixed-Finance Amendment Exhibits

- Describes participating parties
- Provides overview of transaction, restating contents of RTS
- Sets out development schedule and unit mix
- Includes construction and permanent budget per RTS
- Identifies Ratio of public housing funds to private and other public funds w/construction cash flow
- Program Income Certification

HUD Declaration of Restrictive Covenants

- Use Restriction in New Construction extends for the longer of 40 years from when first unit becomes available for occupancy or 10 years after last fiscal year in which operating subsidy is provided.
- Use Restriction in Rehabilitation/Modernization extends for the longer of 20 years from when first unit becomes available for occupancy or 10 years after last fiscal year in which operating subsidy is provided.
- Use Restriction in an Operating Subsidy Only Transaction extends for 10 years after last fiscal year in which operating subsidy is provided to the project.

HUD Declaration of Restrictive Covenants

(continued)

- Permits pledging of public housing collateral financed by the project (i.e., the PH Units and other assets built with public housing funds) and allows foreclosure subject to continued operation of public housing units in accordance with the Declaration
- Limits transfers without prior written HUD approval

Regulatory and Operating Agreement

- Operating Subsidy Methodology (terms negotiated between PHA and owner for payment of operating subsidy in exchange for operation of the public housing units in accordance with the R&O)

- Remedies upon diminished operating subsidy or operating shortfalls

- Reserves – cannot be capitalized from public housing funds; any public housing funds used to replenish must be applied to public housing eligible costs (not to payment of debt, exit taxes, or distributions to partners)

Regulatory and Operating Agreement

- Types of Reserves
  - ACC Reserve - to bridge delays or shortfalls in ACC Subsidy or unexpected increases in operating expenses of public housing units
  - Operating Reserve - typical in transactions involving a mix of public housing and non-public housing units
  - Replacement Reserve - not initially capitalized
- Limitations
  - Segregated subaccounts for public housing rents or operating subsidies
  - Such funds must be returned to the PHA after dissolution of owner, disposition of project or casualty/condemnation without restoration and used for other low-income/public housing eligible uses
- Must be invested in certain permitted investments

Regulatory and Operating Agreement

(continued)

- Management requirements (PHA imposes requirements on Owner who, in turn, imposes these upon the management agent)
  - Admissions and Continued Occupancy Plan and PHA Plan apply to the PH Units
  - PH Units must be rented to income-eligible households (i.e., those at or below 80% of AMI)
    - Section 35 of the US Housing Act of 1937 permits lower income limits to ensure tax credit 60% AMI limitation can be met
    - Public housing residents whose income grows beyond 80% of AMI may not be evicted or lease terminated solely due to such increase

Loan Documents

- No pledge of public housing assets to satisfy guaranties, indemnifications or debt service (although pledge of subject PH assets as noted above is permitted subject to the HUD Declaration)
- Casualty and Condemnation provisions must allow restoration whenever feasible (feasibility may be determined by the parties)
- Subordination of lien to the HUD Declaration

Partnership/Operating Agreement

- No pledge of public housing assets to guaranties, indemnifications, debt service (only as permitted by the HUD Declaration)
- No distributions of public housing funds to partners/members of owner (i.e., operating subsidies, public housing rents or other public housing income)
- Conflicts resolved in favor of Applicable Public Housing Requirements

Priority of HUD's Applicable Public Housing Requirements

- Imposed through Declaration of Restrictive Covenants recorded in first position ahead of ground lease, liens or other restrictive covenants

ATTACHMENT C:
PHASE II Report for 208, 220, 228 and 240 West 114th Street

FINAL
Phase II Environmental Site Investigation

For

A. Philip Randolph Houses
208, 220, 228 and 240 West 114th Street
Manhattan, NY 10026

Prepared for:

New York City Housing Authority
Department for Development
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May 2008

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EXECUTIVE SUMMARY

At the request of the New York City Housing Authority (NYCHA), PB Americas, Inc. (PB) has completed a Phase II Environmental Site Investigation (ESI) for the property located at 208, 220, 228 and 240 West 114th Street (Block 1829, Lots 41, 46, 51, and 57) (Site) located in the A. Philip Randolph Houses in Manhattan, New York. The Site includes basements in existing, largely vacant apartment buildings located on the south side of West 114th Street. The Site occupies approximately 1.1 acres of land and has been developed with 22 five-story residential apartment buildings, each with a basement, that are owned by the NYCHA. A small court yard and playground is present at the eastern end of the structures and a vacant lot is located south of 234 West 114th Street. The Site is located within Block 1829 and bounded by West 114th Street to the north, a six-story residential apartment buildings along Adam Clayton Powell Jr. Boulevard to the east, residential apartment buildings along West 113th Street to the south, and five-story apartment buildings along Frederick Douglas Boulevard to the west.

This Phase II ESI investigation was conducted to address Recognized Environmental Conditions (RECs) that were identified at the Site originally reported in a Phase I Environmental Site Assessment (ESA) prepared by PB in August 2007. During the Phase I ESA site visit, four aboveground storage tanks (ASTs) were noted at the Site. A closed New York State Department of Environmental Conservation (NYSDEC) spill listing is associated with the discovery of oil and debris on the floor inside three of the tank vaults.

The Phase II ESI was completed to determine if the RECs and environmental concerns have impacted the Site and if additional investigation and/or remediation is warranted. The Phase II ESI consisted of the following:

- The advancement of three soil borings in each of the four basements using portable hand drilling equipment and an electric core drill, a striker-bar, a 75-pound weight and a split-spoon sampler. The bore holes were drilled to a maximum depth of ten feet below grade (fbg), from the basement floor. One grab and one composite soil sample was collected from

each boring, one composite sample from all of the borings in each building was also collected.

- Laboratory analysis of the boring grab soil samples for NYSDEC Spill Technology and Remediation Series (STARS) Memo # 1 volatile organic compounds (VOCs) according to the United States Environmental Protection Agency (USEPA) Method 8260, laboratory analysis of the soil column composite soil samples for NYSDEC STARS semi-volatile organic compounds (SVOCs) according to the USEPA Method 8270, and laboratory analysis of the four building soil composite samples for Target Analyte List (TAL) Metals by USEPA Method 6010/7000 series and Total Petroleum Hydrocarbons (TPH).

In order to evaluate the subsurface soil quality, laboratory analytical results were compared with the appropriate regulatory standards and guidance values. The analytical results of the soil samples were compared to the criteria published by the NYSDEC for soils. The NYSDEC Technical and Administrative Guidance Memorandum #4046 (TAGM #4046) dated 1994 (and updated 2000) provides the Recommended Soil Cleanup Objectives (RSCOs). NYSDEC TAGM #4046 also provides guidance for remedial actions at NYSDEC Inactive Hazardous Waste and Spill sites, based on health-related concerns and available clean-up technologies. These include the USEPA's Health Based Guidance Values. The NYSDEC STARS Memo #1, dated 1992, provides guidance for the handling, disposal and/or reuse of non-hazardous petroleum-contaminated soils. Soils that meet beneficial use conditions, as contained in STARS Memo #1, are no longer a solid waste in accordance with NYCRR Part 360-1.2(a)(4).

Field procedures, including photo-ionization detector (PID) readings and visual and olfactory indicators of contamination were utilized during drilling and sampling activities. The analytical results confirmed the following:

- VOCs were not detected above the NYSDEC Toxicity Characteristic Leaching Procedure (TCLP) Alternative Guidance Values (STARS), the USEPA Health Based Guidance Values or the NYSDEC TAGM #4046 RSCOs in any of the soil samples collected.

- Select SVOCs were detected above applicable standards only in B-05. The compounds that exceed either the NYSDEC STARS Memo #1 TCLP Alternative Guidance Value and/or the NYSDEC TAGM #4046 RSCOs include benzo(a)anthracene, benzo(b)pyrene, benzo(b)fluoranthene, chrysene, fluoranthene, phenanthrene, and pyrene. These parameters are typically found in fuel oil products and coal/ash by-products.

- Select metals were detected above applicable standards in all four building-wide composite soil samples collected. Beryllium, chromium, copper, iron, magnesium (B-220), mercury, nickel, vanadium (B-208) and zinc present either above the NYSDEC RSCO and/or the Eastern USA Background Concentration (as listed in the NYSDEC TAGM). None of these metals were detected at concentrations great enough to indicate hazardous soil conditions. The presence of these metals is likely indicative of the fill material beneath the building.

- TPH fingerprint analysis results indicate that low concentrations of typical weathered hydrocarbons were identified in the soil beneath two of the four buildings (208 and 228 West 114th Street). Presence of these hydrocarbons in the soil may be related to use of historic fill material beneath the building.

Based on the results of the field investigation and a comparison of the analytical results to the NYSDEC TAGM #4046 RSCOs and the NYSDEC STARS Memo #1 guidance values, the following conclusions and recommendations are presented:

- Prior to any subsurface work at the Site, the contractor must develop and submit a site-specific Health and Safety Plan (HASP) that meets the requirements set forth by the Occupational Safety and Health Administration (OSHA), the New York State Department of Health (NYSDOH) and other applicable regulations. The HASP should identify the possible locations and risks associated with potential contaminants that may be encountered during excavation/construction activities and the administrative and engineering controls that will be utilized to mitigate concerns.

- In addition to the HASP, a Material Handling Plan (MHP) must also be developed and submitted prior to the initiation of any on-site work. This MHP should identify provisions

and a contingency for managing, handling, transporting and disposing of non-hazardous SVOC and metals impacted soils, including petroleum impacted soils and potentially hazardous soils, including hazardous for lead, as a contingency. This plan should include specific protocol and procedures that will be utilized to manage the waste in accordance with applicable regulations, including all soil disposal sampling requirements. In addition, the MHP must also address the handling and disposal of groundwater in the event dewatering is required during the construction process.

- Based on the analytical results the soils beneath the Site can be classified as non-hazardous contaminated.

- Dust control procedures should be developed and put in place during any proposed excavation activities to minimize the creation and dispersion of fugitive airborne dust. The Contractor shall implement strict dust control measures to protect the workers and the downwind community from potential airborne contaminants released as a direct result of construction activities. The dust control procedures should be in accordance with NYSDOH generic Community Air Monitoring Plan (CAMP) as described in Appendix 1A of the NYSDEC Draft Division of Environmental Remediation (DER)-10, published December 25, 2002.

1.0 INTRODUCTION

1.1 Background Information

At the request of the New York City Housing Authority (NYCHA), PB Americas, Inc. (PB) has completed a Phase II Environmental Site Investigation (ESI) for the property located at 208, 220, 228 and 240 West 114th Street (Block 1829, Lots 41, 46, 51, and 57) (Site) located in the A. Philip Randolph Houses in Manhattan, New York. The Site includes basements in existing, largely vacant apartment buildings located on the south side of West 114th Street. The Site occupies approximately 1.1 acres of land and has been developed with 22 five-story residential apartment buildings, each with a basement, that are owned by the NYCHA. These buildings are proposed to be demolished and be replaced with new NYCHA residential buildings that would cover most of the Site. A small court yard and playground is present at the eastern end of the structures and a vacant lot is located south of 234 West 114th Street. The Site is located within Block 1829 and bounded by West 114th Street to the north, a six-story residential apartment buildings along Adam Clayton Powell Jr. Boulevard to the east, residential apartment buildings along West 113th Street to the south, and five-story apartment buildings along Frederick Douglas Boulevard to the west. A site topographic map is provided as Figure 1 and a site location map is provided as Figure 2.

The investigation was conducted to address recognized environmental conditions (RECs) and environmental concerns that were identified at the Site in the Phase I Environmental Site Assessment (ESA) developed by PB, dated August 2007. During the Phase I ESA site visit, four aboveground storage tanks (ASTs) were noted at the Site. A closed New York State Department of Environmental Conservation (NYSDEC) spill listing is associated with the discovery of oil and debris on the floor inside three of the tank vaults. The Phase II ESI was completed to determine if these RECs have impacted the Site and if additional investigation and/or remediation is warranted.

1.2 Scope of Work

At the request of the NYCHA, PB conducted the Phase II ESI fieldwork, in conjunction with Jersey Boring and Drilling Company, Inc. (Jersey Boring) who performed the utility clearing and drilling activities. The investigation consisted of:

- Review of the Phase I ESAs completed by PB prior to conducting a site walk-through visit for scoping the Phase II ESI.

- The clearance of boring locations for utilities by visual observation of piping in the basement and verbal discussions with on-site personnel.

- Jack-hammering through the concrete basement floor.

- The advancement of three interior soil borings in each basement using a portable hand drilling equipment including a striker-bar and a 75-pound weight and a split-spoon sampler to a maximum depth of ten feet below grade (fbg), below the basement floor, and the collection of one grab, one composite soil sample from each boring (B-01 through B-12), and one composite sample from all of the borings in each building (B-208, B-220, B-228, and B-240).

- Field screening, consisting of visual and olfactory indicators and photo-ionization detector (PID) readings and selection of the grab soil samples for laboratory analysis based on contaminant indicators.

- Laboratory analysis of the boring grab soil samples for NYSDEC Spill Technology and Remediation Series (STARS) Memo # 1 volatile organic compounds (VOCs) according to the United States Environmental Protection Agency (USEPA) Method 8260, laboratory analysis of the soil column composite soil samples for NYSDEC STARS semi-volatile organic compounds (SVOCs) according to the USEPA Method 8270, and laboratory analysis of the four building soil composite samples for Target Analyte List (TAL) Metals by USEPA Method 6010/7000 series and Total Petroleum Hydrocarbons (TPH).

2.0 SITE INFORMATION

2.1 Site Location, Description and Use

The Site is identified as A. Philip Randolph Houses and is located on the south side of West 114th Street, between Adam Clayton Powell Jr. Boulevard and Frederick Douglas Boulevard, in Manhattan, New York. The New York City Department of Buildings (NYCDOB) database and the NYC Department of Finance indicate that the Site is identified as Block 1829, Lots 41, 46, 51, and 57. The Site occupies approximately 1.1 acres of land and has been developed with multiple five-story residential apartment buildings, each with a basement, that are owned by the NYCHA. A small court yard and playground is present at the eastern end of the structures and a vacant lot is located south of 234 W. 114th Street. The Site is located within Block 1829 and bounded by West 114th Street to the north, a six-story residential apartment buildings along Adam Clayton Powell Jr. Boulevard to the east, residential apartment buildings along West 113th Street to the south, and five-story apartment buildings along Frederick Douglas Boulevard to the west. The Phase II ESI work was conducted in the basements of the residential buildings. The physical layout of the Site including surrounding land use is presented on Figure 2.

2.2 Description of Surrounding Properties

The area surrounding the Site is primarily residential. The Wadleigh Girls High School and apartment buildings are located on West 114th Street across from the Site. (These apartment buildings are part of the NYCHA Randolph Houses, but are not slated for demolition.) Public School No. 13 is located south of the Site on West 113th Street. Local business establishments, including convenience stores, a laundromat, a barber shop, etc., can be found along Frederick Douglas Boulevard. A vacant grassed lot with a posted sign stating “baited area” is situated at the northeast corner of the intersection of West 114th Street and Frederick Douglas Boulevard. This property is a recognized environmental condition (REC) because the applied chemicals in an open unpaved surface could potentially impact the subsurface soil and groundwater located upgradient of the Site.

2.3 Site and Regional Topographic Setting

PB's review of the United States Geologic Services (USGS) 7.5 minute topographic map Central Park, NY-NJ quadrangle shows that the Site is situated approximately 40 feet above mean sea level and the vicinity slopes to the east-northeast toward the East River. A copy of the USGS topographic map showing the location of the Site is included on Figure 1.

2.4 Site Geology and Hydrogeology

Manhattan geologic formation lies in the Manhattan Prong of the New England Upland province. It also situates across a major tectonic suture, Cameron's Line. The area surrounding the Site is underlain by fill material and subsequently an unstratified layer of Pleistocene glacial deposit. This unconsolidated deposit, ground moraine, is a brown till composed of clay, sand, and boulders with a thickness less than 25 feet. Underneath this layer is the consolidated Cambrian-Ordovician Inwood Marble. The metamorphic bedrock is a dark gray to black coarsely crystalline micaceous rock with no pore spaces, but contains joints, openings, and fractures. The bedrock beneath the Site was encountered between approximately 1.5 to 10 fbg, below the foundation. The bedrock is mainly comprised of schist and/or gneiss, depending on the depth, and is moderately fractured.

Manhattan was formerly drained by numerous shallow creeks that discharged into the Hudson, Harlem, and East Rivers. Due to development, most of these creeks have been filled in or covered by buildings and streets. Based upon surface topography of the vicinity of the Site, groundwater is expected to be approximately 30 to 40 fbg and assumed to flow to the east-northeast toward the Harlem River. Therefore, in assessing potential off-site environmental impacts, properties located directly west of the Site are of primary concern due to their assumed hydraulically upgradient locations relative to the Site. However, actual groundwater flow direction is affected by local factors, such as tidal influence, underground structures, seasonal fluctuations, soil and bedrock geology, production wells, and other factors.

During the investigation at 220 West 114th Street, water was encountered at approximately 6 fbg and is assumed to be perched groundwater trapped above the weathered bedrock surface.

3.0 SUMMARY OF SUBSURFACE INVESTIGATION

3.1 Soil Sampling Procedures

3.1.1 Soil Borings

In order to further investigate the RECs identified in the Phase I ESAs, a total of three soil borings were installed in each of the four basements. Both grab and composite soil samples were collected from each soil boring.

PB provided oversight for the advancement of the soil borings and the collection of soil samples at the Site. A soil sampling summary including description of general boring placement is presented in Table 1.

The availability of drilling locations in the basement was limited due to the confined work areas with low ceiling. At least three borings were advanced in the vicinity of each AST. The locations of the soil borings are depicted on Figures 3.1 through 3.4.

Prior to advancing the borings, the concrete floor was opened using an electric jack hammer. The borings were advanced utilizing a striker-bar attached to a decontaminated split-spoon sampler. The bar was driven into the subsurface utilizing a 75-pound weight.

Upon sampler retrieval, the soils were examined for visual evidence (i.e. staining, discoloration) and any olfactory indications (i.e. odors) of contamination. Additionally, a PID was used to quantitatively screen the soil for VOCs. Soil classification was documented on boring logs included in Appendix A.

To avoid cross-contamination, trowels, bowls, hand augers, coring devices and other downhole sampling or drilling equipment were decontaminated by scrubbing with a non-phosphate detergent (i.e., Alconox) and rinsing with distilled water prior to the collection of each sample.

3.1.2 Soil Sampling

Each soil boring was identified with a "B" designation followed by a two digit number (B-01 to B-12). The same designation was used during sample collection for the grab samples to be analyzed for NYSDEC STARS VOCs (USEPA Method 8260) and for the boring composite samples to be analyzed for NYSDEC STARS SVOC (USEPA Method 8260). The boring composite samples were comprised of soils from each sampling interval from immediately beneath the basement floor to the boring termination depth. However, borings identified as B-07 (228 West 114th Street) and B-10 (240 West 114th Street) did not yield sufficient amount of soil for analytical testing. Boring B-07 was terminated at a depth of 1.5 fbg due to refusal on bedrock and no soil was recovered for sampling. Boring B-10 was terminated at a depth of 4 fbg with only enough soil for a VOC grab sample.

At each building, representative portions of the boring composite samples were combined into a separate sample referred to as a "boring composite".

The four "building composite" samples were identified with a "B" designation followed by building address number where the sample was collected: B-208, B-220, B-228, and B-240. These samples were analyzed for the TAL Metals by USEPA Method 6010/7000 series and TPH analysis. Borings B-07 and B-10 were not included in the building composite analysis for TAL Metals and TPH due to insufficient amount of soil. Details of the sampling activities and boring identification are presented on Table 1 – Environmental Boring Data Summary.

The soil samples that were selected for laboratory analysis were transferred directly into laboratory supplied sample jars and properly labeled. The samples were stored with ice in a cooler at 4º Celsius prior to and during shipment. Chain-of-custody documentation was prepared and accompanied the samples during shipment to the laboratory. Following the completion of each boring, the boreholes were back-filled with drill cuttings.

The selected samples were taken off-site by the PB field geologist and submitted to Phoenix Environmental Laboratory, a NYS Department of Health (NYSDOH) approved laboratory for analysis.

3.1.3 Field Observations

Fieldwork was conducted between February 19 and 20, 2008 under the supervision of Aleksandra Miesak, PB senior geologist. Soils beneath the basement floor, classified as urban fill, consist predominantly of medium brown sand and fill material (i.e. crushed concrete, brick, glass and wood fragments, etc.). Weathered bedrock was encountered between 1.5 fbg on the western side of the Site to 10 fbg on the eastern side of the Site.

At 220 West 114th Street, water was encountered at approximately 6 fbg and is assumed to be perched groundwater trapped above the weathered bedrock surface.

No petroleum odors were noted during drilling. PID readings were consistently recorded at zero parts per million (ppm).

3.2 Laboratory Analytical Results for Soil Samples

The analytical results of the soil samples were compared to the criteria published by the NYSDEC for soils. The NYSDEC TAGM #4046 dated 1994 (and updated 2001) provides Recommended Soil Cleanup Objectives (RSCOs). NYSDEC TAGM #4046 also provides guidance for remedial actions at NYSDEC Inactive Hazardous Waste and Spill sites, based on health-related concerns and available clean-up technologies. These include the USEPA Health Based Guidance Values and the NYSDEC STARS Memo #1 Toxic Characteristics Leaching Procedures (TCLP) Alternative Guidance Values, dated 1992, which provides guidance for the handling, disposal and/or reuse of non-hazardous petroleum-contaminated soils. Soils that meet beneficial use conditions, as contained in STARS Memo #1, are no longer considered solid waste in accordance with New York City Rules and Regulations (NYCRR) Part 360-1.2(a)(4).

3.2.1 Volatile Organic Compounds (VOCs)

VOCs were not detected above the laboratory method detection limits (MDL) or the NYSDEC TCLP Alternative Guidance Values (STARS), the USEPA Health Based Guidance Values or the NYSDEC TAGM RSCOs in any of the soil samples collected. A summary of the VOC results for the samples collected from the Site is presented in Table 2.

3.2.2 Semi-Volatile Organic Compounds (SVOCs)

SVOCs were only detected above the applicable standards in one of the four soil samples collected, B-05. These compounds include benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene and chrysene were detected above all guidance values (STARS Memo #1 TCLP Alternative Guidance Values, STARS Memo #1 Human Health Guidance Values and NYSDEC TAGM RSCOs). Fluoranthene, phenanthrene and pyrine were detected above the STARS Memo #1 TCLP Alternative Guidance Values. A summary of all the reported SVOC results for the soil samples is presented in Table 3.

3.2.3 Target Analyte List (TAL) Metals

The TAL metal results for the composite soil samples are presented in Table 4. All of the four soil samples collected have reported concentrations of certain metals greater than the NYSDEC RSCO or the Eastern United States Background Concentration.

Impacts from metals are indicated in all four soil borings. The least impacted soil samples are those from B-208 and B-228 while the greatest impacts are present in B-220 and B-240. The metals that are present above either the NYSDEC RSCO and/or the Eastern USA Background Concentration (as listed in the NYSDEC TAGM) in all four soil samples are beryllium, chromium, copper, iron, nickel, zinc and mercury. Magnesium is present above applicable standards in B-220 and vanadium in B-208. None of these metals were detected at concentrations great enough to indicate hazardous soil conditions. Their presence is likely indicative of the presence of fill material beneath the building with a detectable level of contamination.

3.2.4 Total Petroleum Hydrocarbons (TPH)

TPH fingerprint analysis results indicate that low concentrations of typical weathered hydrocarbons were identified in the soil beneath two of the four buildings (208 and 228 West 114th Street). Presence of these hydrocarbons in the soil may be related to use of historic fill material beneath the building. A summary of the laboratory results for the samples is presented in Table 4.

4.0 CONCLUSIONS & RECOMMENDATIONS

This Phase II ESI was completed to assess the RECs and environmental concerns identified in the Phase I ESA, completed by PB in November 2007.

The following conclusions and recommendations are based on the results of the field investigation and a review of the analytical results compared to the following relevant NYSDEC publications for soil; the NYSDEC TAGM #4046, dated 1994, and the NYSDEC STARS Memo # 1; and for groundwater the NYSDEC TOGS Class GA standards.

Field procedures, including PID readings and visual/olfactory indicators, were utilized in the field and chemical analysis was utilized in the laboratory to characterize Site soils. These procedures indicated that the soils beneath the basement floor of the Site are impacted by SVOCs and metals. There were no impacts to the soils from VOCs.

The following items are of special note regarding the soil results:

- The majority of SVOCs detected are classified as PAHs, which are of particular concern due to their potential health impacts. The presence of PAHs can be attributed to constituents of ash and cinder fill that was disposed of at the Site to bring the Site up to its present elevation. The fill consists of crushed brick and concrete, wood pieces, sand, silt and gravel and is the likely source for the PAHs in the remaining soil borings. The presence of the SVOCs may also be due to historical industrial usage of the area. There may be some impacts from the usage of fuel oil products over time at the Site, however there were no records of spills and no visual or olfactory evidence of petroleum contamination during soil sampling.

- Select metals were detected above applicable standards in all four “building composite” soil samples collected. Beryllium, chromium, copper, iron, magnesium (B-220), mercury, nickel, vanadium (B-208) and zinc present either above the NYSDEC RSCO and/or the Eastern USA Background Concentration (as listed in the NYSDEC TAGM). None of these metals

were detected at concentrations great enough to indicate hazardous soil conditions. The presence of these metals is likely indicative of the fill material beneath the building in addition to past historical use.

- TPH fingerprint analysis results indicate that low concentrations of typical weathered hydrocarbons were identified in the soil beneath two of the four buildings (208 and 228 West 114th Street). Presence of these hydrocarbons in the soil may be related to use of historic fill material beneath the building.

- The waste classification of these soils is as non-hazardous contaminated soils.

4.2 Recommendations

According to the analytical results and conclusions presented, PB recommends the following:

- Prior to any subsurface work at the Site, the contractor must develop and submit a site-specific Health and Safety Plan (HASP) that meets the requirements set forth by the Occupational Safety and Health Administration (OSHA), the NYSDOH and other applicable regulations. The HASP should identify the possible locations and risks associated with potential contaminants that may be encountered during excavation/construction activities and the administrative and engineering controls that will be utilized to mitigate concerns.

- In addition to the HASP, a Material Handling Plan (MHP) must also be developed and submitted prior to the initiation of any on-site work. This MHP should identify provisions and a contingency for managing, handling, transporting and disposing of non-hazardous SVOC, PCB and metals impacted soils, including petroleum impacted soils and potentially hazardous soils, including hazardous for lead and/or mercury, as a contingency. This plan should include specific protocols and procedures that will be utilized to manage the waste in accordance with applicable regulations, including all soil disposal sampling requirements. In addition, the MHP must also address the handling and disposal of groundwater in the event dewatering is required during the construction process.

- Based on the levels of SVOCs and metals, the soils beneath the Site can be classified as non-hazardous contaminated.

- Dust control procedures should be developed and put in place during any proposed excavation activities to minimize the creation and dispersion of fugitive airborne dust. The Contractor shall implement strict dust control measures to protect the workers and the downwind community from potential airborne contaminants released as a direct result of construction activities. The dust control procedures should be in accordance with NYSDOH generic Community Air Monitoring Plan (CAMP) as described in Appendix 1A of the NYSDEC Draft Division of Environmental Remediation (DER)-10, published December 25, 2002.

5.0 STATEMENT OF LIMITATIONS

The data presented and the opinions expressed in this report are qualified as stated in the attachment to this section of the report.

Prepared by:

Aleksandra Miesak
Senior Geologist

STATEMENT OF LIMITATIONS

The data presented and the opinions expressed in this report are qualified as follows:

1. The sole purpose of the investigation and of this report is to assess the physical characteristics of the Site with respect to the presence or absence in the environment of oil or hazardous materials and substances as defined in the applicable State and Federal environmental laws and regulations and to gather information regarding current and past environmental conditions at the Site.

2. PB derived the data in this report primarily from visual inspections, examination of records in the public domain, interviews with individuals with information about the Site, and a limited number of subsurface explorations made on the dates indicated. The passage of time, manifestation of latent conditions or occurrence of future events may require further exploration at the Site, analysis of the data, and re-evaluation of the findings, observations, and conclusions expressed in the report.

3. In preparing this report, PB has relied upon and presumed accurate certain information (or the absence thereof) about the Site and adjacent properties provided by governmental officials and agencies, the Client, and others identified herein. Except as otherwise stated in the report, PB has not attempted to verify the accuracy or completeness of any such information.

4. The data reported and the findings, observations, and conclusions expressed in the report are limited by the Scope of Services, including the extent of subsurface exploration and other tests. The Scope of Services was defined by the requests of the Client, the time and budgetary constraints imposed by the Client, and the availability of access to the Site.

5. Because of the limitations stated above, the findings, observations, and conclusions expressed by PB in this report are not, and should not be considered, an opinion concerning the compliance of any past or present owner or operator of the Site with any Federal, State or local law or regulation. No warranty or guarantee, whether expressed or implied, is made with respect to the data reported or findings, observations, and conclusions expressed in this report. Further, such data, findings, observations, and conclusions are based solely upon Site conditions in existence at the time of investigation.

6. This report has been prepared on behalf of and for the exclusive use of the Client, and is subject to and issued in connection with the Agreement and the provisions thereof.

TABLES

NEW YORK CITY HOUSING AUTHORITY
RANDOLPH HOUSES - 208, 220, 228 AND 240 WEST 114TH STREET
NEW YORK, NEW YORK

TABLE 1

ENVIRONMENTAL BORING DATA SUMMARY

Boring/Sample No.	Building Composite Sample No. (Metals & TPH)	Boring Location	Highest PID/FID (1)	Grab Sample Interval	Total VOCs (2)	Total SVOCs (2)	Metals Exceed? (3)	Water Table Depth	E.O.B. Depth	Other Comments
B-01	B-208	208 West 114th Street	0.0	8-9 fbg	0	0	Yes	NE	10 fbg	Soil consists of fill
B-02		208 West 114th Street	0.0	8-9 fbg	0	2,030		NE	10 fbg	Soil consists of fill
B-03		208 West 114th Street	0.0	8-9 fbg	0	0		NE	10 fbg	Soil consists of fill
B-04	B-220	220 West 114th Street	0.0	4-6 fbg	0	840	Yes	NE	6 fbg	Soil consists of fill
B-05		220 West 114th Street	0.0	4 fbg	0	6,160		6 fbg	8 fbg	Soil consists of fill
B-06		220 West 114th Street	0.0	4 fbg	0	0		NE	6 fbg	Soil consists of fill
B-07	NA	228 West 114th Street	0.0	NA	NA	NA	NA	NA	1.5 fbg	No soil available for sampling
B-08	B-228	228 West 114th Street	0.0	3 fbg	0	0	Yes	NE	4 fbg	Soil consists of fill
B-09		228 West 114th Street	0.0	4 fbg	0	0		NE	6 fbg	Soil consists of fill
B-10	NA	240 West 114th Street	0.0	3 fbg	0	NA	NA	NE	4 fbg	Not enough soil to collect SVOC, Metals or TPH samples. Only VOC collected
B-11	B-240	240 West 114th Street	0.0	3 fbg	0	0	Yes	NE	4 fbg	Soil consists of fill
B-12		240 West 114th Street	0.0	4 fbg	0	0		NE	6 fbg	Soil consists of fill

(1) Parts per million (ppm)
fbg- Feet below grade
(2) Parts per billion (ppb)
(3) Does any metal(s) exceed the TAGM 4046 or Eastern US background (ppm)

E.O.B = End of Boring
NE - Not encountered
N/A - Not applicable

NEW YORK CITY HOUSING AUTHORITY
RANDOLPH HOUSES - 208, 220, 228, 240 WEST 114TH STREET
NEW YORK, NEW YORK

TABLE 2

SOIL BORING ANALYTICAL RESULTS FOR
STARS MEMO #1 VOLATILE ORGANIC COMPOUNDS (VOCs) EPA METHOD 8260

Sample ID (depth fbg) **Address:** **Date:**	**STARS Memo #1 - TCLP Alt. Guidance Values* (ppb) (1)**	**STARS Memo #1 Human Health, Guidance (2)**	**NYSDEC TAGM RSCOs (3)**	**B-01 (8-9)** **208 W. 114th St** **1/9/08**	**B-02 (8-9)** **208 W. 114th St** **1/9/08**	**B-03 (8-9)** **208 W. 114th St** **1/9/08**	**B-04 (4-6)** **220 W. 114th St** **1/10/08**	**B-05 (4)** **220 W. 114th St** **1/10/08**	**B-06 (4)** **220 W. 114th St** **1/10/08**	**B-08 (3)** **228 W. 114th St** **1/10/08**	**B-09 (4)** **228 W. 114th St** **1/10/08**	**B-10 (3)** **240 W. 114th St** **1/10/08**	**B-11 (3)** **240 W. 114th St** **1/11/08**	**B-12 (4)** **240 W. 114th St** **1/11/08**
Compound														
Benzene	20(4)	24,000	80 or MDL(4)	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
n-Butylbenzene	100	N/A	10,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
sec-Butylbenzene	100	NE	10,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
tert-Butylbenzene	100	N/A	10,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Ethylbenzene	100	8,000,000	5,500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Isopropylbenzene	100	3,100,000	2,300	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
p-Isopropyltoluene	110	N/A	10,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Methyl tert-butyl ether	1000	N/A	120	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Naphthalene	200	13,000	13,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
n-Propylbenzene	100	N/A	3,700	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,2,4-Trimethylbenzene	100	N/A	10,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,3,5-Trimethylbenzene	100	N/A	3,300	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Toluene	100	20,000,000	1,500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
o-Xylene	100	200,000,000	1,200	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
m,p-Xylene	100	200,000,000	1,200	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Total Stars VOCs	NA	NA	10,000	0	0	0	0	0	0	0	0	0	0	0

Notes:
1- TCLP Alternative Guidance Values, NYSDEC Spill Technology and Remediation Series (STARS) Memo #1
2- USEPA Health Based Guidance Values, NYSDEC Technical and Administrative Guidance Memo (TAGM) #4046
3 - NYSDEC Recommended Soil Cleanup Objectives (RSCOs), TAGM #4046 and/or RSCO for Fuel Oil Contaminated Soil
4-NYSDEC Memo, July 10, 2001-The groundwater standard for benzene was changed to 1ppb which results in a soil cleanup objective of .08ppm
Bold - Exceeds NYSDEC STARS Memo #1 Guidance Value
Bold/Shaded - Exceeds both NYSDEC STARS Memo #1 Guidance Value and RSCO.
B - Analyte Found in Method Blank
NE - Not Established
J - Estimated Value
*NA - Not Analyzed
ND - Not detected at or above the listed laboratory detection limit.

NEW YORK CITY HOUSING AUTHORITY
RANDOLPH HOUSES - 208, 220, 228, 240 WEST 114TH STREET
NEW YORK, NEW YORK

TABLE 3

SOIL BORING ANALYTICAL RESULTS FOR
SEMI VOLATILE ORGANIC COMPOUNDS (SVOCs) EPA METHOD 8270

Sample ID **Address:** **Date Sampled:**	**STARS Memo #1 - TCLP Alt. Guidance Values* (ppb) (1)**	**STARS Memo #1 Human Health, Guidance (2)**	**NYSDEC TAGM RSCOs (3)**	**B-01** **208 W. 114th St** **2/19/08**	**B-02** **208 W. 114th St** **2/19/08**	**B-03** **208 W. 114th St** **2/19/08**	**B-04** **220 W. 114th St** **2/19/08**	**B-05** **220 W. 114th St** **2/19/08**	**B-06** **220 W. 114th St** **2/19/08**	**B-08** **228 W. 114th St** **2/20/08**	**B-09** **228 W. 114th St** **2/20/08**	**B-11** **240 W. 114th St** **2/20/08**	**B-12** **240 W. 114th St** **2/20/08**
Compound(ppb)													
Acenaphthene	400	5,000,000	50,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Acenaphthylene	NA	5,000,000	41,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Anthracene	1,000	20,000,000	50,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Benzo(a)anthracene	0.04	224	224 or MDL	ND	ND	ND	ND	**560**	ND	ND	ND	ND	ND
Benzo(a)pyrene	0.04	61	61 or MDL	ND	ND	ND	ND	**520**	ND	ND	ND	ND	ND
Benzo(b)fluoranthene	0.04	220	1,100	ND	ND	ND	ND	**640**	ND	ND	ND	ND	ND
Benzo(g,h,i)perylene	0.04	N/A	50,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Benzo(k)fluoranthene	0.04	220	1,100	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chrysene	0.04	N/A	400	ND	ND	ND	ND	**540**	ND	ND	ND	ND	ND
Dibenzo(a,h)anthracene	1000	14.3	14 or MDL	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Fluoranthene	1,000	3,000,000	50,000**	ND	790	ND	440	**1,400**	ND	ND	ND	ND	ND
Fluorene	1,000	3,000,000	50,000**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Indeno(1,2,3-c,d)pyrene	0.04	N/A	3,200	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Naphthalene	200	300,000	13,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Phenanthrene	1,000	NA	50,000**	ND	670	ND	ND	**1,400**	ND	ND	ND	ND	ND
Pyrene	1,000	2,000,000	50,000**	ND	570	ND	400	**1,100**	ND	ND	ND	ND	ND
Total Stars SVOCs	NA	NA	500,000	0.0	2,030	0.0	840	6,160	0.0	0.0	0.0	0.0	0.0

Notes:
1- TCLP Alternative Guidance Values, NYSDEC Spill Technology and Remediation Series (STARS) Memo #1
2- USEPA Human Based Guidance Values, NYSDEC Technical and Administrative Guidance Memo (TAGM) #4046
3 - NYSDEC Recommended Soil Cleanup Objectives (RSCOs), TAGM #4046
** As per NYSDEC TAGM #4046, Individual non-carcinogenic semi-VOCs ≤50ppm, and Total semi-VOCs not listed (Tentatively Identified Compounds (TICs) ≤ 500ppm.
Bold - Exceeds NYSDEC STARS Memo #1 Guidance Value
Bold/Shaded - Exceeds both NYSDEC STARS Memo #1 Guidance Value and RSCO

NEW YORK CITY HOUSING AUTHORITY
RANDOLPH HOUSES - 208, 220, 228, 240 WEST 114TH STREET
NEW YORK, NEW YORK

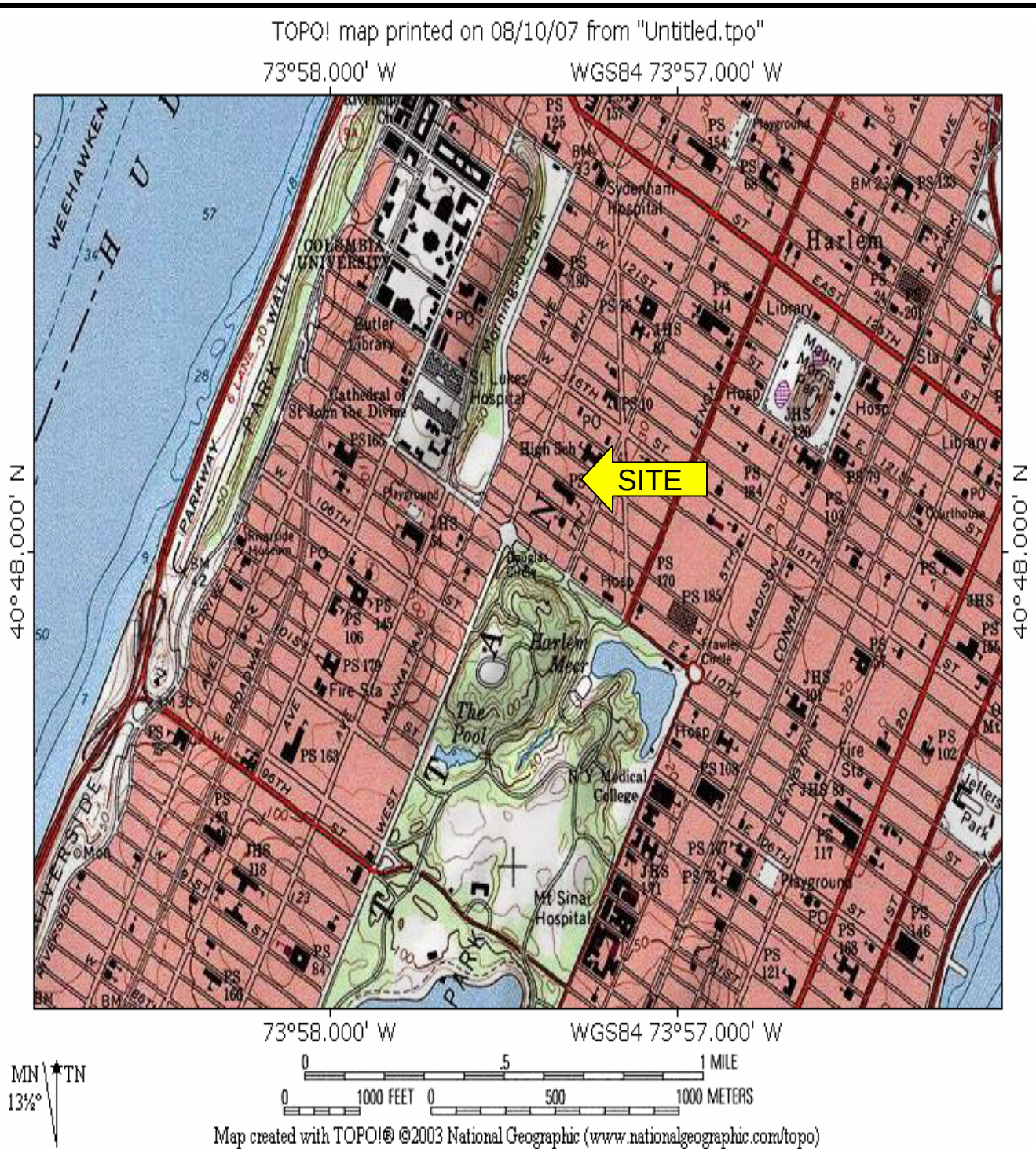
TABLE 4

SOIL BORING ANALYTICAL RESULTS FOR TARGET ANALYTE LIST (TAL) METALS AND TOTAL PETROLEUM HYDROCARBONS (TPH)

Sample ID **Address:** **Date Collected:**	**NYSDEC RSCO (1) (ppm)**	**EASTERN USA BACKGROUND (2) (ppm)**	**B-208** **208 W. 114th St.** **2/19/08**	**B-220** **220 W. 114th St.** **2/19/08**	**B-228** **228 W. 114th St.** **2/20/08**	**B-240** **240 W. 114th St.** **2/20/08**
Metals						
Aluminum	SB	33,000	9,170	10,900	9,130	11,800
Antimony	SB	N/A	ND	ND	ND	ND
Arsenic	7.5 or SB	3-12**	3.10	4.30	4.20	5.30
Barium	300 or SB	15-600	55.8	97.7	89.4	116
Beryllium	0.16 (HEAST) or SB	0-1.75	**0.37**	**0.33**	**0.35**	**0.40**
Cadmium	1 or SB	0.1-1	ND	ND	ND	0.51
Calcium	SB	130-35,000***	6,290	21,000	10,300	15,000
Chromium	10 or SB	1.5-40***	**13.7**	**21.2**	**14.0**	**22.1**
Cobalt	30 or SB	2.5-60***	4.97	8.04	5.96	10.00
Copper	25 or SB	1-50	**26.2**	**28.5**	**25.30**	**51.4**
Iron	2,000 or SB	2,000-550,000	**14,800**	**28,200**	**15,200**	**26,400**
Lead	200 - 500 (****)	SB (****)	55.8	67.4	82.3	124
Magnesium	SB	100-5,000	2,450	**6,890**	4,210	4,600
Manganese	SB	50-5,000	422	359	413	444
Nickel	13 or SB	.5-25	**24.5**	**18.0**	**14.6**	**25.1**
Potassium	SB	8,500-43,000**	1,310	4,150	1,510	3,680
Selenium	2 or SB	0.1-3.9	ND	ND	ND	ND
Silver	SB	N/A	ND	ND	ND	ND
Sodium	SB	6,000-8,000	104	193	193	384
Thallium	SB	N/A	ND	ND	ND	ND
Vanadium	150 or SB	1-300	**172**	33.5	24.2	34.0
Zinc	20 or SB	9-50	**46.1**	**72.0**	**68.1**	**143**
Mercury	0.1	0.001-0.2	**0.28**	**0.25**	**0.53**	**0.29**
Total Metals			34,949	72,043	41,285	62,840
Total Petroleum Hydrocarbons (TPH)						
Fuel Oil #2 / Diesel oil	N/A	N/A	ND	ND	ND	ND
Fuel Oil #4	N/A	N/A	ND	ND	ND	ND
Fuel Oil #6	N/A	N/A	ND	ND	ND	ND
Kerosene	N/A	N/A	ND	ND	ND	ND
Motor Oil	N/A	N/A	*	ND	*	ND
Other Oil (Cutting & Lubricating)	N/A	N/A	ND	ND	ND	ND
Unidentified	N/A	N/A	160	ND	240	ND

1 - NYSDEC Recommended Soil Cleanup Objectives (RSCOs), Technical and Administrative Guidance Memo (TAGM) #4046
2 - Average Eastern USA or NYS Background Concentration, as listed in NYSDEC TAGM #4046
All units are milligrams per kilogram (mg/kg) and discussed in text as parts per million (ppm
ND - Not detected at or above the listed laboratory detection limit
SB - Site Background, HEAST=EPA Database pertaining to health risk assessment levels (refer to this data base if compounds above the guideline
Bold - denotes RSCOs exceedance. **Bold** denotes both RSCOs and SB exceedence
N - Spiked sample recovery not within control limits
J - Estimated value.
** New York State background
*** Some forms of Cyanide are complex and very stable while other forms are pH dependent and hence are very unstable.
Site-specific form(s) of Cyanide should be taken into consideration when establishing soil cleanup objective
**** Background levels for **lead** vary widely. Average levels in undeveloped, rural areas may range from 4-61 ppm
Average background levels in metropolitan or suburban areas or near highways are much higher and typically range from 200-500 ppm.
***** Recommended soil cleanup objectives are average background concentrations as reported in a 1984 survey of reference material by E. Carol McGovern, NYSDEC
* Petroleum Hydrocarbon chromatogram was not a perfect match with any of the standards, but most closely resembles motor oil.

FIGURES



Assumed Groundwater Direction

N

NYCHA

USGS Topographic Map 7.5 Minute Series, Central Park, 2003 NY Quadrangle

FIGURE 1 – SITE TOPOGRAPHIC MAP

SITE NAME: Randolph Houses
ADDRESS: 202 – 246 West 114th Street
Block 1829, Lots 38 to 60
BOROUGH, STATE, ZIP: New York, NY 10026
PB PROJECT NO.: 51221B

PB 100 YEARS

NYCHA

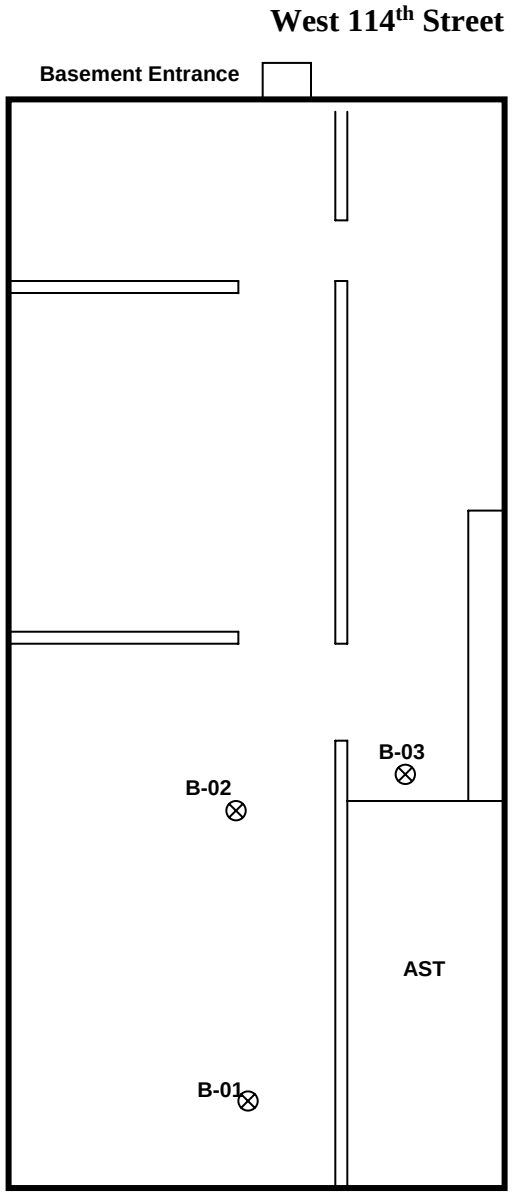
Assumed Groundwater Direction

N

Source: ©2007 Eurpoa Technologies
Google Earth

FIGURE 2 – SITE LOCATION MAP

SITE NAME: Randolph Houses
ADDRESS: 202 – 246 West 114th Street
Block 1829, Lots 111 and 38 to 60
BOROUGH, STATE, ZIP: New York, NY 10026



Legend

Site Boundary

Boring Location

Notes:
All samples in the report and analytical data sheets are designated with the address i.e. B-01for grab and boring composite samples and B-208 for building composite samples.

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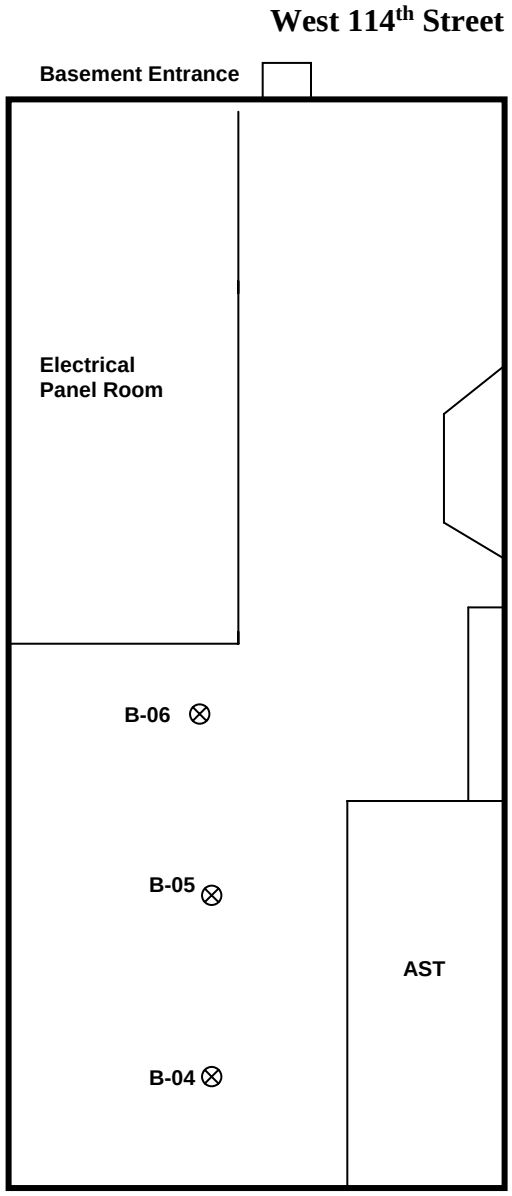
FIGURE 3.1– BORING LOCATIONS

SITE NAME: Randolph Houses
ADDRESS: 208 West 114th Street
BOROUGH, STATE, ZIP: New York, NY 10026



Legend

Site Boundary

Boring Location

Notes:
All samples in the report and analytical data sheets are designated with the address i.e. B-01for grab and boring composite samples and B-208 for building composite samples.

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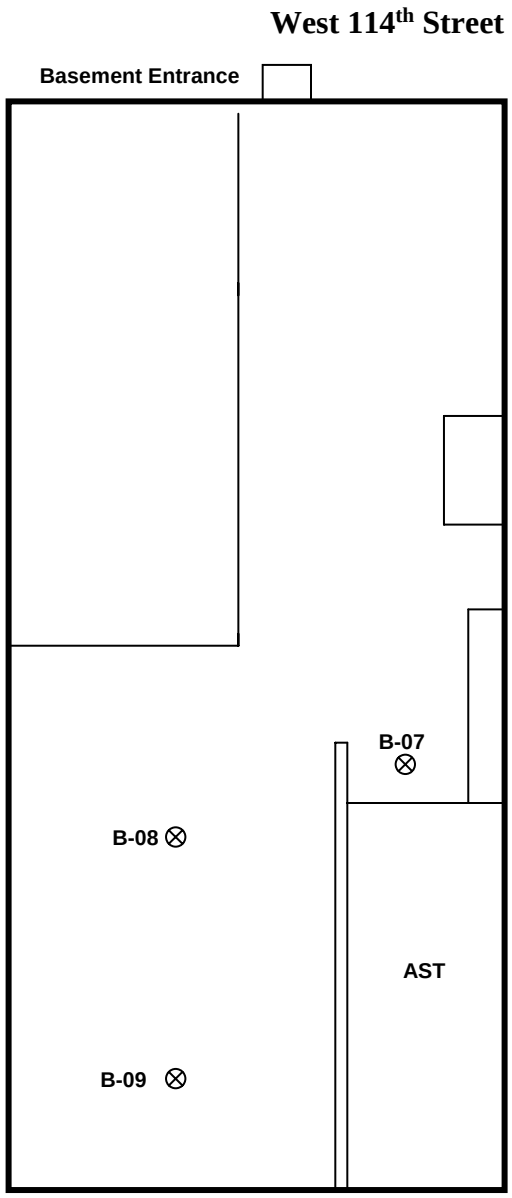
FIGURE 3.2 – BORING LOCATIONS

SITE NAME: Randolph Houses
ADDRESS: 220 West 114th Street
BOROUGH, STATE, ZIP: New York, NY 10026



Notes:
All samples in the report and analytical data sheets are designated with the address i.e. B-01for grab and boring composite samples and B-208 for building composite samples.

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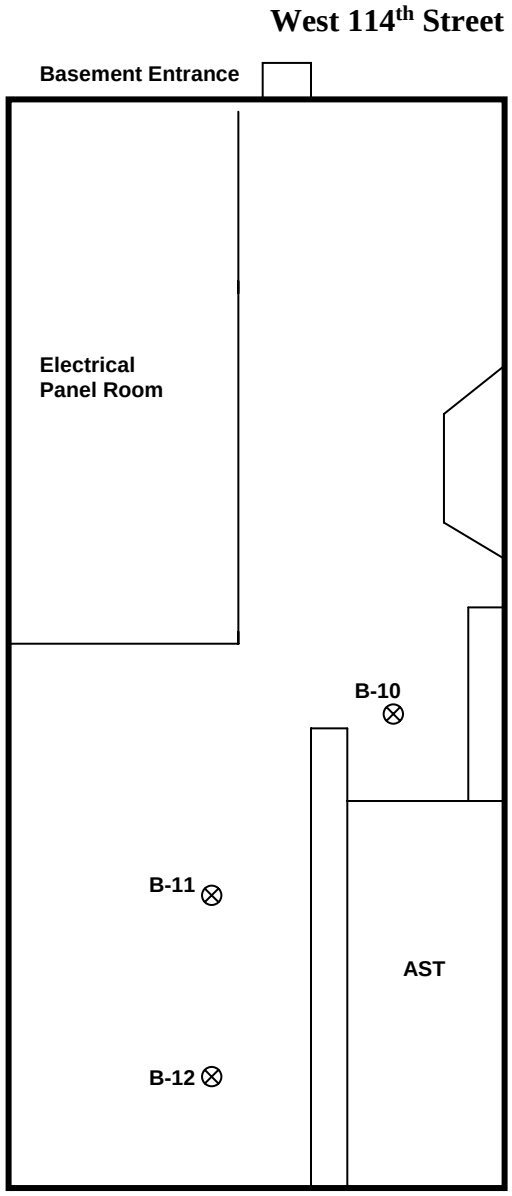
FIGURE 3.3 – BORING LOCATIONS

SITE NAME: Randolph Houses
ADDRESS: 228 West 114th Street
BOROUGH, STATE, ZIP: New York, NY 10026



Notes:
All samples in the report and analytical data sheets are designated with the address i.e. B-01for grab and boring composite samples and B-208 for building composite samples.

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FIGURE 3.4 – BORING LOCATIONS

SITE NAME: Randolph Houses
ADDRESS: 240 West 114th Street
BOROUGH, STATE, ZIP: New York, NY 10026

APPENDIX A
Boring Logs

SOIL BORING LOG

Client: NYCHA - Randolph Houses				Boring/Well No.: B-01		T.O.C. Elev.: N/A		
				Location: 208 W. 114th St. New York, NY				
Project No.:				Surface Elevation:				Page of
Depth Feet	Blow Counts	Recovery (ft/ft)	Overburden/Lithologic Description	Sample ID/ PID Screen	Graphic Log	Well Construction Graphic	Depth Feet	Well Construction Details
0								
2		0.5	Fill consisting of concrete, gravel and brick fragments	0.0				
4		1.0	Fill consisting of rubber and brick fragments with dark brown to black coarse SAND and Gravel.	0.0				
6		0.0	No recovery, brick stuck in the tip of the spoon.	0.0				
8		2.0	Dark brown fine to coarse SAND with little Gravel.	0.0				
10		2.0	Dark brown fine to coarse SAND with little Gravel. Bottom 6 inches is wet Silty SAND with little Clay.	B-01(8'-9')/ 0.0				

Driller: Jersey Boring	Well Casing:	Dia.	To	Seal Type:	Quantity:
Drilling Type/Size: 75 lb hammer	Casing Type:			Filter Pack Type:	Quantity:
Logged By: A. Miesak	Well Screen:	Dia.	To	Static Water Level:	
Drilling Started: 2/19/08	Screen Type:			Date/Time:	
Drilling Completed: 2/19/08	Slot Size:			Notes:	
Well Construction:	Grout Type:		Quantity:		
Blown/Bailed Yield:					

SOIL BORING LOG

Client: NYCHA - Randolph Houses				Boring/Well No.: B-02		T.O.C. Elev.: N/A		
Location: 208 W. 114th St. New York, NY								
Project No.:				Surface Elevation:				Page of
Depth Feet	Blow Counts	Recovery (ft/ft)	Overburden/Lithologic Description	Sample ID/ PID Screen	Graphic Log	Well Constructio n Graphic	Depth Feet	Well Construction Details
0								
2		0.1	Fill consisting of concrete, gravel and brick fragments with dark brown f-c SAND and Muscovite flakes.	0.0				
4		0.1	Fill consisting of brick fragments with dark brown f-c SAND and Gravel.	0.0				
6		0.1	Fill consisting of brick fragments with dark brown f-c SAND and Muscovite flakes.	0.0				
8		1.0	Fine to medium brown SAND with with small fragments of metal.	0.0				
10		1.75	Dark brown fine to medium SAND grading to Silty SAND with little Clay.	B-02(8'-9')/ 0.0				

Driller: Jersey Boring	Well Casing:	Dia.	To		Seal Type:	Quantity:	
Drilling Type/Size: 75 lb hammer	Casing Type:				Filter Pack Type:	Quantity:	
Logged By: A. Miesak	Well Screen:	Dia.	To		Static Water Level:		
Drilling Started: 2/19/08	Screen Type:				Date/Time:		
Drilling Completed: 2/19/08	Slot Size:				Notes:		
Well Construction:	Grout Type:		Quantity:				
Blown/Bailed Yield:							

SOIL BORING LOG

Client: NYCHA - Randolph Houses				Boring/Well No.: B-03		T.O.C. Elev.: N/A		
Location: 208 W. 114th St. New York, NY								
Project No.:				Surface Elevation:				Page of
Depth Feet	Blow Counts	Recovery (ft/ft)	Overburden/Lithologic Description	Sample ID/ PID Screen	Graphic Log	Well Constructio n Graphic	Depth Feet	Well Construction Details
0								
2		0.8	Fill consisting of concrete and brick fragments.	0.0				
4		0.8	Dark Brown fine to coarse SAND with Muscovite flakes and little brick fragments.	0.0				
6		1.0	Medium brown fine to coarse SAND with little Gravel and brick fragments. Bottom 6" red/brown f-m nativeSAND.	0.0				
8		0.8	Dark brown fine to medium SAND with little Silt and fine Gravel.	0.0				
10		0.0	No recovery due to refusal.	B-03(8'-9')/ 0.0				

Driller: Jersey Boring	Well Casing:	Dia.	To	Seal Type:	Quantity:
Drilling Type/Size: 75 lb hammer	Casing Type:			Filter Pack Type:	Quantity:
Logged By: A. Miesak	Well Screen:	Dia.	To	Static Water Level:	
Drilling Started: 2/19/08	Screen Type:			Date/Time:	
Drilling Completed: 2/19/08	Slot Size:			Notes:	
Well Construction:	Grout Type:		Quantity:		
Blown/Bailed Yield:					

SOIL BORING LOG

Client: NYCHA - Randolph Houses				Boring/Well No.: B-04		T.O.C. Elev.: N/A		
				Location: 220 W. 114th St. New York, NY				
Project No.:				Surface Elevation:				Page of
Depth Feet	Blow Counts	Recovery (ft/ft)	Overburden/Lithologic Description	Sample ID/ PID Screen	Graphic Log	Well Construction Graphic	Depth Feet	Well Construction Details
0								
2		0.5	Fill consisting of concrete and brick fragments with dark brown fine to coarse SAND.	0.0				
4		0.8	Dark Brown fine to coarse SAND with fine to coarse Gravel.	0.0				
6		0.1	Medium brown moist fine to coarse SAND and rock fragments. Refusal at 6 ft.	B-04(4'-6')/ 0.0				
8								
10								

Driller: Jersey Boring	Well Casing:	Dia.	To	Seal Type:	Quantity:
Drilling Type/Size: 75 lb hammer	Casing Type:			Filter Pack Type:	Quantity:
Logged By: A. Miesak	Well Screen:	Dia.	To	Static Water Level:	
Drilling Started: 2/19/08	Screen Type:			Date/Time:	
Drilling Completed: 2/19/08	Slot Size:			Notes:	
Well Construction:	Grout Type:		Quantity:		
Blown/Bailed Yield:					

SOIL BORING LOG

Client: NYCHA - Randolph Houses				Boring/Well No.: B-05		T.O.C. Elev.: N/A		
				Location: 220 W. 114th St. New York, NY				
Project No.:				Surface Elevation:				Page of
Depth Feet	Blow Counts	Recovery (ft/ft)	Overburden/Lithologic Description	Sample ID/ PID Screen	Graphic Log	Well Constructio n Graphic	Depth Feet	Well Construction Details
0								
2		0.5	Fill consisting of concrete and brick fragments with dark brown fine to coarse SAND and Gravel.	0.0				
4		0.75	Dark Brown fine to coarse SAND with fine to coarse Gravel and rock fragments.	B-05(4')/ 0.0				
6		0.1	Wet, dark brown medium to coarse SAND.	0.0				
8		0.05	Wet rock and gravel fragments. Refusal at 8 ft.	0.0				
10								

Driller: Jersey Boring	Well Casing:	Dia.	To	Seal Type:	Quantity:
Drilling Type/Size: 75 lb hammer	Casing Type:			Filter Pack Type:	Quantity:
Logged By: A. Miesak	Well Screen:	Dia.	To	Static Water Level:	
Drilling Started: 2/19/08	Screen Type:			Date/Time:	
Drilling Completed: 2/19/08	Slot Size:			Notes:	
Well Construction:	Grout Type:		Quantity:		
Blown/Bailed Yield:					

SOIL BORING LOG

Client: NYCHA - Randolph Houses				Boring/Well No.: B-06		T.O.C. Elev.: N/A		
				Location: 220 W. 114th St. New York, NY				
Project No.:				Surface Elevation:				Page of
Depth Feet	Blow Counts	Recovery (ft/ft)	Overburden/Lithologic Description	Sample ID/ PID Screen	Graphic Log	Well Constructio n Graphic	Depth Feet	Well Construction Details
0								
2		0.45	Fill consisting of gravel and brick fragments with dark brown medium to coarse SAND .	0.0				
4		1.2	Light to medium brown fine to coarse SAND with little Gravel and rock fragments.	B-06(4')/ 0.0				
6		0.0	No recovery, rocks at the bottom caused refusal.	0.0				
8								
10								

Driller: Jersey Boring	Well Casing:	Dia.	To	Seal Type:	Quantity:
Drilling Type/Size: 75 lb hammer	Casing Type:			Filter Pack Type:	Quantity:
Logged By: A. Miesak	Well Screen:	Dia.	To	Static Water Level:	
Drilling Started: 2/19/08	Screen Type:			Date/Time:	
Drilling Completed: 2/19/08	Slot Size:			Notes:	
Well Construction:	Grout Type:		Quantity:		
Blown/Bailed Yield:					

SOIL BORING LOG

Client: NYCHA - Randolph Houses				Boring/Well No.: B-07			T.O.C. Elev.: N/A	
Location: 228 W. 114th St. New York, NY								
Project No.:				Surface Elevation:			Page of	
Depth Feet	Blow Counts	Recovery (ft/ft)	Overburden/Lithologic Description	Sample ID/ PID Screen	Graphic Log	Well Constructio n Graphic	Depth Feet	Well Construction Details
0								
2		0	Refusal at 1.5 ft. No recovery other than small rock fragments in the tip of spoon.	N/A				
4								
6								
8								
10								

Driller: Jersey Boring	Well Casing:	Dia.	To	Seal Type:	Quantity:
Drilling Type/Size: 75 lb hammer	Casing Type:			Filter Pack Type:	Quantity:
Logged By: A. Miesak	Well Screen:	Dia.	To	Static Water Level:	
Drilling Started: 2/20/08	Screen Type:			Date/Time:	
Drilling Completed: 2/20/08	Slot Size:			Notes:	
Well Construction:	Grout Type:		Quantity:		
Blown/Bailed Yield:					

SOIL BORING LOG

Client: NYCHA - Randolph Houses				Boring/Well No.: B-08		T.O.C. Elev.: N/A		
				Location: 228 W. 114th St. New York, NY				
Project No.:				Surface Elevation:				Page of
Depth Feet	Blow Counts	Recovery (ft/ft)	Overburden/Lithologic Description	Sample ID/ PID Screen	Graphic Log	Well Constructio n Graphic	Depth Feet	Well Construction Details
0								
2		0.45	Fill consisting of brick, glass and rock fragments with dark brown medium to coarse SAND.	0.0				
4		0.4	Fill consisiting of brick and gravel fragments with light brown Silty SAND. Refusal at 4 ft.	B-08(3')/ 0.0				
6								
8								
10								

Driller: Jersey Boring	Well Casing:	Dia.	To	Seal Type:	Quantity:		
Drilling Type/Size: 75 lb hammer	Casing Type:			Filter Pack Type:	Quantity:		
Logged By: A. Miesak	Well Screen:	Dia.	To	Static Water Level:			
Drilling Started: 2/20/08	Screen Type:			Date/Time:			
Drilling Completed: 2/20/08	Slot Size:			Notes:			
Well Construction:	Grout Type:		Quantity:				
Blown/Bailed Yield:							

SOIL BORING LOG

Client: NYCHA - Randolph Houses				Boring/Well No.: B-09		T.O.C. Elev.: N/A		
				Location: 228 W. 114th St. New York, NY				
Project No.:				Surface Elevation:				Page of
Depth Feet	Blow Counts	Recovery (ft/ft)	Overburden/Lithologic Description	Sample ID/ PID Screen	Graphic Log	Well Constructio n Graphic	Depth Feet	Well Construction Details
0								
2		0.6	Fill consisting of brick and rock fragments with dark brown fine to coarse SAND with little Silt.	0.0				
4		0.75	Brown fine to coarse SAND with little Silt.	B-09(4')/ 0.0				
6		0.1	Rock in the tip of spoon, refusal at 4.5 ft.					
8								
10								

Driller: Jersey Boring	Well Casing:	Dia.	To	Seal Type:	Quantity:		
Drilling Type/Size: 75 lb hammer	Casing Type:			Filter Pack Type:	Quantity:		
Logged By: A. Miesak	Well Screen:	Dia.	To	Static Water Level:			
Drilling Started: 2/20/08	Screen Type:			Date/Time:			
Drilling Completed: 2/20/08	Slot Size:			Notes:			
Well Construction:	Grout Type:		Quantity:				
Blown/Bailed Yield:							

SOIL BORING LOG

Client: NYCHA - Randolph Houses				Boring/Well No.: B-10		T.O.C. Elev.: N/A		
Location: 240 W. 114th St. New York, NY								
Project No.:				Surface Elevation:				Page of
Depth Feet	Blow Counts	Recovery (ft/ft)	Overburden/Lithologic Description	Sample ID/ PID Screen	Graphic Log	Well Construction Graphic	Depth Feet	Well Construction Details
0								
2		0.05	Fill consisting of brick and rock fragments with very little dark brown medium to coarse SAND.	0.0				
4		0.05	Little medium to coarse SAND and Gravel. Refusal at 4 ft. Not enough soil to collect SVOC sample.	B-10(3')/ 0.0				
6								
8								
10								

Driller: Jersey Boring	Well Casing:	Dia.	To	Seal Type:	Quantity:		
Drilling Type/Size: 75 lb hammer	Casing Type:			Filter Pack Type:	Quantity:		
Logged By: A. Miesak	Well Screen:	Dia.	To	Static Water Level:			
Drilling Started: 2/20/08	Screen Type:			Date/Time:			
Drilling Completed: 2/20/08	Slot Size:			Notes:			
Well Construction:	Grout Type:		Quantity:				
Blown/Bailed Yield:							

SOIL BORING LOG

Client: NYCHA - Randolph Houses				Boring/Well No.: B-11		T.O.C. Elev.: N/A		
				Location: 240 W. 114th St. New York, NY				
Project No.:				Surface Elevation:				Page of
Depth Feet	Blow Counts	Recovery (ft/ft)	Overburden/Lithologic Description	Sample ID/ PID Screen	Graphic Log	Well Construction Graphic	Depth Feet	Well Construction Details
0								
2		0.4	Fill consisting of brick and rock fragments with little fine to coarse SAND.	0.0				
4		0.45	Brown fine to coarse SAND with little Silt. Rocks in the tip, refusal at 4 ft.	B-11(3')/ 0.0				
6								
8								
10								

Driller: Jersey Boring	Well Casing:	Dia.	To	Seal Type:	Quantity:
Drilling Type/Size: 75 lb hammer	Casing Type:			Filter Pack Type:	Quantity:
Logged By: A. Miesak	Well Screen:	Dia.	To	Static Water Level:	
Drilling Started: 2/20/08	Screen Type:			Date/Time:	
Drilling Completed: 2/20/08	Slot Size:			Notes:	
Well Construction:	Grout Type:		Quantity:		
Blown/Bailed Yield:					

SOIL BORING LOG

Client: NYCHA - Randolph Houses				Boring/Well No.: B-12		T.O.C. Elev.: N/A		
				Location: 240 W. 114th St. New York, NY				
Project No.:				Surface Elevation:				Page of
Depth Feet	Blow Counts	Recovery (ft/ft)	Overburden/Lithologic Description	Sample ID/ PID Screen	Graphic Log	Well Construction Graphic	Depth Feet	Well Construction Details
0								
2		0.8	Fill consisting of brick and rock fragments.	0.0				
4		0.5	Medium brown fine to coarse SAND with Gravel.	B-12(4')/ 0.0				
6		0.0	No recovery, refusal due to rock at 6 ft.	0.0				
8								
10								

Driller: Jersey Boring	Well Casing:	Dia.	To	Seal Type:	Quantity:
Drilling Type/Size: 75 lb hammer	Casing Type:			Filter Pack Type:	Quantity:
Logged By: A. Miesak	Well Screen:	Dia.	To	Static Water Level:	
Drilling Started: 2/20/08	Screen Type:			Date/Time:	
Drilling Completed: 2/20/08	Slot Size:			Notes:	
Well Construction:	Grout Type:		Quantity:		
Blown/Bailed Yield:					

APPENDIX B
Laboratory Analytical Report

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

ACCREDITED IN ACCORDANCE WITH nelac NY # 11301

Draft Progress Report

February 28, 2008

FOR: Attn: Ms. Aleksandra Miesak
PB Americas, Inc.
Five Penn Plaza
New York, NY 10001

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:		02/19/08	0:00
Location Code:	PBAMERIC	Received by:	LB	02/21/08	17:00
Rush Request:		Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAQ00911
Phoenix I.D.: AQ00911

Laboratory Data

Client ID: RANDOLPH HOUSES B-01

Parameter	Result	RL	Units	Date	Time	By	Reference
Percent Solid	85		%	02/21/08		X/TJB	E160.3
Soil Ext. Semi-Vol BN	Completed			02/21/08		SJ/E	SW3545
Volatile Organic Compounds							
1,2,4-Trimethylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
1,3,5-Trimethylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Benzene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Ethylbenzene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Isopropylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
m&p-Xylene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Methyl t-Butyl Ether (MTBE)	ND	1	ug/Kg	02/23/08		R/J	8021/8260
n-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
n-Propylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Naphthalene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
o-Xylene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
p-Isopropyltoluene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
sec-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
tert-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Toluene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Total Xylenes	ND	2	ug/Kg	02/23/08		R/J	8021/8260
QA/QC Surrogates							
% Bromofluorobenzene	77		%	02/23/08		R/J	8021/8260
Semivolatiles							
Acenaphthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Acenaphthylene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benz(a)anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(a)pyrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(b)fluoranthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(ghi)perylene	ND	330	ug/Kg	02/22/08		HM	SW 8270

Parameter	Result	RL	Units	Date	Time	By	Reference
Benzo(k)fluoranthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Chrysene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Dibenz(a,h)anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Fluoranthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Fluorene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Indeno(1,2,3-cd)pyrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Naphthalene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Phenanthrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Pyrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
QA/QC Surrogates							
% 2-Fluorobiphenyl	68		%	02/22/08		HM	SW 8270
% Nitrobenzene-d5	57		%	02/22/08		HM	SW 8270
% Terphenyl-d14	79		%	02/22/08		HM	SW 8270

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Limit RL=Reporting Limit

PLEASE NOTE: THIS PROGRESS REPORT IS CONSIDERED PRELIMINARY DATA. THE RESULTS ENTERED HAVE NOT BEEN EXAMINED BY OUR QA/QC DEPARTMENT.

Phyllis Shiller, Laboratory Director

February 28, 2008

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

ACCREDITED IN ACCORDANCE WITH nelac NY # 11301

Draft Progress Report

February 28, 2008

FOR: Attn: Ms. Aleksandra Miesak
PB Americas, Inc.
Five Penn Plaza
New York, NY 10001

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:		02/19/08	0:00
Location Code:	PBAMERIC	Received by:	LB	02/21/08	17:00
Rush Request:		Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAQ00911
Phoenix I.D.: AQ00912

Laboratory Data

Client ID: RANDOLPH HOUSES B-02

Parameter	Result	RL	Units	Date	Time	By	Reference
Percent Solid	88		%	02/21/08		X/TJB	E160.3
Soil Ext. Semi-Vol BN	Completed			02/21/08		SJ/E	SW3545
Volatile Organic Compounds							
1,2,4-Trimethylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
1,3,5-Trimethylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Benzene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Ethylbenzene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Isopropylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
m&p-Xylene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Methyl t-Butyl Ether (MTBE)	ND	1	ug/Kg	02/23/08		R/J	8021/8260
n-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
n-Propylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Naphthalene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
o-Xylene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
p-Isopropyltoluene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
sec-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
tert-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Toluene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Total Xylenes	ND	2	ug/Kg	02/23/08		R/J	8021/8260
QA/QC Surrogates							
% Bromofluorobenzene	93		%	02/23/08		R/J	8021/8260
Semivolatiles							
Acenaphthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Acenaphthylene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benz(a)anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(a)pyrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(b)fluoranthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(ghi)perylene	ND	330	ug/Kg	02/22/08		HM	SW 8270

Parameter	Result	RL	Units	Date	Time	By	Reference
Benzo(k)fluoranthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Chrysene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Dibenz(a,h)anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Fluoranthene	790	330	ug/Kg	02/22/08		HM	SW 8270
Fluorene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Indeno(1,2,3-cd)pyrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Naphthalene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Phenanthrene	670	330	ug/Kg	02/22/08		HM	SW 8270
Pyrene	570	330	ug/Kg	02/22/08		HM	SW 8270
QA/QC Surrogates							
% 2-Fluorobiphenyl	63		%	02/22/08		HM	SW 8270
% Nitrobenzene-d5	57		%	02/22/08		HM	SW 8270
% Terphenyl-d14	78		%	02/22/08		HM	SW 8270

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Limit RL=Reporting Limit

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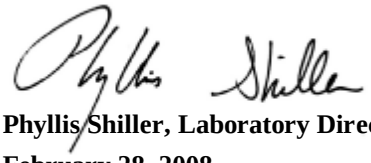

Phyllis Shiller, Laboratory Director

February 28, 2008

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

ACCREDITED IN ACCORDANCE WITH nelac NY # 11301

Draft Progress Report

February 28, 2008

FOR: Attn: Ms. Aleksandra Miesak
PB Americas, Inc.
Five Penn Plaza
New York, NY 10001

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:		02/19/08	0:00
Location Code:	PBAMERIC	Received by:	LB	02/21/08	17:00
Rush Request:		Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAQ00911
Phoenix I.D.: AQ00913

Laboratory Data

Client ID: RANDOLPH HOUSES B-03

Parameter	Result	RL	Units	Date	Time	By	Reference
Percent Solid	89		%	02/21/08		X/TJB	E160.3
Soil Ext. Semi-Vol BN	Completed			02/25/08		SJ/E	SW3545
Volatile Organic Compounds							
1,2,4-Trimethylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
1,3,5-Trimethylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Benzene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Ethylbenzene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Isopropylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
m&p-Xylene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Methyl t-Butyl Ether (MTBE)	ND	1	ug/Kg	02/23/08		R/J	8021/8260
n-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
n-Propylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Naphthalene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
o-Xylene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
p-Isopropyltoluene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
sec-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
tert-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Toluene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Total Xylenes	ND	2	ug/Kg	02/23/08		R/J	8021/8260
QA/QC Surrogates							
% Bromofluorobenzene	88		%	02/23/08		R/J	8021/8260
Semivolatiles							
Acenaphthene	ND	330	ug/Kg	02/26/08		HM	SW 8270
Acenaphthylene	ND	330	ug/Kg	02/26/08		HM	SW 8270
Anthracene	ND	330	ug/Kg	02/26/08		HM	SW 8270
Benz(a)anthracene	ND	330	ug/Kg	02/26/08		HM	SW 8270
Benzo(a)pyrene	ND	330	ug/Kg	02/26/08		HM	SW 8270
Benzo(b)fluoranthene	ND	330	ug/Kg	02/26/08		HM	SW 8270
Benzo(ghi)perylene	ND	330	ug/Kg	02/26/08		HM	SW 8270

Parameter	Result	RL	Units	Date	Time	By	Reference
Benzo(k)fluoranthene	ND	330	ug/Kg	02/26/08		HM	SW 8270
Chrysene	ND	330	ug/Kg	02/26/08		HM	SW 8270
Dibenz(a,h)anthracene	ND	330	ug/Kg	02/26/08		HM	SW 8270
Fluoranthene	ND	330	ug/Kg	02/26/08		HM	SW 8270
Fluorene	ND	330	ug/Kg	02/26/08		HM	SW 8270
Indeno(1,2,3-cd)pyrene	ND	330	ug/Kg	02/26/08		HM	SW 8270
Naphthalene	ND	330	ug/Kg	02/26/08		HM	SW 8270
Phenanthrene	ND	330	ug/Kg	02/26/08		HM	SW 8270
Pyrene	ND	330	ug/Kg	02/26/08		HM	SW 8270
QA/QC Surrogates							
% 2-Fluorobiphenyl	81		%	02/26/08		HM	SW 8270
% Nitrobenzene-d5	69		%	02/26/08		HM	SW 8270
% Terphenyl-d14	94		%	02/26/08		HM	SW 8270

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

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Phyllis Shiller, Laboratory Director

February 28, 2008

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587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

ACCREDITED IN ACCORDANCE WITH nelac NY # 11301

Draft Progress Report

February 28, 2008

FOR: Attn: Ms. Aleksandra Miesak
PB Americas, Inc.
Five Penn Plaza
New York, NY 10001

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:		02/19/08	0:00
Location Code:	PBAMERIC	Received by:	LB	02/21/08	17:00
Rush Request:		Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAQ00911
Phoenix I.D.: AQ00914

Laboratory Data

Client ID: RANDOLPH HOUSES B-04

Parameter	Result	RL	Units	Date	Time	By	Reference
Percent Solid	87		%	02/21/08		X/TJB	E160.3
Soil Ext. Semi-Vol BN	Completed			02/21/08		SJ/E	SW3545
Volatile Organic Compounds							
1,2,4-Trimethylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
1,3,5-Trimethylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Benzene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Ethylbenzene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Isopropylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
m&p-Xylene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Methyl t-Butyl Ether (MTBE)	ND	1	ug/Kg	02/23/08		R/J	8021/8260
n-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
n-Propylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Naphthalene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
o-Xylene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
p-Isopropyltoluene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
sec-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
tert-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Toluene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Total Xylenes	ND	2	ug/Kg	02/23/08		R/J	8021/8260
QA/QC Surrogates							
% Bromofluorobenzene	95		%	02/23/08		R/J	8021/8260
Semivolatiles							
Acenaphthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Acenaphthylene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benz(a)anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(a)pyrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(b)fluoranthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(ghi)perylene	ND	330	ug/Kg	02/22/08		HM	SW 8270

Parameter	Result	RL	Units	Date	Time	By	Reference
Benzo(k)fluoranthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Chrysene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Dibenz(a,h)anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Fluoranthene	440	330	ug/Kg	02/22/08		HM	SW 8270
Fluorene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Indeno(1,2,3-cd)pyrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Naphthalene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Phenanthrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Pyrene	400	330	ug/Kg	02/22/08		HM	SW 8270
QA/QC Surrogates							
% 2-Fluorobiphenyl	38		%	02/22/08		HM	SW 8270
% Nitrobenzene-d5	33		%	02/22/08		HM	SW 8270
% Terphenyl-d14	41		%	02/22/08		HM	SW 8270

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

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Phyllis Shiller, Laboratory Director

February 28, 2008

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Tel. (860) 645-1102 Fax (860) 645-0823

ACCREDITED IN ACCORDANCE WITH nelac NY # 11301

Draft Progress Report

February 28, 2008

FOR: Attn: Ms. Aleksandra Miesak
PB Americas, Inc.
Five Penn Plaza
New York, NY 10001

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:		02/19/08	0:00
Location Code:	PBAMERIC	Received by:	LB	02/21/08	17:00
Rush Request:		Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAQ00911
Phoenix I.D.: AQ00915

Laboratory Data

Client ID: RANDOLPH HOUSES B-06

Parameter	Result	RL	Units	Date	Time	By	Reference
Percent Solid	90		%	02/21/08		X/TJB	E160.3
Soil Ext. Semi-Vol BN	Completed			02/21/08		SJ/E	SW3545
Volatile Organic Compounds							
1,2,4-Trimethylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
1,3,5-Trimethylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Benzene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Ethylbenzene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Isopropylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
m&p-Xylene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Methyl t-Butyl Ether (MTBE)	ND	1	ug/Kg	02/23/08		R/J	8021/8260
n-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
n-Propylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Naphthalene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
o-Xylene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
p-Isopropyltoluene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
sec-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
tert-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Toluene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Total Xylenes	ND	2	ug/Kg	02/23/08		R/J	8021/8260
QA/QC Surrogates							
% Bromofluorobenzene	89		%	02/23/08		R/J	8021/8260
Semivolatiles							
Acenaphthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Acenaphthylene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benz(a)anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(a)pyrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(b)fluoranthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(ghi)perylene	ND	330	ug/Kg	02/22/08		HM	SW 8270

Parameter	Result	RL	Units	Date	Time	By	Reference
Benzo(k)fluoranthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Chrysene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Dibenz(a,h)anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Fluoranthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Fluorene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Indeno(1,2,3-cd)pyrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Naphthalene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Phenanthrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Pyrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
QA/QC Surrogates							
% 2-Fluorobiphenyl	38		%	02/22/08		HM	SW 8270
% Nitrobenzene-d5	37		%	02/22/08		HM	SW 8270
% Terphenyl-d14	46		%	02/22/08		HM	SW 8270

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Limit RL=Reporting Limit

PLEASE NOTE: THIS PROGRESS REPORT IS CONSIDERED PRELIMINARY DATA. THE RESULTS ENTERED HAVE NOT BEEN EXAMINED BY OUR QA/QC DEPARTMENT.

Phyllis Shiller, Laboratory Director

February 28, 2008

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

ACCREDITED IN ACCORDANCE WITH nelac NY # 11301

Draft Progress Report

February 28, 2008

FOR: Attn: Ms. Aleksandra Miesak
PB Americas, Inc.
Five Penn Plaza
New York, NY 10001

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:		02/20/08	0:00
Location Code:	PBAMERIC	Received by:	LB	02/21/08	17:00
Rush Request:		Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAQ00911
Phoenix I.D.: AQ00916

Laboratory Data

Client ID: RANDOLPH HOUSES B-08

Parameter	Result	RL	Units	Date	Time	By	Reference
Percent Solid	85		%	02/21/08		X/TJB	E160.3
Soil Ext. Semi-Vol BN	Completed			02/21/08		SJ/E	SW3545
Volatile Organic Compounds							
1,2,4-Trimethylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
1,3,5-Trimethylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Benzene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Ethylbenzene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Isopropylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
m&p-Xylene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Methyl t-Butyl Ether (MTBE)	ND	1	ug/Kg	02/23/08		R/J	8021/8260
n-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
n-Propylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Naphthalene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
o-Xylene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
p-Isopropyltoluene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
sec-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
tert-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Toluene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Total Xylenes	ND	2	ug/Kg	02/23/08		R/J	8021/8260
QA/QC Surrogates							
% Bromofluorobenzene	91		%	02/23/08		R/J	8021/8260
Semivolatiles							
Acenaphthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Acenaphthylene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benz(a)anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(a)pyrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(b)fluoranthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(ghi)perylene	ND	330	ug/Kg	02/22/08		HM	SW 8270

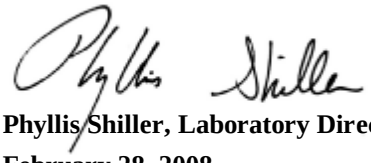
Parameter	Result	RL	Units	Date	Time	By	Reference
Benzo(k)fluoranthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Chrysene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Dibenz(a,h)anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Fluoranthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Fluorene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Indeno(1,2,3-cd)pyrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Naphthalene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Phenanthrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Pyrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
QA/QC Surrogates							
% 2-Fluorobiphenyl	52		%	02/22/08		HM	SW 8270
% Nitrobenzene-d5	46		%	02/22/08		HM	SW 8270
% Terphenyl-d14	60		%	02/22/08		HM	SW 8270

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Limit RL=Reporting Limit

PLEASE NOTE: THIS PROGRESS REPORT IS CONSIDERED PRELIMINARY DATA. THE RESULTS ENTERED HAVE NOT BEEN EXAMINED BY OUR QA/QC DEPARTMENT.



Phyllis Shiller, Laboratory Director

February 28, 2008

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

ACCREDITED IN ACCORDANCE WITH nelac NY # 11301

Draft Progress Report

February 28, 2008

FOR: Attn: Ms. Aleksandra Miesak
PB Americas, Inc.
Five Penn Plaza
New York, NY 10001

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:		02/20/08	0:00
Location Code:	PBAMERIC	Received by:	LB	02/21/08	17:00
Rush Request:		Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAQ00911
Phoenix I.D.: AQ00917

Laboratory Data

Client ID: RANDOLPH HOUSES B-09

Parameter	Result	RL	Units	Date	Time	By	Reference
Percent Solid	88		%	02/21/08		X/TJB	E160.3
Soil Ext. Semi-Vol BN	Completed			02/21/08		SJ/E	SW3545
Volatile Organic Compounds							
1,2,4-Trimethylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
1,3,5-Trimethylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Benzene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Ethylbenzene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Isopropylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
m&p-Xylene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Methyl t-Butyl Ether (MTBE)	ND	1	ug/Kg	02/23/08		R/J	8021/8260
n-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
n-Propylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Naphthalene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
o-Xylene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
p-Isopropyltoluene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
sec-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
tert-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Toluene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Total Xylenes	ND	2	ug/Kg	02/23/08		R/J	8021/8260
QA/QC Surrogates							
% Bromofluorobenzene	86		%	02/23/08		R/J	8021/8260
Semivolatiles							
Acenaphthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Acenaphthylene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benz(a)anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(a)pyrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(b)fluoranthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(ghi)perylene	ND	330	ug/Kg	02/22/08		HM	SW 8270

Parameter	Result	RL	Units	Date	Time	By	Reference
Benzo(k)fluoranthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Chrysene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Dibenz(a,h)anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Fluoranthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Fluorene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Indeno(1,2,3-cd)pyrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Naphthalene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Phenanthrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Pyrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
QA/QC Surrogates							
% 2-Fluorobiphenyl	75		%	02/22/08		HM	SW 8270
% Nitrobenzene-d5	68		%	02/22/08		HM	SW 8270
% Terphenyl-d14	86		%	02/22/08		HM	SW 8270

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Limit RL=Reporting Limit

PLEASE NOTE: THIS PROGRESS REPORT IS CONSIDERED PRELIMINARY DATA. THE RESULTS ENTERED HAVE NOT BEEN EXAMINED BY OUR QA/QC DEPARTMENT.

Phyllis Shiller, Laboratory Director

February 28, 2008

Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

ACCREDITED IN ACCORDANCE WITH nelac NY # 11301

Draft Progress Report

February 28, 2008

FOR: Attn: Ms. Aleksandra Miesak
PB Americas, Inc.
Five Penn Plaza
New York, NY 10001

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:		02/20/08	0:00
Location Code:	PBAMERIC	Received by:	LB	02/21/08	17:00
Rush Request:		Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAQ00911
Phoenix I.D.: AQ00918

Laboratory Data

Client ID: RANDOLPH HOUSES B-10

Parameter	Result	RL	Units	Date	Time	By	Reference
Percent Solid	92		%	02/25/08		X/TJB	E160.3
Volatile Organic Compounds							
1,2,4-Trimethylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
1,3,5-Trimethylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
Benzene	ND	2	ug/Kg	02/22/08		R/J	8021/8260
Ethylbenzene	ND	2	ug/Kg	02/22/08		R/J	8021/8260
Isopropylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
m&p-Xylene	ND	2	ug/Kg	02/22/08		R/J	8021/8260
Methyl t-Butyl Ether (MTBE)	ND	1	ug/Kg	02/22/08		R/J	8021/8260
n-Butylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
n-Propylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
Naphthalene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
o-Xylene	ND	2	ug/Kg	02/22/08		R/J	8021/8260
p-Isopropyltoluene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
sec-Butylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
tert-Butylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
Toluene	ND	2	ug/Kg	02/22/08		R/J	8021/8260
Total Xylenes	ND	2	ug/Kg	02/22/08		R/J	8021/8260
QA/QC Surrogates							
% Bromofluorobenzene	91		%	02/22/08		R/J	8021/8260

Parameter	Result	RL	Units	Date	Time	By	Reference

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Limit RL=Reporting Limit

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Phyllis Shiller, Laboratory Director

February 28, 2008

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

ACCREDITED IN ACCORDANCE WITH nelac NY # 11301

Draft Progress Report

February 28, 2008

FOR: Attn: Ms. Aleksandra Miesak
PB Americas, Inc.
Five Penn Plaza
New York, NY 10001

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:		02/20/08	0:00
Location Code:	PBAMERIC	Received by:	LB	02/21/08	17:00
Rush Request:		Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAQ00911
Phoenix I.D.: AQ00919

Laboratory Data

Client ID: RANDOLPH HOUSES B-11

Parameter	Result	RL	Units	Date	Time	By	Reference
Percent Solid	86		%	02/21/08		X/TJB	E160.3
Soil Ext. Semi-Vol BN	Completed			02/21/08		SJ/E	SW3545
Volatile Organic Compounds							
1,2,4-Trimethylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
1,3,5-Trimethylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
Benzene	ND	2	ug/Kg	02/22/08		R/J	8021/8260
Ethylbenzene	ND	2	ug/Kg	02/22/08		R/J	8021/8260
Isopropylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
m&p-Xylene	ND	2	ug/Kg	02/22/08		R/J	8021/8260
Methyl t-Butyl Ether (MTBE)	ND	1	ug/Kg	02/22/08		R/J	8021/8260
n-Butylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
n-Propylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
Naphthalene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
o-Xylene	ND	2	ug/Kg	02/22/08		R/J	8021/8260
p-Isopropyltoluene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
sec-Butylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
tert-Butylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
Toluene	ND	2	ug/Kg	02/22/08		R/J	8021/8260
Total Xylenes	ND	2	ug/Kg	02/22/08		R/J	8021/8260
QA/QC Surrogates							
% Bromofluorobenzene	88		%	02/22/08		R/J	8021/8260
Semivolatiles							
Acenaphthene	ND	320	ug/Kg	02/22/08		HM	SW 8270
Acenaphthylene	ND	320	ug/Kg	02/22/08		HM	SW 8270
Anthracene	ND	320	ug/Kg	02/22/08		HM	SW 8270
Benz(a)anthracene	ND	320	ug/Kg	02/22/08		HM	SW 8270
Benzo(a)pyrene	ND	320	ug/Kg	02/22/08		HM	SW 8270
Benzo(b)fluoranthene	ND	320	ug/Kg	02/22/08		HM	SW 8270
Benzo(ghi)perylene	ND	320	ug/Kg	02/22/08		HM	SW 8270

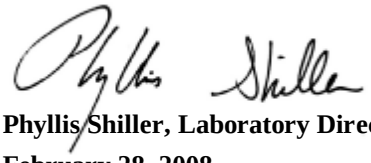
Parameter	Result	RL	Units	Date	Time	By	Reference
Benzo(k)fluoranthene	ND	320	ug/Kg	02/22/08		HM	SW 8270
Chrysene	ND	320	ug/Kg	02/22/08		HM	SW 8270
Dibenz(a,h)anthracene	ND	320	ug/Kg	02/22/08		HM	SW 8270
Fluoranthene	ND	320	ug/Kg	02/22/08		HM	SW 8270
Fluorene	ND	320	ug/Kg	02/22/08		HM	SW 8270
Indeno(1,2,3-cd)pyrene	ND	320	ug/Kg	02/22/08		HM	SW 8270
Naphthalene	ND	320	ug/Kg	02/22/08		HM	SW 8270
Phenanthrene	ND	320	ug/Kg	02/22/08		HM	SW 8270
Pyrene	ND	320	ug/Kg	02/22/08		HM	SW 8270
QA/QC Surrogates							
% 2-Fluorobiphenyl	76		%	02/22/08		HM	SW 8270
% Nitrobenzene-d5	62		%	02/22/08		HM	SW 8270
% Terphenyl-d14	83		%	02/22/08		HM	SW 8270

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Limit RL=Reporting Limit

PLEASE NOTE: THIS PROGRESS REPORT IS CONSIDERED PRELIMINARY DATA. THE RESULTS ENTERED HAVE NOT BEEN EXAMINED BY OUR QA/QC DEPARTMENT.



Phyllis Shiller, Laboratory Director

February 28, 2008

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

ACCREDITED IN ACCORDANCE WITH nelac NY # 11301

Draft Progress Report

February 28, 2008

FOR: Attn: Ms. Aleksandra Miesak
PB Americas, Inc.
Five Penn Plaza
New York, NY 10001

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:		02/20/08	0:00
Location Code:	PBAMERIC	Received by:	LB	02/21/08	17:00
Rush Request:		Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAQ00911
Phoenix I.D.: AQ00920

Laboratory Data

Client ID: RANDOLPH HOUSES B-12

Parameter	Result	RL	Units	Date	Time	By	Reference
Percent Solid	87		%	02/21/08		X/TJB	E160.3
Soil Ext. Semi-Vol BN	Completed			02/21/08		SJ/E	SW3545
Volatile Organic Compounds							
1,2,4-Trimethylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
1,3,5-Trimethylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
Benzene	ND	2	ug/Kg	02/22/08		R/J	8021/8260
Ethylbenzene	ND	2	ug/Kg	02/22/08		R/J	8021/8260
Isopropylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
m&p-Xylene	ND	2	ug/Kg	02/22/08		R/J	8021/8260
Methyl t-Butyl Ether (MTBE)	ND	1	ug/Kg	02/22/08		R/J	8021/8260
n-Butylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
n-Propylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
Naphthalene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
o-Xylene	ND	2	ug/Kg	02/22/08		R/J	8021/8260
p-Isopropyltoluene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
sec-Butylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
tert-Butylbenzene	ND	1	ug/Kg	02/22/08		R/J	8021/8260
Toluene	ND	2	ug/Kg	02/22/08		R/J	8021/8260
Total Xylenes	ND	2	ug/Kg	02/22/08		R/J	8021/8260
QA/QC Surrogates							
% Bromofluorobenzene	88		%	02/22/08		R/J	8021/8260
Semivolatiles							
Acenaphthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Acenaphthylene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benz(a)anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(a)pyrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(b)fluoranthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Benzo(ghi)perylene	ND	330	ug/Kg	02/22/08		HM	SW 8270

Parameter	Result	RL	Units	Date	Time	By	Reference
Benzo(k)fluoranthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Chrysene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Dibenz(a,h)anthracene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Fluoranthene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Fluorene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Indeno(1,2,3-cd)pyrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Naphthalene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Phenanthrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
Pyrene	ND	330	ug/Kg	02/22/08		HM	SW 8270
QA/QC Surrogates							
% 2-Fluorobiphenyl	88		%	02/22/08		HM	SW 8270
% Nitrobenzene-d5	76		%	02/22/08		HM	SW 8270
% Terphenyl-d14	102		%	02/22/08		HM	SW 8270

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Limit RL=Reporting Limit

PLEASE NOTE: THIS PROGRESS REPORT IS CONSIDERED PRELIMINARY DATA. THE RESULTS ENTERED HAVE NOT BEEN EXAMINED BY OUR QA/QC DEPARTMENT.

Phyllis Shiller, Laboratory Director

February 28, 2008

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

ACCREDITED IN ACCORDANCE WITH nelac NY # 11301

Draft Progress Report

February 28, 2008

FOR: Attn: Ms. Aleksandra Miesak
PB Americas, Inc.
Five Penn Plaza
New York, NY 10001

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:		02/20/08	0:00
Location Code:	PBAMERIC	Received by:	LP	02/21/08	17:00
Rush Request:		Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAQ00911
Phoenix I.D.: AQ00983

Laboratory Data

Client ID: RANDOLPH HOUSES B-05

Parameter	Result	RL	Units	Date	Time	By	Reference
Percent Solid	88		%	02/21/08		X/TJB	E160.3
Soil Ext. Semi-Vol BN	Completed			02/22/08		SJ/D	SW3545
Volatile Organic Compounds							
1,2,4-Trimethylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
1,3,5-Trimethylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Benzene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Ethylbenzene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Isopropylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
m&p-Xylene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Methyl t-Butyl Ether (MTBE)	ND	1	ug/Kg	02/23/08		R/J	8021/8260
n-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
n-Propylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Naphthalene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
o-Xylene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
p-Isopropyltoluene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
sec-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
tert-Butylbenzene	ND	1	ug/Kg	02/23/08		R/J	8021/8260
Toluene	ND	2	ug/Kg	02/23/08		R/J	8021/8260
Total Xylenes	ND	2	ug/Kg	02/23/08		R/J	8021/8260
QA/QC Surrogates							
% Bromofluorobenzene	94		%	02/23/08		R/J	8021/8260
Semivolatiles							
Acenaphthene	ND	330	ug/Kg	02/25/08		HM	SW 8270
Acenaphthylene	ND	330	ug/Kg	02/25/08		HM	SW 8270
Anthracene	ND	330	ug/Kg	02/25/08		HM	SW 8270
Benz(a)anthracene	560	330	ug/Kg	02/25/08		HM	SW 8270
Benzo(a)pyrene	520	330	ug/Kg	02/25/08		HM	SW 8270
Benzo(b)fluoranthene	640	330	ug/Kg	02/25/08		HM	SW 8270
Benzo(ghi)perylene	ND	330	ug/Kg	02/25/08		HM	SW 8270

Parameter	Result	RL	Units	Date	Time	By	Reference
Benzo(k)fluoranthene	ND	330	ug/Kg	02/25/08		HM	SW 8270
Chrysene	540	330	ug/Kg	02/25/08		HM	SW 8270
Dibenz(a,h)anthracene	ND	330	ug/Kg	02/25/08		HM	SW 8270
Fluoranthene	1400	330	ug/Kg	02/25/08		HM	SW 8270
Fluorene	ND	330	ug/Kg	02/25/08		HM	SW 8270
Indeno(1,2,3-cd)pyrene	ND	330	ug/Kg	02/25/08		HM	SW 8270
Naphthalene	ND	330	ug/Kg	02/25/08		HM	SW 8270
Phenanthrene	1400	330	ug/Kg	02/25/08		HM	SW 8270
Pyrene	1100	330	ug/Kg	02/25/08		HM	SW 8270
QA/QC Surrogates							
% 2-Fluorobiphenyl	71		%	02/25/08		HM	SW 8270
% Nitrobenzene-d5	70		%	02/25/08		HM	SW 8270
% Terphenyl-d14	66		%	02/25/08		HM	SW 8270

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Limit RL=Reporting Limit

PLEASE NOTE: THIS PROGRESS REPORT IS CONSIDERED PRELIMINARY DATA. THE RESULTS ENTERED HAVE NOT BEEN EXAMINED BY OUR QA/QC DEPARTMENT.

Phyllis Shiller, Laboratory Director

February 28, 2008

PHOENIX

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587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

ACCREDITED IN ACCORDANCE WITH nelac NY # 11301

Draft Progress Report

February 28, 2008

FOR: Attn: Ms. Aleksandra Miesak
PB Americas, Inc.
Five Penn Plaza
New York, NY 10001

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:		02/19/08	0:00
Location Code:	PBAMERIC	Received by:	LB	02/21/08	17:00
Rush Request:		Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAQ00921
Phoenix I.D.: AQ00921

Laboratory Data

Client ID: RANDOLPH HOUSES B-208

Parameter	Result	RL	Units	Date	Time	By	Reference	
Silver	< 0.40	0.40	mg/Kg	02/23/08		LK	SW6010	
Aluminum	9170	8.0	mg/Kg	02/27/08		L/E	SW6010	
Arsenic	3.1	0.8	mg/Kg	02/23/08		LK	SW6010	
Barium	55.8	0.40	mg/Kg	02/23/08		LK	SW6010	
Beryllium	0.37	0.32	mg/Kg	02/23/08		LK	SW6010	
Calcium	6290	0.8	mg/Kg	02/23/08		LK	6010/200.7	
Cadmium	< 0.40	0.40	mg/Kg	02/23/08		LK	SW6010	
Cobalt	4.97	0.40	mg/Kg	02/23/08		LK	SW6010	1
Chromium	13.7	0.40	mg/Kg	02/23/08		LK	SW6010	
Copper	26.2	4.0	mg/kg	02/27/08		L/E	SW6010	
Iron	14800	4.0	mg/Kg	02/27/08		L/E	SW6010	
Mercury	0.28	0.11	mg/kg	02/25/08		RS	SW-7471	
Potassium	1310	0.8	mg/Kg	02/23/08		LK	SW6010	
Magnesium	2450	0.40	mg/Kg	02/23/08		LK	SW6010	
Manganese	422	4.0	mg/Kg	02/27/08		L/E	SW6010	
Sodium	104	40	mg/Kg	02/27/08		L/E	SW6010	
Nickel	24.5	0.40	mg/Kg	02/23/08		LK	SW6010	
Lead	55.8	0.40	mg/Kg	02/23/08		LK	SW6010	
Antimony	< 4.0	4.0	mg/Kg	02/23/08		LK	SW6010	
Selenium	< 2.0	2.0	mg/Kg	02/23/08		LK	SW6010	
Thallium	< 4.0	4.0	mg/Kg	02/23/08		LK	SW6010	
Vanadium	172	4.0	mg/Kg	02/27/08		L/E	6010	
Zinc	46.1	0.40	mg/Kg	02/23/08		LK	SW6010	
Percent Solid	88		%	02/21/08		X/TJB	E160.3	
Mercury Digestion	Completed			02/25/08		E	SW7471	
Total Metals Digest	Completed			02/22/08		AG	SW846 - 3050	
Extraction of TPH SM	Completed			02/21/08		BJ/E	3545/3550	1
TPH by GC (Extractable Products)								
Fuel Oil #2 / Diesel Fuel	ND	76	mg/kg	02/27/08		JRB	8100Mod	
Fuel Oil #4	ND	76	mg/kg	02/27/08		JRB	8100Mod	

Parameter	Result	RL	Units	Date	Time	By	Reference
Fuel Oil #6	ND	76	mg/kg	02/27/08		JRB	8100Mod
Kerosene	ND	76	mg/kg	02/27/08		JRB	8100Mod
Motor Oil	**	76	mg/kg	02/27/08		JRB	8100Mod
Other Oil (Cutting & Lubricating)	ND	76	mg/kg	02/27/08		JRB	8100Mod
Unidentified	160	76	mg/kg	02/27/08		JRB	8100Mod
QA/QC Surrogates							
% n-Pentacosane	116		%	02/27/08		JRB	8100Mod

1 = This parameter is not certified by NY NELAC for this matrix. NY NELAC does not offer certification for all parameters.

Comments:

**Petroleum hydrocarbon chromatogram was not a perfect match with any of the standards, but most closely resembles motor oil.

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Limit RL=Reporting Limit

PLEASE NOTE: THIS PROGRESS REPORT IS CONSIDERED PRELIMINARY DATA. THE RESULTS ENTERED HAVE NOT BEEN EXAMINED BY OUR QA/QC DEPARTMENT.

Phyllis Shiller, Laboratory Director
February 28, 2008

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

ACCREDITED IN ACCORDANCE WITH nelac NY # 11301

Draft Progress Report

February 28, 2008

FOR: Attn: Ms. Aleksandra Miesak
PB Americas, Inc.
Five Penn Plaza
New York, NY 10001

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:		02/19/08	0:00
Location Code:	PBAMERIC	Received by:	LB	02/21/08	17:00
Rush Request:		Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAQ00921
Phoenix I.D.: AQ00922

Laboratory Data

Client ID: RANDOLPH HOUSES B-220

Parameter	Result	RL	Units	Date	Time	By	Reference	
Silver	< 0.35	0.35	mg/Kg	02/23/08		LK	SW6010	
Aluminum	10900	7.0	mg/Kg	02/27/08		L/E	SW6010	
Arsenic	4.3	0.7	mg/Kg	02/23/08		LK	SW6010	
Barium	97.7	0.35	mg/Kg	02/23/08		LK	SW6010	
Beryllium	0.33	0.28	mg/Kg	02/23/08		LK	SW6010	
Calcium	21000	7.0	mg/Kg	02/27/08		L/E	6010/200.7	
Cadmium	< 0.35	0.35	mg/Kg	02/23/08		LK	SW6010	
Cobalt	8.04	0.35	mg/Kg	02/23/08		LK	SW6010	1
Chromium	21.2	0.35	mg/Kg	02/23/08		LK	SW6010	
Copper	28.5	3.5	mg/kg	02/27/08		L/E	SW6010	
Iron	28200	3.5	mg/Kg	02/27/08		L/E	SW6010	
Mercury	0.25	0.10	mg/kg	02/25/08		RS	SW-7471	
Potassium	4150	7.0	mg/Kg	02/27/08		L/E	SW6010	
Magnesium	6890	3.5	mg/Kg	02/27/08		L/E	SW6010	
Manganese	359	3.5	mg/Kg	02/27/08		L/E	SW6010	
Sodium	193	35	mg/Kg	02/27/08		L/E	SW6010	
Nickel	18.0	0.35	mg/Kg	02/23/08		LK	SW6010	
Lead	67.4	0.35	mg/Kg	02/23/08		LK	SW6010	
Antimony	< 3.5	3.5	mg/Kg	02/23/08		LK	SW6010	
Selenium	< 1.7	1.7	mg/Kg	02/23/08		LK	SW6010	
Thallium	< 3.5	3.5	mg/Kg	02/23/08		LK	SW6010	
Vanadium	33.5	3.5	mg/Kg	02/27/08		L/E	6010	
Zinc	72.0	0.35	mg/Kg	02/23/08		LK	SW6010	
Percent Solid	92		%	02/21/08		X/TJB	E160.3	
Mercury Digestion	Completed			02/25/08		E	SW7471	
Total Metals Digest	Completed			02/22/08		AG	SW846 - 3050	
Extraction of TPH SM	Completed			02/21/08		BJ/E	3545/3550	1
TPH by GC (Extractable Products)								
Fuel Oil #2 / Diesel Fuel	ND	72	mg/kg	02/24/08		JRB	8100Mod	
Fuel Oil #4	ND	72	mg/kg	02/24/08		JRB	8100Mod	

Parameter	Result	RL	Units	Date	Time	By	Reference
Fuel Oil #6	ND	72	mg/kg	02/24/08		JRB	8100Mod
Kerosene	ND	72	mg/kg	02/24/08		JRB	8100Mod
Motor Oil	ND	72	mg/kg	02/24/08		JRB	8100Mod
Other Oil (Cutting & Lubricating)	ND	72	mg/kg	02/24/08		JRB	8100Mod
Unidentified	ND	72	mg/kg	02/24/08		JRB	8100Mod
QA/QC Surrogates							
% n-Pentacosane	77		%	02/24/08		JRB	8100Mod

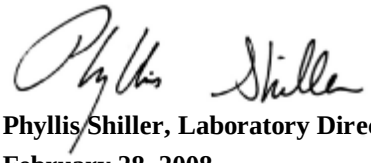
1 = This parameter is not certified by NY NELAC for this matrix. NY NELAC does not offer certification for all parameters.

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Limit RL=Reporting Limit

PLEASE NOTE: THIS PROGRESS REPORT IS CONSIDERED PRELIMINARY DATA. THE RESULTS ENTERED HAVE NOT BEEN EXAMINED BY OUR QA/QC DEPARTMENT.



Phyllis Shiller, Laboratory Director

February 28, 2008

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

ACCREDITED IN ACCORDANCE WITH nelac NY # 11301

Draft Progress Report

February 28, 2008

FOR: Attn: Ms. Aleksandra Miesak
PB Americas, Inc.
Five Penn Plaza
New York, NY 10001

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:		02/20/08	0:00
Location Code:	PBAMERIC	Received by:	LB	02/21/08	17:00
Rush Request:		Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAQ00921
Phoenix I.D.: AQ00923

Laboratory Data

Client ID: RANDOLPH HOUSES B-228

Parameter	Result	RL	Units	Date	Time	By	Reference	
Silver	< 0.38	0.38	mg/Kg	02/23/08		LK	SW6010	
Aluminum	9130	7.7	mg/Kg	02/27/08		L/E	SW6010	
Arsenic	4.2	0.8	mg/Kg	02/23/08		LK	SW6010	
Barium	89.4	0.38	mg/Kg	02/23/08		LK	SW6010	
Beryllium	0.35	0.31	mg/Kg	02/23/08		LK	SW6010	
Calcium	10300	0.8	mg/Kg	02/23/08		LK	6010/200.7	
Cadmium	< 0.38	0.38	mg/Kg	02/23/08		LK	SW6010	
Cobalt	5.96	0.38	mg/Kg	02/23/08		LK	SW6010	1
Chromium	14.0	0.38	mg/Kg	02/23/08		LK	SW6010	
Copper	25.3	3.8	mg/kg	02/27/08		L/E	SW6010	
Iron	15200	3.8	mg/Kg	02/27/08		L/E	SW6010	
Mercury	0.53	0.12	mg/kg	02/25/08		RS	SW-7471	
Potassium	1510	0.8	mg/Kg	02/23/08		LK	SW6010	
Magnesium	4210	0.38	mg/Kg	02/23/08		LK	SW6010	
Manganese	413	3.8	mg/Kg	02/27/08		L/E	SW6010	
Sodium	193	38	mg/Kg	02/27/08		L/E	SW6010	
Nickel	14.6	0.38	mg/Kg	02/23/08		LK	SW6010	
Lead	82.3	0.38	mg/Kg	02/23/08		LK	SW6010	
Antimony	< 3.8	3.8	mg/Kg	02/23/08		LK	SW6010	
Selenium	< 1.9	1.9	mg/Kg	02/23/08		LK	SW6010	
Thallium	< 3.8	3.8	mg/Kg	02/23/08		LK	SW6010	
Vanadium	24.2	3.8	mg/Kg	02/27/08		L/E	6010	
Zinc	68.1	0.38	mg/Kg	02/23/08		LK	SW6010	
Percent Solid	87		%	02/21/08		X/TJB	E160.3	
Mercury Digestion	Completed			02/25/08		E	SW7471	
Total Metals Digest	Completed			02/22/08		AG	SW846 - 3050	
Extraction of TPH SM	Completed			02/21/08		BJ/E	3545/3550	1
TPH by GC (Extractable Products)								
Fuel Oil #2 / Diesel Fuel	ND	76	mg/kg	02/24/08		JRB	8100Mod	
Fuel Oil #4	ND	76	mg/kg	02/24/08		JRB	8100Mod	

Client ID: RANDOLPH HOUSES B-228 Phoenix I.D.: AQ00923

Parameter	Result	RL	Units	Date	Time	By	Reference
Fuel Oil #6	ND	76	mg/kg	02/24/08		JRB	8100Mod
Kerosene	ND	76	mg/kg	02/24/08		JRB	8100Mod
Motor Oil	**	76	mg/kg	02/24/08		JRB	8100Mod
Other Oil (Cutting & Lubricating)	ND	76	mg/kg	02/24/08		JRB	8100Mod
Unidentified	240	76	mg/kg	02/24/08		JRB	8100Mod
QA/QC Surrogates							
% n-Pentacosane	Interference		%	02/24/08		JRB	8100Mod

1 = This parameter is not certified by NY NELAC for this matrix. NY NELAC does not offer certification for all parameters.

Comments:

**Petroleum hydrocarbon chromatogram was not a perfect match with any of the standards, but most closely resembles motor oil.

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Limit RL=Reporting Limit

PLEASE NOTE: THIS PROGRESS REPORT IS CONSIDERED PRELIMINARY DATA. THE RESULTS ENTERED HAVE NOT BEEN EXAMINED BY OUR QA/QC DEPARTMENT.

Phyllis Shiller, Laboratory Director
February 28, 2008

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ACCREDITED IN ACCORDANCE WITH nelac NY # 11301

Draft Progress Report

February 28, 2008

FOR: Attn: Ms. Aleksandra Miesak
PB Americas, Inc.
Five Penn Plaza
New York, NY 10001

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:		02/20/08	0:00
Location Code:	PBAMERIC	Received by:	LB	02/21/08	17:00
Rush Request:		Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAQ00921
Phoenix I.D.: AQ00924

Laboratory Data

Client ID: RANDOLPH HOUSES B-240

Parameter	Result	RL	Units	Date	Time	By	Reference	
Silver	< 0.40	0.40	mg/Kg	02/23/08		LK	SW6010	
Aluminum	11800	8.0	mg/Kg	02/27/08		L/E	SW6010	
Arsenic	5.3	0.8	mg/Kg	02/23/08		LK	SW6010	
Barium	116	0.40	mg/Kg	02/23/08		LK	SW6010	
Beryllium	0.40	0.32	mg/Kg	02/23/08		LK	SW6010	
Calcium	15000	8.0	mg/Kg	02/27/08		L/E	6010/200.7	
Cadmium	0.51	0.40	mg/Kg	02/23/08		LK	SW6010	
Cobalt	10.0	0.40	mg/Kg	02/23/08		LK	SW6010	1
Chromium	22.1	0.40	mg/Kg	02/23/08		LK	SW6010	
Copper	51.4	4.0	mg/kg	02/27/08		L/E	SW6010	
Iron	26400	4.0	mg/Kg	02/27/08		L/E	SW6010	
Mercury	0.29	0.12	mg/kg	02/25/08		RS	SW-7471	
Potassium	3680	0.8	mg/Kg	02/23/08		LK	SW6010	
Magnesium	4600	0.40	mg/Kg	02/23/08		LK	SW6010	
Manganese	444	4.0	mg/Kg	02/27/08		L/E	SW6010	
Sodium	384	40	mg/Kg	02/27/08		L/E	SW6010	
Nickel	25.1	0.40	mg/Kg	02/23/08		LK	SW6010	
Lead	124	0.40	mg/Kg	02/23/08		LK	SW6010	
Antimony	< 4.0	4.0	mg/Kg	02/23/08		LK	SW6010	
Selenium	< 2.0	2.0	mg/Kg	02/23/08		LK	SW6010	
Thallium	< 4.0	4.0	mg/Kg	02/23/08		LK	SW6010	
Vanadium	34.0	4.0	mg/Kg	02/27/08		L/E	6010	
Zinc	143	0.40	mg/Kg	02/23/08		LK	SW6010	
Percent Solid	87		%	02/21/08		X/TJB	E160.3	
Mercury Digestion	Completed			02/25/08		E	SW7471	
Total Metals Digest	Completed			02/22/08		AG	SW846 - 3050	
Extraction of TPH SM	Completed			02/21/08		BJ/E	3545/3550	1
TPH by GC (Extractable Products)								
Fuel Oil #2 / Diesel Fuel	ND	76	mg/kg	02/24/08		JRB	8100Mod	
Fuel Oil #4	ND	76	mg/kg	02/24/08		JRB	8100Mod	

Parameter	Result	RL	Units	Date	Time	By	Reference
Fuel Oil #6	ND	76	mg/kg	02/24/08		JRB	8100Mod
Kerosene	ND	76	mg/kg	02/24/08		JRB	8100Mod
Motor Oil	ND	76	mg/kg	02/24/08		JRB	8100Mod
Other Oil (Cutting & Lubricating)	ND	76	mg/kg	02/24/08		JRB	8100Mod
Unidentified	ND	76	mg/kg	02/24/08		JRB	8100Mod
QA/QC Surrogates							
% n-Pentacosane	84		%	02/24/08		JRB	8100Mod

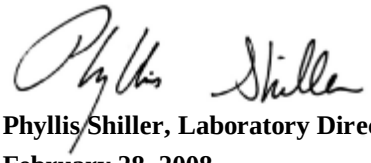
1 = This parameter is not certified by NY NELAC for this matrix. NY NELAC does not offer certification for all parameters.

Comments:

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

ND=Not detected BDL=Below Detection Limit RL=Reporting Limit

PLEASE NOTE: THIS PROGRESS REPORT IS CONSIDERED PRELIMINARY DATA. THE RESULTS ENTERED HAVE NOT BEEN EXAMINED BY OUR QA/QC DEPARTMENT.



Phyllis Shiller, Laboratory Director

February 28, 2008

ATTACHMENT D:
Additional SHPO Correspondence

AKRF

Environmental and Planning Consultants

440 Park Avenue South
7th Floor
New York, NY 10016
tel: 212 696-0670
fax: 212 213-3191
www.akrf.com

July 23, 2010

Ms. Kathleen Howe
Historic Preservation Specialist
New York State Office of Parks, Recreation and Historic Preservation
Waterford, NY 12188

Re: NYCHA Randolph Houses – 204-277 West 114th Street
New York County
07PR03421

Dear Kathy:

As discussed, we are seeking a reevaluation of eligibility for the 36 tenements located on both sides of West 114th Street between Adam Clayton Powell Jr Blvd and Frederick Douglass Blvd. These properties, in conjunction with the Lydia F. Wadleigh School, contribute to the West 114th Street Historic District (See Exhibit A). This district was determined eligible by OPRHP on August 21, 2007, based on information provided by NYCHA to OPRHP. It appears this information consisted of photographs of the buildings.

As the analysis of the potential redevelopment options has progressed, additional research has been undertaken. This research provides new information and requires that the existing eligibility determination, which cites significance based partially on the buildings' construction as New Law Tenements, to be re-evaluated.

Construction Dates

The north side of West 114th Street contains 14 tenements (251-277 West 114th Street), in addition to the Wadleigh School to the east. The Wadleigh School is individually S/NR eligible and a New York City Landmark. The south side of the street contains 22 tenements (204-246 West 114th Street).

All 36 tenements are Old Law Tenements and were not subject to the NYS Tenement House Act of 1901, commonly known as the "New Law". The New Law was passed to prohibit the construction of dark and poorly ventilated residential buildings and stipulated maximum lot coverage and size of airshafts/courtyards. The classification of the buildings as Old Law Tenements is reflected in information at the NYC Department of Buildings, including Certificates of Occupancies and inspection forms.

Specific dates of construction and architects for the south side of the street are as follows:

- 204-206 West 114th Street: built 1896, Ferdon & Ellicott, architects.
- 208-212 West 114th Street: built 1896, Neville & Bagge, architects.
- 214-216 West 114th Street: built 1897, Neville & Bagge, architects.
- 218-226 West 114th Street: built 1899, John P. Leo, architect.

The buildings on the north side of the street were also built prior to 1901, and are classified by the New York City Department of Buildings as Old Law Tenements. It is possible that some of the tenements could have been built circa 1895, as a new building permit was filed in 1895 to erect eight five-story brick buildings on the north side of the street, 100 feet east of Eighth Avenue (Frederick Douglass Blvd).

Alterations

The buildings have all been altered since their construction, some to a greater extent than others. On the exteriors, alterations include missing and sealed up window openings, new stoops, missing cornices, and insertion of openings in some of the buildings at ground level to create storage spaces. All buildings have been altered through the removal of the original windows and replacement with aluminum double-hung sash.

With respect to the interiors, the buildings have been altered. The buildings were all renovated in the 1960s. The extent of the alterations are summarized below.

On the north side of the street, the buildings were built with 11 residential units, two on each of floors 1-5 and one in the basement. These have been altered by the removal of the unit in the basement, addition of a third unit on the first floor, and reconfiguration of the units on floors 2 and 5. The original configuration for each floor on the upper floors was two apartments: one extending along the west side of the building, one extending along the east side of the building, with a central corridor in between. The 1960's alterations changed the configuration to one where there are still 2 units on floors 2-5, but there is an apartment facing north and an apartment facing south. For example, please see attached Figures 1 and 2, which show the original floor plans and the 1966 alterations of the building at 253 West 114th Street. These alterations have resulted in the removal of original ceilings, wall partitions, fixtures, and moldings. The wood floors appear to be original. 251 and 259 West 114th Street have further been altered by the removal of all the units on the first floor to create community and office spaces.

On the south side of the street, 204-212 West 114th Street were also built as 11 unit buildings. 208-212 West 114th Street have had the same kinds of alterations made as the 11 units on the north side of the street: removal of the basement unit, addition of a third unit on the first floor, and reconfiguration of the upper floors to change the layout of the two apartments from one where there is an apartment on each of the east and west sides of the buildings, to a configuration where is an apartment on each of the north and south sides of the building. For example, please see attached Figures 3 and 4, which show the original floor plans and the 1966 alterations for the building at 210 West 114th Street. 204 and 206 West 114th Street have been more drastically modified to include the alterations described above and through the removal of the original staircase, originally centrally located near the entrance of the building. In 204 West 114th Street, the stairs have been replaced with a new staircase on the west east side of the building. In 206 West 114th Street, the stairs have been replaced with a new staircase on the east side of the building (see Figures 5-8, which show original floor plans and the 1966 alterations for the building at 206 West 114th Street).

The buildings at 214-246 West 114th Street were built with 16 units, one in the basement and three each on floors 2-5. In these buildings, the basement unit has been removed. The partitions within the units on all the floors have been reconfigured, including creating hallways within the units to eliminate railroad style apartments. The basements of the buildings at 222, 224, and 226 West 114th Street have been combined. To accomplish this, the stairs leading from the first floor to the ground floor of these buildings were removed and access is provided below street level at 224 West 114th Street. Please see Figures 9 and 10, which show the original floor plans and the 1966 alterations for the building at 226 West 114th Street.

All buildings on the north and south sides of the street were further modified in the 1980s with alterations to the kitchens and bathrooms. Most of the buildings appear to have replacement treads, banisters, and handrails. A few appear to retain wood handrails and at least one most of the original marble stair treads. The buildings no longer retain original moldings or fixtures and the ceilings and most wall partitions date to the 1960's alterations.

Streetscape and Conditions

The buildings are 5-stories and are constructed of wood and brick – brick load bearing walls and wood floor joists. The primary facades are clad in brick with brownstone used to clad the ground floors and used as ornament at the upper floors (see Figures 11-13). Typically, the stone has been painted and is deteriorated in a number of locations (see Figure 14). The stoops are replacements, and are of concrete (see Figure 12). As described above, some of the buildings have missing and sealed up window openings, missing cornices, and insertion of openings with roll-down metal security gates at ground level to create storage spaces (see Figures 11 and 12).

In the interior, wall and ceiling surfaces—of sheetrock—in the unoccupied buildings on the south side of the street and vacant units on the north side of the streets are deteriorated, likely due to leaking water pipes (see Figures 15-17). At the top floors, the wood joists and flooring show signs of water infiltration, probably as a result of roof leaks. In some units, the water has warped the wood floors. Peeling paint and disintegrating sheetrock is also prevalent.

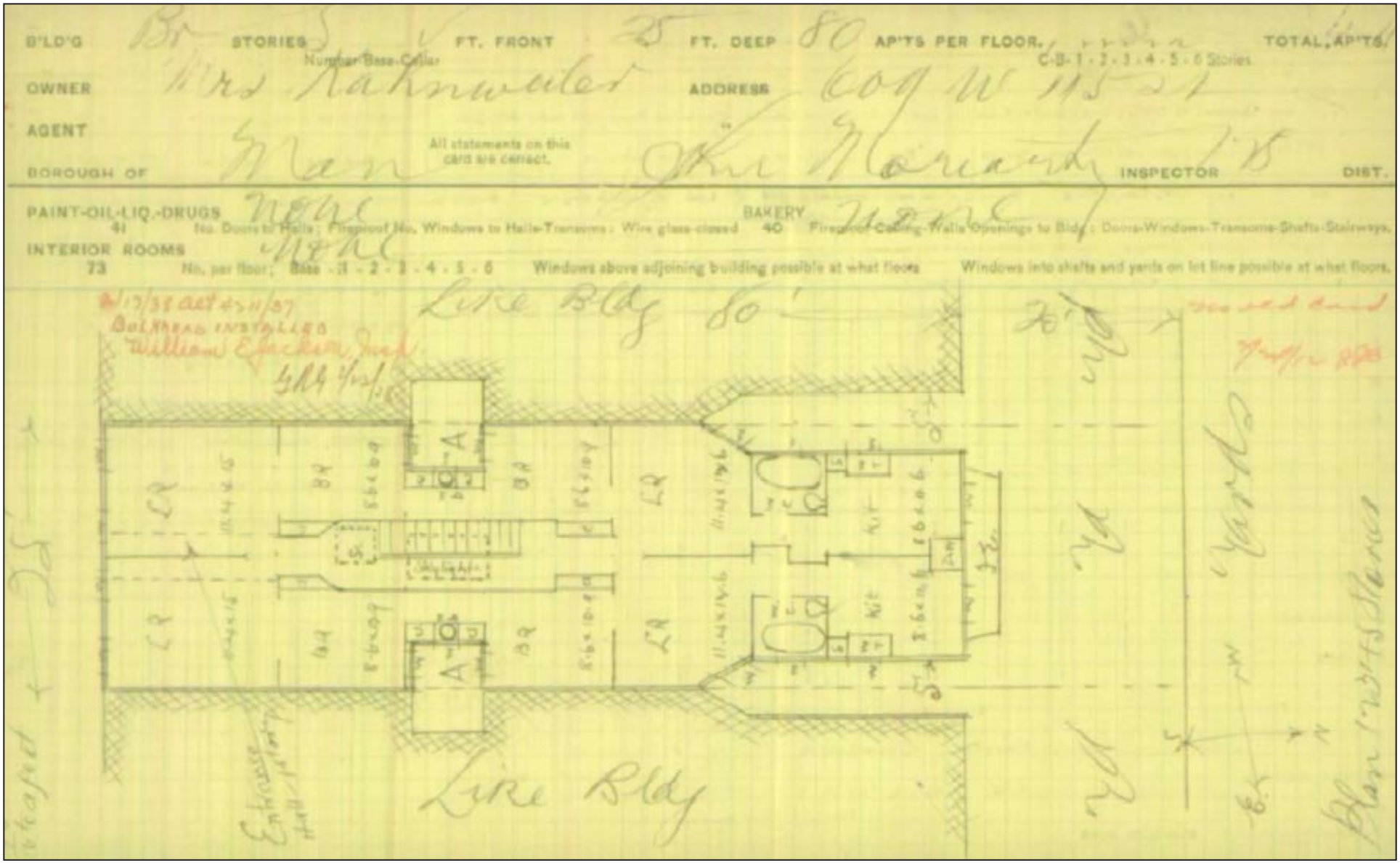
A full structural analysis would be required to determine any structural issues associated with the buildings.

Please let me know if you have any questions or require further information at (646) 388-9745.

Sincerely,

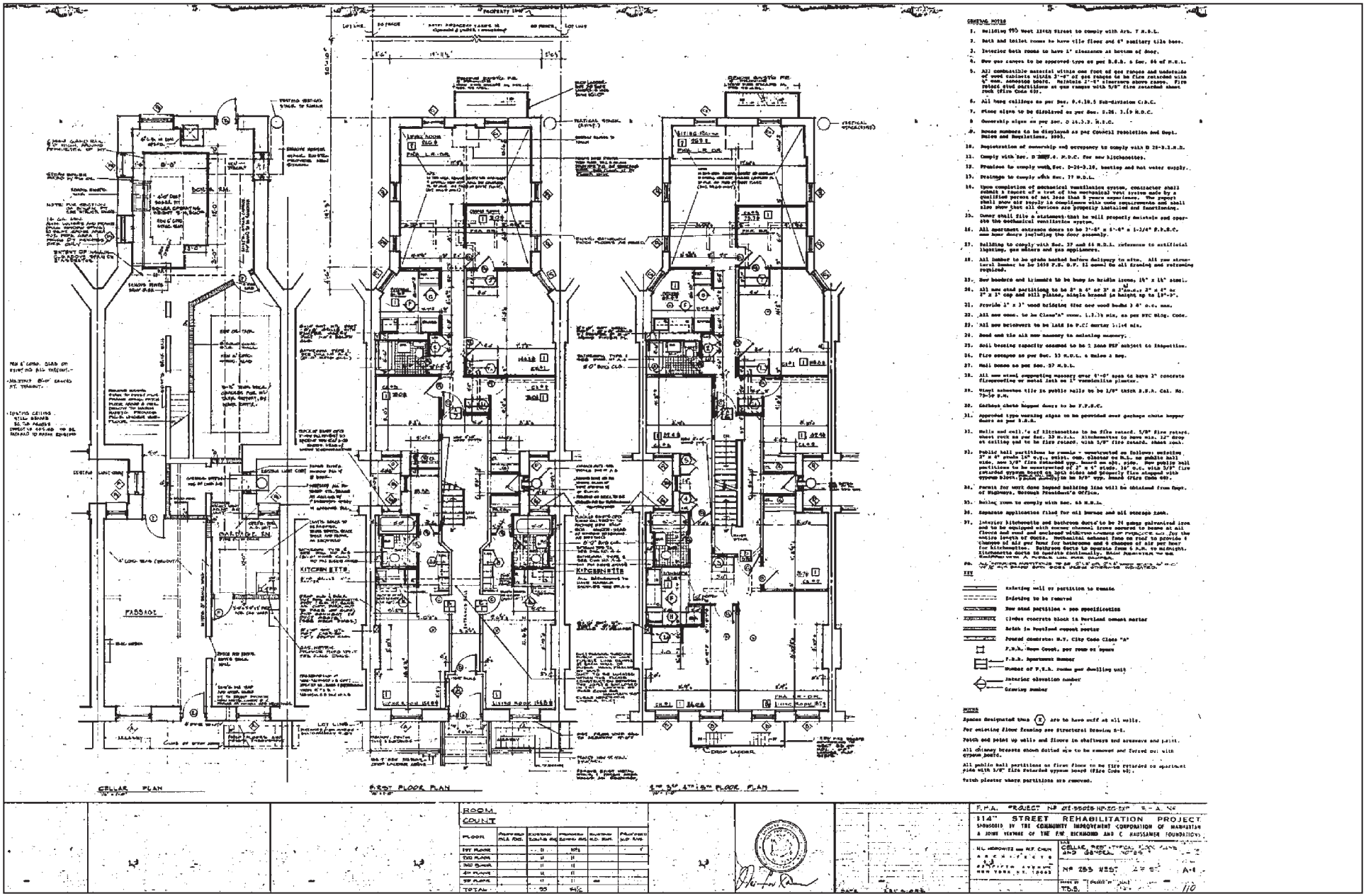
Claudia Cooney
Vice President

cc: Beth Cumming, SHPO
Cara McAteer, NYCHA
Amy Chester, NYCHA
Therese Fretwell, HUD

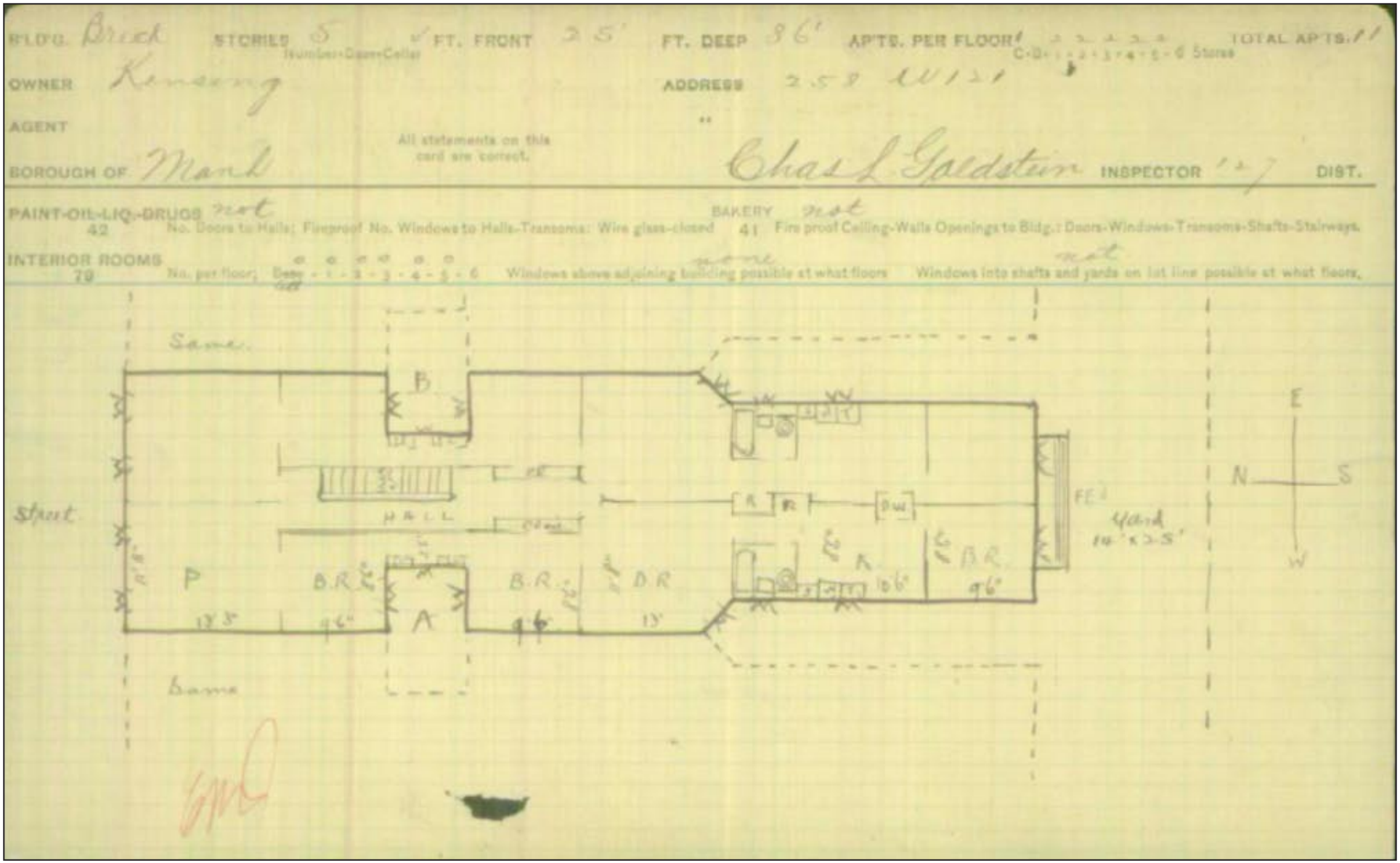


253 West 114th Street Ground Floor
Original Floor Plan

Figure 1

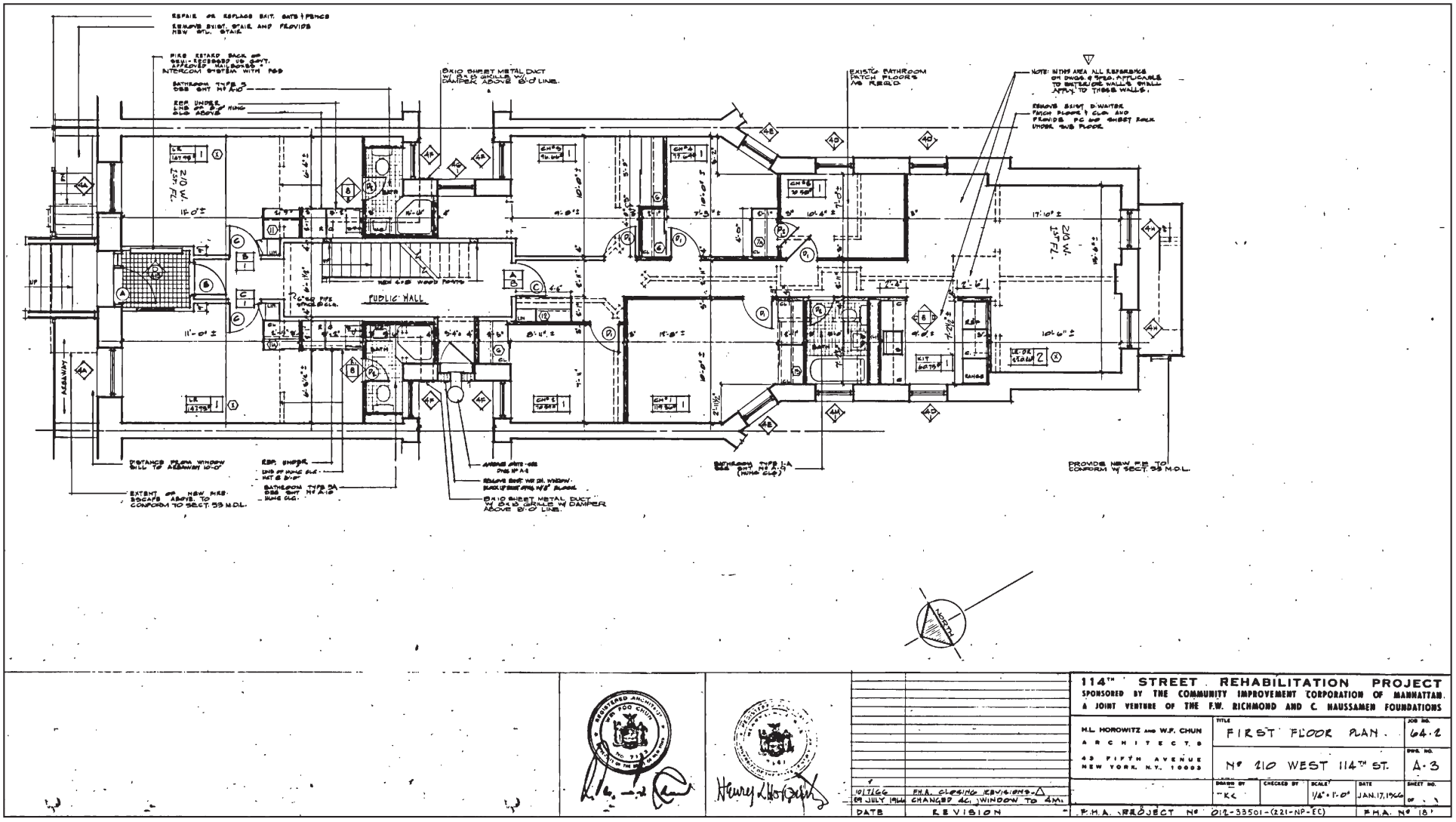


253 West 114th Street - Floor Plans
1966 Alterations



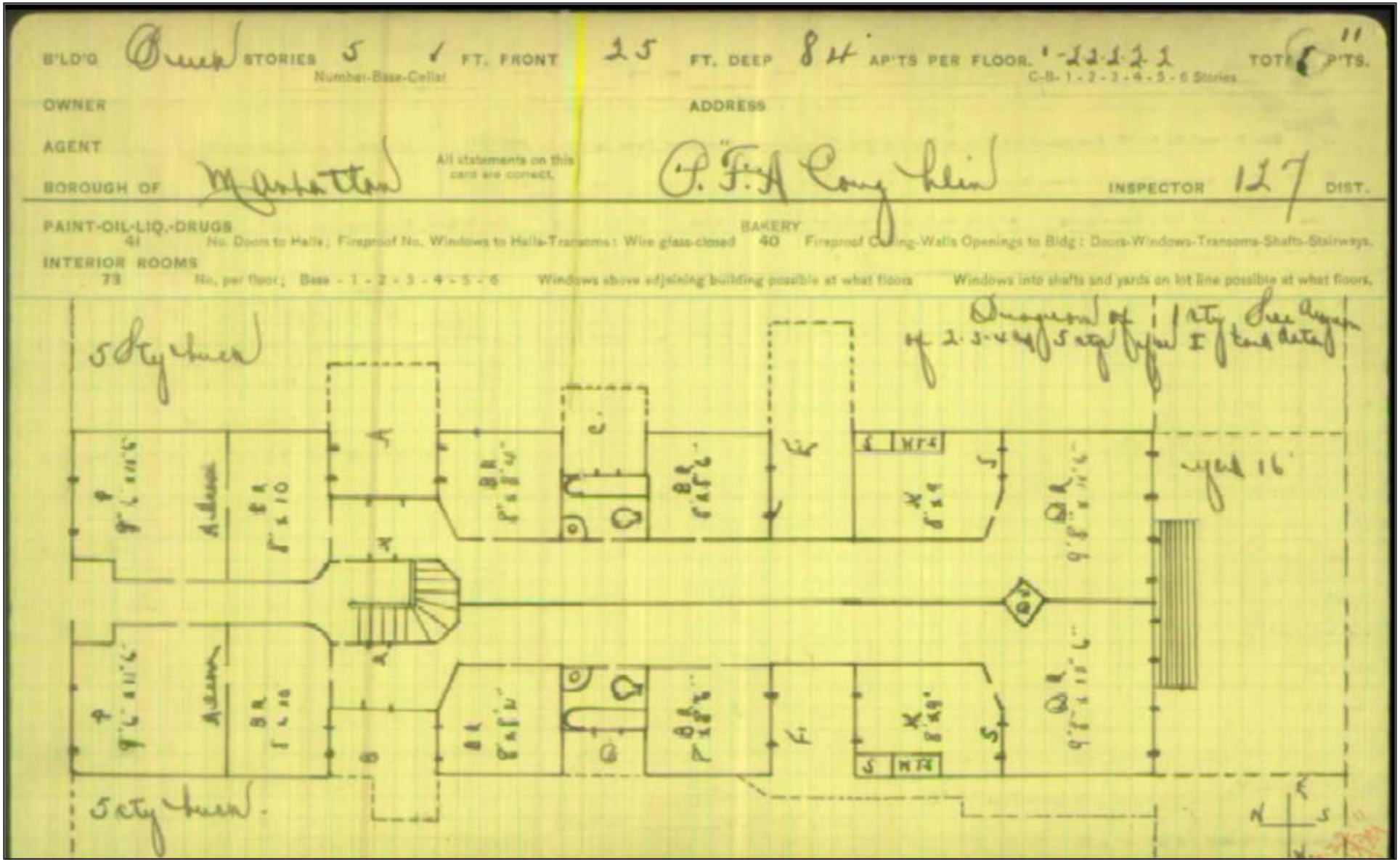
210 West 114th Street Upper Floor
Original Floor Plan

Figure 3



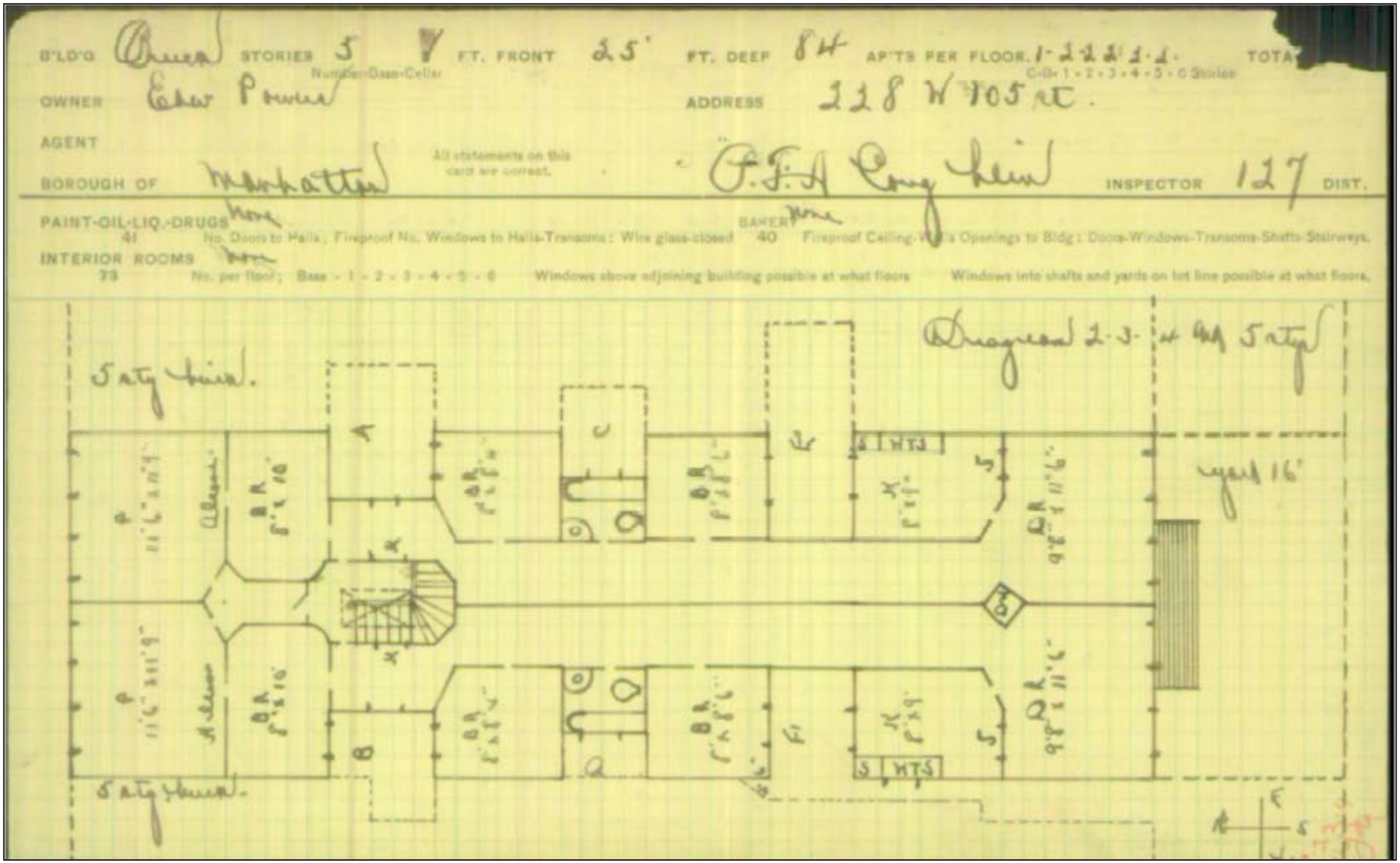
210 West 114th Street - First Floor
1966 Alterations

Figure 4



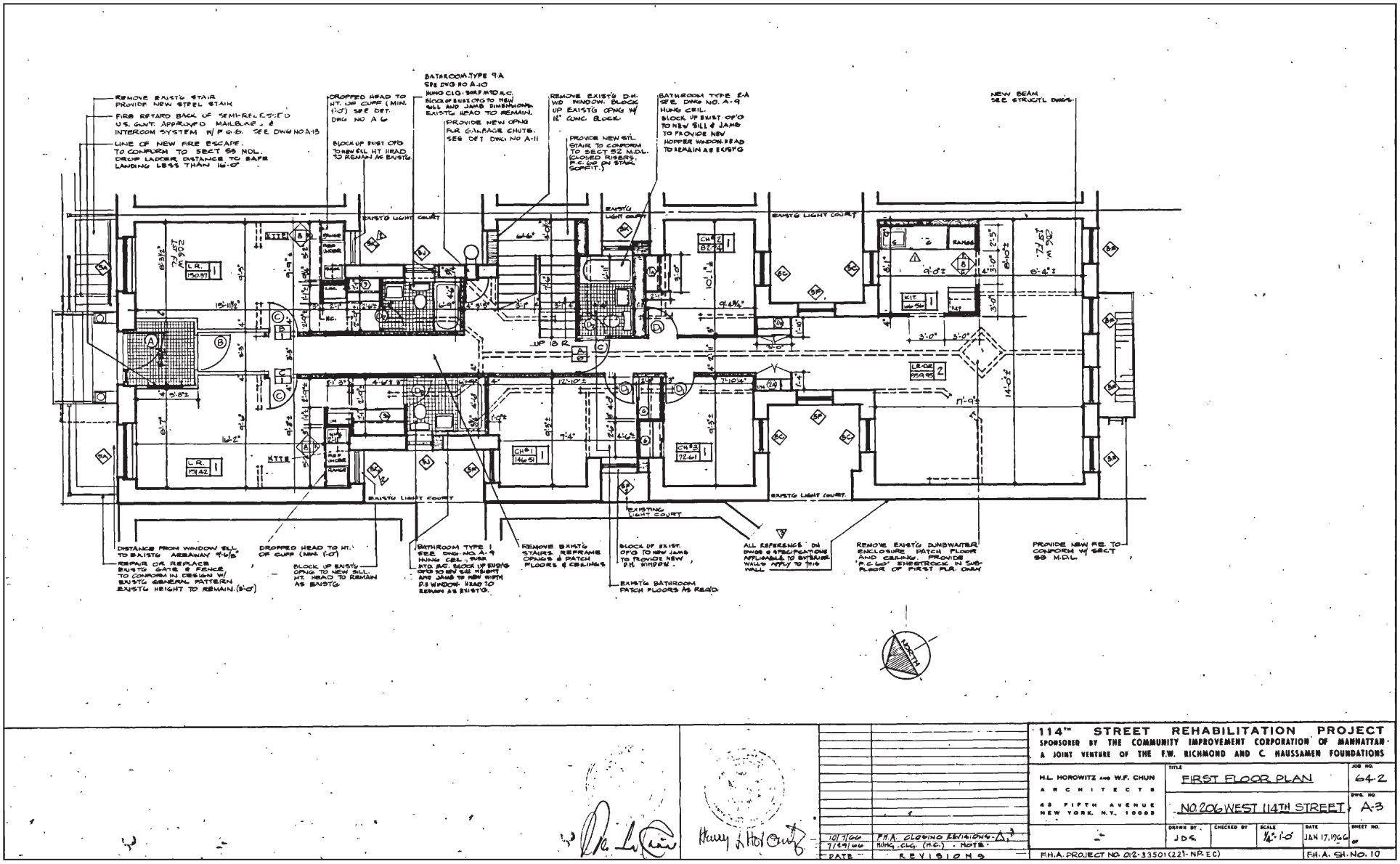
206 West 114th Street Ground Floor
Original Floor Plan

Figure 5



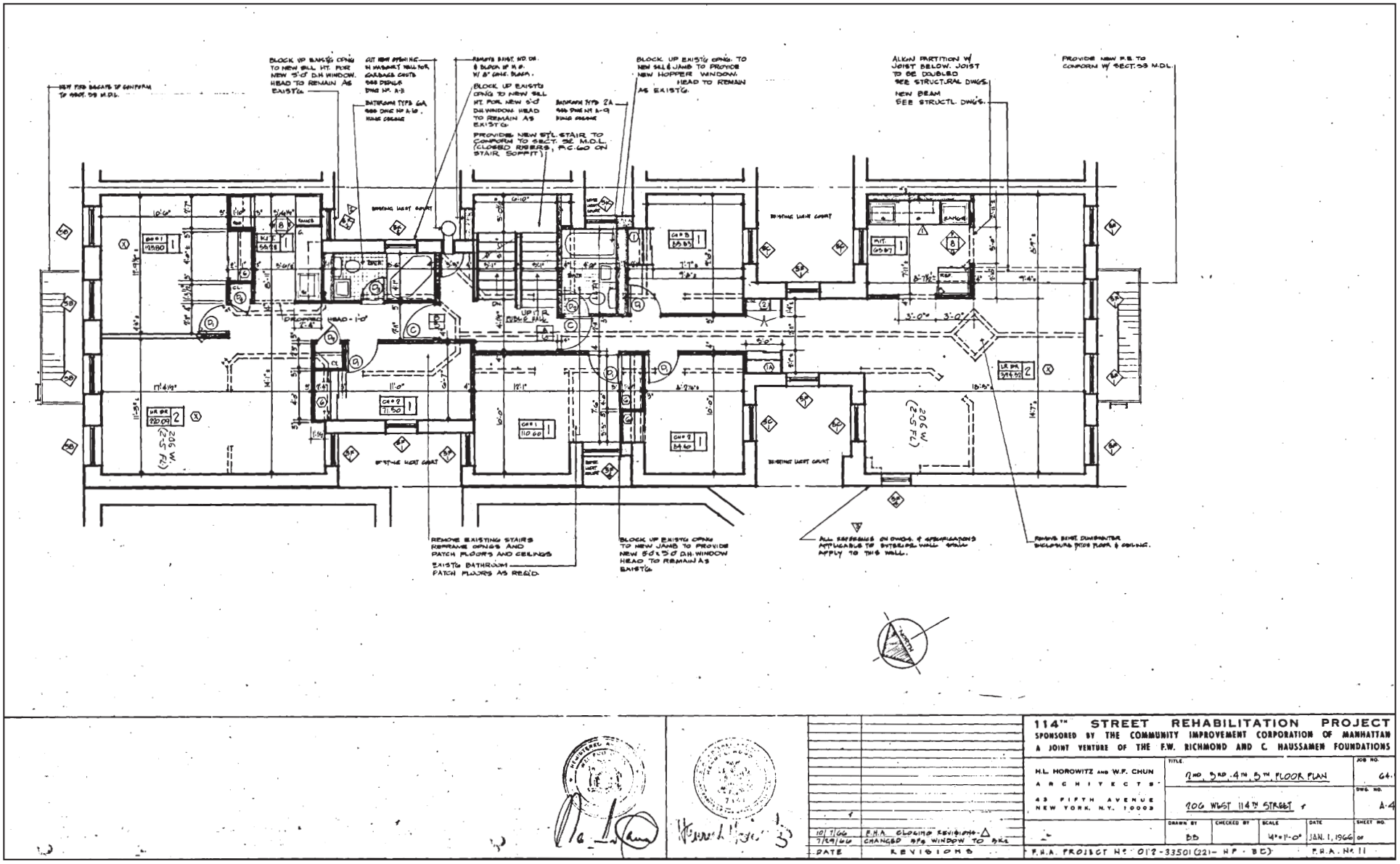
206 West 114th Street Upper Floor
Original Floor Plan

Figure 6



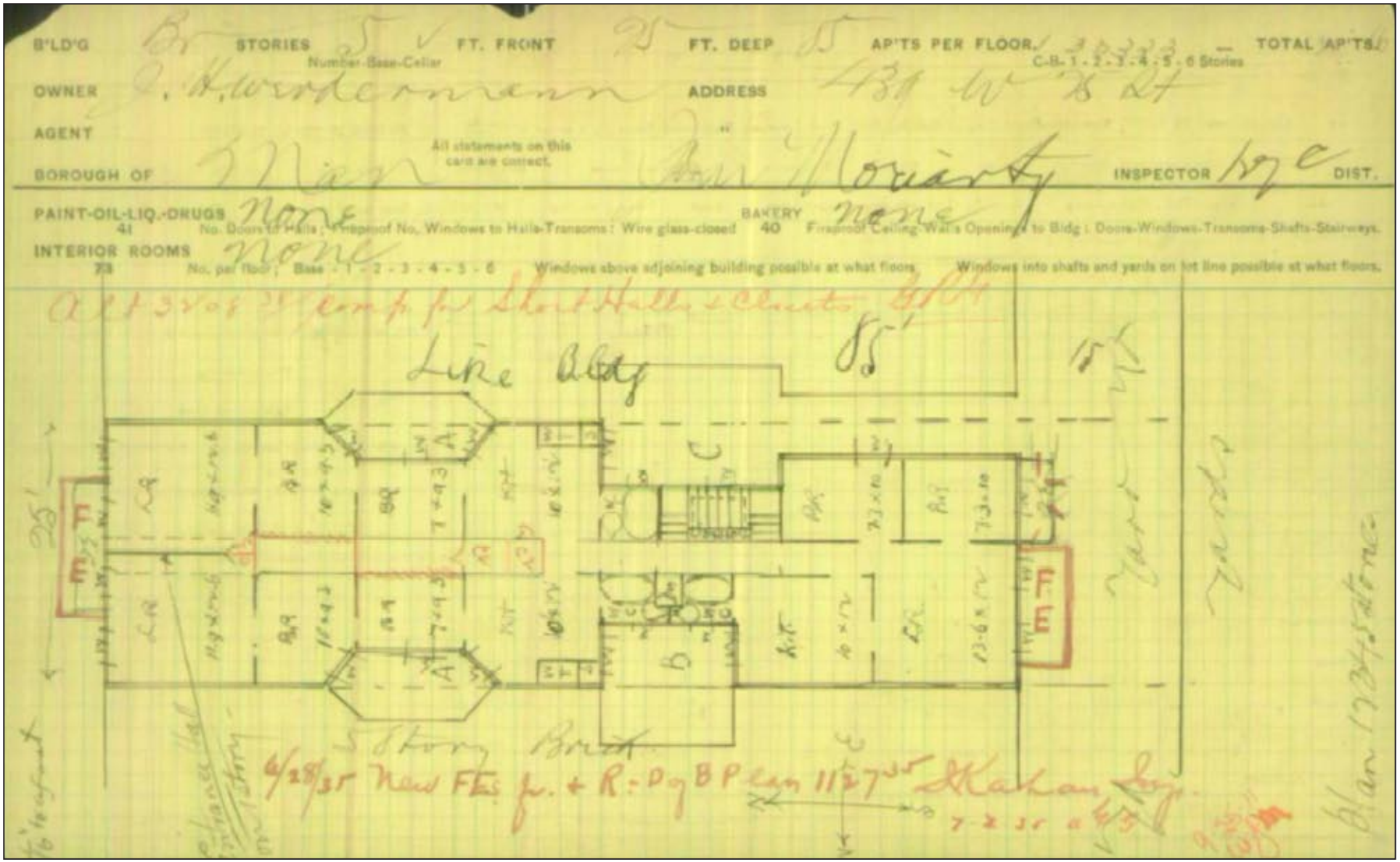
206 West 114th Street - First Floor
1966 Alternations

Figure 7

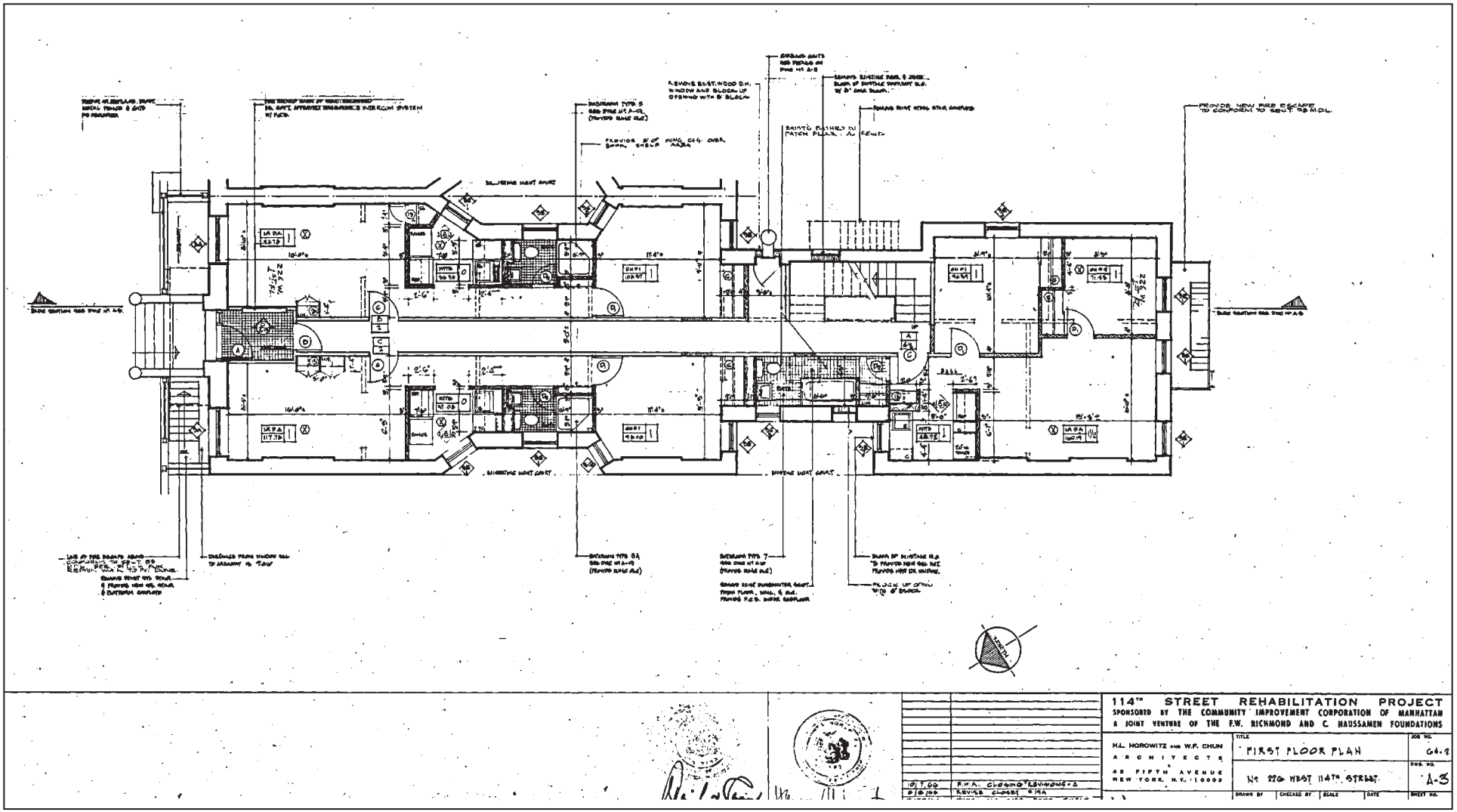


206 West 114th Street - Upper Floors
1966 Alterations

Figure 8



226 West 114th Street Ground and Upper Floors
Original Floor Plan



226 West 114th Street - First Floor
1966 Alterations
Figure 10

View southwest of south side of West 114th Street **1**

232-234 West 114th Street **2**

Existing Conditions
Figure 11

222-226 West 114th Street **3**

View west on 114th Street **4**

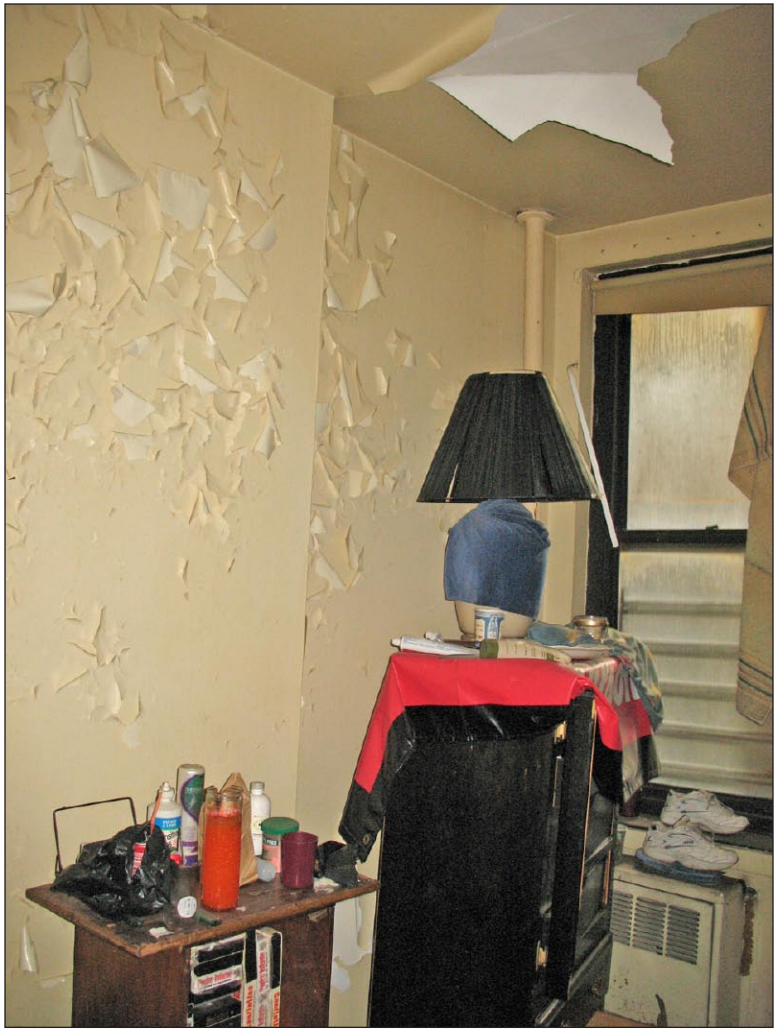
View northwest of north side of west 114th Street **5**

View northeast of north side of West 114th Street **6**

Ground floor facade of 204 West 114th Street **7**

204 West 114th Street surround **8**

Ground floor hallway at 206 West 114th Street **9**



Typical north apartment bedroom with window facing air shaft **10**

Typical apartment hallway **11**

Typical room with security gate **12**

Deteriorated ceiling in hallway **13**

Water damage **14**

NEW YORK STATE OFFICE OF PARKS · RECREATION · HISTORIC PRESERVATION

David A. Paterson
Governor

Carol Ash
Commissioner

New York State Office of Parks, Recreation and Historic Preservation

Historic Preservation Field Services • Peebles Island, PO Box 189, Waterford, New York 12188-0189

518-237-8643

www.nysparks.com

July 28, 2010

Claudia Cooney
Vice President
AKRF
440 Park Avenue South
7th Floor
New York, NY 10016

Re: HUD
Randolph Houses
New York County
07PR03421

Dear Ms. Cooney:

Thank you for continuing to consult with the New York State Historic Preservation Office (SHPO) for the proposed redevelopment of the tenements located on West 114th Street between Frederick Douglass Blvd and Adam Clayton Powell Jr. Blvd. in Manhattan. We have reviewed the submitted information in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966 and relevant implementing regulations. These comments are those of the SHPO and relate only to the Historic/Cultural resources. They do not include other environmental impacts to New York State Parkland that may be involved in or near your project. Such impacts must be considered as part of the environmental review of the project pursuant to the National Environmental Policy Act and/or the State Environmental Quality Review Act (New York Environmental Conservation Law Article 8).

We appreciate the detailed documentation you have provided regarding construction dates, alterations, and streetscape and conditions of the tenements. Your research provided new information that we did not have at the time of our original Determination of Eligibility (DOE) for the West 114th Street Historic District prepared in 2007. At your request, we have re-evaluated the area and concluded that the district continues to meet the National Register criteria. Attached is a revised Resource Evaluation for the district that supersedes the earlier one which had erroneously stated that the tenements were New Law tenements whereas they were built prior to 1901 so they are actually Old Law tenements.

If you have any questions, I can be reached at (518) 237-8643, ext. 3266. Please refer to the Project Review (PR) number in any future correspondences regarding this project.

Sincerely,

Kathleen A. Howe

Kathleen A. Howe
Historic Preservation Program Analyst – National Register Unit
e-mail: kathy.howe@oprhp.state.ny.us

cc: T. Fretwell – HUD

David A. Paterson
Governor

Carol Ash
Commissioner

New York State Office of Parks,
Recreation and Historic Preservation

Historic Preservation Field Services Bureau • Peebles Island, PO Box 189, Waterford, New York 12188-0189
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RESOURCE EVALUATION

DATE: **July 28, 2010 (revised eligibility)**
PROPERTY: West 114th Street Historic District
ADDRESS: 204-246 W. 114th & 215-277 W. 114th Street
PROJECT REF: 07PR03421

STAFF: Kathy Howe
MCD: Manhattan
COUNTY: New York Co.
USN: 06101.016404-

I. ☐ Property is individually listed on SR/NR:
name of listing:

☐ Property is a contributing component of a SR/NR district:
name of district:

II. ☒ Property meets eligibility criteria.

☐ Property contributes to a district which appears to meet eligibility criteria.

Pre SRB: ☐ Post SRB: ☐ SRB date

Criteria for Inclusion in the National Register:

A. ☒ Associated with events that have made a significant contribution to the broad patterns of our history;

B. ☐ Associated with the lives of persons significant in our past;

C. ☒ Embodies the distinctive characteristics of a type, period or method of construction; or represents the work of a master; or possess high artistic values; or represents a significant and distinguishable entity whose components may lack individual distinction;

D. ☐ Have yielded, or may be likely to yield information important in prehistory or history.

STATEMENT OF SIGNIFICANCE:

The West 114th Street Historic District consists of 37 contributing buildings: 36 tenements and one school, on both sides of the street between Adam Clayton Powell, Jr. Boulevard (Seventh Avenue) to the east and Frederick Douglass Boulevard (Eighth Avenue) to the west, in Harlem. The buildings are five-story Old Law brick tenements constructed prior to the NYS Tenement House Act of 1901. Specific dates of construction and architects for buildings on the south side of the street are:

- 204-206 West 114th Street, 1896, Gordon & Ellicott
- 208-212 West 114th Street, 1896, Neville & Bagge

- 214-216 West 114th Street, 1897, Neville & Bagge
- 218-226 West 114th Street, 1899, John P. Leo.

The architects for the tenements on the north side of the street have not been identified. While the buildings have all been altered to varying degrees since their construction, as a group, they convey a distinct sense of place that represents turn-of-the-century, working-class, speculative, residential construction in Harlem.

The tenements are clad in brick with painted brownstone used to clad the ground floors and as ornament at the upper floors. The buildings are capped with pressed-metal cornices. The most ornate feature on the buildings is the entrance, ornamented with carved moldings, brackets, and other details. On the upper facades, ornament is often found on the window lintels and beltcourses. The buildings display characteristics of the Renaissance Revival and French Beaux-Arts, including pediments, keystones, quoins, classical moldings, garlands, cartouches, and scroll brackets.

The West 114th Street Historic District is significant under National Register criterion C as a group of buildings that embody the distinctive characteristics of a working-class tenement neighborhood in New York City. The district is significant under criterion A, reflecting the development patterns and social history of Harlem. The construction of these buildings reflects the history of development in Harlem, especially development built in anticipation of the city's first subway lines which opened in 1904.

As the community developed and the population grew, new public services were necessary including the construction of a school at 215 West 114th Street. I.S. 88, also known as the Lydia F. Wadleigh School, is an outstanding example of early-20th century French Renaissance style institutional architecture in New York City. Built in 1901-02 to the design of C.B.J. Snyder, architect in charge of school buildings in New York City, I.S. 88 is a particularly distinguished example of his work and is a key visual feature of the West 114th Street Historic District streetscape.

ATTACHMENT E: NYCHA Resident Data Book Statistics for Randolph Houses 2011

NAME: **RANDOLPH**

BOROUGH: MANHATTAN PROGRAM: FEDERAL TDS No: 278

MANAGED BY: KING TOWERS

POLITICAL DISTRICTS: U.S. Congress: 15 NY State Senate: 30 NY State Assembly: 68

HUD No: NY005202

AMP No: NY005010300

2000 CENSUS TRACT: 216, 218

NY City Council: 09 Com. Dist: 10

JANUARY 1, 2011 PERCENTAGE DISTRIBUTION

	White	Black	Hispanic	Asian	Other	Total	White	Black	Hispanic	Asian	Other
NUMBER OF FAMILIES	4	94	11	0	0	109	3.7%	86.2%	10.1%	0.0%	0.0%
FEMALE HEAD OF HOUSEHOLD	3	83	6	0	0	92	3.3%	90.2%	6.5%	0.0%	0.0%
MALE HEAD OF HOUSEHOLD	1	11	5	0	0	17	5.9%	64.7%	29.4%	0.0%	0.0%
POPULATION	5	212	22	0	0	239	2.1%	88.7%	9.2%	0.0%	0.0%
AVERAGE FAMILY SIZE	1.3	2.3	2.0	0.0	0.0	2.2					
NUMBER OF MINORS UNDER 18	1	53	3	0	0	57	1.8%	93.0%	5.3%	0.0%	0.0%
AVG. NO. PER FAMILY	0.3	0.6	0.3	0.0	0.0	0.5					
AS PERCENT OF POPULATION	20.0%	25.0%	13.6%	****	****	23.8%					
AVERAGE GROSS INCOME	$8,531	$24,385	$15,119	$0	$0	$22,898					
AVERAGE GROSS RENT	$208	$452	$365	$0	$0	$435					
NUMBER OF FAMILIES WITH HEAD 62 YEARS AND OVER	1	44	1	0	0	46	2.2%	95.7%	2.2%	0.0%	0.0%
AS PERCENT OF ALL FAMILIES	25.0%	46.8%	9.1%	****	****	42.2%					
FEMALE HEAD 62 YEARS PLUS	1	39	1	0	0	41	2.4%	95.1%	2.4%	0.0%	0.0%
MALE HEAD 62 YEARS PLUS	0	5	0	0	0	5	0.0%	100.0%	0.0%	0.0%	0.0%
PERSONS 62 YEARS AND OVER LIVING ALONE	1	18	1	0	0	20	5.0%	90.0%	5.0%	0.0%	0.0%
POPULATION 62 YEARS PLUS	1	48	1	0	0	50	2.0%	96.0%	2.0%	0.0%	0.0%
AS PERCENT OF POPULATION	20.0%	22.6%	4.5%	****	****	20.9%					
NUMBER OF WELFARE FAMILIES	0	16	0	0	0	16	0.0%	100.0%	0.0%	0.0%	0.0%
AS PERCENT OF ALL FAMILIES	0.0%	17.0%	0.0%	****	****	14.7%					
WITH HEAD 62 YRS. AND OVER	0	6	0	0	0	6					
ON FULL WELFARE	0	6	0	0	0	6					
NUMBER OF ONE PARENT FAMILIES W/MINORS UNDER 18	0	26	3	0	0	29	0.0%	89.7%	10.3%	0.0%	0.0%
AS PERCENT OF ALL FAMILIES	0.0%	27.7%	27.3%	****	****	26.6%					
FEMALE ONE PARENT	0	26	3	0	0	29					
MALE ONE PARENT	0	0	0	0	0	0					
ON WELFARE	0	10	0	0	0	10					
NUMBER OF FAMILIES WITH ONE OR MORE EMPLOYED	1	37	5	0	0	43	2.3%	86.0%	11.6%	0.0%	0.0%
AS PERCENT OF ALL FAMILIES	25.0%	39.4%	45.5%	****	****	39.4%					
WITH ADULT AS SECONDARY WAGE EARNER	0	11	0	0	0	11					
AVERAGE NUMBER OF YEARS IN PUBLIC HOUSING	21.0	29.2	20.0	0.0	0.0	28.0					

NUMBER OF YEARS PROJECT IN FULL OPERATION: 33.7

POPULATION BY AGE GROUP

UNDER 4	4-5	6-9	10-13	14-17	18-20	21-49	50-61
3	4	14	13	23	11	78	43