

**Appendix B:**

**Agency Correspondence**

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**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  
518-237-8643  
www.nysparks.com

David A. Paterson  
Governor

Carol Ash  
Commissioner

## RESOURCE EVALUATION

DATE: June 3, 2008

STAFF: Kathy Howe

PROPERTY: National Maritime Union/Joseph Curran Building) MCD: New York  
(current Edward and Theresa O'Toole Medical Services Building)

ADDRESS: 36 Seventh Avenue

COUNTY: New York

USN: 06101.005738

- 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 National Maritime Union (NMU) headquarters building (also known as the Joseph Curran Building) is located on the west side of Seventh Avenue between West 12<sup>th</sup> and West 13<sup>th</sup> streets in Greenwich Village. Though less than 50 years of age – and, thus, outside the period of significance for the National Register-listed Greenwich Village Historic District in which it is located - the National Maritime Union headquarters building is exceptionally significant at the national level by meeting National Register Criterion A in the area of maritime labor history. The National Maritime Union was formed in 1937 and by 1946 had 73,000 members.<sup>1</sup> By the mid-1950s, NMU undertook a major building program of hiring

<sup>1</sup> "Politics and Pork Chops," *Time*, June 17, 1946.

halls as a tangible expression of the union's fight to rid the maritime industry of corruption and discrimination.

"Crime on the Waterfront," a series of Pulitzer prize-winning investigative articles by Malcolm Johnson published in the *New York Sun* in 1949 described corruption and organized crime infiltration on the NYC waterfront. Johnson's articles awakened America to the murders, graft, and extortion that made up everyday life on the waterfront. A series of commissions were formed to further investigate and clean up the corruption. The popular 1954 movie *On the Waterfront* with Marlon Brando was based on Johnson's articles about life among the longshoremen. While NMU represented the seamen working aboard the ships rather than the longshoremen, the union sought to improve and professionalize the maritime industry by instituting fair hiring practices. "The hiring hall was the keystone of fair employment practice. Jobs awarded through a union hiring hall were based on seniority and 'time on the beach' – how long a member had been without work."<sup>2</sup> The construction of hiring halls in a progressive architectural design projected an image of reform related to the changes forced on the industry in the 1950s.

NMU hired architect Albert C. Ledner, a student of Frank Lloyd Wright, to design hiring halls in port cities throughout the U.S. Ledner designed a total of 14 projects for the NMU between 1954 and 1968. In 1961 he began work on the largest of the projects – a national headquarters for the union's 35 port offices combined with a New York hiring hall. It made sense that NMU's headquarters be located in New York which was the country's busiest port in the postwar years. Dedicated in 1964, the headquarters was named after Joseph Curran, the union's founder and long-time president who served from 1937 to 1973.

Affiliated with the AFL-CIO, the establishment of the NMU was part of the growing labor union movement in the United States during the 1930s and 1940s. From its inception, NMU membership was racially integrated. Under the leadership of Curran, NMU successfully fought to eliminate racial discrimination in hiring, wages, living accommodations and work assignments. The new hiring halls ensured a steady supply of experienced seamen for the shipping industry, and reduced the corruption which had plagued the industry. "Curran worked to make American merchant seamen the best-paid maritime workers in the world. NMU established a 40-hour work week, overtime, paid vacations, pension and health benefits, tuition reimbursement, and standards for shipboard food and living quarters."<sup>3</sup>

The main block of the Curran Building cantilevers above the two curving glass-block walls of its base giving it the appearance of floating on its site. The concrete walls - covered with white ceramic tiles since 1966 to eliminate periodic cleaning and painting - progressively cantilever in increments as they ascend. The overhangs are accentuated by scalloped-edge profiles creating an interesting play of light and shadow. Ledner employed a nautical theme in his design. The scalloped edges of the façade panels, for example, resemble the portholes of a ship when seen from straight on. The forms on the rooftop forms are reminiscent of a ship's smokestacks.

The first floor of the building originally housed a large hiring hall which was divided into two spaces - one for deck and engine crews and one for stewards – by a large retractable scheduling board. This space has since been divided into smaller spaces for clinics and offices. The circular and tubular forms of the sixth story once housed the union's executive offices, council chamber, and elevator lobby. While few of the original finishes remain at this floor, the circular spaces and tunnel-like corridor are extant.

The National Maritime Union headquarters meets Criterion C as a locally significant example of postwar Modern architecture employing expressive forms. It is part of a group of postwar buildings in New York

<sup>2</sup> Kathleen Randall, editor/primary author, "Curran/O'Toole Building," *Backgrounders*, docomomo, New York/Tri-State, September 2007, p. 1.

<sup>3</sup> Josh Barbenel, "Joseph Curran, 75, Founder of National Maritime Union," *New York Times*, August 15, 1981; Murray Kempton, *Part of Our Time: Some Monuments and Ruins of the Thirties*, New York: Random House, 1998 (1955); "Retired Union Boss Joseph Curran Dies," *Associated Press*, August 14, 1981.

that moved beyond the orthodox Rationalism of the International Style toward a more expressive or organic architecture. As noted by the New York/Tri-State chapter of docomomo, "The Curran/O'Toole Building entered the cityscape at roughly the same time as some notable structures plying Modern architecture's boundaries for more expressive forms: Lincoln Center (Wallace Harrison, et al., 1962-1969), George Washington Bridge Bus Station (Pier Luigi Nervi, 1963); 2 Columbus Circle (Edward Durell Stone, 1964); Summit Hotel (Morris Lapidus, 1961); and TWA Terminal (Eero Saarinen, 1956-1962)."<sup>4</sup>

Ledner's work for NMU between 1954 and 1967 represents a distinct phase of his long career which also includes many residential and small-scale commercial designs. After graduating from the Tulane University School of Architecture in 1948, he received a four-month fellowship to study with Frank Lloyd Wright at Taliesin, Wisconsin. By 1950 he had begun his solo practice based in New Orleans, LA. At 84, Ledner is still designing buildings on a semi-retired basis.

The influence of Wright's late work can be discerned in Ledner's designs for the Curran Building his other NMU hiring halls. "The design approach for each hall is well integrated with its site. In addition, the adjoining volumes, circulation, floor layouts, interior design and furnishings become part of a unified, interrelated composition."<sup>5</sup> The ambitious program was decidedly modern in function and aesthetics. The circular forms used in elevation and plan for the Curran Building, for example, are reminiscent of Wright's Marin County Civic Center (1957-1962).<sup>6</sup>

In 1973, the NMU sold the headquarters building to Saint Vincent Catholic Medical Centers. It was renamed the Edward & Theresa O'Toole Medical Services Building and has been used for outpatient clinics and offices since that time.

If you have any questions concerning this Determination of Eligibility, please call Kathy Howe at (518) 237-8643, ext. 3266.

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<sup>4</sup> Randall, "Curran/O'Toole Building," p. 5.

<sup>5</sup> Hansel Hernandez-Navarro and Kyle Normandin, docomomo fiche on the Curran/O'Toole Building, June 25, 2007.

<sup>6</sup> Lindsay McCook, Historic Resource Inventory Form on the O'Toole Building, Columbia University Historic Preservation Studio, September 8, 2008.



Andrew M. Cuomo  
Governor

Rose Harvey  
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

March 21, 2011

Claudia Cooney  
AKRF  
40 Park Avenue South, 7<sup>th</sup> Floor  
New York, NY 10016

Re: DOH/DASNY  
New Center for Comprehensive Care  
New York County  
11PR01845

Dear Ms. Cooney:

Thank you for requesting the comments of the New York State Field Services Bureau of the Office of Parks, Recreation and Historic Preservation (OPRHP). We have reviewed the submitted information in accordance with the New York State Historic Preservation Act of 1980 (Section 14.09 of the New York Parks, Recreation and Historic Preservation Law). These comments are those of the Field Services Bureau and relate only to 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 State Environmental Quality Review Act (New York Environmental Conservation Law Article 8) and its implementing regulations (6 NYCRR Part 617).

Our National Register Unit notes that the O'Toole building, also known as the National Maritime Union/Joseph Curran Building is eligible for listing on the State and National Registers of Historic Places. A copy of the Resource Evaluation is attached for your use. Our Archeology Unit has no further archeological concerns. Since the building is historic we request the following additional information regarding the proposed work:

1. Plans and specifications all proposed interior and exterior work. Preliminary and/or pre-final documents or renderings are preferred.
2. Clear color photographs illustrating all areas to be effected by interior and exterior work. Photos of the general project area should be accompanied by detail images where work is proposed. All photographs should be labeled and keyed to a site or building plan indicating the location and direction of each image. Images must be at least 4"x6". Digital images are acceptable provided they are printed in color at a high resolution.

Since this building is eligible for listing on the National Register of Historic Places, your project could qualify for the Federal Rehabilitation Tax Credit Program. The program enables building owners to receive a 20% tax credit on certified rehabilitation expenses. If you have any questions, I can be reached at (518) 237-8643, ext. 3282. Please refer to the Project Review (PR) number in any future correspondences regarding this project.

Sincerely,

Beth A. Cumming  
Historic Site Restoration Coordinator  
[Beth.cumming@oprhp.state.ny.us](mailto:Beth.cumming@oprhp.state.ny.us)

via e-mail only

## ENVIRONMENTAL REVIEW

**Project number:** DEPARTMENT OF CITY PLANNING / 10DCP003M  
**Project:** ST. VINCENT'S PROPOSED NEW HOSP. & RESIDENTIAL  
**Date received:** 5/27/2011

### **Comments:**

The LPC is in receipt of the preliminary Historic Resources and Shadows DEIS chapters dated May 18, 2011.

### **Archaeological review:**

- 1) ADDRESS: 17 AVENUE, BBL: 1006070001,
- 2) ADDRESS: 76 GREENWICH AVENUE, BBL: 1006170001,
- 3) ADDRESS: 207 AVENUE, BBL: 1006170055.

### **No Properties with Archaeological significance.**

### **Architectural review:**

The Shadow chapter is acceptable.

The Historic Resources chapter is acceptable provided the following change is made:

154 W. 14 St. has been heard by the LPC and appears eligible as an individual landmark.

Cc: SHPO



6/2/2011

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SIGNATURE  
Gina Santucci, Environmental Review Coordinator

DATE

**File Name:** 24932\_FSO\_GS\_06022011.doc



**Andrew M. Cuomo**  
Governor

**Rose Harvey**  
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

June 30, 2011

Robert Dobruskin  
Department of City Planning, City of New York  
22 Reade Street, Room 4E  
New York, NY 10007-1216

Re: CEQR (10DCP003M)  
Saint Vincent's Campus Redevelopment  
New York County  
11PR04235

Dear Mr. Dobruskin:

Thank you for requesting the comments of the New York State Office of Parks, Recreation and Historic Preservation (OPRHP) as part of the review process under the New York City Environmental Quality Review Act (CEQR). As you know the role of this office in the CEQR process is to provide the Lead Agency with our comments on historic preservation matters as part of its evaluation of potential environmental impacts that may be associated with the proposed project. As such, we are reviewing the proposed project in accordance with the New York State Parks, Recreation and Historic Preservation Law, Section 14.09.

Kathy Howe of our Survey Unit notes that The Church of Our Lady of Guadalupe located at 229 West 14<sup>th</sup> Street and the building at 154 West 14<sup>th</sup> Street are both eligible for listing on the State and National Registers of Historic Places. She concurs with that the project is within the boundaries of the Greenwich Village Historic District which is listed on the State and National Registers of Historic Places. She further concurs that the O'Toole Building is individually eligible for listing on the State and National Registers of Historic Places.

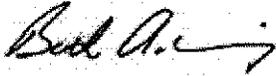
We understand that the O'Toole building is proposed for adaptive re-use. In addition we understand that the remainder of the Saint Vincent's Buildings will be converted to residential uses. We note that Raskob, Smith, Nurses' Residence, Reiss and Spellman are contributing buildings to the Greenwich Village Historic District. It is our recommendation that any work required to convert these buildings to residential use follow the Secretary of the Interior's Standards for Rehabilitation.

We appreciate the opportunity to comment under the CEQR review process as an interested party. It should be noted that further consultation with our office will be necessary as the project moves forward if

there is any state or federal involvement in the project. Involvement of a state agency like the New York State Department of Health triggers a more formal review under Section 14.09 of the New York State Parks, Recreation and Historic Preservation Law. If there is any federal involvement, for example with HUD funding, that triggers a more formal review under Section 106 of the National Historic Preservation Act.

If you have any questions, I can be reached at (518) 237-8643, ext. 3282. Please refer to the Project Review (PR) number in any future correspondences regarding this project.

Sincerely,



Beth A. Cumming  
Historic Site Restoration Coordinator  
e-mail: [Beth.cumming@oprhp.state.ny.us](mailto:Beth.cumming@oprhp.state.ny.us)

cc: D. McCarthy – NYC Planning

Via e-mail only



**Environmental  
Protection**

*Caswell F. Holloway*  
**Commissioner**

**Angela Licata**  
Deputy Commissioner  
Environmental Planning and  
Analysis  
alicata@dep.nyc.gov

59-17 Junction Boulevard  
Flushing, NY 11373  
T: (718) 595-4398  
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August 4, 2011

Mr. Robert Dobruskin  
Director, Environmental Assessment and Review Division  
New York City Department of City Planning  
22 Reade Street, Room 4E  
New York, New York 10007-1216

**Re: Saint Vincent's Campus Redevelopment**  
**Block 607, Lot 1 and Block 617, Lots 1 and 55**  
**DEP # 10DEPTECH034M / CEQR # 10DCP003M**  
**New York, New York**

Dear Mr. Dobruskin:

The New York City Department of Environmental Protection, Bureau of Environmental Planning and Analysis (DEP) has reviewed the July 2011 Phase II Environmental Site Assessment Workplan (Phase II Workplan) and Health and Safety Plan (HASP) prepared by AKRF, Inc. on behalf of RSV, LLC (c/o Rudin Management Company, Inc.) and Saint Vincent's Catholic Medical Centers of New York, d/b/a Saint Vincent's Catholic Medical Centers (applicant). The applicant is seeking a number of discretionary actions (zoning map amendments, zoning text amendments, large scale general development permit, etc.) from the New York City Department of City Planning (DCP) in connection with the proposed development of a primarily residential development and new publicly accessible open space by RSV, LLC, and also the development of a comprehensive health care facility to be owned and operated by the North Shore-Long Island Jewish Health System (NSLIJ). The project site is the former campus of Saint Vincent's Hospital Manhattan, and comprises three sites: the East Site on the east side of Seventh Avenue between West 11th and 12th Streets; the Triangle Site bounded by Seventh Avenue, West 12th Street and Greenwich Avenue; and the O'Toole Building Site on the west side of Seventh Avenue between West 12th and 13th Streets. The vacant former hospital buildings (Coleman/Link Pavilions, Cronin Building, Spellman Pavilion, Reiss Pavilion, Nurses' Residence, and Smith/Raskob Buildings) occupy the East Site. On the Triangle Site the Materials Handling Facility, with loading bays and a connection to the East Site via a tunnel running beneath Seventh Avenue, and the O'Toole Building which continues to house ambulatory care programs, which is expected to relocate by the summer of 2011. The proposed zoning map amendment is for a rezoning action of the Seventh Avenue portion of the East Site from C2-6 to C6-2 and a rezoning action of the midblock portion of the East Site from R6 and C1-6 to R8 in the Greenwich Village neighborhood of Manhattan Community District 2. The existing Coleman, Link, and Reiss Pavilions and the Cronin Building on the East Site would be demolished and replaced with new residential buildings, some with retail space and medical offices on the lower floors. The existing Raskob and Smith Buildings,

Spellman Pavilion and Nurses' Residence on the East Site would be converted to residential uses. Existing extensions in the rear yards of the Nurses' Residence and the Spellman Pavilion would be removed for construction of a courtyard in the center of the residential development on the East Site. Construction on the East Site would entail subsurface disturbance to depths of approximately 20 to 25 feet below street grade. The Materials Handling Facility on the Triangle Site would be demolished to allow for the creation of a new publicly accessible open space. The area used for the storage of medical gases on the west end of the Triangle Site would be retained for use by NSLIJ. The existing O'Toole Building would be renovated for use as a Center for Comprehensive Care. The conversion would entail interior demolition and reconstruction, as well as limited expansion of the ground floor and limited subsurface disturbance for the expansion.

The July 2011 Workplan proposes to conduct twelve soil borings: two soil borings on the Triangle Site to approximately 10 feet below basement floor grade; eight soil borings in the West 11th Street and West 12th Street sidewalks adjacent to the East Site to groundwater or, if groundwater is not encountered, to approximately 30 feet below surface grade (these borings would be advanced in the sidewalks due to anticipated interior access limitations on the East Site); and two soil borings on the O'Toole Building Site to groundwater (expected approximately 20 feet below grade) or, if groundwater is not encountered, to approximately 30 feet below surface grade. As currently proposed, if drilling cannot be conducted on portions of the site (such as the Triangle Site and the western portion of the East Site) due to Metropolitan Transportation Authority requirements relating to their proximity to subway tunnels, samples will be collected from these locations using a hand auger; hand-augered borings would be advanced to a maximum of 10 feet below grade.

Two soil samples will be collected from each boring for laboratory analysis, based on field observations (odor and staining) and photoionization detector readings and analyzed for Volatile Organic Compounds (VOCs) by United States Environmental Protection Agency (EPA) Method 8260, Semi-Volatile Organic Compounds (SVOCs) by EPA Method 8270, Pesticides by EPA Method 8081, Polychlorinated Biphenyls (PCBs) by EPA Method 8082, and Target Analyte List (TAL) Metals. Groundwater samples will be collected from up to seven of the twelve soil borings (one at the Triangle Site, four at the East Site and two at the O'Toole Site), using temporary well points installed in the borings. If groundwater is encountered in the existing monitoring wells observed in the sidewalks south-adjacent to the Link Pavilion and north-adjacent to the O'Toole Building, groundwater samples may be collected from these wells instead of two of the proposed temporary wells. Groundwater samples will be collected and analyzed for VOCs by EPA Method 8260, SVOCs by EPA Method 8270, Pesticides by EPA Method 8081, PCBs by EPA Method 8082, and TAL metals (total and filtered analysis).

Based upon our review of the submitted documentation, we have the following comments/recommendations to DCP:

### Workplan

- DCP should instruct the applicant that soil and groundwater samples should be collected and analyzed by a New York State Department of Health Environmental Laboratory Approval

Program certified laboratory for the presence of VOCs by EPA Method 8260, SVOCs by EPA Method 8270, Pesticides/PCBs by EPA Method 8081/8082 and TAL metals (filtered and unfiltered for groundwater samples).

- DCP should inform the applicant that upon completion of the investigation activities, the consultant should submit a detailed Phase II report to DEP for review and approval. The report should include, at a minimum, an executive summary, narrative of the field activities, laboratory data and conclusions, comparison of soil and groundwater analytical result (i.e., New York State Department of Environmental Conservation (NYSDEC) 6NYCRR PART 375 and NYSDEC Water Quality Regulations), updated site plans depicting sample locations, boring logs, and remedial recommendations, if warranted

### **Health and Safety Plan**

The HASP identifies appropriate protection for the on-site workers during the Phase II Environmental Site Investigation.

DEP finds the Phase II Workplan and HASP for the proposed project acceptable as long as the aforementioned information is incorporated into the Workplan.

Future correspondence related to this project should include the following tracking number **10DEPTECH034M**. If you have any questions, you may contact Mr. Wei Yu at (718) 595-4358.

Sincerely,



Maurice S. Winter  
Deputy Director, Site Assessment

c: E. Mahoney  
M. Winter  
M. Myrie  
W. Yu  
T. Estes  
M. Wimbish  
C. Evans – DCP  
D. McCarthy – DCP  
File



Carter H. Strickland, Jr.  
Commissioner

Angela Licata  
Deputy Commissioner  
Environmental Planning and  
Analysis  
alicata@dep.nyc.gov

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December 12, 2011

Mr. Robert Dobruskin  
Director, Environmental Assessment and Review Division  
New York City Department of City Planning  
22 Reade Street, Room 4E  
New York, New York 10007-1216

**Re: Saint Vincent's Campus Redevelopment  
Block 607, Lot 1 and Block 617, Lot 1  
DEP # 10DEPTECH034M / CEQR # 10DCP003M  
New York, New York**

Dear Mr. Dobruskin:

The New York City Department of Environmental Protection, Bureau of Environmental Planning and Analysis (DEP) has reviewed the October 2011 Remedial Action Plan (RAP) and Construction Health and Safety Plan (CHASP) prepared by AKRF, Inc. on behalf of RSV, LLC (c/o Rudin Management Company, Inc.) and Saint Vincent's Catholic Medical Centers of New York, d/b/a Saint Vincent's Catholic Medical Centers (applicant). The applicant is seeking a number of discretionary actions (zoning map amendments, zoning text amendments, large scale general development permit, etc.) from the New York City Department of City Planning (DCP) in connection with the proposed development of a primarily residential development and new publicly accessible open space by RSV, LLC, and also the development of a comprehensive health care facility to be owned and operated by the North Shore-Long Island Jewish Health System (NSLIJ). The project site is the former campus of Saint Vincent's Hospital Manhattan, and comprises three sites: the East Site on the east side of Seventh Avenue between West 11th and 12th Streets; the Triangle Site bounded by Seventh Avenue, West 12th Street and Greenwich Avenue; and the O'Toole Building Site on the west side of Seventh Avenue between West 12th and 13th Streets. The vacant former hospital buildings (Coleman/Link Pavilions, Cronin Building, Spellman Pavilion, Reiss Pavilion, Nurses' Residence, and Smith/Raskob Buildings) occupy the East Site. On the Triangle Site the Materials Handling Facility, with loading bays and a connection to the East Site via a tunnel running beneath Seventh Avenue, is unused and the O'Toole Building which continues to house ambulatory care programs, is expected to relocate by the summer of 2011. The proposed zoning map amendment is for a rezoning action of the Seventh Avenue portion of the East Site from C2-6 to C6-2 and a rezoning action of the midblock portion of the East Site from R6 and C1-6 to R8 in the Greenwich Village neighborhood of Manhattan Community District 2. The existing Coleman, Link, and Reiss Pavilions and the Cronin Building on the East Site would be demolished and replaced with new residential buildings, some with retail space and medical offices on the lower floors. The existing Raskob and

Smith Buildings, Spellman Pavilion and Nurses' Residence on the East Site would be converted to residential uses. Existing extensions in the rear yards of the Nurses' Residence and the Spellman Pavilion would be removed for construction of a courtyard in the center of the residential development on the East Site. Construction on the East Site would entail subsurface disturbance to depths of approximately 20 to 25 feet below street grade. The Materials Handling Facility on the Triangle Site would be demolished to allow for the creation of a new publicly accessible open space. The area used for the storage of medical gases on the west end of the Triangle Site would be retained for use by NSLIJ. The existing O'Toole Building would be renovated for use as a Center for Comprehensive Care. The conversion would entail interior demolition and reconstruction, as well as limited expansion of the ground floor and limited subsurface disturbance for the expansion.

The October 2011 RAP proposes the installation of a vapor/moisture barrier on the underside of the new foundation slabs and foundation walls; proper handling, transportation, and disposal of contaminated soil in accordance with applicable NYSDEC regulations; proper removal/closing of underground storage tanks and above-ground storage tanks in accordance with applicable NYSDEC regulations; de-watering into storm/sewer drains in accordance with applicable NYCDEP requirements; dust monitoring; on-site soil will be stockpiled and covered with polyethylene sheeting and installation of at least two feet of certified clean fill in open areas not covered with concrete, asphalt, or pavers. The October 2011 CHASP addresses worker and community health and safety during redevelopment.

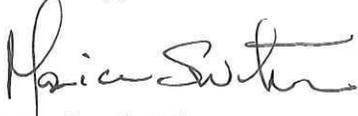
Based upon our review of the submitted documentation, we have the following comments/recommendations to DCP:

- DCP should inform the applicant that based on the age of the subject buildings; asbestos containing materials may be present in the on-site structures. These materials should be properly removed and/or managed prior to the start of any renovation/construction activities and disposed of in accordance with all federal, state and local regulations. DCP should also instruct the applicant that appropriate procedures to minimize the potential for injury or exposure to this potential contaminant of concern including all associated information fact sheets or Material Safety Data Sheets should be included in the CHASP.
- DCP should instruct the applicant to include the names and phone numbers of the Site Supervisor and Alternates in the CHASP.

DEP finds the October 2011 RAP and CHASP for the proposed project acceptable as long as the aforementioned information is incorporated into the CHASP. DCP should instruct the applicant that at the completion of the project, a Professional Engineer (P.E.) certified Remedial Closure Report should be submitted to DEP for review and approval for the proposed project. The P.E. certified Remedial Closure Report should indicate that all remedial requirements have been properly implemented (i.e., proper transportation/disposal manifests and certificates from impacted soils removed and properly disposed of in accordance with all NYSDEC regulations, proof of installation of vapor barrier, and two feet of certified clean fill/top soil capping requirement in any landscaped/grass covered areas not capped with concrete/asphalt, etc.).

Future correspondence related to this project should include the following tracking number **10DEPTECH034M**. If you have any questions, you may contact Mr. Wei Yu at (718) 595-4358.

Sincerely,



Maurice S. Winter  
Deputy Director, Site Assessment

- c: E. Mahoney
- M. Winter
- M. Myrie
- W. Yu
- T. Estes
- M. Wimbish
- C. Evans – DCP
- D. McCarthy – DCP
- O. Abinader – DCP
- File