

FORMER NUHART PLASTIC MANUFACTURING SITE
280 FRANKLIN STREET, BROOKLYN, NY
NYSDEC SITE #224136

PROJECT STATUS REPORT – March 2016

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FROM: Stephanie O. Davis, CPG, Vice President

DATE: April 7, 2016

This status report summarizes activities conducted at the Former Nuhart Plastic Manufacturing Site (Site) in March 2016. Activities during this time period were conducted by FPM Group (FPM). Roux Associates, Inc. (Roux) representatives have also participated in Site evaluations and communications. A site plan showing the general site layout, nearby area, and associated wells is included as Figure 1. Schedule information is presented under each activity discussion.

Interim remedial measure (IRM) activities for monitoring and removal of light non-aqueous-phase liquid (LNAPL) at the Site were performed during the monitoring period in general conformance with the NYSDEC-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system. Some issues with offsite wells MW-12 and MW-13 were also addressed. The Feasibility Study (FS) for the Site previously submitted to the NYSDEC and NYSDOH was undergoing revision. Investigation activities for the Site were previously completed as documented in previous project status reports and are not discussed herein.

A. Interim Remedial Measure Activities

Monthly IRM routine activities were conducted by FPM on March 11, 2016. A table documenting the product apparent thickness measurements is provided as Attachment A and a Well Location Map showing the extent of LNAPL on the monitoring date is provided as Figure 1.

➤ Maintenance Activities

General maintenance activities were performed, including collection of spent IRM-related absorbent materials in the vicinity of recovery wells, placing new absorbent materials as needed to contain product, and proper labeling of waste containers used during this IRM event. Both skimming systems associated with recovery wells RW-8 and RW-12 were found to be powered and operational during the site visit.

Monitoring wells MW-12 and MW-13 located within the Greenpoint Landing construction area were found to have been damaged. Well MW-12 was found to have soil blocking the casing above the level of the screen and small-diameter tubing was present within the casing from below the soil to the top of the casing. A water level measurement could not be obtained from MW-12. The protective manhole above MW-13 had been removed, together with the well cap and small-diameter tubing was also found

in this well. MW-13 was not blocked and a water level measurement was obtained. A Langan representative was contacted and it was determined that the Greenpoint Landing construction contractor had inadvertently damaged the wells and then attempted to clear the soil that had fallen into the wells; Langan had not been notified of this issue. FPM returned to well MW-12 on March 18 and removed the obstructing soil by flushing and circulating clean water and pumping the well until the soil was cleared and the well's connection with the formation was re-established. No signs suggestive of potential contamination, including LNAPL, were noted during this process. The casings for wells MW-12 and MW-13 were secured and Langan was notified of the need for the protective manholes to be restored as soon as feasible.

➤ Monitoring and Product Removal

Gauging of all onsite and offsite monitoring and recovery wells associated with the Site was conducted; wells that could not be accessed are noted on Attachment A. All wells containing LNAPL are noted, as are wells where LNAPL is absent. No changes were noted in the extent of the product. As noted above, although well MW-12 located within the Greenpoint Landing construction area could not be accessed during the monitoring event, when the well was cleared the following week no LNAPL was noted.

In March 2016 changes in the depth to the water table relative to the levels observed in February 2016 were variable, with some wells showing increases and some wells showing decreases. Product apparent thicknesses were noted to decrease in most of the wells where the water table rose and increase in the wells where the water table dropped. These are typical responses to water table changes.

The amount of LNAPL removed from the wells during this event is estimated as 90 gallons, including LNAPL from the drums associated with the skimmers on recovery wells RW-8 and RW-12. Based on previous LNAPL estimates, an estimated 1,206 gallons of product have been removed from the subsurface since early 2015, with most of the product disposed. Approximately 194 gallons of product remain stored at this time in IBC tanks located in the Site building, pending pickup and offsite disposal. When the IBC tanks are nearly full and/or the containerized spent absorbent materials require disposal, the designated waste management company will be contacted and waste disposal requested.

Eastern Environmental Solutions, Inc. (Eastern) is presently contracted to conduct waste management activities for disposal of product from the IBC tanks at the Site; the most recent waste removal event was conducted on February 9, 2016. To date Eastern has transported and disposed an estimated 1,012 gallons of product at the Cycle Chem facility in Elizabeth, NJ as hazardous waste. The completed waste manifest from the February 9, 2016 disposal event is pending and will be attached to the monthly report issued following its receipt. Waste transport and disposal information will continue to be included in the progress reports following the months during which waste disposal activities occur.

➤ Additional Activities

Wells MW-12 and MW-13, located within the Greenpoint Landing construction area, were not surveyed during the 2015 surveying project as the surveyors could not access the construction area at that time. The wells were surveyed on March 18, 2016, with the resulting information added to the well elevation data sheet for the Site. During the surveying event it was noted by FPM representatives that both well casings had been damaged relative to their condition in 2015 and that the tops of both casings appeared to be lower than previously observed. Therefore, depth-to-water measurements made in these wells in 2015 were likely not referenced to the current tops of the casings and should not be integrated with the current well casing elevations to evaluate the water table elevation. Unless

additional damage is noted in the future, water level measurements made during future water level monitoring events are anticipated to be usable for determining the water table elevations in these wells.

B. Feasibility Study

FPM prepared an FS for the Site that includes evaluations of potential remedial methods to address Site-related contamination. The FS was transmitted to the NYSDEC, NYSDOH, and the established document repositories for review on January 28, 2016. The NYSDEC transmitted correspondence to the remedial party concerning the FS on March 3, 2016. On March 15, 2016 the NYSDEC was notified that the FS would be revised to address the comments in the NYSDEC's March 3 correspondence and a request was made to re-submit the revised FS by April 25, 2016. The NYSDEC responded on March 16 confirming the re-submittal date. The FS is presently being revised to address the comments in the NYSDEC's March 3, 2016 correspondence and is scheduled to be resubmitted to the NYSDEC and NYSDOH on or before April 25, 2016.

C. Meetings and NYSDEC Communication

The NYSDEC participated in periodic informal communications in March 2016. Communication on Site-related technical matters will continue, as needed, between NYSDEC, FPM, Roux and others.

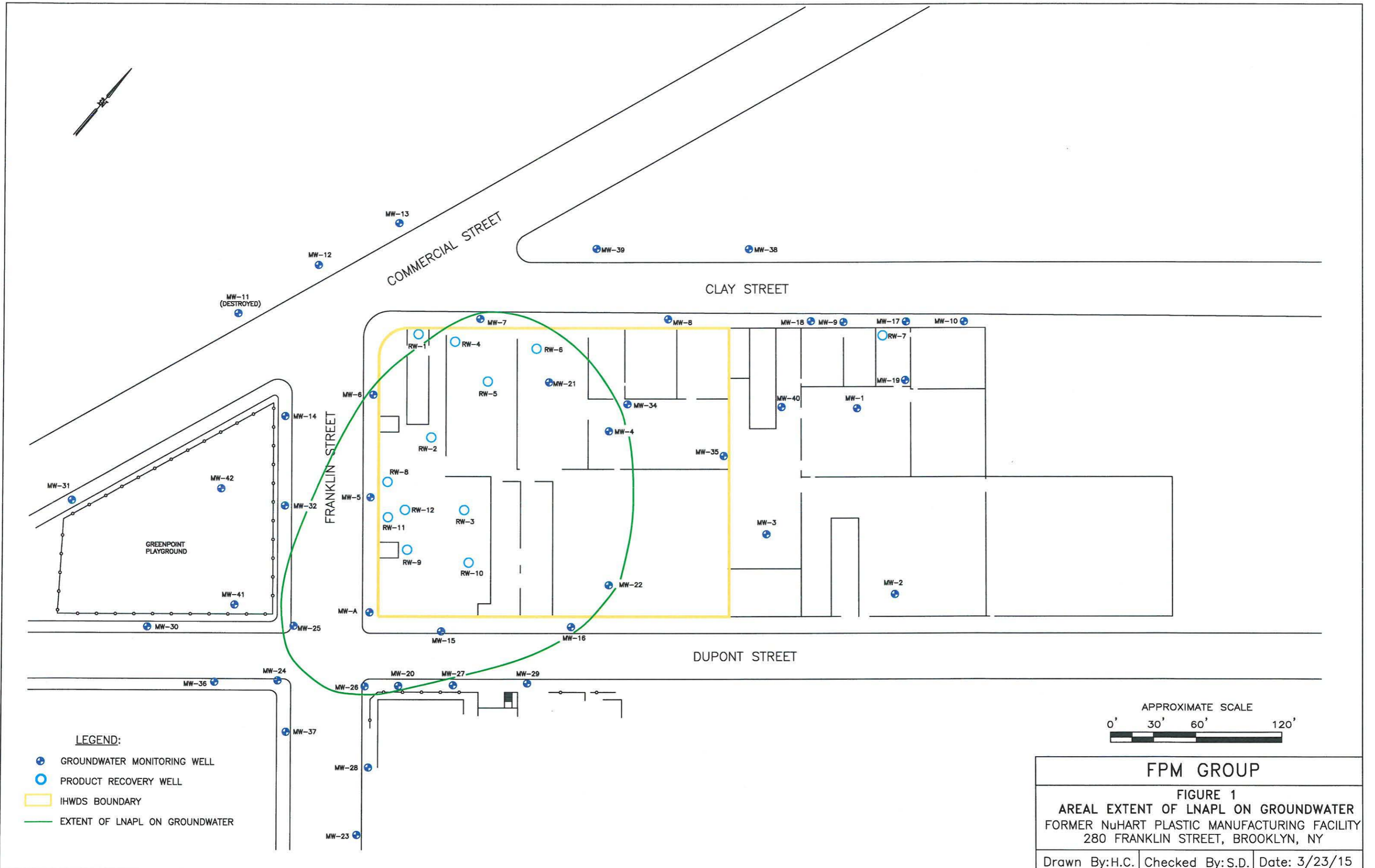
Attachments

Attachment A – Apparent Thickness of LNAPL

Figure 1 – Well Location Map showing areal extent of LNAPL on groundwater

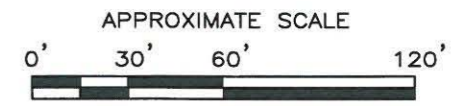
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LEGEND:

- ⊕ GROUNDWATER MONITORING WELL
- ⊙ PRODUCT RECOVERY WELL
- ▭ IHWDS BOUNDARY
- EXTENT OF LNAPL ON GROUNDWATER



FPM GROUP

FIGURE 1
AREAL EXTENT OF LNAPL ON GROUNDWATER
FORMER NuHART PLASTIC MANUFACTURING FACILITY
280 FRANKLIN STREET, BROOKLYN, NY

Drawn By: H.C. | Checked By: S.D. | Date: 3/23/15

