



HALEY & ALDRICH OF NEW YORK
1441 Broadway, Suite 6031
New York, NY 10018
646.518.7735

13 November 2018
File No. 133110-002

Via Email: yukyin.wong@dec.ny.gov
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 2
47-40 21st Street
Long Island City, New York 11101

Attention: Mr. Bryan Wong

Subject: Project Status Report
Former NuHart Plastics Manufacturing Site # 224136
280 Franklin Street
Brooklyn, New York

Dear Mr. Wong:

Haley & Aldrich of New York is pleased to present this Project Status Report on behalf of Dupont Street Developers, LLC for the above referenced Site. Copies of this Project Status Report have also been provided to Dawn Hettrick of the New York State Department of Health. The Project Status Report is for July 2018 to October 2018. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK

A handwritten signature in blue ink that reads 'James M. Bellew'.

James Bellew
Senior Client Leader

CC:

Dawn Hettrick (NYSDOH)
Dupont Street Developers, LLC
Joseph Brunner
Jane O'Connell (NYSDEC)
Wendy A. Marsh

Email: dawn.hettrick@health.ny.gov
Email: bojinzhu@gmail.com
Email: yb321@yahoo.com
Email: jane.oconnell@dec.ny.gov
Email: wmarsh@hancocklaw.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from July 2018 through October 2018. Activities during this period were conducted by Haley and Aldrich of New York (HANY). A Site Plan showing the general Site layout, nearby area, and associated wells is included as Figure 1.

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.

Data Gap

Prior to HANY being engaged to the Site, GZA GeoEnvironmental (GZA) was the Environmental Consultant for the Owner. HANY understands that in June 2018 GZA performed maintenance and repairs to the Belt Skimmer Systems and was troubleshooting the operation. HANY understands that GZA deactivated the system around August to early September 2018. Ramboll reactivated the system on 28 September 2018 and rechecked that the system was operational on 4 October 2018.

Interim Remedial Measure Activities

The IRM routine activities (Monthly) were performed by HANY on 6 November 2018. The apparent LNAPL thickness measurement table is provided as Attachment A. Additionally, a Well Location Map showing the extent of LNAPL based on the monitoring date is shown as **Figure 1**.

Maintenance Activities

General maintenance activities include collection of spent IRM-related absorbent materials in the vicinity of recovery wells, placing new absorbent materials and proper labeling of waste containers generated 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 and LNAPL Removal

Gauging of onsite and offsite monitoring and recovery wells associated with the Site was performed and the wells that could not be accessed and/or gauged are identified on **Attachment A**. No changes were observed in the lateral extent of the LNAPL plume. On 6 November 2018, high tide was observed from 8:00 AM to 2:00 PM during the well gauging period (by NOAA/NOS/CO-OPS Station ID (8517673) Hunters Point, Newtown Creek, NY). It is noted that there is a data gap from July 2018 through September 2018. The depths to the water table were variable relative to the depths noted in the previous status reports, with some wells showing increases and some wells showing decreases. LNAPL apparent thicknesses were also variable, with increases generally noted in wells where the depth to water increased and decreases noted in wells where the depth to water decreased.

The product recovery holding reservoirs were emptied during this event. The amount of LNAPL removed from the wells was estimated at 110 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 2,565 gallons of product have been removed from the subsurface since early 2015, with most of the

LNAPL disposed. The removed LNAPL is stored in intermediate bulk container (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. To date, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. No waste was transported from the Site during this period and transportation and disposal information will continue to be included in the progress reports following the months during which disposal activities occur.

Feasibility Study and Proposed Remedial Action Work Plan (PRAP)

The Feasibility study prepared by GZA was submitted to the NYSDEC in January 2017. The NYSDEC issued the proposed remedial action work plan (PRAP) in September 2018. A public comment hearing was held on 4 October 2018 to discuss the proposed remedy for the Site. The public comment period ends on 9 November 2018.

Site Soil Management Report

There were no requests for evaluation of potential work in the LNAPL plume area during this period. During this period Ramboll US Corporation (Ramboll) was engaged to evaluate an oily residue present in the sidewalk along Dupont Street. Ramboll visited the site on 26 September 2018 and observed the presence of fried rice directly in the middle of the oily residue. Ramboll collected sediment samples from within the area which were analyzed for Volatile Organic Compounds, Semi Volatile Organic Compounds and Total Petroleum Hydrocarbons. Ramboll concluded that the presence of the oily residue was likely from the continued spreading of fried rice in the area.

Attachments

Attachment A – Apparent Thickness of LNAPL

Attachment B – Well Location Map showing areal extent of LNAPL on groundwater

Attachment A

Apparent Thickness of LNAPL

Table 1:
Attachment A: Apparent Thickness of LNAPL
Former NuHart Plastic Manufacturing Site, NYSDEC #224136
280 Franklin Street
Brooklyn, NY

Readings taken 11/0619/18
between 7:00 am and 2:00 pm
(High tide @ 8:16 AM and Low
tide @ 2:10 PM)

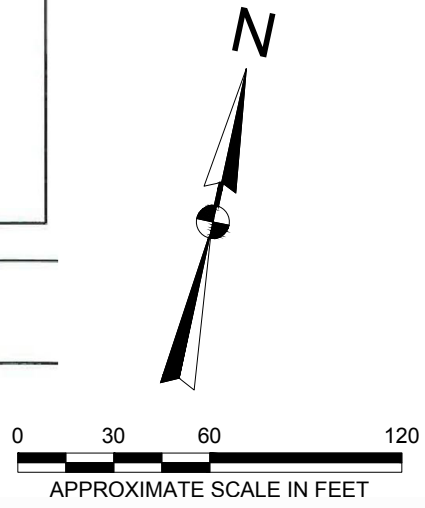
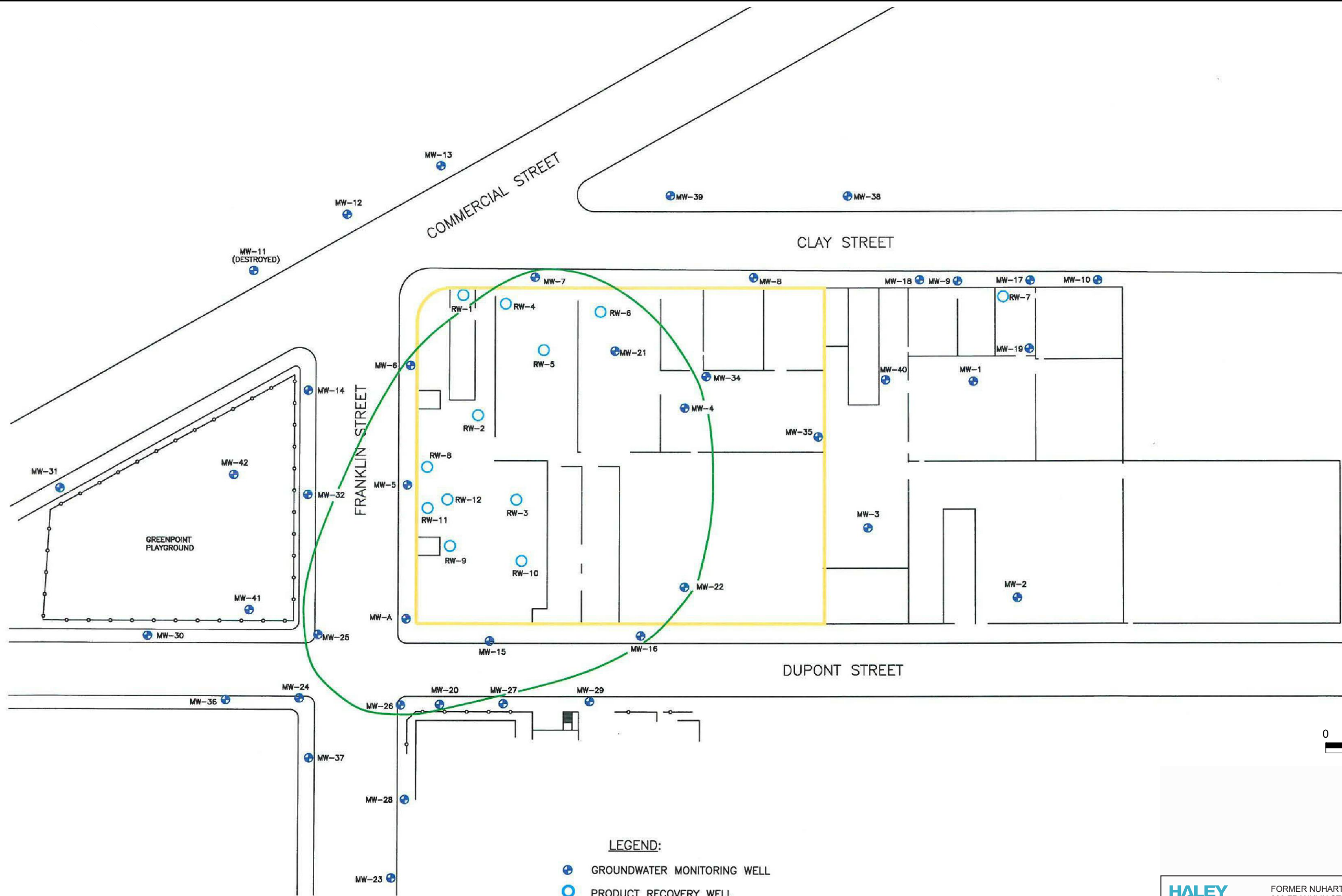
Well Number	*Depth to Product (feet)	*Depth to Water (feet)	2018												2017											
			Oct-18	Jun-18	May-18	Apr-18	Mar-18	Feb-18	Jan-18	Nov-17	Oct-17	Sep-17	Aug-17	Jul-17	Jun-17	May-17	Apr-17	Mar-17	Feb-17	Jan-17	Dec-16	Nov-16	Oct-16	Sep-16	Aug-16	
MW - 4	ND*	ND*	ND*	0.12	1.13	0.65	0.73	*	0.92	2.12	0.81	1.76	1.73	1.23	1.77	ND*	1.32	1.61	1.13	1.31	1.30	1.00	1.18	1.35	1.71	
MW - 5	10.09	14.21	4.12	1.66	1.83	2.77	2.19	2.21	4.65	5.83	2.19	4.44	4.4	3.71	3.54	2.81	2.80	3.13	4.05	3.00	3.55	4.43	3.64	3.22	4.31	
MW - 6	9.29	ND*	ND	0.55	0.50	2.47	0.74	##	##	##	1.22	3.19	3.15	##	##	##	##	##	##	##	##	##	##	##	##	
MW - 7	10.31	10.85	0.54	1.89	1.99	1.80	2.03	2.55	3.32	4.91	1.48	1.45	1.41	0.9	0.00	1.50	1.92	2.53	3.71	1.28	0.78	1.73	0.91	0.04	1.89	
MW - 8	ND	10.17	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 12	ND	7.28	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 13	ND	7.66	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 14	ND	9.03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 15	10.75	10.87	0.12	0.04	0.04	0.07	0.07	0.08	3.16	1.78	0.31	0.29	0.26	0.26	0.24	0.12	0.22	0.28	0.40	0.31	0.20	0.80	0.20	0.17	0.81	
MW - 16	11.43	11.63	0.20	0.06	0.10	0.13	—	0.1	0.34	0.25	0.35	0.37	0.35	0.08	0.28	0.03	0.10	0.23	0.20	0.31	ND	ND	ND	ND	ND	
MW - 20	10.76	13.27	2.51	1.4	1.55	2.52	1.77	1.02	3.15	3.99	2.52	2.58	2.63	2.9	2.83	2.61	2.94	2.33	3.02	3.02	2.88	3.28	2.90	3.16	2.89	
MW - 21	11.52	13.25	1.73	1.43	1.42	1.62	1.38	2.29	3.83	4.79	3.26	3.35	2.13	1.45	2.75	3.31	3.30	3.04	3.62	7.59	3.27	3.32	1.25	2.39	3.61	
MW - 22	12.32	13.01	0.69	0.97	0.89	0.76	1.11	0.28	0.37	1.77	1.25	1.24	1.21	0.75	0.66	0.66	0.78	0.64	0.65	0.50	0.51	0.38	0.30	0.01	0.51	
MW - 23	ND	11.44	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 24	ND	10.65	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 25	10.38	13.82	3.44	2.85	2.89	4.03	3.45	3.44	3.66	4.54	4.03	4.05	4.02	3.73	4.09	3.85	3.70	3.74	3.47	3.89	3.62	3.60	4.20	3.79	3.65	
MW - 26	10.40	13.85	3.45	0.75	2.35	3.14	2.48	3.19	3.95	5.59	3.81	3.82	3.79	3.65	3.42	3.29	3.73	3.64	3.24	3.14	3.20	3.56	4.00	3.28	4.26	
MW - 27	ND	10.87	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 28	ND	11.18	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 29	ND	11.34	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 30	ND	10.07	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 31	ND	10.41	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	—	—	—	—	
MW - 32	ND	10.13	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 34	ND	11.76	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 35	ND	14.67	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 36	ND	10.92	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 37	ND*	ND*	ND*	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 38	ND	9.98	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	—	—	—	—	
MW - 39	ND	9.03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 40	ND	7.29	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 41	—	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 42	ND*	ND*	ND*	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
RW - 1	ND	9.11	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
RW - 2	12.29	17.83	5.54	0.06	0.08	1.65	0.08	5.52	4.01	5.19	0.56	0.58	0.53	6.09	6.25	0.42	1.13	2.90	3.09	3.53	1.65	1.18	1.26	1.35	1.88	
RW - 3	15.18	18.95	3.77	2.08	2.03	2.52	2.12	3.03	ND	3.31	3.17	3.15	3.22	2.28	3.44	2.85	2.71	3.46	2.98	3.10	1.91	3.95	2.40	2.50	3.08	
RW - 4	12.36	15.21	2.85	2.96	2.97	3.80	3.01	02.39	3.06	4.32	4.33	4.17	4.18	3.1	4.1	03.69	3.65	3.69	3.67	3.05	3.80	2.80	2.77	3.30	2.73	
RW - 5	11.02	ND*	ND*	0.44	0.33	0.65	0.34	4.64	0.49	4.49	5.28	5.27	5.26	5.42	3.75	5.00	5.44	5.10	0.70	2.95	1.55	3.05	0.42	0.36	0.50	
RW - 6	12.22	14.13	1.91	0.83	0.88	0.96	0.91	00.90	2.61	1.64	0.73	0.6	1.61	0.93	5.35	1.05	1.27	1.22	0.90	0.90	0.85	0.68	0.87	0.92	1.46	
RW - 8 **	—	—	—	0.02	0.02	0.03	0.03	0.06	1.99	—	1.15	2.2	3.62	1.99	1.2	2.34	0.02	0.01	—	—	—	—	—	—	—	
RW - 9	13.51	18.03	4.52	0.11	2.38	2.28	1.51	2.88	4.32	5.58	3.72	3.77	3.69	2.84	3.25	2.70	2.69	3.50	3.66	2.47	3.09	3.57	2.45	2.35	3.19	
RW - 10	13.27	15.73	2.46	1.52	1.60	3.70	0.66	3.48	4.64	4.28	3.65	3.67	3.71	3.67	3.78	4.07	3.79	4.27	4.70	4.15	3.86	3.45	3.80	3.36	4.44	
RW - 11	13.51	15.72	2.21	2.51	2.52	4.34	2.41	2.50	5.01	5.5	2.97	4.57	3.93	2.33	3.00	2.92	3.00	3.55	3.73	2.65	1.90	2.04	2.43	2.12	3.66	
RW - 12 **	—	—	—	0.11	0.02	2.61	0.02	1.12	1.5	5.96	3.65	5.4	2.68	0.01	0.03	0.01	0.02	0.80	3.89	—	—	—	—	—	—	

Notes:
Data Recorded using an oil/water interface probe, measurements from the tops of well casings
= LNAPL observed, apparent thickness not determined
NI = Not Installed
ND = Not Detected
Wells MW-1, MW-2, MW-9, MW-10, MW-17, MW-18, MW-19, and RW-7 are associated with NYSDEC Spill 06-01852 and are under a separate investigation
Well-34 has uneven casing top
est= Estimated Value
* = Well was dry
** = Well equipped with automated product recovery system
— = Data not recorded due to access issues
Wells were gauged on June 19, 2018

Attachment B

Site Figure

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LEGEND:

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

NOTES:

1. THE BASE MAP WAS DEVELOPED FROM AN ELECTRONIC FILE PROVIDED BY DUPONT STREET DEVELOPERS, LLC, ENTITLED "AERIAL EXTENT OF LNAPL ON GROUNDWATER," DATED MARCH 23, 2015, ORIGINAL SCALE 1" = 60'.

HALEY ALDRICH FORMER NUHART PLASTIC MANUFACTURING
 280 FRANKLIN STREET
 BROOKLYN, NEW YORK

AERIAL EXTENT OF LNAPL ON GROUNDWATER

NOVEMBER 2018

FIGURE 1