



HALEY & ALDRICH OF NEW YORK
237 West 35th Street
16th Floor
New York, NY 10123
646.518.7735

16 March 2021
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 Stephen Lawrence of the New York State Department of Health. The Project Status Report is for October 2020 to March 2021. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Senior Associate

CC:

Stephen Lawrence (NYSDOH)
Dupont Street Developers, LLC
Jane O'Connell (NYSDEC)
Richard Guishard

Email: Stephen.Lawrence@health.ny.gov
Email: bojinzhu@gmail.com
Email: jane.oconnell@dec.ny.gov
Email: statedesignsny@gmail.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from October 2020 to March 2021. 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. There was a gap in the monthly reporting on the Site due to the pending transaction and a contractual discrepancy. During the site visit the belt skimmer system was not powered. The system was powered off to prevent any potential overflow of system during the resolution of the above.

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 New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (Monthly) were performed by HANY on 15 March 2021.

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, general housekeeping activities 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 operational during the Site visit. Prior to completion of the routine activities all accessible doors on the ground level were checked and secured. Ownership confirmed security of the upper floors and roof access.

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 15 March 2021, high tide was observed from 11:55 AM to 5:42 PM partially during the well gauging period (by NOAA/NOS/CO-OPS Station ID 8517673) Hunters Point, Newtown Creek, NY). 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 39 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 3,779 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, Proposed Remedial Action Work Plan (PRAP) and Record of Decision

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 ended on 9 November 2018. The Record of Decision was issued by the NYSDEC in March 2019 and received by the repositories in April 2019. The translated fact sheet was sent to the NYSDEC for review on 16 May 2017 and finalized on 30 May 2019. Translated fact sheets were distributed to applicable site contacts on 3 June 2019.

Site Soil Management Report

There were no requests for evaluation of potential work in the LNAPL plume area during this period. NYSDEC did issue a letter on 16 February 2021 regarding a request for evaluation of offsite groundwater impacts made by NYSDEC in October 2018. A work plan for the request will be drafted in the next monitoring period.

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 3/15/21 between 10:00 am and 1:00 pm (high tide @ 11:55 am and low tide @ 5:42 pm)

Table with columns: Well Number, Depth to Water (feet), Depth to Product (feet), Apparent Thickness of LNAPL (feet) for years 2021, 2020, 2019, 2018, 2017, 2016. Rows include MW-4 through MW-36 and RW-1 through RW-12, with data points for each month of the respective year.

Notes: Data recorded using an oil/water interface probe, measurements from the tops of well casings ## = NAPL observed, apparent thickness not determined NI = Not Installed ND = Not Detected NG = Not Gauged 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 Total of 39 gallons of product removed from product recovery system Well-34 has uneven casing top est= Estimated Value == Data not recorded due to access issues * = Well was dry ** = Well equipped with automated product recovery system ***= DTW reading not determined Wells were gauged on 15 March 2021

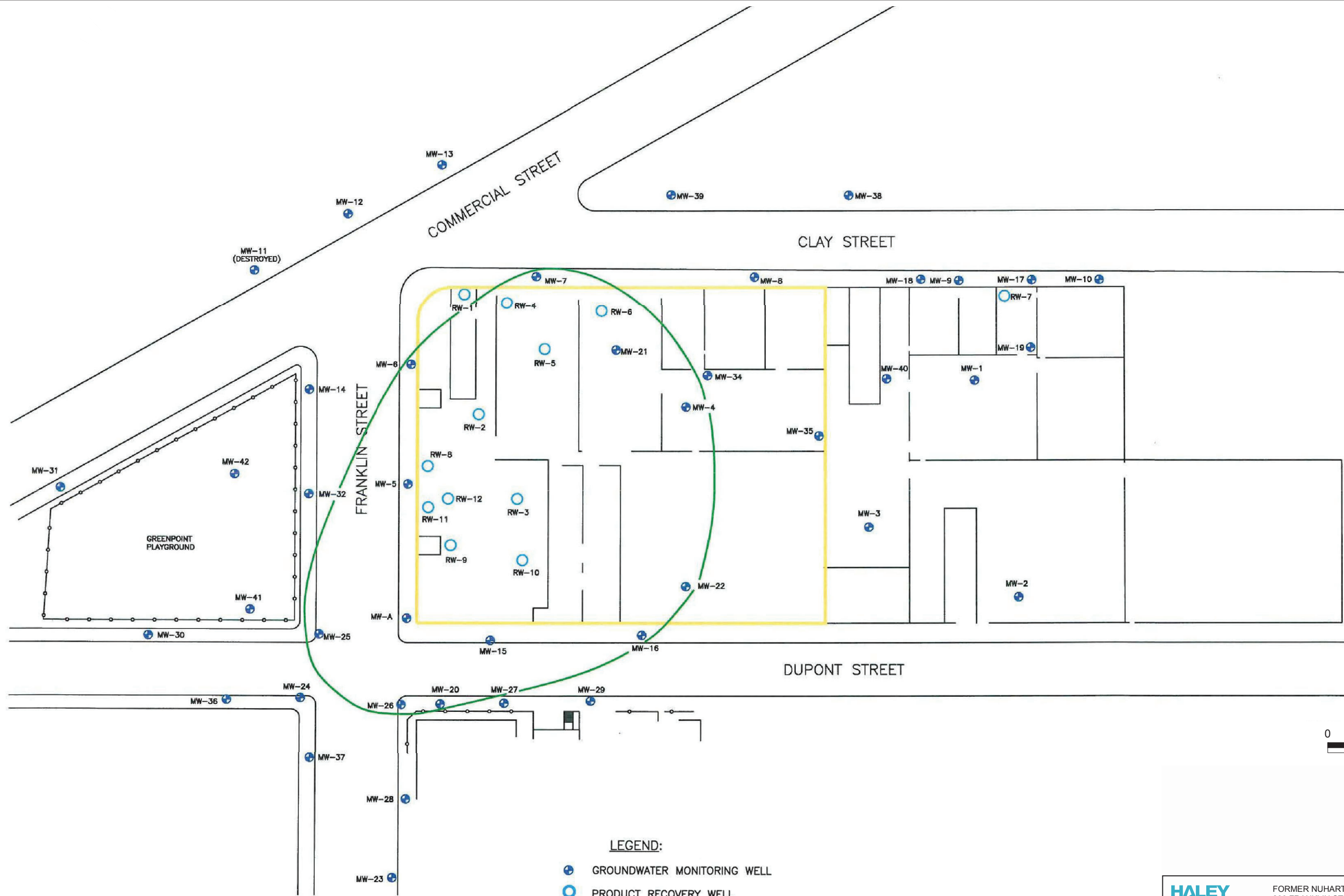
Table 1:
Attachment A: Apparent Thickness of LNAPL
Former NuHart Plastic Manufacturing Site, NYSDEC #224136
280 Franklin Street
Brooklyn, NY

Table with columns for Well Number, Depth to Water (feet), Depth to Product (feet), and Apparent Thickness of LNAPL (feet) for months from 2012 to 2016. The table lists 42 wells (MW-4 to MW-36 and RW-1 to RW-12) with data points for each month. Values range from 'Trace' to 5.85 feet. Many wells show 'ND' (Not Detected) or 'NG' (Not Gauged) for most months.

Notes:
Data recorded using an oil/water interface probe, measurements from the tops of well casings
= NAPL observed, apparent thickness not determined
NI = Not Installed ND = Not Detected NG = Not Gauged
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
Total of 39 gallons of product removed from product recovery system
Well-24 has uneven casing top
est= Estimated Value == Data not recorded due to access issues
* = Well was dry ** = Well equipped with automated product recovery system ***= DTW reading not determined
Wells were gauged on 15 March 2021

Attachment B

Site Figure



- 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

MARCH 2021

FIGURE 1



HALEY & ALDRICH OF NEW YORK
237 West 35th Street
16th Floor
New York, NY 10123
646.518.7735

9 April 2021
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 Stephen Lawrence of the New York State Department of Health. The Project Status Report is for March 2021 to April 2021. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Senior Associate

CC:

Stephen Lawrence (NYSDOH)
Dupont Street Developers, LLC
Jane O'Connell (NYSDEC)
Richard Guishard

Email: Stephen.Lawrence@health.ny.gov
Email: bojinzhu@gmail.com
Email: jane.oconnell@dec.ny.gov
Email: statedesignsny@gmail.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from March 2021 to April 2021. 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 New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (Monthly) were performed by HANY on 5 April 2021.

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, general housekeeping activities 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 operational during the Site visit.

In addition, an obstruction of residual sampling materials was removed from MW-41 to allow for gauging.

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 5 April 2021, high tide was observed from 4:53 AM to 11:14 AM partially during the well gauging period (by NOAA/NOS/CO-OPS Station ID 8517673) Hunters Point, Newtown Creek, NY). 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 60 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 3,839 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, Proposed Remedial Action Work Plan (PRAP) and Record of Decision

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 ended on 9 November 2018. The Record of Decision was issued by the NYSDEC in March 2019 and received by the repositories in April 2019. The translated fact sheet was sent to the NYSDEC for review on 16 May 2017 and finalized on 30 May 2019. Translated fact sheets were distributed to applicable site contacts on 3 June 2019.

Notice of Violation

A Notice of Violation (NOV) was issued by NYSDEC on 22 February 2021 for failure to properly maintain and implement the IRM activities and submit timely monthly reports. An administrative settlement conference was held on 17 March 2021 to discuss the NOV.

Site Soil Management Report

There were no requests for evaluation of potential work in the LNAPL plume area during this period. NYSDEC did issue a letter on 16 February 2021 regarding a request for evaluation of offsite groundwater impacts made by NYSDEC in October 2018. A work plan for this request is currently in draft and will be submitted to NYSDEC during the subsequent monitoring period.

Attachments

Attachment A – Apparent Thickness of LNAPL

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

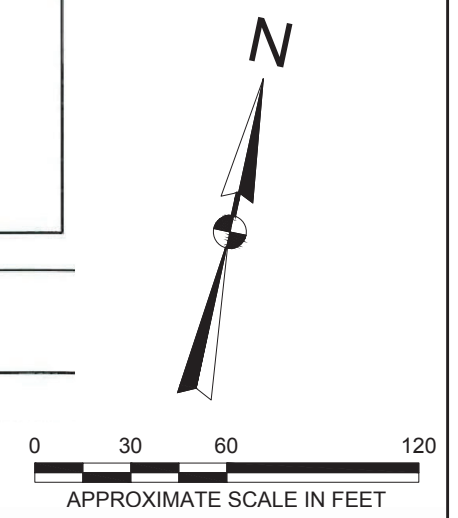
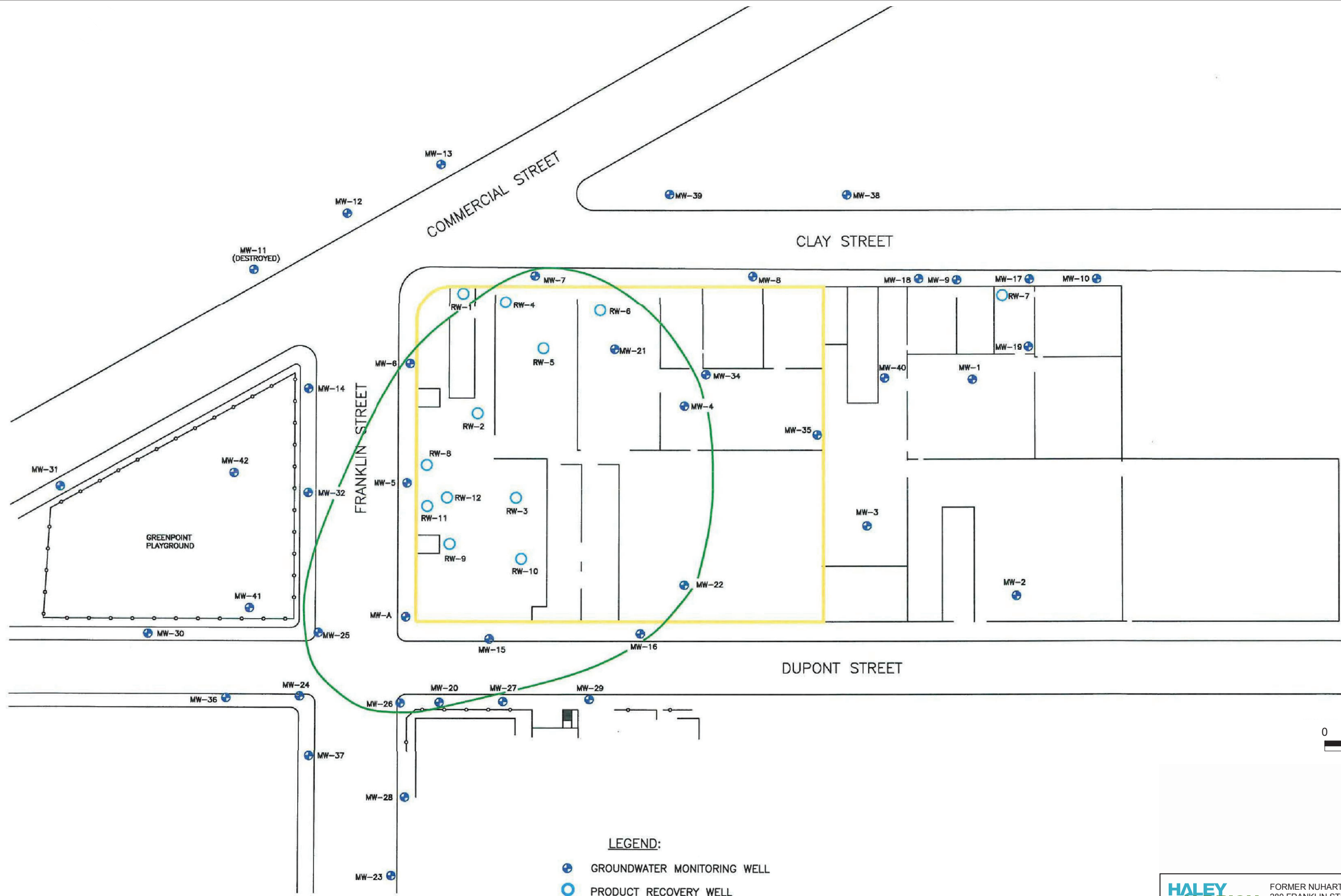
Attachment A

Apparent Thickness of LNAPL

Attachment B

Site Figure

©2016 - GZA GeoEnvironmental, Inc. GZA-J:\76400's\12.0076485.00\Figures\CAD\76485.00.003.dwg [1] September 07, 2016 - 11:26am miguel.torres



- 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

APRIL 2021

FIGURE 1



HALEY & ALDRICH OF NEW YORK
237 West 35th Street
16th Floor
New York, NY 10123
646.518.7735

10 May 2021
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
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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 Stephen Lawrence of the New York State Department of Health. The Project Status Report is for April 2021 to May 2021. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
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Senior Associate

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Email: statedesignsny@gmail.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from April 2021 to May 2021. 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 New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (Monthly) were performed by HANY on 7 May 2021.

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, general housekeeping activities 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 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 7 May 2021, high tide was observed from 7:31 AM to 1:20 PM during the well gauging period (by NOAA/NOS/CO-OPS Station ID 8517673) Hunters Point, Newtown Creek, NY). 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 55 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 3,894 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.

Upcoming Site Activities

During the next reporting period an updated sample will be collected from the stored LNAPL on the Site and submitted to CycleChem for approval. Upon approval, a fluid recovery event will be coordinated with Eastern Environmental for transportation and disposal of the LNAPL on the Site.

Feasibility Study, Proposed Remedial Action Work Plan (PRAP) and Record of Decision

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 ended on 9 November 2018. The Record of Decision was issued by the NYSDEC in March 2019 and received by the repositories in April 2019. The translated fact sheet was sent to the NYSDEC for review on 16 May 2017 and finalized on 30 May 2019. Translated fact sheets were distributed to applicable site contacts on 3 June 2019.

Notice of Violation

A Notice of Violation (NOV) was issued by NYSDEC on 22 February 2021 for failure to properly maintain and implement the IRM activities and submit timely monthly reports. An administrative settlement conference was held on 17 March 2021 to discuss the NOV.

Site Soil Management Report

There were no requests for evaluation of potential work in the LNAPL plume area during this period. NYSDEC did issue a letter on 16 February 2021 regarding a request for evaluation of offsite groundwater impacts made by NYSDEC in October 2018. A work plan for this request was submitted to NYSDEC on 12 April 2021 and is currently pending NYSDEC comment and/or approval.

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 5/7/21 between 10:15
am and 13:15 pm (high tide @ 7:31 am
and low tide @ 1:20 pm)

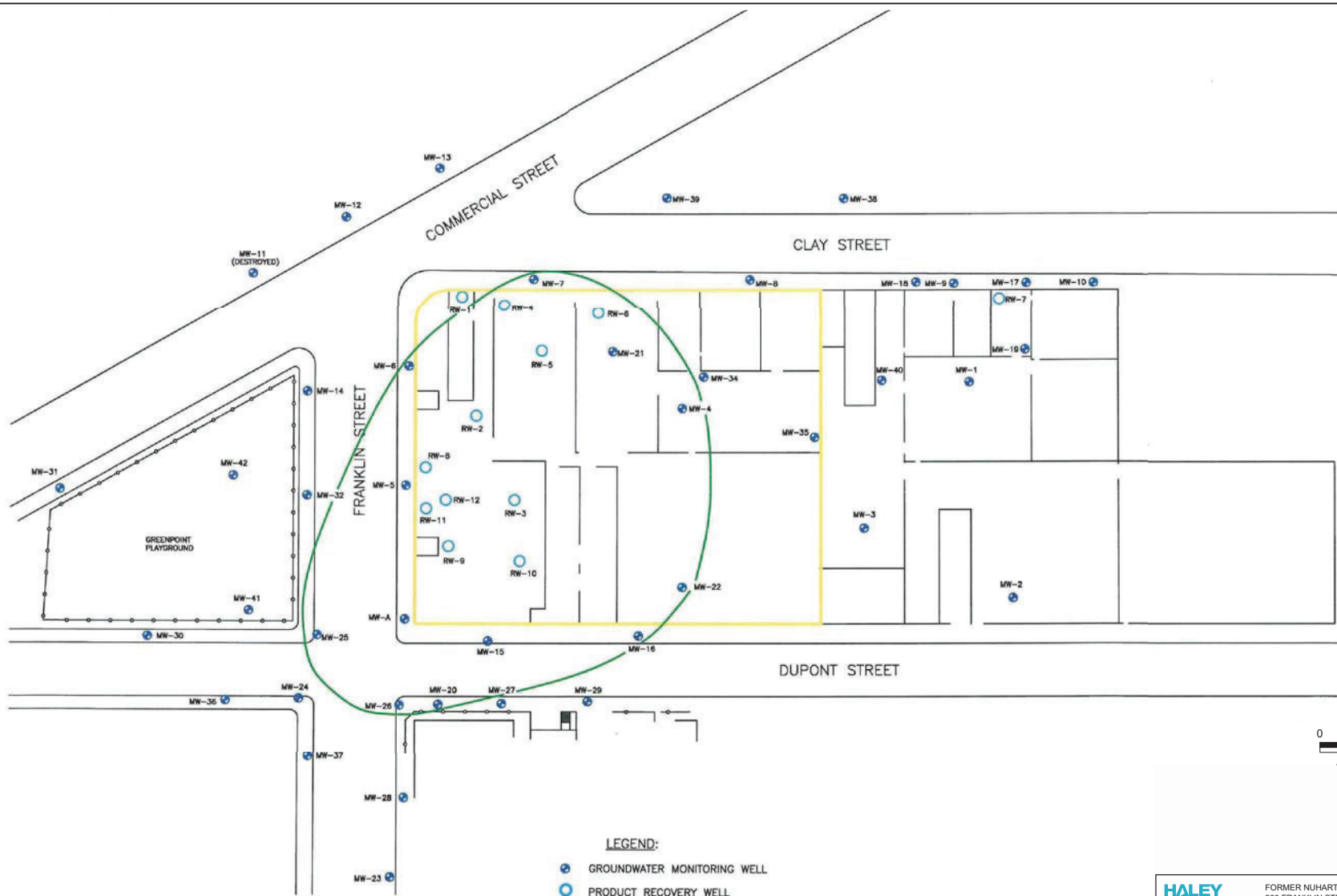
Apparent Thickness of LNAPL (feet)

Table with columns for Well Number, Depth to Water (feet), and Apparent Thickness of LNAPL (feet) for years 2017-2021. The table contains data for wells MW-4 through MW-42 and RW-1 through RW-12. Values include thickness in feet, with many cells marked 'ND' (Not Detected) or '##' (Not Installed).

Notes:
Data recorded using an oil/water interface probe, measurements from the tops of well casings
= NAPL observed, apparent thickness not determined
NI = Not Installed ND = Not Detected NG = Not Gauged
Wells MW-1, MW-2, MW-9, MW-10, MW-17, MW-18, MW-19, and RW-7 are associated with NYSDEC Split 06-01852 and are under a separate investigation
Total of 55 gallons of product removed from product recovery system
Well-34 has uneven casing top
est= Estimated Value ___ = Data not recorded due to access issues
* = Well was dry ** = Well equipped with automated product recovery system
Wells were gauged on 7 May 2021

Attachment B

Site Figure



- 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

MAY 2021

FIGURE 1



HALEY & ALDRICH OF NEW YORK
237 West 35th Street
16th Floor
New York, NY 10123
646.518.7735

9 June 2021
File No. 133110-002

Via Email: yukyin.wong@dec.ny.gov
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 2
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Sincerely yours,
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James Bellew
Senior Associate

CC:

Stephen Lawrence (NYSDOH)
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This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from April 2021 to May 2021. 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 New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (Monthly) were performed by HANY on 8 June 2021.

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, general housekeeping activities 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 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 8 June 2021, high tide was observed from 9:16 AM to 2:46 PM during the well gauging period (by NOAA/NOS/CO-OPS Station ID 8517673) Hunters Point, Newtown Creek, NY). 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 35 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 3,929 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.

During this reporting period a waste characterization sample was collected from the stored LNAPL on the Site. The application is under review for submittal to CycleChem.

Upcoming Site Activities

The CycleChem disposal application will be submitted for approval during the next reporting period. Upon approval, a fluid recovery event will be coordinated with Eastern Environmental for transportation and disposal of the LNAPL on the Site.

Feasibility Study, Proposed Remedial Action Work Plan (PRAP) and Record of Decision

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 ended on 9 November 2018. The Record of Decision was issued by the NYSDEC in March 2019 and received by the repositories in April 2019. The translated fact sheet was sent to the NYSDEC for review on 16 May 2017 and finalized on 30 May 2019. Translated fact sheets were distributed to applicable site contacts on 3 June 2019.

Notice of Violation

A Notice of Violation (NOV) was issued by NYSDEC on 22 February 2021 for failure to properly maintain and implement the IRM activities and submit timely monthly reports. An administrative settlement conference was held on 17 March 2021 to discuss the NOV.

Site Soil Management Report

There were no requests for evaluation of potential work in the LNAPL plume area during this period. NYSDEC did issue a letter on 16 February 2021 regarding a request for evaluation of offsite groundwater impacts made by NYSDEC in October 2018. A work plan for this request was submitted to NYSDEC on 12 April 2021 and comments were received on 4 June 2020. A revised work plan is required within 30 days and will be submitted during the next reporting period.

Attachments

Attachment A – Apparent Thickness of LNAPL

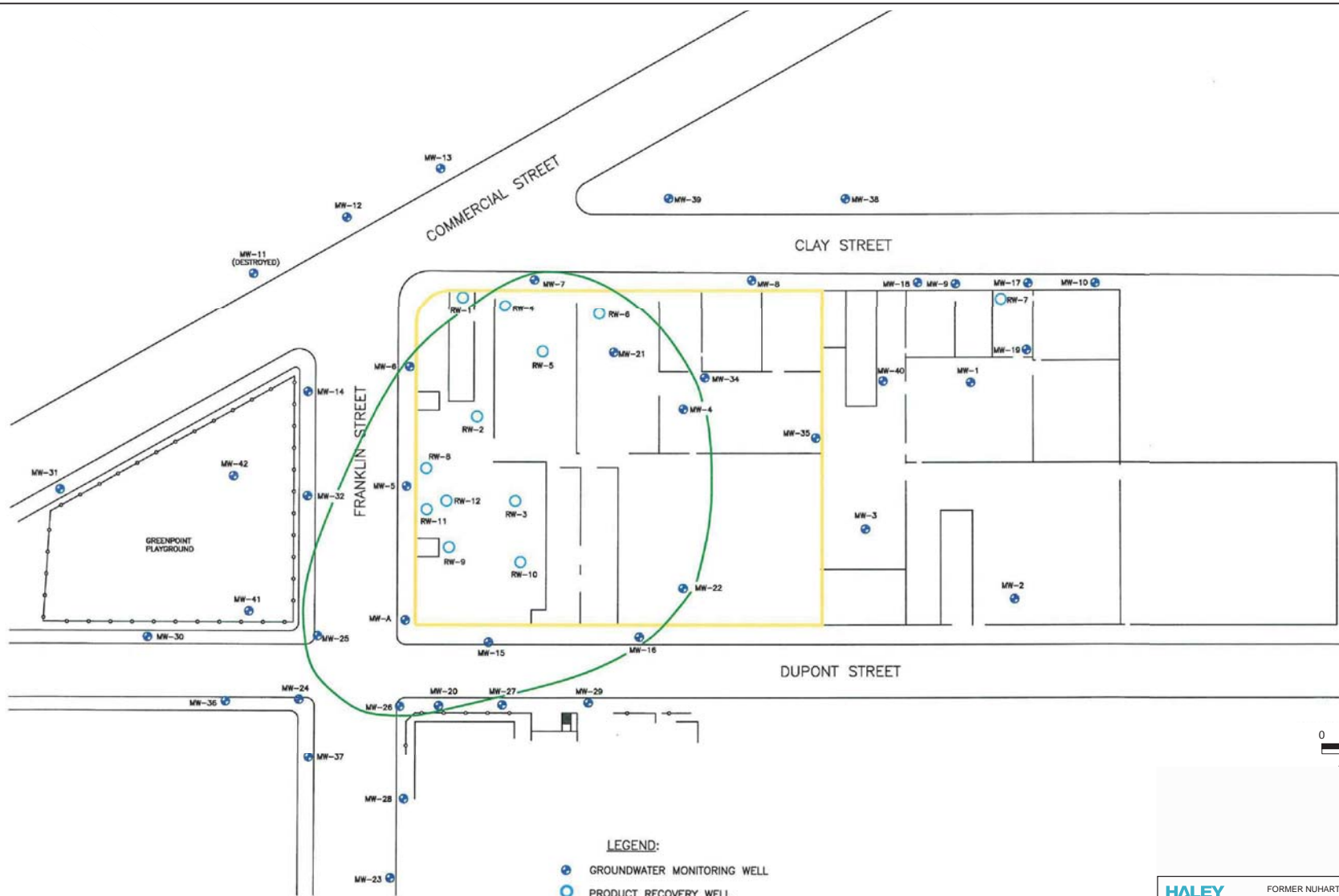
Attachment B – Well Location Map showing areal extent of LNAPL on groundwater

Attachment A

Apparent Thickness of LNAPL

Attachment B

Site Figure



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

JUNE 2021

FIGURE 1



HALEY & ALDRICH OF NEW YORK
237 West 35th Street
16th Floor
New York, NY 10123
646.518.7735

9 July 2021
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 Stephen Lawrence of the New York State Department of Health. The Project Status Report is for June 2021 to July 2021. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Senior Associate

CC:

Stephen Lawrence (NYSDOH)
Dupont Street Developers, LLC
Jane O'Connell (NYSDEC)
Richard Guishard

Email: Stephen.Lawrence@health.ny.gov
Email: bojinzhu@gmail.com
Email: jane.oconnell@dec.ny.gov
Email: statedesignsny@gmail.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from June 2021 to July 2021. 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 New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (Monthly) were performed by HANY on 7 July 2021.

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, general housekeeping activities 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 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 7 July 2021, high tide was observed from 8:50 AM to 2:13 PM during the well gauging period (by NOAA/NOS/CO-OPS Station ID 8517673) Hunters Point, Newtown Creek, NY). 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 25 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 3,954 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.

During this reporting period a waste characterization sample was collected from the stored LNAPL on the Site. The application is under review for submittal to CycleChem.

Upcoming Site Activities

The CycleChem disposal application will be submitted for approval during the next reporting period. Upon approval, a fluid recovery event will be coordinated with Eastern Environmental for transportation and disposal of the LNAPL on the Site.

Feasibility Study, Proposed Remedial Action Work Plan (PRAP) and Record of Decision

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 ended on 9 November 2018. The Record of Decision was issued by the NYSDEC in March 2019 and received by the repositories in April 2019. The translated fact sheet was sent to the NYSDEC for review on 16 May 2017 and finalized on 30 May 2019. Translated fact sheets were distributed to applicable site contacts on 3 June 2019.

Notice of Violation

A Notice of Violation (NOV) was issued by NYSDEC on 22 February 2021 for failure to properly maintain and implement the IRM activities and submit timely monthly reports. An administrative settlement conference was held on 17 March 2021 to discuss the NOV.

Site Soil Management Report

There were no requests for evaluation of potential work in the LNAPL plume area during this period. NYSDEC did issue a letter on 16 February 2021 regarding a request for evaluation of offsite groundwater impacts made by NYSDEC in October 2018. A work plan for this request was submitted to NYSDEC on 12 April 2021 and comments were received on 4 June 2020. A revised work plan was submitted on 2 July 2021.

Attachments

Attachment A – Apparent Thickness of LNAPL

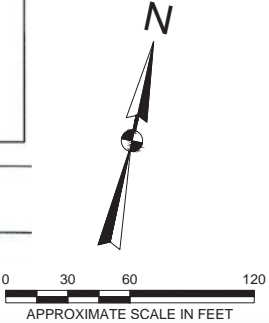
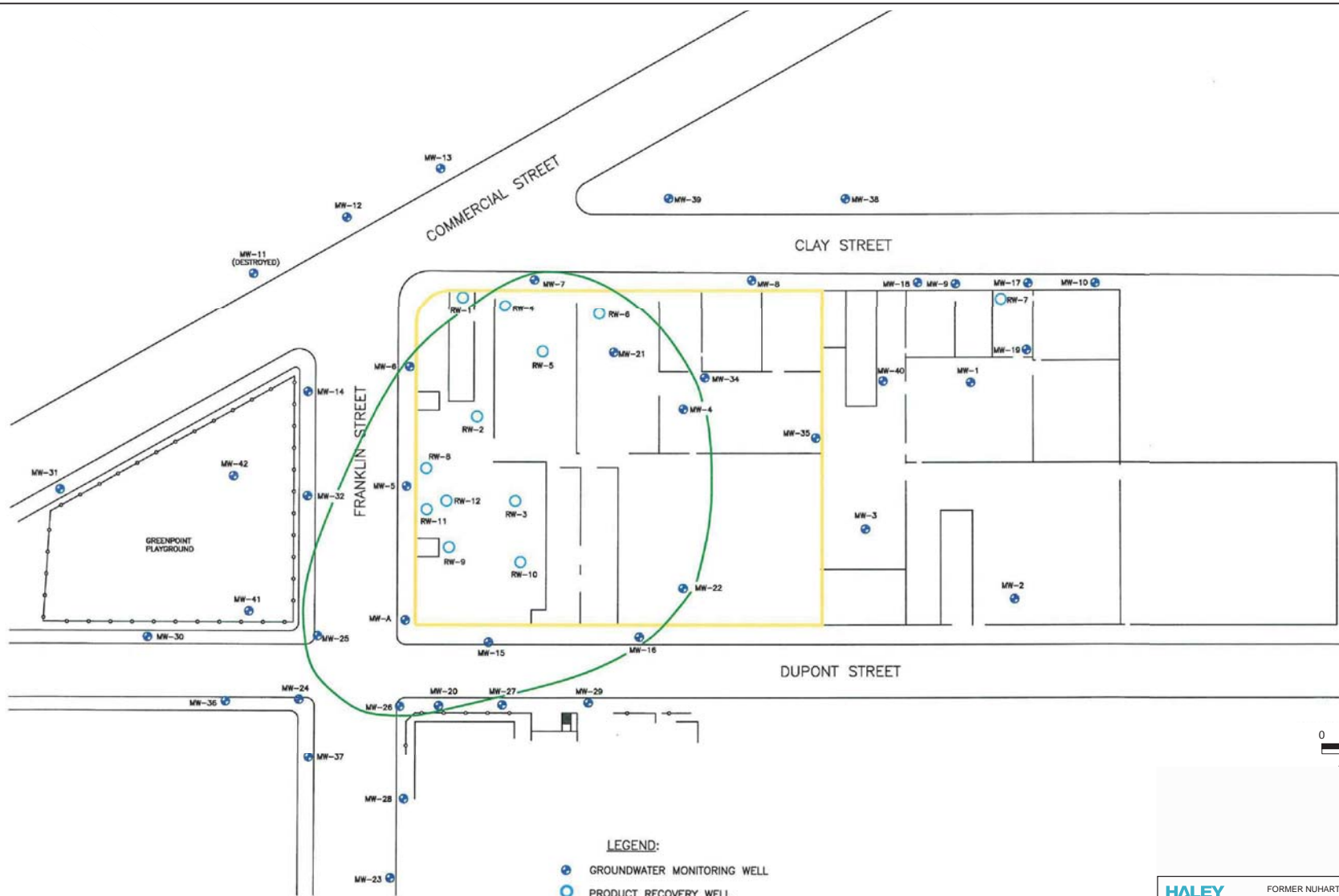
Attachment B – Well Location Map showing areal extent of LNAPL on groundwater

Attachment A

Apparent Thickness of LNAPL

Attachment B

Site Figure



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

JUNE 2021

FIGURE 1



HALEY & ALDRICH OF NEW YORK
237 West 35th Street
16th Floor
New York, NY 10123
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10 August 2021
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
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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 Stephen Lawrence of the New York State Department of Health. The Project Status Report is for June 2021 to July 2021. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Senior Associate

CC:

Stephen Lawrence (NYSDOH)
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Richard Guishard

Email: Stephen.Lawrence@health.ny.gov
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Email: jane.oconnell@dec.ny.gov
Email: statedesignsny@gmail.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from July 2021 to August 2021. Activities during this period were conducted by Haley and Aldrich of New York (Haley & Aldrich). 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 New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (Monthly) were performed by Haley & Aldrich on 3 August 2021.

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, general housekeeping activities 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 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 3 August 2021, high tide was observed from 6:33 AM to 12:10 PM during the well gauging period (by NOAA/NOS/CO-OPS Station ID 8517673) Hunters Point, Newtown Creek, NY). 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 62 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 4,016 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.

Upcoming Site Activities

The CycleChem disposal application will be submitted for approval during the next reporting period. Upon approval, a fluid recovery event will be coordinated with Eastern Environmental for transportation and disposal of the LNAPL on the Site.

A Geotechnical Investigation of the entire NuHart Property, conducted by JZN Engineering, began on 14 July 2021 and remains ongoing. Haley & Aldrich is overseeing this investigation while performing the community air monitoring program and has submitted 13 daily reports to NYSDEC during this reporting period.

Feasibility Study, Proposed Remedial Action Work Plan (PRAP) and Record of Decision

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 ended on 9 November 2018. The Record of Decision was issued by the NYSDEC in March 2019 and received by the repositories in April 2019. The translated fact sheet was sent to the NYSDEC for review on 16 May 2017 and finalized on 30 May 2019. Translated fact sheets were distributed to applicable site contacts on 3 June 2019. A Notice of Violation (NOV) was issued by NYSDEC on 22 February 2021 for failure to properly maintain and implement the IRM activities and submit timely monthly reports. An administrative settlement conference was held on 17 March 2021 to discuss the NOV. NYSDEC did issue a letter on 16 February 2021 regarding a request for evaluation of offsite groundwater impacts made by NYSDEC in October 2018. A work plan for this request was submitted to NYSDEC on 12 April 2021 and comments were received on 4 June 2020. A revised work plan was submitted on 2 July 2021.

Site Communication

On 20 July 2021 a communication was received by the NYSDEC from a member of the community regarding exhaust from the geotechnical driller operation existing the building. In order to facilitate a safe drilling environment (indoor air quality) it is standard operating procedure to vent out the exhaust directly from the machine through an opening on the Site via an exhaust extension. Information regarding this operation was transmitted to the NYSDEC.

Site Soil Management Plan (SSMP)

Geotechnical drilling commenced during this period by the future potential Ownership group. The Geotechnical work is being performed in accordance with the approved SSMP.

In addition, a request was made by National Grid on 07 July 2021 regarding upcoming utility work in the area under a NYCDOT permit. Haley & Aldrich was contacted by the NYSDEC regarding this proposed work. A response from National Grid has not yet been received.

Dupont Street Developers, LLC

10 August 2021

Page 4

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

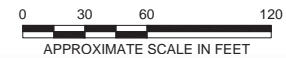
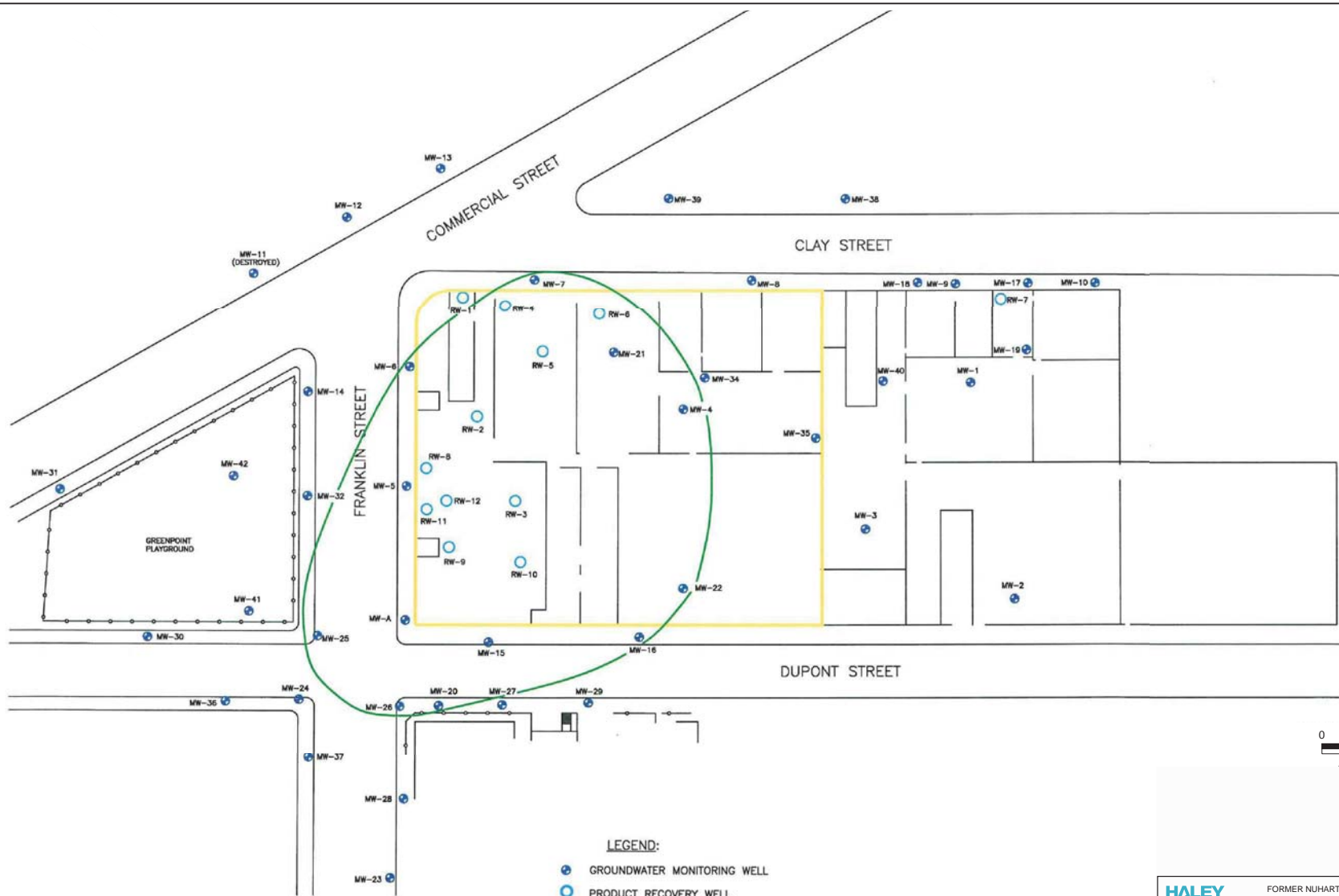
Readings taken 8/3/2021 between
 7:30 am and 11:00 am (high tide @
 6:33 am and low tide @ 12:10 pm)

Well Number	Depth to Water (feet)	Depth to Product (feet)	Apparent Thickness of LNAPL (feet)																																															
			2021						2020						2019						2018						2017																							
			21-Aug	Jul-21	Jun-21	May-21	Apr-21	Mar-21	Nov-20	Oct-20	Jul-20	Jun-20	May-20	Apr-20	Mar-20	Feb-20	Jan-20	Dec-19	Nov-19	Oct-19	Sep-19	Aug-19	Jul-19	Jun-19	May-19	Apr-19	Mar-19	Feb-19	Jan-19	Dec-18	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			
MW - 4	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	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

Notes:
 Data recorded using an oil/water interface probe, measurements from the tops of well casings
 ## = NAPL observed, apparent thickness not determined
 NI = Not Installed ND = Not Detected NG = Not Gauged
 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
 Total of 62 gallons of product removed from product recovery system
 Well-34 has uneven casing top
 est= Estimated Value ___ = Data not recorded due to access issues
 * = Well was dry ** = Well equipped with automated product recovery system
 Wells were gauged on 3 August 2021

Attachment B

Site Figure



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

NOTES:

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

AERIAL EXTENT OF LNAPL ON GROUNDWATER

JULY 2021

FIGURE 1



HALEY & ALDRICH OF NEW YORK
237 West 35th Street
16th Floor
New York, NY 10123
646.518.7735

10 September 2021

File No. 0200669

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 Stephen Lawrence of the New York State Department of Health. The Project Status Report is for August 2021 to September 2021. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Senior Associate


Mari C. Conlon, P.G.
Project Manager

CC:

Stephen Lawrence (NYSDOH)
Dupont Street Developers, LLC
Jane O'Connell (NYSDEC)
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This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from August 2021 to September 2021. Activities during this period were conducted by Haley and Aldrich of New York (Haley & Aldrich). 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 New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (Monthly) were performed by Haley & Aldrich on 02 September 2021.

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, general housekeeping activities 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 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 02 September 2021, low tide was observed from 6:57 AM to 12:27 PM during the well gauging period (by NOAA/NOS/CO-OPS Station ID 8517673) Hunters Point, Newtown Creek, NY). 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 70 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 4,086 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.

Upcoming Site Activities

The CycleChem disposal application will be submitted for approval during the next reporting period. Upon approval, a fluid recovery event will be coordinated with Eastern Environmental for transportation and disposal of the LNAPL on the Site.

A Geotechnical Investigation of the entire NuHart Property, conducted by JZN Engineering, began on 14 July 2021 and was completed on 10 August 2021. Haley & Aldrich is overseeing this investigation while performing the community air monitoring program and has submitted 8 daily reports to NYSDEC during this reporting period.

Feasibility Study, Proposed Remedial Action Work Plan (PRAP) and Record of Decision

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 ended on 9 November 2018. The Record of Decision was issued by the NYSDEC in March 2019 and received by the repositories in April 2019. The translated fact sheet was sent to the NYSDEC for review on 16 May 2017 and finalized on 30 May 2019. Translated fact sheets were distributed to applicable site contacts on 3 June 2019. A Notice of Violation (NOV) was issued by NYSDEC on 22 February 2021 for failure to properly maintain and implement the IRM activities and submit timely monthly reports. An administrative settlement conference was held on 17 March 2021 to discuss the NOV.

NYSDEC issued a letter on 16 February 2021 regarding a request for evaluation of offsite groundwater impacts made by NYSDEC in October 2018. A work plan for this request was submitted to NYSDEC on 12 April 2021 and comments were received on 4 June 2020. A revised work plan was submitted on 2 July 2021. A RCRA closure plan was submitted to the NYSDEC on 07 September 2021.

Site Communication

On 03 September 2021 a communication was received by the NYSDEC from a member of the community regarding smoke emanating from one of the sidewalk vaults. The vault did not appear to be associated with the Site and the NYSDEC contacted Con Edison.

Site Soil Management Plan (SSMP)

Geotechnical drilling was completed during this period by the future potential Ownership group. The Geotechnical work was performed in accordance with the approved SSMP.

Attachments

Attachment A – Apparent Thickness of LNAPL

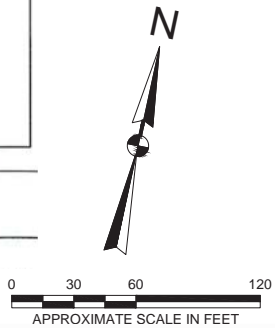
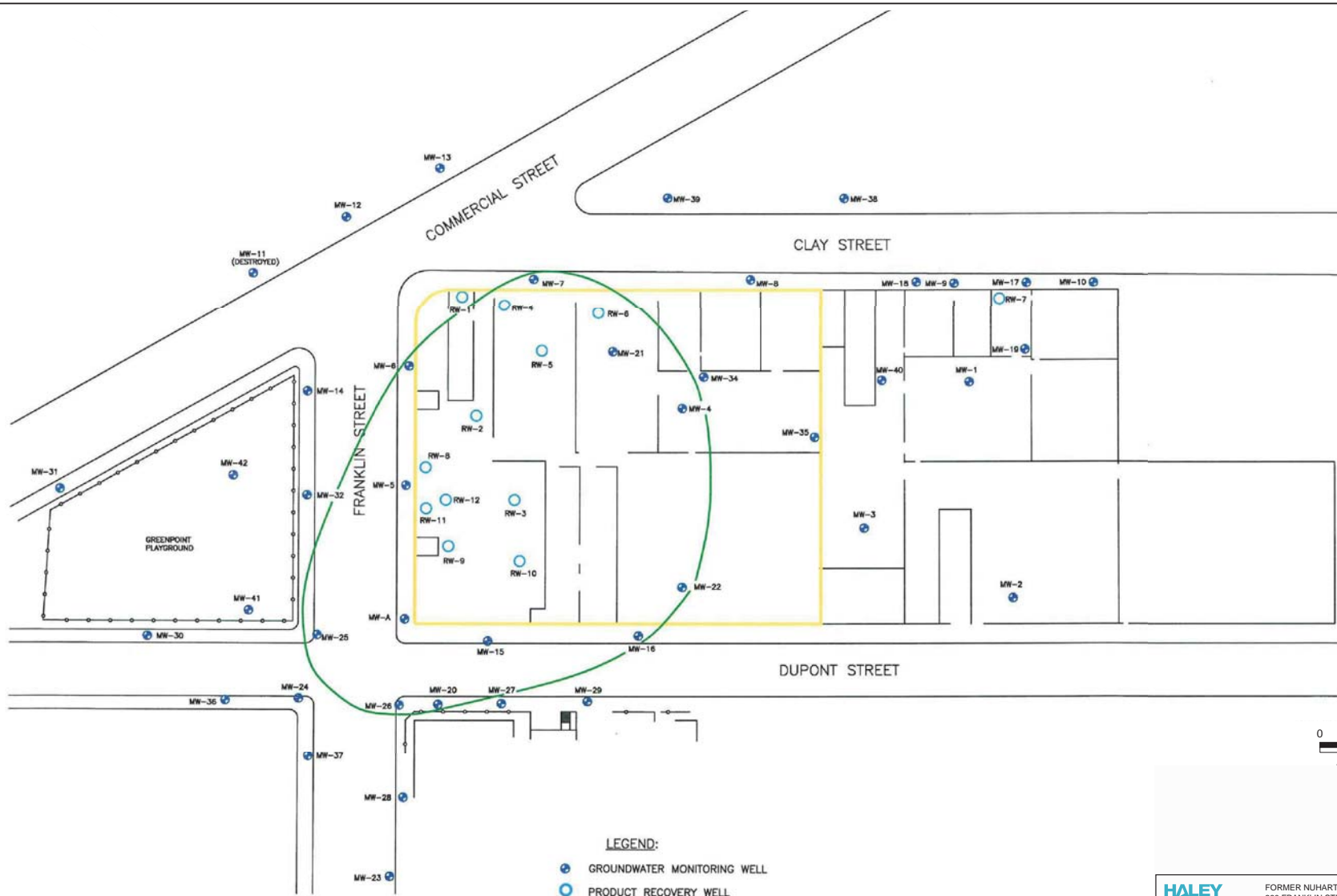
Attachment B – Well Location Map showing areal extent of LNAPL on groundwater

Attachment A

Apparent Thickness of LNAPL

Attachment B

Site Figure



LEGEND:
 ● GROUNDWATER MONITORING WELL
 ○ PRODUCT RECOVERY WELL
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NOTES:

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AERIAL EXTENT OF LNAPL ON GROUNDWATER

AUGUST 2021

FIGURE 1



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237 West 35th Street
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10 October 2021
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James Bellew
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Mari C. Conlon, P.G.
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Email: Stephen.Lawrence@health.ny.gov
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Email: jane.oconnell@dec.ny.gov
Email: statedesignsny@gmail.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from September 2021 to October 2021. Activities during this period were conducted by Haley and Aldrich of New York (Haley & Aldrich). 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 New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

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Maintenance Activities

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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 07 October 2021, low tide was observed from 4:21 AM to 10:39 AM during the well gauging period (by NOAA/NOS/CO-OPS Station ID 8517673) Hunters Point, Newtown Creek, NY). 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 85 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 4,171 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.

Upcoming Site Activities

The CycleChem disposal application will be submitted for approval during the next reporting period. Upon approval, a fluid recovery event will be coordinated with Eastern Environmental for transportation and disposal of the LNAPL on the Site.

Utility trenching on Clay Street to the north of the Former NuHart Plastics Manufacturing Site, conducted by National Grid, began on 7 October 2021 and will last for an additional 2 – 3 days. Haley & Aldrich is overseeing this investigation while performing the community air monitoring program and will submit daily reports to NYSDEC during this reporting period.

Feasibility Study, Proposed Remedial Action Work Plan (PRAP) and Record of Decision

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 ended on 9 November 2018. The Record of Decision was issued by the NYSDEC in March 2019 and received by the repositories in April 2019. The translated fact sheet was sent to the NYSDEC for review on 16 May 2017 and finalized on 30 May 2019. Translated fact sheets were distributed to applicable site contacts on 3 June 2019. A Notice of Violation (NOV) was issued by NYSDEC on 22 February 2021 for failure to properly maintain and implement the IRM activities and submit timely monthly reports. An administrative settlement conference was held on 17 March 2021 to discuss the NOV.

NYSDEC issued a letter on 16 February 2021 regarding a request for evaluation of offsite groundwater impacts made by NYSDEC in October 2018. A work plan for this request was submitted to NYSDEC on 12 April 2021 and comments were received on 4 June 2020. A revised work plan was submitted on 2 July 2021 and the subsequent approval was received on 13 September 2021. The Site Investigation work is currently being coordinated with subcontractors. A RCRA closure plan was submitted to the NYSDEC on 07 September 2021. Comments were received on 01 October 2021 and the revised RCRA Closure Plan was submitted on 07 October 2021.

Site Communication

On 03 September 2021 a communication was received by the NYSDEC from a member of the community regarding smoke emanating from one of the sidewalk vaults. The vault did not appear to be associated with the Site and the NYSDEC contacted Con Edison.

Site Soil Management Plan (SSMP)

We were contacted by National Grid during this period to perform oversight for some utility work along Clay and Dupont Street. Oversight work was completed on the 07 October 2021 through 08 October 2021.

Dupont Street Developers, LLC

10 October 2021

Page 4

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

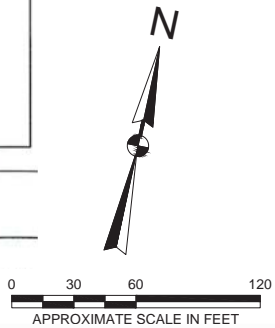
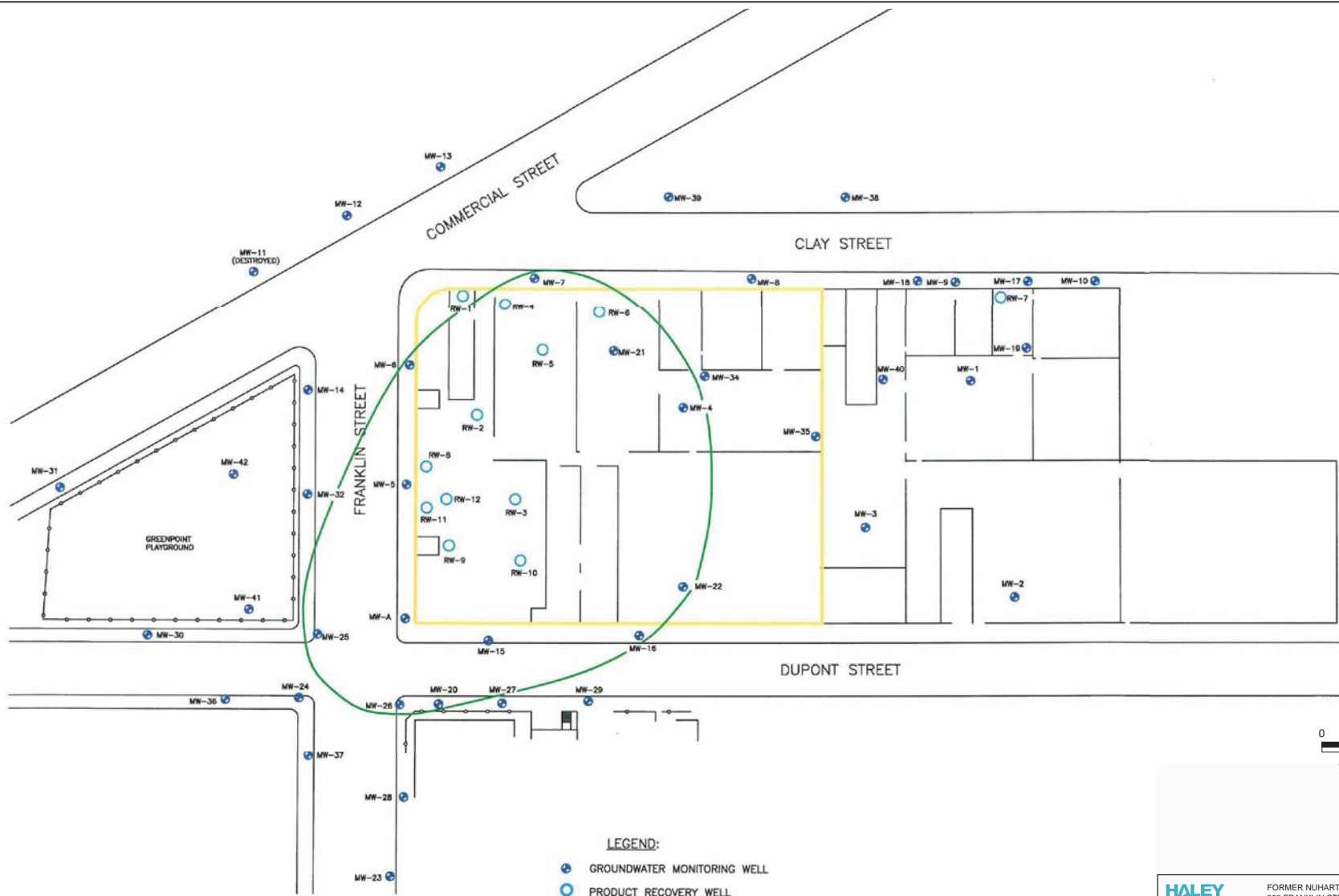
Table 1:
 Attachment A: Apparent Thickness of LNAPL
 Former NuHart Plastic Manufacturing Site, NYSDEC #224136
 280 Franklin Street
 Brooklyn, NY

Well Number	Depth to Water (feet)	Depth to Product (feet)	Apparent Thickness of LNAPL (feet)																																																	
			2016												2015												2014												2013												2012	
			Jan-17	Dec-16	Nov-16	Oct-16	Sep-16	Aug-16	Jul-16	Jun-16	May-16	Apr-16	Mar-16	Feb-16	Jan-16	Dec-15	Nov-15	Oct-15	Sep-15	Aug-15	Jul-15	Jun-15	May-15	Apr-15	Mar-15	Jan-15	Sep-14	Aug-14	Jul-14	Jun-14	May-14	Apr-14	Mar-14	Feb-14	Jan-14	Dec-13	Nov-13	Oct-13	Sep-13	Aug-13	Jul-13	Apr-13	Mar-13	Feb-13	Jan-13	Dec-12	Nov-12	Oct-12	Sep-12			
MW-4	ND*	ND*	1.31	1.30	1.00	1.18	1.35	1.71	1.73	1.80	1.53	1.73	1.43	1.85	1.77	1.96	2.04	1.99	1.77	2.22	4.27	0.35	0.44	---	0.56	---	---	1.75	1.90	1.24	Trace	---	0.01	Trace	0.23	0.22	0.30	0.66	0.78	##	3.49	2.22	0.59	0.67	0.44	0.44	0.80	0.31	0.33	3.13		

Notes:
 Data recorded using an oil/water interface probe, measurements from the tops of well casings
 ## = NAPL observed, apparent thickness not determined
 NI = Not Installed ND = Not Detected NG = Not Gauged
 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
 Total of 70 gallons of product removed from product recovery system
 Well-34 has uneven casing top
 est- Estimated Value -- = Data not recorded due to access issues
 * = Well was dry ** = Well equipped with automated product recovery system
 Wells were gauged on 07 October 2021

Attachment B

Site Figure



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

SEPTEMBER 2021 **FIGURE 1**



HALEY & ALDRICH OF NEW YORK
237 West 35th Street
16th Floor
New York, NY 10123
646.518.7735

10 November 2021

File No. 0200669

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 Stephen Lawrence of the New York State Department of Health. The Project Status Report is for October 2021 to November 2021. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Senior Associate


Mari C. Conlon, P.G.
Project Manager

CC:

Stephen Lawrence (NYSDOH)
Dupont Street Developers, LLC
Jane O'Connell (NYSDEC)
Richard Guishard

Email: Stephen.Lawrence@health.ny.gov
Email: bojinzhu@gmail.com
Email: jane.oconnell@dec.ny.gov
Email: statedesignsny@gmail.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from October 2021 to November 2021. Activities during this period were conducted by Haley and Aldrich of New York (Haley & Aldrich). 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 New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (Monthly) were performed by Haley & Aldrich on 08 November 2021.

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**.

Since asbestos abatement work is ongoing onsite, MW-3, MW-4, MW-22, MW-34, and MW-35 are in their working area we were not able to access.

Maintenance Activities

General maintenance activities include collection of spent IRM-related absorbent materials in the vicinity of recovery wells, placing new absorbent materials, general housekeeping activities 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 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 08 October 2021, high tide was observed from 11:55 AM to 6:15 PM after the well gauging period (by NOAA/NOS/CO-OPS Station ID 8517673) Hunters Point, Newtown Creek, NY). 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 57 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 4,228 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.

Upcoming Site Activities

Asbestos abatement is ongoing at the Site and will continue into the next reporting period.

Feasibility Study, Proposed Remedial Action Work Plan (PRAP) and Record of Decision

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 ended on 9 November 2018. The Record of Decision was issued by the NYSDEC in March 2019 and received by the repositories in April 2019. The translated fact sheet was sent to the NYSDEC for review on 16 May 2017 and finalized on 30 May 2019. Translated fact sheets were distributed to applicable site contacts on 3 June 2019. A Notice of Violation (NOV) was issued by NYSDEC on 22 February 2021 for failure to properly maintain and implement the IRM activities and submit timely monthly reports. An administrative settlement conference was held on 17 March 2021 to discuss the NOV.

NYSDEC issued a letter on 16 February 2021 regarding a request for evaluation of offsite groundwater impacts made by NYSDEC in October 2018. A work plan for this request was submitted to NYSDEC on 12 April 2021 and comments were received on 4 June 2020. A revised work plan was submitted on 2 July 2021 and the subsequent approval was received on 13 September 2021. The Site Investigation work is currently being coordinated with subcontractors.

A RCRA Closure Plan was submitted to the NYSDEC on 07 September 2021. Comments were received on 01 October 2021 and the revised RCRA Closure Plan was submitted on 07 October 2021. Additional comments were discussed on a conference call with NYSDEC and NYSDOH on 29 October 2021. Revisions to the RCRA Closure Plan will be submitted in the next reporting period.

Site Communication

A community board meeting hosted by North Brooklyn Neighbors was conducted on 26 October 2021 to discuss site status and next steps with the development team.

Site Soil Management Plan (SSMP)

Haley & Aldrich was contacted by National Grid during this period to perform oversight for utility trench installation along Clay Street. Oversight work was completed on the 7 October 2021, 8 October 2021, 21 October 2021, 25 October 2021, 27 October 2021 and 28 October 2021. Haley & Aldrich oversaw this work while performing the community air monitoring as required in the Site Soil Management Plan.

Dupont Street Developers, LLC

10 November 2021

Page 4

Attachments

Attachment A – Apparent Thickness of LNAPL

Figure 1 – Site Figure

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

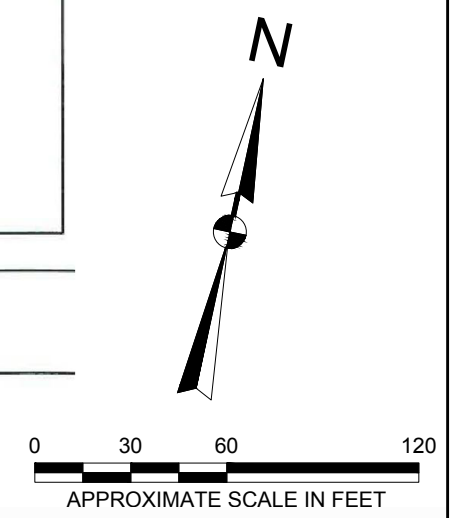
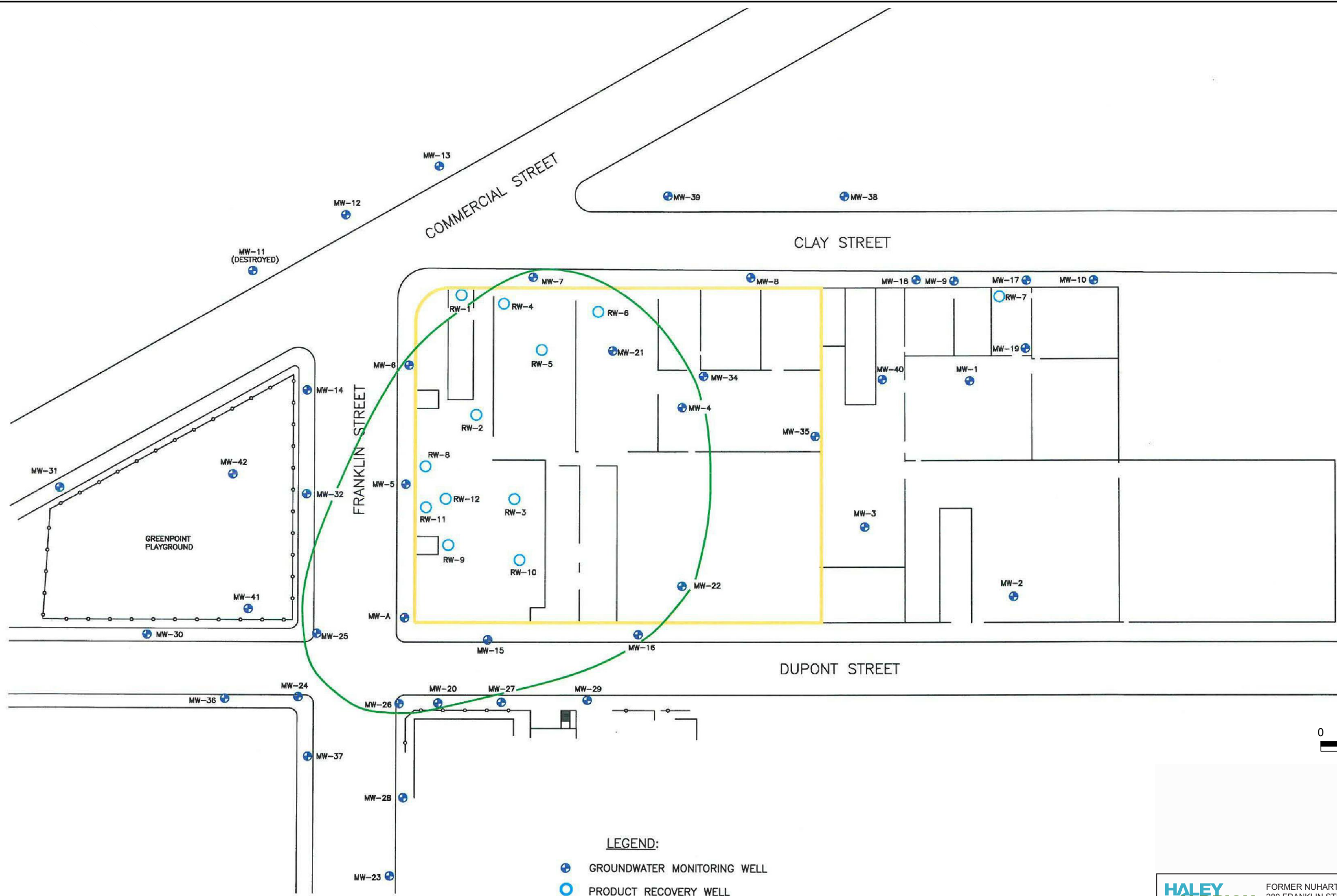
Readings taken 11/8/2021 between 8:00 am and 11:00 am (high tide @ 11:55 am and low tide @ 6:10 pm)

Table with columns for Well Number, Depth to Water (feet), Depth to Product (feet), and Apparent Thickness of LNAPL (feet) for years 2021, 2020, 2019, 2018, and 2017. Rows include wells MW-4 through MW-42, RW-1 through RW-11, and RW-12 through RW-7.

Notes: Data recorded using an oil/water interface probe, measurements from the tops of well casings # = NAPL observed, apparent thickness not determined NI = Not Installed ND = Not Detected NG = Not Gauged 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 Total of 57 gallons of product removed from product recovery system est = Estimated Value -- = Data not recorded due to access issues * = Well was dry ** = Well equipped with automated product recovery system Wells were gauged on 8 November 2021

Attachment B

Site Figure



- 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

OCTOBER 2021

FIGURE 1



HALEY & ALDRICH OF NEW YORK
237 West 35th Street
16th Floor
New York, NY 10123
646.518.7735

10 December 2021
File No. 0200669

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 Stephen Lawrence of the New York State Department of Health. The Project Status Report is for November 2021 to December 2021. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Principal


Mari C. Conlon, P.G.
Senior Project Manager

CC:

Stephen Lawrence (NYSDOH)
Dupont Street Developers, LLC
Jane O'Connell (NYSDEC)
Richard Guishard

Email: Stephen.Lawrence@health.ny.gov
Email: bojinzhu@gmail.com
Email: jane.oconnell@dec.ny.gov
Email: statedesignsny@gmail.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from November 2021 to December 2021. Activities during this period were conducted by Haley and Aldrich of New York (Haley & Aldrich). 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 New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (monthly) were performed by Haley & Aldrich on 08 December 2021.

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**.

Since asbestos abatement work is ongoing onsite, MW-4, RW-6, MW-22, MW-34, MW-35, and MW-40 are in the working area and were not able to be accessed. MW-37 well was found to be damaged beyond immediate repair and was not gauged during this reporting period. Efforts to rehabilitate the well will be evaluated during the coming reporting period.

Maintenance Activities

General maintenance activities include collection of spent IRM-related absorbent materials in the vicinity of recovery wells, placing new absorbent materials, general housekeeping activities 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 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 08 December 2021, high tide was observed from 12:44 PM to 6:49 PM after the well gauging period (by NOAA/NOS/CO-OPS Station ID 8517673) Hunters Point, Newtown Creek, NY). 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 in the recovery holding reservoirs were emptied during this event. The amount of LNAPL removed from the wells was estimated at 63.5 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 4,291.5 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.

Upcoming Site Activities

Asbestos abatement is ongoing at the Site and will continue into the next reporting period.

Deliverables

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 ended on 9 November 2018. The Record of Decision was issued by the NYSDEC in March 2019 and received by the repositories in April 2019. The translated fact sheet was sent to the NYSDEC for review on 16 May 2017 and finalized on 30 May 2019. Translated fact sheets were distributed to applicable site contacts on 3 June 2019. A Notice of Violation (NOV) was issued by NYSDEC on 22 February 2021 for failure to properly maintain and implement the IRM activities and submit timely monthly reports. An administrative settlement conference was held on 17 March 2021 to discuss the NOV.

NYSDEC issued a letter on 16 February 2021 regarding a request for evaluation of offsite groundwater impacts made by NYSDEC in October 2018. A work plan for this request was submitted to NYSDEC on 12 April 2021 and comments were received on 4 June 2020. A revised work plan was submitted on 2 July 2021 and the subsequent approval was received on 13 September 2021. The Site Investigation work is currently being coordinated with subcontractors.

A RCRA Closure Plan was submitted to the NYSDEC on 07 September 2021. Comments were received on 01 October 2021 and the revised RCRA Closure Plan was submitted on 07 October 2021. Additional comments were discussed on a conference call with NYSDEC and NYSDOH on 29 October 2021. A revised RCRA Closure Plan was submitted on 11 November 2021. The public comment period began on 1 December 2021 and will conclude on 31 December 2021.

Site Communication

A community board meeting hosted by North Brooklyn Neighbors was conducted on 26 October 2021 to discuss site status and next steps with the development team.

Attachments

Attachment A – Apparent Thickness of LNAPL

Figure 1 – 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

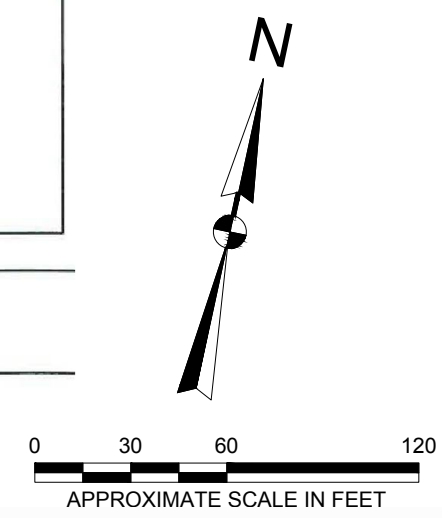
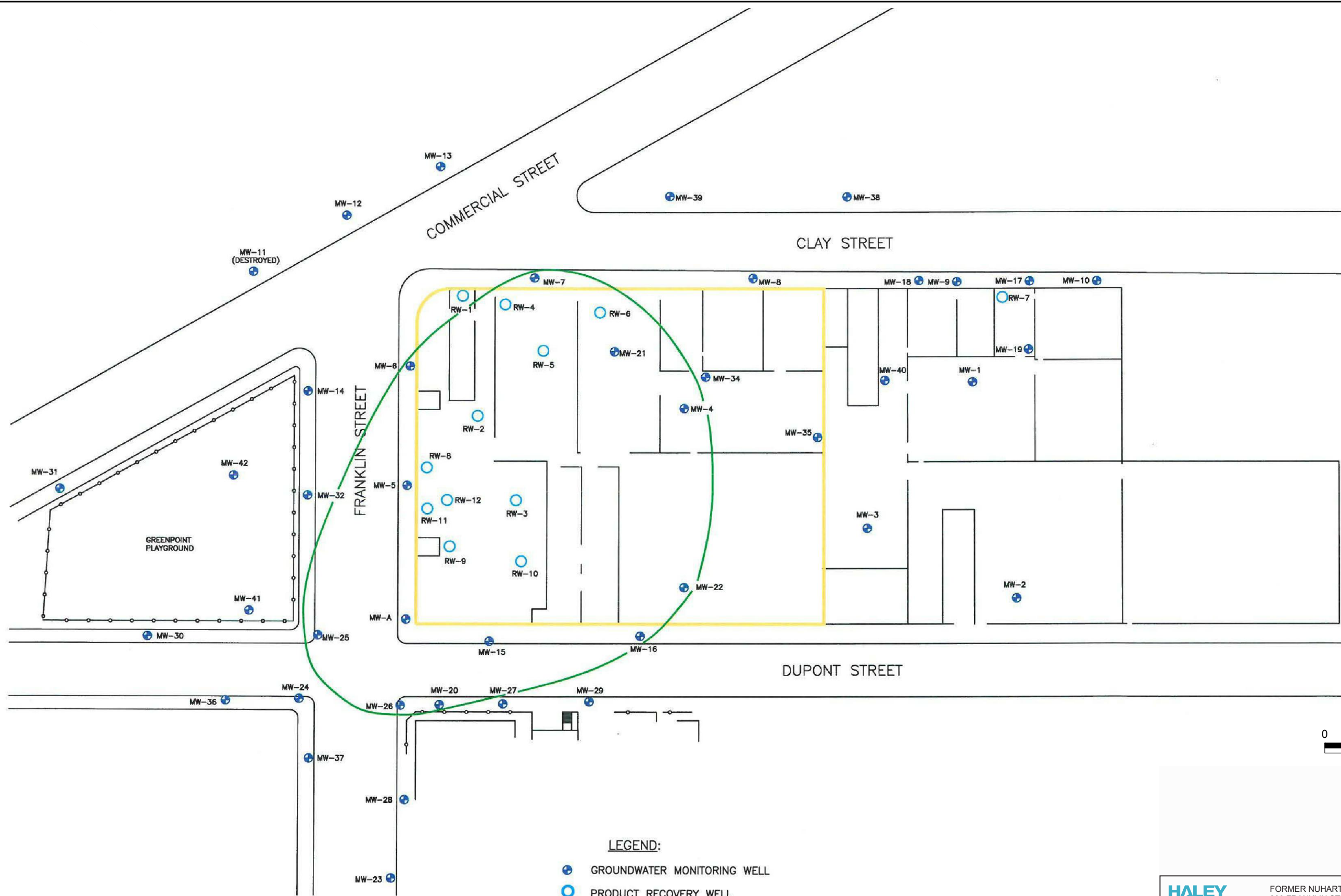
Table with columns: Well Number, Depth to Water (feet), Depth to Product (feet), Apparent Thickness of LNAPL (feet) for years 2012-2016. Rows include monitoring wells MW-4 through MW-42 and recovery wells RW-1 through RW-11, with data points for monthly or bi-monthly gaugings.

Notes:

Data recorded using an oil/water interface probe, measurements from the tops of well casings
= NAPL observed, apparent thickness not determined
NI = Not Installed ND = Not Detected NG = Not Gauged
Wells MW-4, MW-2, MW-9, MW-10, MW-17, MW-19, and RW-7 are associated with NYSDEC Spill 06-01852 and are under a separate investigation
Total of 63.5 gallons of product removed from product recovery system during this period
etc= Estimated Value --- = Data not recorded due to access issues
* = Well was dry ** = Well equipped with automated product recovery system
Wells were gauged on 8 December 2021

Attachment B

Site Figure



- 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 2021

FIGURE 1



HALEY & ALDRICH OF NEW YORK
237 West 35th Street
16th Floor
New York, NY 10123
646.518.7735

10 January 2022
File No. 0200669

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
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Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Principal


Mari C. Conlon, P.G.
Senior Project Manager

CC:

Stephen Lawrence (NYSDOH)
Dupont Street Developers, LLC
Jane O'Connell (NYSDEC)
Richard Guishard

Email: Stephen.Lawrence@health.ny.gov
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This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from December 2021 to January 2022. Activities during this period were conducted by Haley and Aldrich of New York (Haley & Aldrich). 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 New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (monthly) were performed by Haley & Aldrich on 6 January 2022.

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**.

MW-40 was not accessible due to asbestos abatement equipment and barriers remaining in place. The MW-37 blockage reported during the last reporting period was removed during this reporting period and the monitoring well was gauged as part of the monthly event.

Maintenance Activities

General maintenance activities include collection of spent IRM-related absorbent materials in the vicinity of recovery wells, placing new absorbent materials, general housekeeping activities 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 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 January 2021, high tide was observed from 12:25 PM to 6:22 PM after the well gauging period (by NOAA/NOS/CO-OPS Station ID 8517673) Hunters Point, Newtown Creek, NY). 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 in the recovery holding reservoirs were emptied during this event. The amount of LNAPL removed from the wells was estimated at 51 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 4,342.5 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.

Upcoming Site Activities

Upon approval of the RCRA Closure Work Plan, activities will commence to implement closure activities. Waste characterization will be implemented upon approval of procedures from NYSDEC and NYSDOH.

Deliverables

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 ended on 9 November 2018. The Record of Decision was issued by the NYSDEC in March 2019 and received by the repositories in April 2019. The translated fact sheet was sent to the NYSDEC for review on 16 May 2017 and finalized on 30 May 2019. Translated fact sheets were distributed to applicable site contacts on 3 June 2019. A Notice of Violation (NOV) was issued by NYSDEC on 22 February 2021 for failure to properly maintain and implement the IRM activities and submit timely monthly reports. An administrative settlement conference was held on 17 March 2021 to discuss the NOV.

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Site Communication

Weekly communication for site updates was established by the Dupont Street 1 LLC. The updates are available to interested parties who register and includes a summary email transmitted every Friday. A link for sign up is posted on the North Brooklyn Neighbors Website under the NuHart Superfund Link.

Attachments

Attachment A – Apparent Thickness of LNAPL

Figure 1 – 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

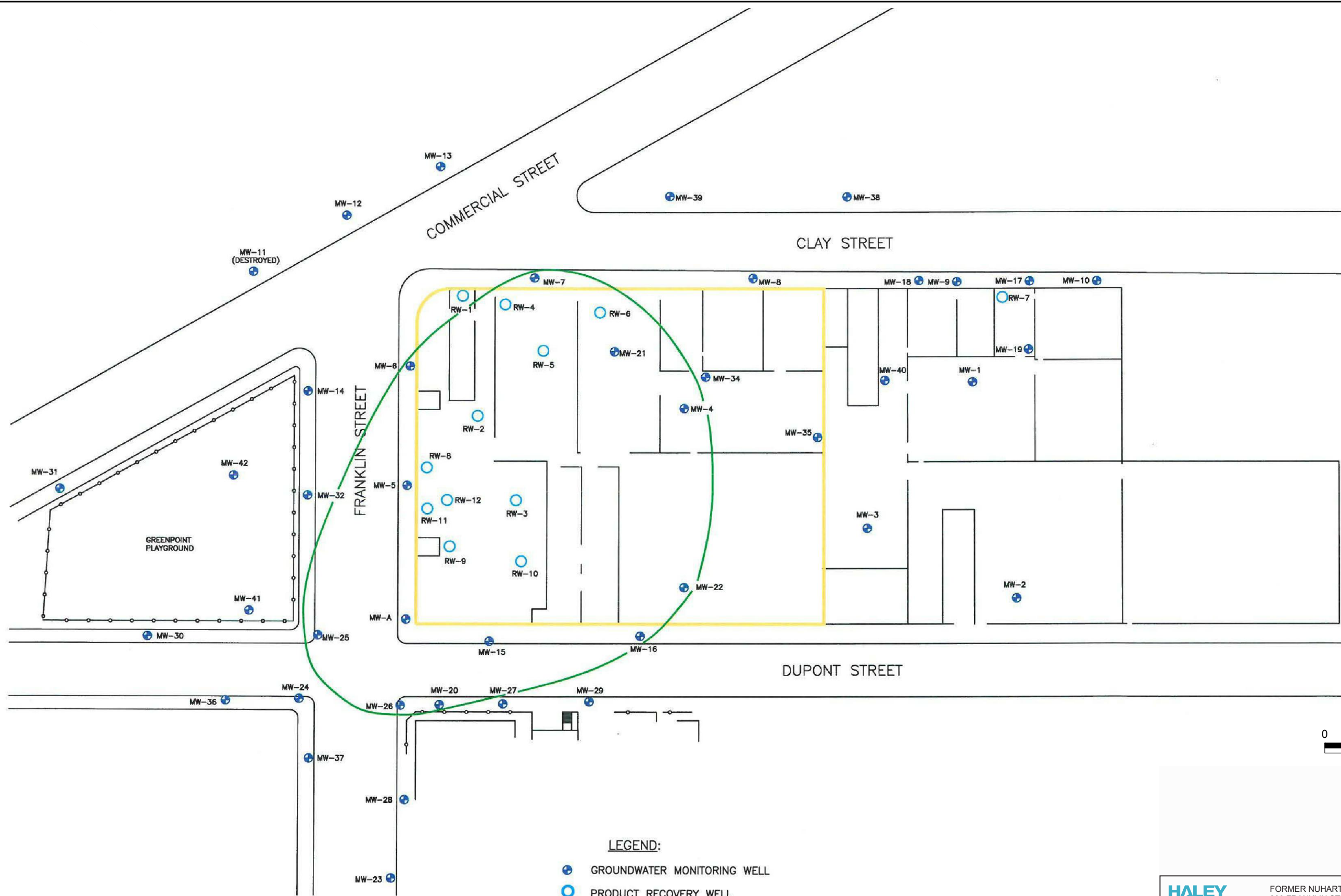
Readings taken 1/6/2022 between 9:00 am and 11:15 am (high tide @ 12:25 pm and low tide @ 6:22 pm)

Table with columns for Well Number, Depth to Water (feet), Depth to Product (feet), and Apparent Thickness of LNAPL (feet) from 2022 to 2017 for wells MW-4 through MW-18 and RW-1 through RW-11.

Notes: Data recorded using an oil/water interface probe, measurements from the tops of well casings # = NAPL observed, apparent thickness not determined NI = Not Installed ND = Not Detected NG = Not Gauged 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 Total of 51 gallons of product removed from product recovery system during this period etc= Estimated Value ** = Well equipped with automated product recovery system * = Well was dry Wells were gauged on 6 January 2022

Attachment B

Site Figure



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

DECEMBER 2021

FIGURE 1