



Monthly Progress Report 2024 No. 8

Former NuHart West Site

65 Dupont Street, Brooklyn, NY

NYSDEC Site No. 224136

Reporting Period: August 1, 2024 – September 1, 2024

1. Introduction

In accordance with the reporting requirements for the Former NuHart West Site, located at 65 Dupont Street, Brooklyn, NY (Site), Haley & Aldrich of New York Engineering and Geology, LLP (Haley & Aldrich of New York), has prepared this monthly progress report, on behalf of Dupont Street Owner LLC, to summarize the work performed at the Site from August 1, 2024 through September 1, 2024.

The Former NuHart West Site is located in the Greenpoint neighborhood of Brooklyn, NY and is identified as Block 2487 Lot 17 on the New York City tax map. The Site is listed in the New York State Department of Environmental Conservation (NYSDEC) Inactive Hazardous Waste Registry as a Class 2 Site (Site No. 224136). The Site was underlain by sub-grade footings, utility networks, closed underground storage tanks (USTs), and piping and trench systems. The USTs and trench systems were cleaned out and the USTs were closed in accordance with applicable regulations in 2006. Former industrial operations at the Site have impacted on-Site and off-Site soil and groundwater with phthalates and lubricating oil (Hecla oil), most likely released from the tank and piping/trench systems. Phthalates and a phthalate/oil mixture are present in soil and as a light non-aqueous-phase liquid (LNAPL) plume floating on the groundwater surface primarily beneath the Site and extending somewhat off-Site to the southwest. Groundwater is encountered at approximately 8 to 10 feet below ground surface (ft bgs). Currently, the Site is a 49,000-square foot lot undergoing above-grade building construction.

Resource Conservation and Recovery Act (RCRA) closure activities were completed at the Site in May 2022. Interim remedial measure (IRM) activities are no longer being conducted at the Site since the product recovery systems were decommissioned as part of the RCRA Closure. IRM activities concluded in February 2022. Eastern Environmental Solutions, Inc. (Eastern) previously conducted waste management activities for disposal of product from the IBC tanks at the Site. Prior to 2022, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. In January 2022, ACV Environmental Services Inc. (ACV) transported and disposed a total of 2,529 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste.

2. Investigation or Remedial Actions Relative to the Site during this Reporting Period

Below-grade work on-Site is complete and work on the building superstructure is ongoing.

Haley & Aldrich of New York continues to observe off-Site intrusive work associated with subgrade utility work to ensure it is in conformance with the Site Soil Management Plan (SSMP), including conducting community air monitoring. Daily reports are submitted the following business day to the NYSDEC and New York State Department of Health (NYSDOH) case managers.

A vacuum enhanced fluid recovery (VEFR) pilot test was conducted in off-Site monitoring wells with oversight of NYSDEC and/or local elected officials on 12 and 14 August 2024 to determine the feasibility of VEFR as a method for LNAPL recovery in monitoring wells located outside the proposed active LNAPL recovery system.

3. Monthly On-Site and Off-Site Monitoring Well Gauging

Gauging of off-Site monitoring wells associated with the Site was performed on 23 August 2024. On-Site monitoring wells are no longer accessible due to construction activities. Gauging results are included in the attached table. Additionally, transducers are installed in MW-29, MW-30, MW-38, MW-39, and MW-42 and could not be gauged. The wells that could not be accessed are identified on Figure 1.

Due to LNAPL identified in MW-24 in previous reporting periods, an absorbent sock (New Pig) remains installed in MW-24 and is inspected on a weekly basis and replaced periodically, as needed. Absorbent socks have also been installed in all off-Site monitoring wells outside the construction fence where LNAPL is present including MW-14, MW-20, MW-25, MW-26, and RW-51.

4. Actions Relative to the Site Anticipated for the Next Reporting Period(s)

- Continue oversight of off-Site utility work in accordance with the SSMP.
- NYSDEC approval of the OU-2 LNAPL Recovery System Design for the active recovery system and begin installation of the OU-2 active LNAPL recovery system.
- Collection and fingerprint laboratory analysis of LNAPL in MW-14 and in a monitoring well within the LNAPL plume area for comparison.
- The revised SVE Design Letter and Responses to NYSDEC comments, and the Final OU-2 LNAPL Recovery System Design (passive recovery) will be submitted during the next reporting period(s).

5. Approved Activity Modifications (changes of work scope and/or schedule)

There have been no modifications to the work scope.

6. Results of Sampling, Testing and Other Relevant Data

Haley & Aldrich conducted quarterly groundwater sampling of designated monitoring wells in OU-2 on 21 through 22 August 2024 in accordance with the 100% Remedial Design Report to determine the effectiveness of the zero-valent iron (ZVI) injections conducted at the Site in February 2024. Further evaluation of MW-43 is being conducted and results will be provided in the next reporting period(s).

No other sampling was conducted during this reporting period.

7. Deliverables Submitted During This Reporting Period

The Final OU-2 LNAPL Recovery System Design specifically for the active recovery system was submitted to NYSDEC on 22 August 2024. A revised design for LNAPL recovery outside the active recovery system is anticipated to be submitted during the next reporting period.

The revised RCRA Closure Report was submitted to NYSDEC on 30 July 2024.

The OU-2 ZVI Injection and SVE Pilot Test Summary Letter was submitted to NYSDEC on 22 May 2024. A response to this submission was received from NYSDEC on 3 July 2024 and a response/revision letter will be submitted back to NYSDEC in the next reporting period.

8. Information Regarding Percentage of Completion

The Remedial Action is approximately 90% complete.

9. Unresolved Delays Encountered or Anticipated That May Affect the Schedule and Mitigation Efforts

None.

10. Community Participation (CP) Plan Activities during This Reporting Period

A VEFR pilot test was conducted at the Site for NYSDEC and local elected officials to observe on 14 August 2024. Comments from the pilot will be incorporated into the LNAPL recovery plan for recovery wells outside the active recovery system, anticipated to be submitted during the next reporting period.

11. Activities Anticipated in Support of the CP Plan for the Next Reporting Period(s):

None.

12. Miscellaneous Information

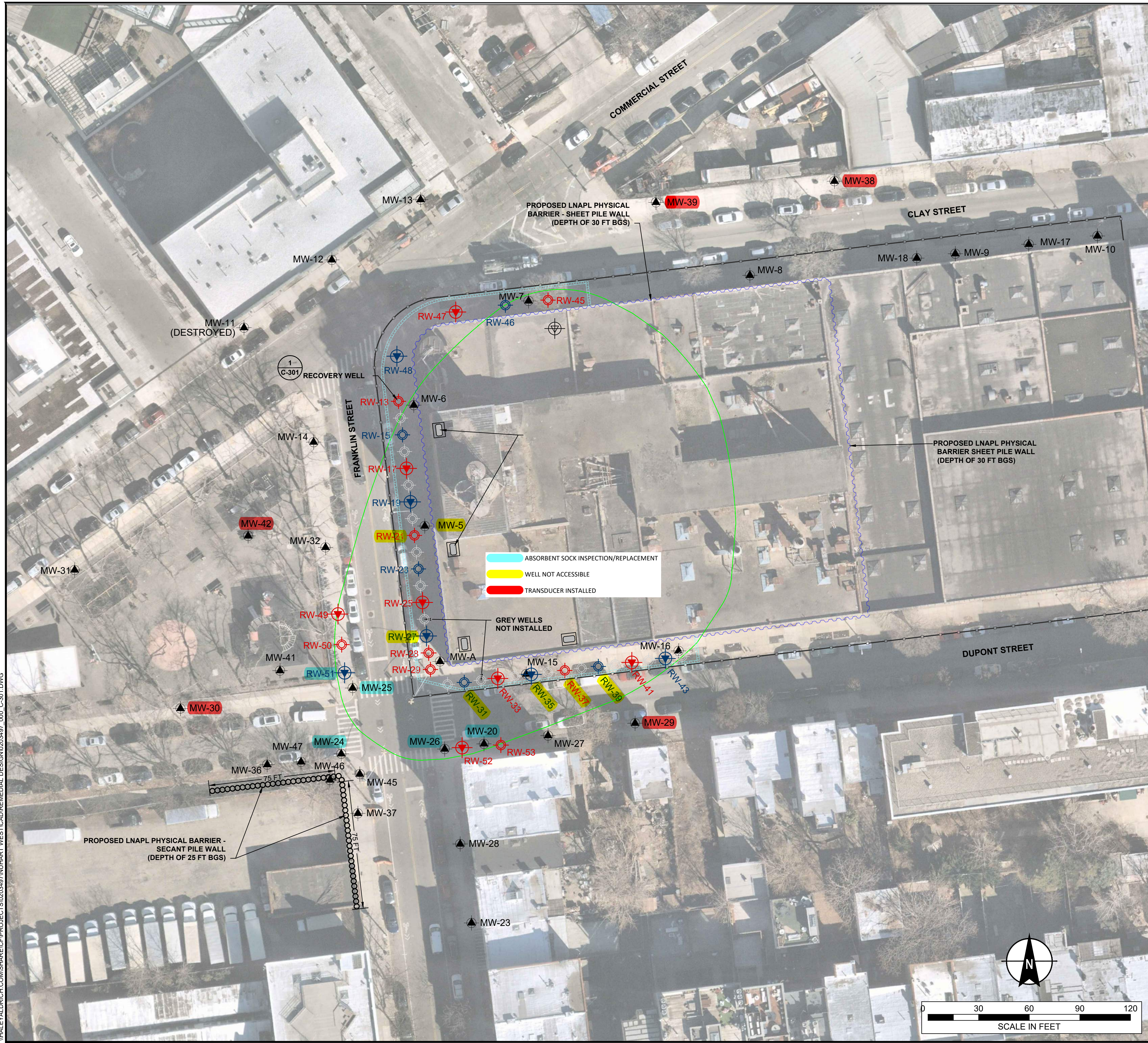
None.

Attachment A: Apparent Thickness of LNAPL
Former NuHart Plastic Manufacturing Site, NYSDEC #224136
65 Dupont Street
Brooklyn, NY

Table with columns for Well Number, Depth to Water (feet), Depth to Product (feet), and monthly data for years 2021 through 2024. Data points include various measurements such as ND, NA, and numerical values.

- Notes:
1. Data recorded using an oil/water interface probe, measurements from the tops of well casings
2. ## = NAPL observed, apparent thickness not determined
3. NI = Not Installed
4. ND = Not Detected
5. NA = No Access
6. NG = Not Gauged
7. TD = Transducer installed
8. ** = Water not detected; well filled with sediment, value is the total depth of the well
9. Wells MW-45, MW-46, and MW-47 installed on 13 March 2023
10. Absorbent sock installed in MW-14, MW-20, MW-24, MW-25, and MW-26
11. 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
12. Well-34 has uneven casing top
13. est= Estimated Value
14. * = Well was dry
15. ****= DTW reading not determined. Probe indicated water response at oil depth, but oil observed on probe.
16. Wells were gauged on 23 August 2024
17. Sheen = Sheen of LNAPL observed on interface probe, depth to LNAPL not detected

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LEGEND

- EXTENT OF LNAPL IN GROUNDWATER
- ~~~~~ PROPOSED LNAPL BARRIER SHEET PILE WALL (OU-1)
- TEMPORARY CONSTRUCTION FENCING
- ⊕ PROPOSED LNAPL RECOVERY WELL LOCATION (4" DIAMETER WITH 0.01 SLOT SIZE)
- ⊕ PROPOSED LNAPL RECOVERY WELL LOCATION (2" DIAMETER WITH 0.01 SLOT SIZE)
- ⊕ PROPOSED LNAPL RECOVERY WELL LOCATION (4" DIAMETER WITH 0.02 SLOT SIZE)
- ⊕ PROPOSED LNAPL RECOVERY WELL LOCATION (2" DIAMETER WITH 0.02 SLOT SIZE)
- ⊕ POTENTIAL LNAPL RECOVERY WELL TO BE INSTALLED AFTER PILOT TEST
- ▲ EXISTING GROUNDWATER MONITORING WELL TO BE PROTECTED DURING CONSTRUCTION
- PROPOSED LNAPL BARRIER SECANT PILE WALL (OU-2)
- OIL ABSORBANT SOCKS

NOTES

1. LOCATION OF ALL EXISTING AND PROPOSED FEATURES SHOWN ON THIS PLAN ARE APPROXIMATE.
2. ANY WELLS DAMAGED DURING REMEDIATION WILL BE ABANDONED AND REPLACED.
3. DURING THE MONTHLY GAUGING EVENT ON 20 JULY 2024, APPROXIMATELY 0.25 FT OF LNAPL WAS PRESENT IN MW-14 WHERE LNAPL HAS NOT PREVIOUSLY BEEN OBSERVED. HALEY & ALDRICH OF NEW YORK IS ASSUMING THAT THE PRESENCE OF LNAPL IN THIS WELL IS DUE TO THE SPILL THAT OCCURED AT 40 COMMERCIAL STREET IN JUNE 2024.

- ABSORBENT SOCK INSPECTION/REPLACEMENT
- WELL NOT ACCESSIBLE
- TRANSDUCER INSTALLED

GREY WELLS NOT INSTALLED

NOT FOR CONSTRUCTION

Project No.:	0203497-000
Scale:	AS SHOWN
Date:	NOVEMBER 7, 2022
Drawn By:	JPC/KFP
Designed By:	SAU
Checked By:	SAU
Approved By:	JMB
Stamp:	

Rev.	Description	By	Date
0	100% DESIGN	SAU	4/10/23

FORMER NUHART PLASTIC MANUFACTURING SITE
 STATE SUPERFUND PROJECT
 BROOKLYN, NEW YORK

LNAPL BARRIER/LNAPL RECOVERY PLAN

C-301