

November 4, 2024
REVISED: November 11, 2024

Abdulla Elbuytari
Project Manager
NYSDEC DER
625 Broadway
Albany, New York 12233

**Re: Interim Site Management Plan - Periodic Review Report
688 Court Street
Brooklyn, New York
NYSDEC Site No. 224145
Langan Project No. 170662501**

Dear Mr. Elbuytari:

Langan Engineering, Environmental, Surveying, Landscape Architecture and Geology, D.P.C. (Langan) prepared this Periodic Review Report (PRR) on behalf of MC PR III 688 Court Realty LLC (site owner) for the property located at 688 Court Street in Brooklyn, New York (the site). The site is a portion of New York State Department of Environmental Conservation (NYSDEC) Site No. 224145 and is subject to an Interim Site Management Plan (ISMP). This PRR documents the semi-annual site inspection conducted on September 12, 2024, as required by the NYSDEC-approved August 2015 ISMP, prepared by Langan. In accordance with the ISMP, the Remedial Party (RP), LANXESS Solutions US Inc. (previously Chemtura Corporation), is responsible for remedial investigation and cleanup of the site and the adjoining property at 757 Clinton Street. The site owner, MC PR III 688 Court Realty LLC, is responsible for complying with the engineering controls (EC) and institutional controls (IC) established in the NYSDEC-approved August 2015 ISMP and the Environmental Easement executed on June 6, 2016. A Site Plan is included as Figure 1.

The site is identified on the Brooklyn Borough Tax Map as Block 621, Lot 1, and is bound by a closed section of Halleck Street and Red Hook Recreational Park to the north; Court Street and two industrial and manufacturing warehouses to the east; a commercial parking area and building followed by Bryant Street to the south; and Clinton Street and property owned by Sunlight Clinton Realty, LLC to the west. Though covered under the ISMP, the property adjacent and southwest of the site located at 757 Clinton Street (labeled as "Building 17 [VIP Area]" and the adjacent "yard" in Figure 1) and identified on the Brooklyn Borough Tax Map as Block 621, Lot 50 is not owned or operated by MC PR III 688 Court Realty LLC and was not inspected or reported in this PRR.

The site contains a one-story, vacant industrial warehouse building, an inactive groundwater treatment equipment storage building, a vacant asphalt-paved parking area, a temporary guard booth, and a portable bathroom. The groundwater treatment building located on the southern part of the site is associated with an inactive dual-phase extraction system formerly operated by the RP. Equipment and refuse storage from the previous tenant, including a telephone pole storage container, is in the southern part of the site, and three dumpsters are in the southwestern and western parts of the site. The remainder of the site is occupied by a vacant parking lot.

The ICs for the site are detailed in the 2016 Environmental Easement and are generally related to regulatory compliance, operation, inspection, and maintenance of the ECs; protection of public health and the environment; and periodic reporting. The ECs for the site include a secured site perimeter comprised of stone/masonry walls and chain-link security fencing, building exteriors, and heavy metal gates, and a composite cover system comprised of asphalt- and concrete-paved parking areas and concrete building slabs. In accordance with the ISMP, the site owner must inspect the site perimeter and composite cover semi-annually, as well as after any significant storm/flooding events, to observe conditions and evaluate effectiveness in protecting human health and the environment from exposure to site-related contamination.

Site Inspection

A semi-annual site visit was conducted on September 12, 2024, to document the condition of ECs, including the site perimeter and composite cover system. Langan completed a chemical inventory in all accessible spaces. ECs and chemical storage areas are shown on Figure 1. A photographic log documenting the site inspection is included in Attachment A. The completed Site Inspection Checklist and a product inventory are included in Attachment B. Site observations are described below.

Site Perimeter and Cover System

The site perimeter is comprised of the 725 Clinton Street building exterior, stone/masonry walls, locked metal gates, chain-link fencing, and construction fencing that were observed to be intact and secure during the site visit. The composite cover system throughout the site consists of asphalt and concrete pavement and concrete building slabs. An approximately 3-foot by 3-foot area of exposed soil was observed inside the construction-fencing secured, concrete-paved area adjoining the eastern wall of the 725 Clinton Street building. Three areas of exposed soil were observed along the construction fence on top of suspected cracks in the concrete. Three approximately 1-foot by 2-foot areas of exposed soil and vegetation were observed within the construction area against the construction fencing. The areas containing exposed soil are secured within a controlled construction area that is inaccessible to visitors without authorized entry. The remainder of the composite cover system appeared to be intact. No evidence of significant ground-intrusive work since the March 2024 inspection was observed.

The construction area is currently inactive, pending the planned demolition of the 725 Clinton Street building in October 2024. Following building demolition, the parking lot area will be

expanded to encompass the former building footprint, including the areas of exposed soil, in accordance with the NYSDEC-approved 2022 Excavation Work Plan.

Injection, extraction, and monitoring wells covered by manhole covers were observed throughout the site. Asphalt surrounding one manhole cover (EW-20) in the central part of the site exhibited evidence of spalling at the contact with the cover; however, the underlying soil was not exposed. The remaining manhole covers, and surrounding asphalt-paved areas were observed to be intact and free from surficial cracks. Langan observed localized staining of the asphalt in the northern part of the site. Langan did not observe indications that the staining has penetrated the asphalt cover. Odors or other indications of a release were not observed.

Chemical Inventory

A site-wide chemical inventory was performed. The observed chemicals are listed below.

Former Washing Machine Warehouse (725 Clinton Street Building)

- Two 5-gallon gasoline canisters
- One 3-gallon gasoline canister
- One 2.5-gallon gasoline canister
- One 5-gallon bucket of EP 80W-90 Gear Oil
- One 5-gallon bucket of Bonita® concentrated multi-purpose cleaning solution
- Seven 5-pound fire extinguishers
- One 12 oz can of Rust-oleum Paint and Primer.

Parking Lot

- Two 5-pound fire extinguishers

Treatment Building

- One 1-gallon of d-Limonene® cleaning solvent
- One 1-gallon container of muriatic acid
- One 0.5-gallon carton of Alconox® powdered precision cleaner
- One 50-gallon high-density polyethylene (HDPE) drum of Redux® B-15 microbiocide
- One 15-ounce canister of Rust-oleum® Pro Enamel
- Two 15-ounce canisters of Krylon® inverted marking paint
- One 4-liter container of Hexanes ACS degreasing solvent
- One 55-gallon steel drum labeled as "Carbon Filtration Systems – Inc." with an illegible non-hazardous waste label
- One steel 55-gallon drum labeled "PCB water" on a hazardous waste label, one steel 55-gallon drum with a blank hazardous waste label, and one steel, unlabeled 55-gallon drum. The drums were also observed during the September 2022, March 2023, September

2023, and March 2024 inspections. Woodard & Curran, the environmental engineer for the RP, informed Langan in September 2022 that one of the drums labeled as hazardous waste is empty and the other contains investigation-derived waste generated during previous gauging events. The drums were reportedly pre-labeled as hazardous as a precautionary measure and have not been confirmed to contain hazardous waste.

Closing

On behalf of the site owner, the undersigned certifies the following:

- One of the ECs at the site, the site-wide composite cover system, contains an approximately 3-foot by 3-foot crack and three approximately 1-foot by 2-foot cracks through which soil and vegetation are visible. The areas of exposed soil are within an area on the northwestern part of the site that is secured by construction fencing in preparation for demolition of the 725 Clinton Street building and expansion of the parking lot. The secured area is only accessible to authorized personnel.
- Spalling of surrounding asphalt was observed near the collar of a manhole cover for an extraction well (EW-20) on the central part of the site. Soil underlying the asphalt was not exposed.
- We recommend that the area of the aforementioned exposed soil remain secured behind fencing within the 725 Clinton Street construction area and remain inaccessible to unauthorized visitors, with only trained personnel operating in accordance with the 2016 ISMP and 2022 Excavation Work Plan having access to the exposed area. We understand the exposed area will be covered with pavement during expansion of the tenant parking lot in November 2024.
- We recommend off-site disposal of the two 55-gallon drums of investigation-derived waste, one unlabeled 55-gallon drum, and one 55-gallon drum with a non-hazardous waste label in the treatment building, in accordance with applicable local, state, and federal laws and regulations. Until removal can be accommodated, we recommend securing the building with a lock to restrict tenant access to drums.
- We recommend that good housekeeping practices continue to be implemented at the site.

Please contact the undersigned with any questions.

Sincerely,
**Langan Engineering, Environmental, Surveying,
Landscape Architecture and Geology, D.P.C**

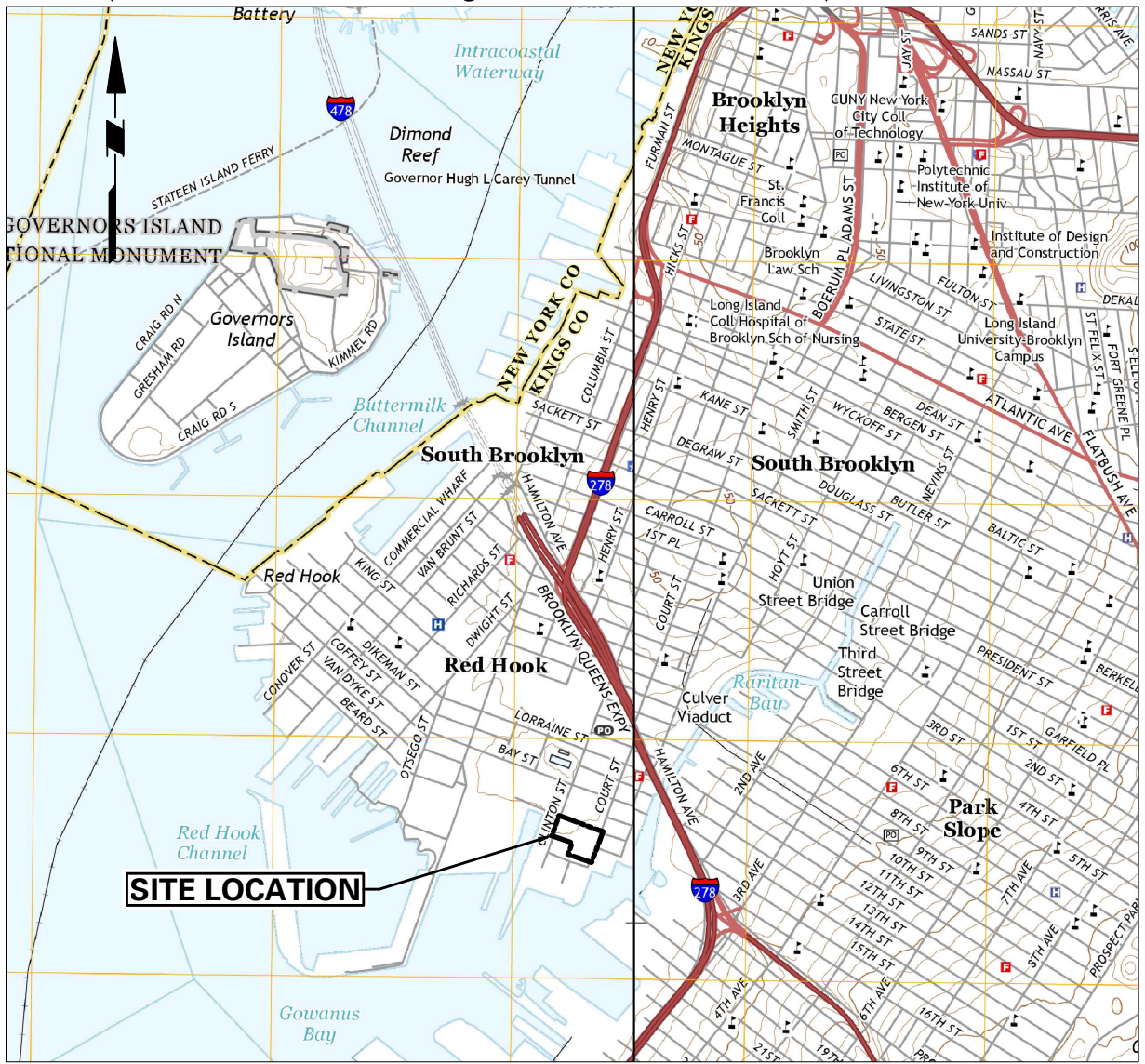
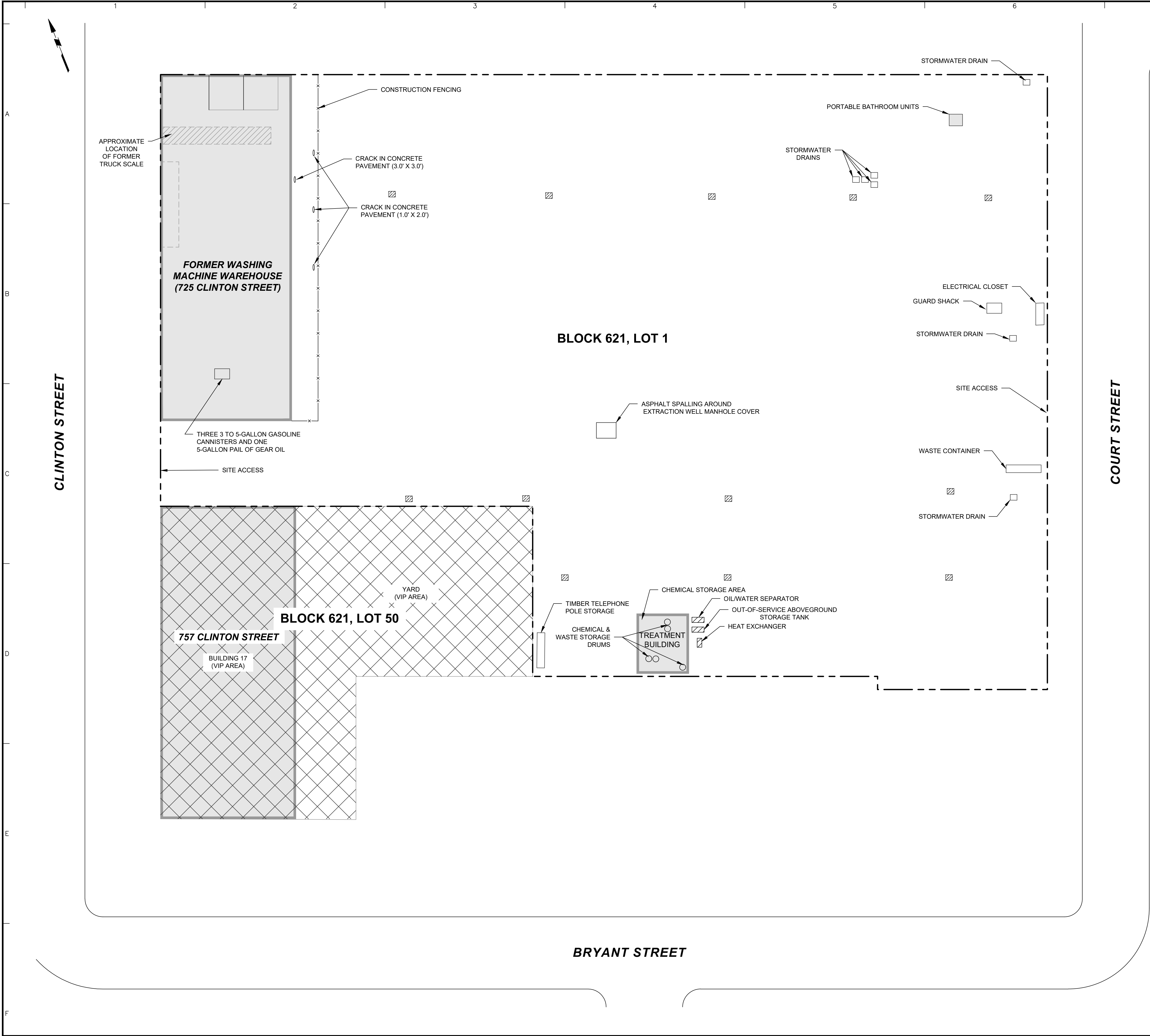


Jason J. Hayes, P.E., LEED AP
Principal/Vice President

cc: B. Lisser, C. Chang (Madison Capital)
S. Kimball (PGIM)
M. Raygorodetsky, S. Knoop (Langan)
S. Russo (Greenberg Traurig, LLP)

Enclosures: Figure 1 Site Plan
Attachment A Photograph Log
Attachment B Site Inspection Checklists and Product Inventory

FIGURE



SITE LOCATION MAP

SCALE: 1"=1500'

LEGEND:

- APPROXIMATE SITE PERIMETER AND EXTENT OF SITE COVER
- APPROXIMATE BUILDING EXTENTS
- APPROXIMATE INTERIOR BUILDING WALLS
- BLOCK 621, LOT 50 (AREA ALSO PART OF NYSDEC SITE NO. 224145 AND COVERED UNDER INTERIM SITE MANAGEMENT PLAN)
- LIGHTING FIXTURE

GENERAL NOTES:

- BASE MAP FOR THE SITE LOCATION MAP IS REFERENCED FROM THE UNITED STATES GEOLOGICAL SURVEY 7.5 MINUTE TOPOGRAPHIC MAPS, INCLUDING THE JERSEY CITY AND BROOKLYN QUADRANGLES.
- BASE MAP FOR THE SITE PLAN IS AMENDED FROM A MAY 2001 REMEDIAL ACTION WORK PLAN SITE LAYOUT, PREPARED BY ENVIRO-SCIENCES, INC.
- ALL LOCATIONS SHOWN ARE APPROXIMATE AND ARE SHOWN FOR REFERENCE ONLY. LOCATION OF INTERIOR BUILDING WALLS WERE APPROXIMATED FROM FIELD OBSERVATIONS.
- OBSERVATIONS BASED ON SITE INSPECTION CONDUCTED ON MARCH 13, 2024.
- THIS PERIODIC REVIEW REPORT ADDRESSES CONDITIONS ON BLOCK 621, LOT 1 ONLY.

LANGAN

Langan Engineering, Environmental, Surveying,
Landscape Architecture and Geology, D.P.C.
360 West 31st Street, 8th Floor
New York, NY 10001

T: 212.479.5400 F: 212.479.5444 www.langan.com

Project

688 COURT STREET

NYSDEC SITE No. 224145
BLOCK No. 621 LOT No. 1

BROOKLYN NEW YORK

Figure Title

**SITE PLAN:
SEPTEMBER 12, 2024
SITE INSPECTION**

Project No.

170662501

Date

11/11/2024

Drawn By

BK

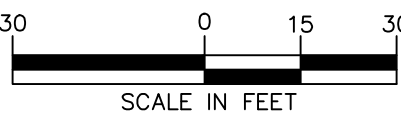
Checked By

SK

Figure No.

1

Sheet 1 of 1



ATTACHMENT A
PHOTOGRAPH LOG



Photo 1: View of the central part of the site (facing south).



Photo 2: General view of the western part of the site (facing west).



Photo 3: Temporary guard shack in the eastern part of the site (facing southeast)

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Photo 4: Northwestern part of site adjacent to 725 Clinton Street (facing northwest). Note remaining vehicle from previous tenant



Photo 5: Remaining equipment from previous tenant in the eastern part of the site (facing southwest).

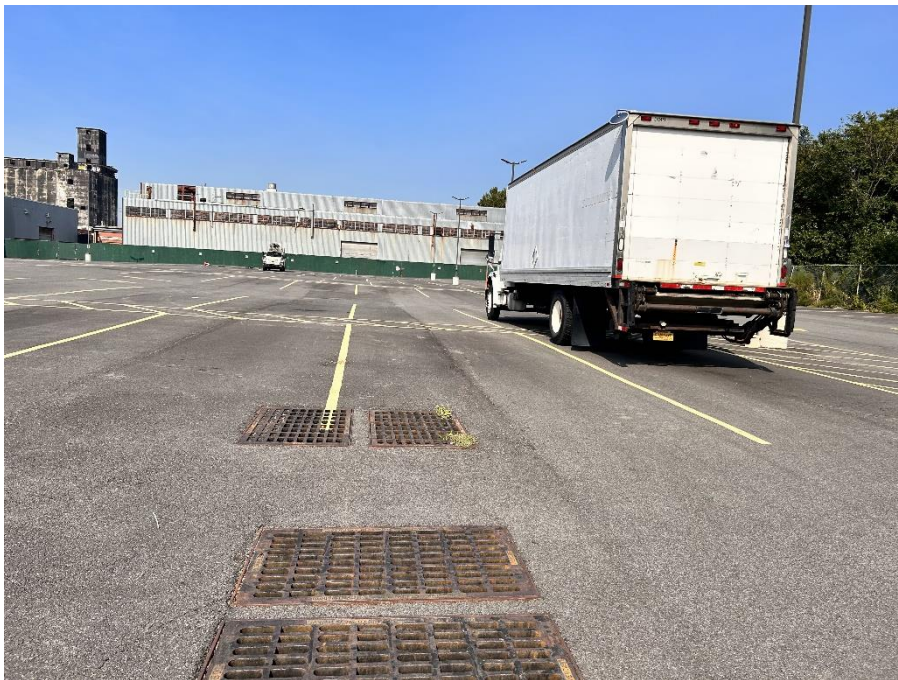


Photo 6: Storm drains and remaining vehicle from previous tenant vehicle in the central part of the site (facing west).



Photo 7: Spalling asphalt around manhole cover in the central part of the site (facing northeast).



Photo 8: Timber storage container along the southern boundary of the site (facing south).



Photo 9: Treatment building and staged equipment from prior tenant (facing south).



Photo 10: Interior of treatment system building (facing north).



Photo 11: 55-gallon metal drum containing activated carbon in treatment building.



Photo 12: Two 55-gallon drums labeled "PCB water" and one 55-gallon drum with a blank hazardous waste label inside the treatment building (facing east).



Photo 13: Remaining telecommunications equipment from previous tenant near the southern site boundary (facing north).



Photo 14: Storm drain and waste storage containers in the eastern part of the site (facing north).



Photo 14: Concrete-paved area adjoining 725 Clinton Street building (left) and the commercial vehicle parking area to the east (facing north).



Photo 15: Area of exposed soil in the concrete pavement within the secured construction area adjoining 725 Clinton Street building (facing east).



Photo 16: Exposed soil in concrete pavement in the central part of the secured construction area adjoining 725 Clinton Street building (facing southwest).

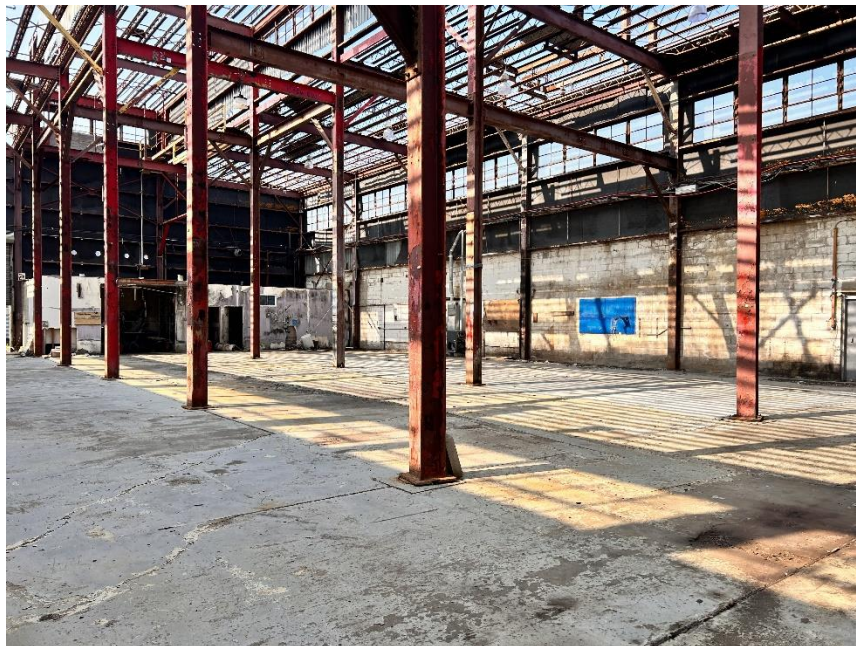


Photo 17: Concrete cover slab in 725 Clinton Street Building (facing southwest).



Photo 18: Former mechanical repair room in 725 Clinton Street (facing south).



Photo 19: Five-gallon gasoline canisters and five-gallon bucket of gear oil inside 725 Clinton Street (facing east).

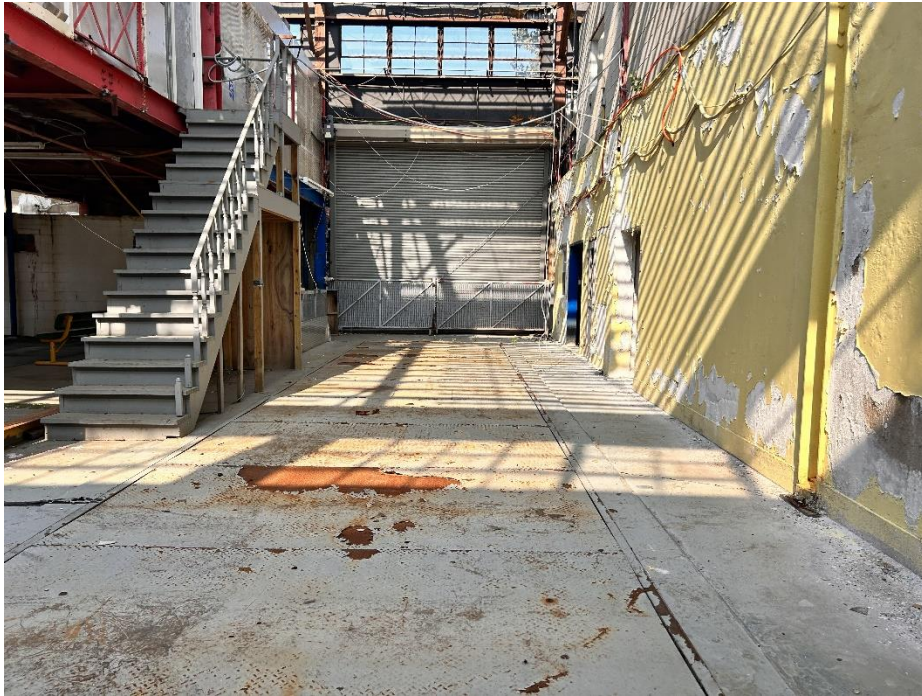


Photo 20: Former truck scale located in the northern part of 725 Clinton Street (facing west).

ATTACHMENT B
SITE INSPECTION CHECKLISTS AND PRODUCT INVENTORY

SITE INSPECTION CHECKLIST

Site Name: 688 Court Street Location: Brooklyn, NY Project Number: 170662501

Inspector Name: Olivia O'Donnell Date: 9/12/24 Weather Conditions:

Reason for Inspection (i.e., routine, severe condition, etc.): Semi-Annual Inspection Inspection Period: Fall 2024

Check one of the following: **Y:** Yes **N:** No **NA:** Not Applicable

		Y	N	NA	Normal Situation	Remarks
	General					
1	What are the current site conditions?	--	--	--	--	The site currently consists of a former laundry services machine warehouse, an inactive treatment building, a recently constructed parking lot with associated light fixtures, storm drains, and portable trailers, bathrooms, and storage units. At the time of the site visit, access was available to all areas of the site.
2	Are all applicable site records (e.g., documentation of construction activity, most current easement, etc.) complete and up to date?	Y			Y	
	Easement					
3	Has site use (commercial) remained the same?	Y			Y	The site is currently a vacant parking lot and loading area. Equipment and two vehicles are left on site by the previous occupant. Additionally, three dumpsters and one timber telephone pole storage container were observed in the southeastern and southern parts of the site, respectively.
4	Does it appear that all environmental easement restrictions have been followed?	Y			Y	
	Impermeable Cap					
5	Are there any indications of a breach to the site perimeter?		N		Y	
6	Are there any indications of a breach in the capping system at the time of this inspection?	Y				
7	Are there any cracks in the building slabs?	Y				An approximately 3x3 ft hole in the eastern part adjacent to 725 Clinton Street building. Small piles of soil adjacent to the construction fence in 725 Clinton Street eastern part of site. Small cracks with vegetation growing in south and east parts of site and eastern parts of 725 Clinton St area adjacent to the construction fence.
8	Are there any cracks in the building walls?		N		Y	
9	Is there any construction activity, or indication of any construction activity within the past certification year (including any tenant improvements), that included the breaching of the capping system, on-site at the time of this inspection?		N		Y	
10	If YES to number 9, is there documentation that the Soil Management Plan, HASP, and CAMP for the site was/is being followed?			NA		

*** If the answer to any of the above questions indicate non-compliance with any IC/ECs for the site, additional remarks must be provided and, where applicable, documentation attached to this checklist detailing additional inspection and repair activities.

Additional remarks A photographic log (Attachment A) and Site Plan (Figure 1) are attached for reference.

Minimum Inspection Schedule: Site-wide inspections will be conducted semi-annually, per certification year, at a minimum. Additional inspections will also be conducted at times of severe condition events. All inspection events will utilize this checklist.

Product Inventory - September 2024
Interim Site Management Plan Periodic Review Report

688 Court Street
 Brooklyn, New York
 NYSDEC Site No. C224145
 Langan Project No. 170662501

Product Inventory		
Former Washing Machine Warehouse		
No.	Type	Amount
7	Fire extinguisher	5 lbs
2	Gasoline Canister	5 gal
1	Gasoline Canister	3 gal
1	Gasoline Canister	2.5 gal
1	EP 80W-90 Gear Oil	5 gal
1	Bonita Neutral cleaner/Neutralizer	5 gal
1	Rust oleum paint + primer	12 oz
Parking Lot		
No.	Type	
2	Fire extinguisher	5 lbs
Treatment Building		
No.	Type	Amount
2	Unlabeled Drum	55 gal
2	Hazardous Material Drums (Groundwater) ¹	55 gal
1	Muriatic acid	1 gal
1	Rust-Oleum Pro Enamel	15 oz
1	Redux B-15 Drum	50 gal
1	Hexanes ACS	4 L
1	Alcanox Powdered Precision Cleaner	.5 gal
1	D-limonene	1 gal
1	Gasoline Canister	3 gal
1	Krylom Industrial Inverted Marking Paint	15 oz
1	Activated Carbon Drum	55 Gal

1. According to Woodard & Curran, the environmental engineer for the RP, one of the drums labeled as hazardous waste is empty and the others contain investigation-derived waste generated during previous gauging events. The drums were reportedly pre-labeled as hazardous in an abundance of caution and the drums have not been confirmed to contain hazardous waste