

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau B
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June 9, 2015

Jack Abel
J&H Holding Company LLC
350 Dewitt Avenue
Brooklyn, NY 11207

**Re: Former Watermark, 491 Wortman Avenue, Brooklyn, NY, BCP Site
C224139; Interim Remedial Measures Work Plan, April 28, 2015**

Dear Mr. Abel:

The New York State Department of Environmental Conservation (DEC) has reviewed the document referenced above. The comments discussed below must be satisfactorily addressed prior to approval of the work plan.

2.3.1 AS System Installation

- In Figure 3, show the configuration of Leg 1 and 2.
- Clarify if freezing of any above ground piping will be an issue inside of the building.

2.3.11 Backfill Importation and Placement

- Analytical results for imported material used as backfill must comply with levels in DER-10, Appendix 5, for the intended use of the site.
- Must provide documentation of the source of fill to DER for approval before it is used at the site (reference Der-10, section 5.4(e)6 for requirements).

2.3.12 Dust, Odor, Vapor and Nuisance Control Plan

- A CAMP should be developed in accordance with DER-10, Appendices 1A and 1B, and included as an appendix to the work plan. It should specifically address how monitoring will be accomplished inside the building if non-workers are present during remedial activities.

2.4.2.1 Air Sparging Operational Parameters

- Include a figure that shows the configuration of the air sparge wells (Leg 1 and 2).
- The second paragraph states that the compressor is sized at 190 scfm. However, Table 4 shows 176 scfm. Please clarify this discrepancy.

2.4.2.2 Vapor Collection Operational Parameters

- This section states that the blower is sized for a flow rate of 800 scfm at a vacuum of 90 inches. However, Table 5 does not show this. Please clarify the discrepancy.

2.4.6 Rebound Monitoring

- Define what would be considered a “substantial decline in groundwater concentrations” for this site. What percent reduction in concentrations is this system expected to achieve?

2.6 Notification

- In accordance with DER-10, sections 1.4(c) and the department must be notified seven calendar days prior to the actual start of any field activities.

2.7 Health and Safety Plan

- The HASP should mention that remedial work will take place inside the building, and discuss the health and safety precautions will be taken for non-workers inside the building or in the adjacent place at the building.

3.2.1 Monthly Progress Reports: AS/SVE System Installation and

3.2.2 Monthly Progress Reports: AS/SVE System OM&M

- Ensure that the progress reports include the applicable items discussed in DER-10, section 5.7(b).

3.3 Construction Completion Report

- The report should meet the requirements of DER-10, section 5.8(b) and (c).

3.4 Final Engineering Report/Site Management Plan

- The FER and SMP for the site will be prepared after completion of on-site and off-site remedies, since the applicant is a participant. DEC will provide a template for the preparation of the FER and SMP.

Note that comments from NYSDOH will be sent separately later this week. These comments will also have to be satisfactorily addressed. Please modify the work plan accordingly and submit it to DEC by June 19, 2015 or earlier. If you have any questions, contact me at alicia.barraza@dec.ny.gov or 518-402-9690.

Sincerely,



Alicia Barraza,
Project Manager
Section A

Jack Abel
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ec: Gerald Nicholls, Langan Engineering
M. Komoroske, DEC
J. O'Connell, DEC R2
Dawn Hettrick, DOH
Justin Deming, DOH