



Integral Engineering, P.C.
1001 6th Avenue
11th Floor
New York, NY 10007

telephone: 212.962.4303
facsimile: 212.962.4302
www.integral-corp.com

MEMORANDUM

To: Wendi Y. Zheng
New York State Department of Environmental Conservation

From: Sara Barbuto and Keith P. Brodock, P.E. Integral Engineering, P.C.

Date: April 10, 2020

Subject: Monthly Progress Report
Former Cleaner Sales and Equipment Corp. NYSDEC Site No. 224177

Project No.: E051

In accordance with the reporting requirements of the Brownfield Site Cleanup Agreement for the above-captioned Site, Integral Engineering, P.C. (Integral) presents this monthly progress report to New York State Department of Environmental Conservation (NYSDEC) on behalf of 135 Kent Avenue Management Corp. This progress report presents an update on the implementation of the remedial program activities at 135 Kent Avenue (Former Cleaner Sales and Equipment Corp. Site; NYSDEC Site No. 224177) for the month of March 2020.

ACTIONS COMPLETED DURING THIS REPORTING PERIOD

During this reporting period we have completed the following actions:

1. Reviewed sub-slab depressurization system (SSDS) pressure gauge readings at 135 Kent Avenue.
2. Performed actions to cure violations listed in the NYSDEC January 15, 2020 Notice of Violation (NOV) letter.

Additional information regarding these actions is provided in the following sections.

135 Kent Avenue SSDS Monitoring

Due to COVID-19 concerns and NYSDEC’s recent guidance interpreting Governor Cuomo’s Executive Order 202.6, Integral cannot perform monitoring in a manner that would allow for proper social distancing within the building, and was not able to perform SSDS monitoring of vapor monitoring points (VMPs) and SSDS suction points in March 2020. The master tenant, Raul Sillau, performed a site visit on March 31, 2020, upon request by Integral. Mr. Sillau confirmed that the SSDS was running and provided photos of SSDS pressure gauges PI102 and PI103 (see attached Figure 1). These readings are consistent with pressure readings observed during the past two monitoring events, as presented in Table 1 below.

Table 1. SSDS Pressure Gauge Readings, 2020

Gauge	Pressure (inches of H ₂ O)		
	January 23, 2020	February 26, 2020	March 31, 2020
PI102 (Before SSDS Lead Drum)	45	44	45
PI103 (After SSDS Lead Drum)	32	32	31

As documented by Integral in the monthly progress reports, the SSDS blower has run consistently without incident during the January and February 2020 monitoring events and all 2019 monitoring events. The March 31, 2020 SSDS pressure gauge readings are indicative of similar SSDS blower function as was observed by Integral during the January and February 2020 monitoring events, when readings at VMPs indicated vacuum pressure was being applied across the slab throughout the building.

Integral does not anticipate any maintenance activities will be required for the SSDS during the next several months: Integral and AARCO Environmental performed a carbon changeout of the SSDS treatment drums on February 26, 2020 and the next carbon changeout will likely not be necessary until August 2020. Integral and Mr. Sillau are in communication and will continue to monitor SSDS blower function and pressure gauges. Once COVID-19 restrictions are lifted, Integral will resume SSDS monitoring.

Response to NOV Letter

NYSDEC issued an NOV letter for the Site on January 15, 2020. NYSDEC listed two violations in the NOV letter; the first violation pertains to language within building leases, and the second pertains to air filtration units missing in the building and the schedule for the Site remedial investigation. NYSDEC held an Administrative Settlement Conference February 27, 2020 (hereafter referred to as the “conference”) to discuss the violations and mutually agreeable approaches to cure. Representatives for 135 Kent Management Corp (Applicant), including Keith P. Brodock, P.E. and Sara Barbuto of Integral and James J. Periconi of Periconi, LLC; and

representatives for Citiwindows LLC (Applicant's agent), including building master tenant Raul Sillau and his wife Monica Sillau, and Citiwindow LLC's attorney, Steven B. Sperber of Sperber, Denenberg, & Kahan, PC, attended the February 27, 2020, Conference held at the NYSDEC Region 2 Office. During this meeting, these representatives and NYSDEC discussed potential actions to cure the violations listed in the NOV letter. At the conclusion of the Conference, NYSDEC requested that Integral advise the agency of actions taken to cure the violations in an NOV response due to NYSDEC by no later than April 10, 2020.

During the March 2020 reporting period, Integral drafted the NOV response letter and made progress on the agreed upon approaches to cure. Integral's actions included but were not limited to: compilation of 135 Kent Avenue leases, coordination of air filtration unit procurement, preparation of draft tenant agreement letters that communicate the importance of air filtration unit operation, and continued progress on offsite remedial activities. Integral documented these actions and next steps in the NOV response letter, which it submitted to NYSDEC on April 10, 2020.

PLANNED ACTIVITIES FOR THE APRIL 2020 REPORTING PERIOD

Given anticipated ongoing COVID-19 restrictions, it is likely that Integral will again work with Mr. Sillau to provide SSDS pressure gauge readings in order to monitor SSDS blower function. Additional details regarding April 2020 activities will be provided in the next monitoring report, due May 10, 2020.

SSDS Pressure Gauge PI102
(Before Lead Carbon Treatment Drum)
Pressure = 45 inches of H₂O



SSDS Pressure Gauge PI103
(After Lead and Before Lag Carbon Treatment Drum)
Pressure = 31 inches of H₂O



Notes:
Photographs taken by Raul Sillau on March 31, 2020.