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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: June 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 May 2020.

ACTIONS COMPLETED DURING THIS REPORTING PERIOD

During this reporting period we have completed the following actions:

1. Reviewed SSDS pressure gauge readings at 135 Kent Avenue.
2. Collected sub-slab depressurization system (SSDS) monitoring measurements at vacuum monitoring points (VMPs) and suction points at 135 Kent Avenue.
3. Performed actions to cure the violations listed in the January 15, 2020 Notice of Violation 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 was not able to perform SSDS monitoring of vapor monitoring points (VMPs) and SSDS suction points in May 2020. The master tenant, Raul Sillau, performed a site visit on May 11, 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 January and February 2020 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	May 11, 2020	June 3, 2020
PI102 (Before SSDS Drum)	45	44	46	45
PI103 (After SSDS Drum)	32	32	31	31

The May 11, 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.

After discussion with Mr. Sillau regarding access to the building, Integral performed SSDS monitoring of accessible VMPs and SSDS suction points on June 3, 2020. Pressure readings were collected from VMPs; airflow velocity readings were collected from SSDS suction points. The results of the June 3, 2020 monitoring event for all SSDS suction points and VMPs are presented in Table 2 below.

Table 2. June 3, 2020 SSDS Monitoring Results

Location	Airflow Velocity (ft/min)	Pressure (inches of H ₂ O)
SSDS Suction Points		
V-1	1,276	--
V-2	1,101	--
V-3	1,199	--
V-4	1,023	--
V-5	1,288	--
V-6	Not accessible	--
VMPs		
PV-1R	--	-0.013
PV-2R	--	-0.078
PV-3	--	-0.004
PV-4R	--	Not accessible
PV-5R	--	-0.015
PV-6RR	--	0.003
PV-7RR	--	-0.003
PV-8	--	-0.023
PV-10RR	--	-0.027
PV-11R	--	-0.002

The site plan, included as Figure 2, shows the locations of VMPs labeled as PV-x (permanent vapor wells) and SSDS suction points labeled as V-x (vapor wells). A positive pressure reading was observed in VMP PV-6RR. VMP PV-6RR may not be properly connected to the building sub slab. Plumber’s putty was applied to this VMP during the June 3 SSDS monitoring event and no change was noted; if this VMP continues to have a positive pressure reading it will be re-installed. Integral was not able to access VMP PV-4R or suction point V-6 due to the temporary closure of HigherDose. Pressure and flow data collected on June 3, 2020 were generally comparable to those collected during the January and February 2020 monitoring events, and those performed at the site since December 2016.

During the June 3, 2020 monitoring event, Integral noted that the phone line for the Sensaphone SSDS alarm system was not functional. Integral is returning to the site on Monday, June 15, 2020 to provide access to a Verizon technician.

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. On April 10, 2020, Integral submitted a response letter regarding actions to cure

violations listed the NOV letter. This letter included documentation 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. During the May 2020 monitoring period, Integral made progress on the agreed upon approaches to cure. Integral's actions included but were not limited to drafting the tenant agreement letters, reviewing logistics for air filtration unit replacement in commercial spaces upon business reopening, communications with the master tenant regarding commercial space occupancy, and offsite SSDS pilot test feasibility at 58 North 6th Street under COVID-19 restrictions.

PLANNED ACTIVITIES FOR THE JUNE 2020 REPORTING PERIOD

The SSDS system is currently operating. Integral performed the June 2020 monitoring on June 3, 2020. Integral will be at the building on June 15, 2020 to provide access to a Verizon technician for repair of the SSDS alarm system phone line. The July monthly monitoring event is scheduled for July 1, 2020. Integral will continue to make progress on the actions to cure the violations in the NOV letter in light of state and local restrictions. Additional details regarding June 2020 activities will be provided in the next monitoring report, due July 10, 2020.

SSDS Pressure Gauge PI102
(Before Lead Carbon Treatment Drum)
Pressure = 46 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 May 11, 2020.

135 Kent Avenue
 Site # C224177
 SSDS Monitoring Form

Date: 6/3/20
 Time Begin: 1035
 Time End: ~~1255~~ 1305
 Staff: Jonathan Pereira

Sub-Slab Monitoring Point	Pressure (in. H ₂ O)
PV-1R	-0.013
PV-2R	-0.078
PV-3	No access - 0.004
PV-4R	No access
PV-5R	-0.015
PV-6RR	0.003
PV-7RR	-0.003
PV-8	-0.023
PV-10RR	-0.027
PV-11R	-0.002

SSDS Monitoring Point	Flow Velocity (ft/min)
V-1	1,276
V-2	1,101
V-3	1,199
V-4	1,023
V-5	1,288
V-6	no access

Notes: Higher Dose locations PV-4R & V-6 unaccessible due to shop closure

SSDS Treatment Room	Monitoring Point	Pressure (in. H ₂ O)	PID (ppm)	Notes
Before lead drum	Gauge PI102	45	no port	
Before lag drum	Gauge PI103 Sample Port	31	1.3	
After lag drum	Gauge PI104 Sample Port	18	0.3	
Ambient Air				

Is SSDS blower operating: Yes No
 Is heat exhaust fan operating: Yes No
 Is Sensaphone operating: Yes No
 Tampering, vandalism, or damage to
 SSDS: Yes No
 Exhaust stack: Yes No