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MEMORANDUM

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

From: Sara Barbuto

Date: November 12, 2024

Subject: Monthly Progress Report
Former Cleaner Sales and Equipment Corp. NYSDEC Site No. C224177

Project No.: E1022

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 LLC. 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. C224177) for the month of October 2024.

ACTIONS COMPLETED DURING THIS REPORTING PERIOD

During this reporting period we have completed the following actions:

1. Collected sub-slab depressurization system (SSDS) monitoring measurements at vapor monitoring points (VMPs) and suction points at 135 Kent Avenue.
2. Prepared for implementation of the engineering control modifications Work Plan.
3. Reviewed pilot testing data for the design of a vapor mitigation system at 58 North 6th Street.
4. Coordinated with 60 North 6th Street's environmental consultants for collection of an indoor air sample and installation of additional VMPs.

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

135 Kent Avenue SSDS Monitoring

Integral performed SSDS monitoring of SSDS suction points and accessible VMPs on October 4, 2024:

Table 1. October 4, 2024 135 Kent Avenue SSDS Monitoring Results

Location	Airflow Velocity (ft/min)	Pressure (inches of H ₂ O)
SSDS Suction Points		
V-1	2,125	--
V-2	1,578	--
V-3	1,466	--
V-4	1,935	--
V-5	1,616	--
V-6	1,950	--
VMPs		
PV-1R	--	-0.019
PV-2RR	--	-0.469
PV-3	--	-0.021
PV-4R	--	-0.034
PV-5R	--	-0.017
PV-6RR	--	-0.002
PV-7RR	--	-0.032
PV-8	--	-0.026
PV-10RR	--	-0.025
PV-11RR	--	-0.070

135 Kent Avenue Engineering Control Modifications

Integral and NYSDEC held a teleconference on March 22, 2024 to discuss proposed 1st floor renovations at 135 Kent Avenue and IRM and engineering control modifications. Per discussion on the March 22, 2024 call, Integral prepared an IRM modification memorandum referencing the 2014 SSDS design document and subsequent CCR/OM&M documents. This document was submitted for NYSDEC and New York State Department of Health (NYSDOH) review on April 26, 2024, and included the following elements:

- Relocation of several SSDS vacuum monitoring points and SSDS vacuum wells
- Adjustments to SSDS piping and equipment

- Replacement of first floor air filtration units with in-line carbon filtration in the HVAC system.

NYSDEC and NYSDOH provided comments to the IRM modification memorandum on May 10, 2024. Integral submitted the revised IRM modification memorandum and community air monitoring plan (CAMP) document on May 20, 2024. NYSDEC and NYSDOH approved IRM modification memorandum on June 11, 2024.

On June 6, 2024, Integral submitted a work plan presenting proposed engineering control modifications to NYSDEC and NYSDOH for review and comment that included the following elements:

- Temporary removal and replacement of the first floor slab for retail space preparation, installation of Americans with Disabilities Act (ADA)-compliant entrances, and utility line adjustments
- Probing beneath the former 48 N 6th Street deli to identify the location and status of a closed-in-place underground storage tank
- Relocation of SSDS equipment to a roof-top skid.

NYSDEC and NYSDOH provided comments to this work plan on July 12, 2024 and held a meeting to discuss comments with Integral and 135 Kent LLC on July 26, 2024. Integral submitted the revised work plan on August 6, 2024. NYSDEC and NYSDOH approved the engineering control modification work plan on September 5, 2024.

On September 30, 2024, NYSDEC and NYSDOH held a teleconference with 135 Kent LLC and Integral to discuss tenant concerns regarding the implementation of these work plans. Integral and 135 Kent LLC are coordinating implementation of the proposed IRM and engineering control modification work plans and will provide NYSDEC and NYSDOH a construction schedule and duration of construction when it is available. 135 Kent LLC will notify NYSDEC and all the tenants on-site at least 10 days prior to commencing any field work related to the approved work plans.

58 North 6th Street Vapor Mitigation

On December 7, 2023, Integral submitted a pilot test work plan for the design of a vapor mitigation system to 58 North 6th Street management for review and comment. On February 13, 2024, Integral received confirmation from building management for 58 North 6th Street that the pilot test work plan was acceptable. Integral and subcontractors performed utility mark-out and a communication study on April 30, 2024. Ground penetrating radar (GPR) was performed to mark utilities. Communication holes and suction pits were drilled in the 58 North 6th Street building's northern cellar slab, southern cellar slab, and the first-floor slab-on-grade to apply vacuum and measure pressure response. After completing the communications study, the communication holes were filled in with polyurethane caulk and the suction pits were filled in

with concrete. Integral prepared a draft SSDS layout for 58 North 6th Street management review and is in discussion with 58 North 6th Street management regarding SSDS equipment layout.

Upon agreement of the SSDS layout with building management for 58 North 6th Street, Integral will prepare a vapor mitigation design work plan for NYSDEC review.

60 North 6th Street Vapor Mitigation

Integral has been in communication with P.W. Grosser, the environmental consultants for 60 North 6th Street, regarding installation of additional VMPs and pressure measurements from the building's active SSDS, and collection of an indoor sample. The first floor of the 60 North 6th Street building is now occupied by a commercial tenant. Integral wrote the environmental consultant for 60 North 6th Street on April 13, 2024 requesting a floor plan showing where additional VMPs can be installed, and asking when an indoor air sample can be collected.

PLANNED ACTIVITIES FOR THE NEXT REPORTING PERIOD

The SSDS system is currently operating. The following activities are planned for the November 2024 reporting period:

- November 2024 monthly monitoring will be performed the week of November 18, 2024.
- Integral and 135 Kent LLC are coordinating implementation of the proposed IRM and engineering control modification work plans and will provide NYSDEC and NYSDOH a construction schedule and duration of construction when it is available. 135 Kent LLC will notify NYSDEC and all the tenants on-site at least 10 days prior to commencing any field work related to the approved work plans.
- Integral will coordinate air filtration unit maintenance with 58 North 6th Street building management.
- Integral will prepare the results of the 58 North 6th Street pilot testing in a design report for NYSDEC review.
- Integral will continue to communicate with the environmental consultants for 60 North 6th Street.

Additional details regarding November 2024 activities will be provided in the next monitoring report, due December 10, 2024.

**135 Kent Avenue
Site # C224177
SSDS Monitoring Form**

Date: 10/4/2024
Time Begin: 11:30
Time End: 15:45
Staff: DM

Sub-Slab Monitoring Point	Pressure (in. H ₂ O)
PV-1R	-0.019
PV-2RR	-0.469
PV-3	-0.021
PV-4R	-0.034
PV-5R	-0.017
PV-6RR	-0.002
PV-7RR	-0.032
PV-8	-0.026
PV-10RR	-0.025
PV-11RR	-0.070

SSDS Monitoring Point	Flow Velocity (ft/min)	Valve Position
V-1	2,125	0°
V-2	1,578	45°
V-3	1,466	30°
V-4	1,935	0°
V-5	1,616	45°
V-6	1,950	0°

Notes:

SSDS Treatment Room	Monitoring Point	Pressure (in. H ₂ O)	PID (ppm)	Notes
Before lead drum	Gauge PI102	46	no port	
Before lag drum	Gauge PI103 Sample Port	34	2.3	
After lag drum	Gauge PI104 Sample Port	18	2	
Ambient Air			0.0	

Is SSDS blower operating:

Yes	No
Yes	No
Yes	No

Is heat exhaust fan operating:

Is Sensaphone operating:

Tampering, vandalism, or damage to

SSDS:

Yes

No

Exhaust stack:

Yes

No
