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MEMORANDUM

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

From: Julia Ryan

Date: December 10, 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 November 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 November 26, 2024:

Table 1. November 26, 2024 135 Kent Avenue SSDS Monitoring Results

Location	Airflow Velocity (ft/min)	Pressure (inches of H ₂ O)
SSDS Suction Points		
V-1	2,083	--
V-2	1,483	--
V-3	1,396	--
V-4	1,796	--
V-5	1,373	--
V-6	1,682	--
VMPs		
PV-1R	--	-0.051
PV-2RR	--	-0.364
PV-3	--	-0.020
PV-4R	--	-0.030
PV-5R	--	-0.009
PV-6RR	--	--
PV-7RR	--	-0.026
PV-8	--	-0.024
PV-10RR	--	-0.024
PV-11RR	--	-0.130

During November monitoring, VMPs PV-1R and PV-11RR initially read approximately +2.00 inches of H₂O, and steadily decreased to -0.051 and -0.130 inches of H₂O, respectively, over a period of several minutes. VMP PV-6RR was not accessible during November monitoring. Integral staff confirmed with associates of 135 Kent LLC that new concrete had been poured over the VMP during work to raise the height of the sidewalk along North 6th Street. Integral is coordinating with 135 Kent LLC to expose PV-6RR prior to the December monitoring.

135 Kent Avenue Engineering Control Modifications

Integral and NYSDEC held a teleconference on March 22, 2024 to discuss proposed first floor renovations at 135 Kent Avenue and Interim Remedial Measures (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 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-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 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 December 2024 reporting period:

- December 2024 monthly monitoring will be performed the week of December 16, 2024.
- Integral is coordinating with 135 Kent LLC to remove concrete that covered VMP PV-6RR during November monthly monitoring.
- 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 January 10, 2024.

135 Kent Avenue
Site # C224177
SSDS Monitoring Form

Date: 11/26/2024
Time Begin: 11:15
Time End: 15:15
Staff: DM

Sub-Slab Monitoring Point	Pressure (in. H ₂ O)
PV-1R	-0.051
PV-2RR	-0.364
PV-3	-0.020
PV-4R	-0.030
PV-5R	-0.009
PV-6RR	--
PV-7RR	-0.026
PV-8	-0.024
PV-10RR	-0.024
PV-11RR	-0.130

SSDS Monitoring Point	Flow Velocity (ft/min)	Valve Position
V-1	2,083	0°
V-2	1,483	45°
V-3	1,396	15°
V-4	1,796	0°
V-5	1,373	45°
V-6	1,682	0°

Notes: PV-1R and PV-11RR initially read approximately +2.00 in. H₂O and dropped to their respective pressures over a period of several minutes

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	33	2.3	
After lag drum	Gauge PI104 Sample Port	19	2.0	
Ambient Air			0.0	

Is SSDS blower operating:

Yes	No
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Is heat exhaust fan operating:

Yes	No
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Is Sensaphone operating:

Yes	No
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Tampering, vandalism, or damage to

SSDS:

Yes	No
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Exhaust stack:

Yes	No
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