

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

From: Robert Bennett

Date: January 15, 2025

Subject: Monthly Progress Report for 135 Kent Ave, Brooklyn, NY
Former Cleaner Sales & Equipment Corp. Site
NYSDEC BCP Site No. C224177

MONTHLY PROGRESS MEMORANDUM

In accordance with the reporting requirements of the Brownfield Site Cleanup Agreement for the above-captioned Site, Rock Enviro LLC, presents this monthly progress report to the 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 December 2024.

ACTIONS COMPLETED DURING THIS REPORTING PERIOD

During this reporting period we have completed the following actions:

1. Notified NYSDEC & NYSDOH that Rock Enviro LLC (Rock Enviro) has replaced Integral Engineering, P.C. as the environmental consultant for this project. Rock Enviro was retained by 135 Kent Ave LLC on December 13, 2024.
2. Notified NYSDEC & NYSDOH that Sean Carter (License # 083593) from Matrix Environmental Engineers PLLC (Matrix) will be the new remedial engineer. Matrix submitted a certificate of authorization to perform engineering services in NY State to NYSDEC and NYSDOH on January 2, 2025. 135 Kent Ave LLC retained Matrix to provide professional engineering services and a copy of the contract between the applicant and engineer was provided to NYSDEC and NYSDOH.



3. Collected sub-slab depressurization system (SSDS) monitoring measurements at vapor monitoring points (VMPs) and airflow/velocity readings within riser pipes directly above suction pits across the slab-on-grade area at 135 Kent Avenue on December 30, 2024. SSDS suction pits and vapor monitoring points are shown in the attached **Figure 1**.
4. Prepared for implementation of tasks listed in the engineering control modifications work plan.
5. Inspected the slab integrity across the Site and visually inspected for possible exposure pathways.
6. Collected pressure and PID readings from the system before and after activated carbon drums.
7. Inspected all system piping and looked for leaks.
8. Water was noted in riser piping between vapor pits, V1/V2 and the equipment compound. The sound of running water could be heard on slightly pitched riser piping in the hallway near the elevator shaft. The source of water is currently unknown, but further investigation is needed to determine where the source of water is coming from. This will be further investigated during upcoming SSDS modifications or during the next monthly monitoring event, whichever comes first.
 - a. Rock Enviro recommends that a weep hole is installed near the base of pitched piping to extract water from the system. The liquid should be allowed to drain for a short period of time while the blower is temporarily powered off. Liquids in the system can lead to damaged bearings in the blower and can render activated carbon less adsorbative, if saturated. The weep hole will be plugged after liquids are removed from the system piping. The liquids will be containerized in laboratory-supplied glassware and kept in a freezer in case laboratory analysis is requested.
9. A new SSDS equipment compound with noise attenuation construction was delivered to the Site and placed on the rooftop of the 2-story building, near the elevator bulkhead.
10. Collected measurements from the rooftop to determine an appropriate location and position for the new SSDS equipment compound. There are several operable sun-roof windows in the vicinity of the proposed location. However, the final location will be at least 10 feet away from any operable windows and fresh air intakes.

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



SSDS MONITORING/SYSTEM MEASUREMENTS

Rock Enviro performed monthly monitoring of SSDS suction pits and accessible vapor monitoring points (VMPs) on December 30, 2024. The following summarizes monitoring results:

Table 1 – SSDS Suction Pits

Location	Airflow/Velocity (ft per minute - fpm)
V-1	1,432
V-2	961
V-3	1,218
V-4	1,365
V-5	1,037
V-6	994

Table 2 – Vapor Monitoring Points (VMPs)

Location	Pressure/Vacuum (inches water column – “wc)
PV-1R	-0.016
PV-2RR	-0.125
PV-3	-0.008
PV-4R	-0.011
PV-5R	-0.002
PV-6RR	NR*
PV-7RR	-0.07
PV-8	-0.012
PV-10RR	-0.014
PV-11RR	-0.018

Notes:



1. The location of SSDS suction pits and vapor monitoring points are shown in the attached Figure 1.
2. Airflow/velocity readings were collected from ½" diameter access ports at the base of riser piping, just below the ball valves, and inches above the concrete slab surrounding each SSDS suction pit.
3. Airflow/velocity readings were collected using a STA2 model hotwire anemometer manufactured by Fieldpiece Instruments Inc. The anemometer was factory calibrated within the last 6 months.
4. Pressure/vacuum readings were collected from vapor monitoring points (VMPs) installed across the slab-on-grade foundation area. Several of the VMPs (PV-3, PV-4R, PV-5R, PV-7RR, PV-8 and PV-10RR) were reading -0.000 inches WC. Dirt/debris was removed from the tubing connected to these VMPs and then a vacuum reading was detected. Some VMPs took several minutes before a reading was detected. It is recommended that repairs are made to existing VMPs including replacement of manhole covers, tubing, and possibly implants.
5. Pressure/vacuum readings were collected using a Dwyer Model 476A-0 digital manometer. This unit was factory calibrated within the last 12-months and field calibrated prior to this monitoring event.
6. NR* = No Reading. A vacuum reading could not be collected from VMP, PV-6RR, because it has been paved over and requires replacement.

ENGINEERING CONTROL MODIFICATIONS

A teleconference was held between NYSDEC, Rock Enviro, Matrix and representatives from 135 Kent Ave LLC on January 13, 2025, to discuss proposed renovations at 135 Kent Avenue and Interim Remedial Measures (IRM) and engineering control modifications. The scope of work specified in the IRMW and ECMWP was summarized to ensure that all parties agreed and understood these report's requirements and objectives. Per the discussion on the January 13, 2025, teleconference, NYSDEC noted that a memorandum must be prepared by the remedial engineer describing how noise/vibration will be mitigated at the proposed rooftop SSDS equipment compound. NYSDEC also verified that containment tents with negative pressure machines will need to be erected at all slab modification areas (e.g., trenches, SSDS pits, monitoring points, and the ramp area – identified as Slab Modification Area 2 in the ECMWP. NYSDEC also emphasized the importance of providing tenants on the second floor with contact information for the new consultant and engineer. Additionally, a post-construction meeting will need to be held before work can start at the Site. All subcontractors and professionals that will be working at the Site during renovations and EC modifications must attend this call.

The anticipated start date for the commencement of work is the first week of February 2025. The applicant or consultant will contact NYSDEC before the planned start date to schedule the Pre-Construction teleconference. We will ensure that all parties, including all subcontractors, are in attendance.



PLANED ACTIVITIES FOR THE NEXT REPORTING PERIOD

The SSDS is currently operating continuously without interruption. The following activities are planned for the January 2025 reporting period:

- January 2025 monthly monitoring will be performed the 3rd or 4th week of January, and the monthly report will be submitted no later than February 10, 2025.
- A memorandum must be prepared by the remedial engineer describing how noise/vibration will be mitigated at the proposed rooftop SSDS equipment compound.
- The residential tenants on the second floor of the building will be provided with updated contact information including phone and email for Rock Enviro and Matrix. It is recommended that a flyer/notice is created and hung on walls in public corridors. The flyer/notice should also include emergency contact information.
- Rock Enviro and 135 Kent Ave LLC are coordinating implementation of the proposed IRM and ECMWP and will provide NYSDEC and NYSDOH with a construction schedule that includes the anticipated duration of construction when available. 135 Kent Ave LLC will notify NYSDEC and all the tenants at least 10 days prior to commencing any field work related to the approved work plans.
- Rock Enviro is coordinating air filtration maintenance throughout the onsite building.
- Rock Enviro has subcontracted a disposal contractor that will provide drums and assist with waste derived from remedial tasks. The subcontractor will provide sealable drums, treatment and/or recycling (if feasible), manifests and tracking documents, drum labels, and scheduled pickups and offsite transportation. Waste stream disposal anticipated for this project includes RCRA PCE soil (D039) Stabilization (Process Code OT46), and RCRA PCE concrete microencapsulation (Process Code LF24). Additional information regarding the waste stream will be determined after a waste characterization study is completed. The waste characterization study will be conducted during the first week of work when the slab is opened up for SSDS pit installation/replacement. This will minimize the number of holes created in the slab, keeping the composite cover system intact.
- Rock Enviro is working with 135 Kent Ave LLC to develop a suitable construction design for containment tents. The tents will comply with the specifications detailed in the "Special Requirements Community Air Monitoring Plan" document, prepared by Integral, dated May 2024.
- 135 Kent Ave LLC will contact NYSDEC to schedule a Pre-Construction teleconference. The developer, general contractor, plumber, electrician, environmental consultant, remedial engineer, drum/disposal contractor, and SSDS labor subcontractor will be in attendance during this call.

Additional details regarding January 2025 activities will be provided in the next monthly monitoring report, due February 10, 2025.



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. 135 Kent Ave LLC is currently 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, Rock Enviro and Matrix will prepare a vapor mitigation design work plan for NYSDEC review.

60 NORTH 6TH STREET VAPOR MITIGATION

Integral was 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 to P.W. Grosser 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. 135 Kent Ave LLC has indicated that a response is still pending.

ACTIVE SSDS MONITORING FORM FOR 135 KENT AVE ON THE FOLLOWING PAGE



ACTIVE SSDS MONITORING FORM

Site Address: 135 Kent Avenue, Brooklyn, NY 11249

Site Name: Former Cleaner Sales and Equipment Corp Site

NYSDEC Site #: C224177

Date: 12/30/2024

Start Time: 08:45

End Time: 13:20

Field Technician: Jason Gellati
 (Rock Enviro Field Manager)

Vapor Monitoring Point (VMP)	Pressure Reading (inches WC)
PV-1R	-0.016
PV-2RR	-0.125
PV-3	-0.008
PV-4R	-0.011
PV-5R	-0.002
PV-6RR	NR*
PV-7RR	-0.07
PV-8	-0.012
PV-10RR	-0.014
PV-11RR	-0.018

SSDS Pit ID	Airflow/Velocity (ft/min)	Valve Position (degrees)
V-1	1,432	0°
V-2	961	45°
V-3	1,218	30°
V-4	1,365	0°
V-5	1,037	45°
V-6	994	15°

Notes: NR* = No Reading. A vacuum reading could not be collected from VMP, PV-6RR, because it has been paved over and requires replacement.

SSDS Treatment Room	Monitoring Point	Pressure (inches WC)	PID Reading (ppm)	Notes
Before Lead Drum	Gauge PI102	36	No Port	
Before Lag Drum	Gauge PI103 Sample Port	25	2.9	
After Lag Drum	Gauge PI104 Sample Port	17	1.8	
Ambient Air	NA	NA	0.0	

Is SSDS blower operating: **YES**

Is heat exhaust fan operating: **YES**

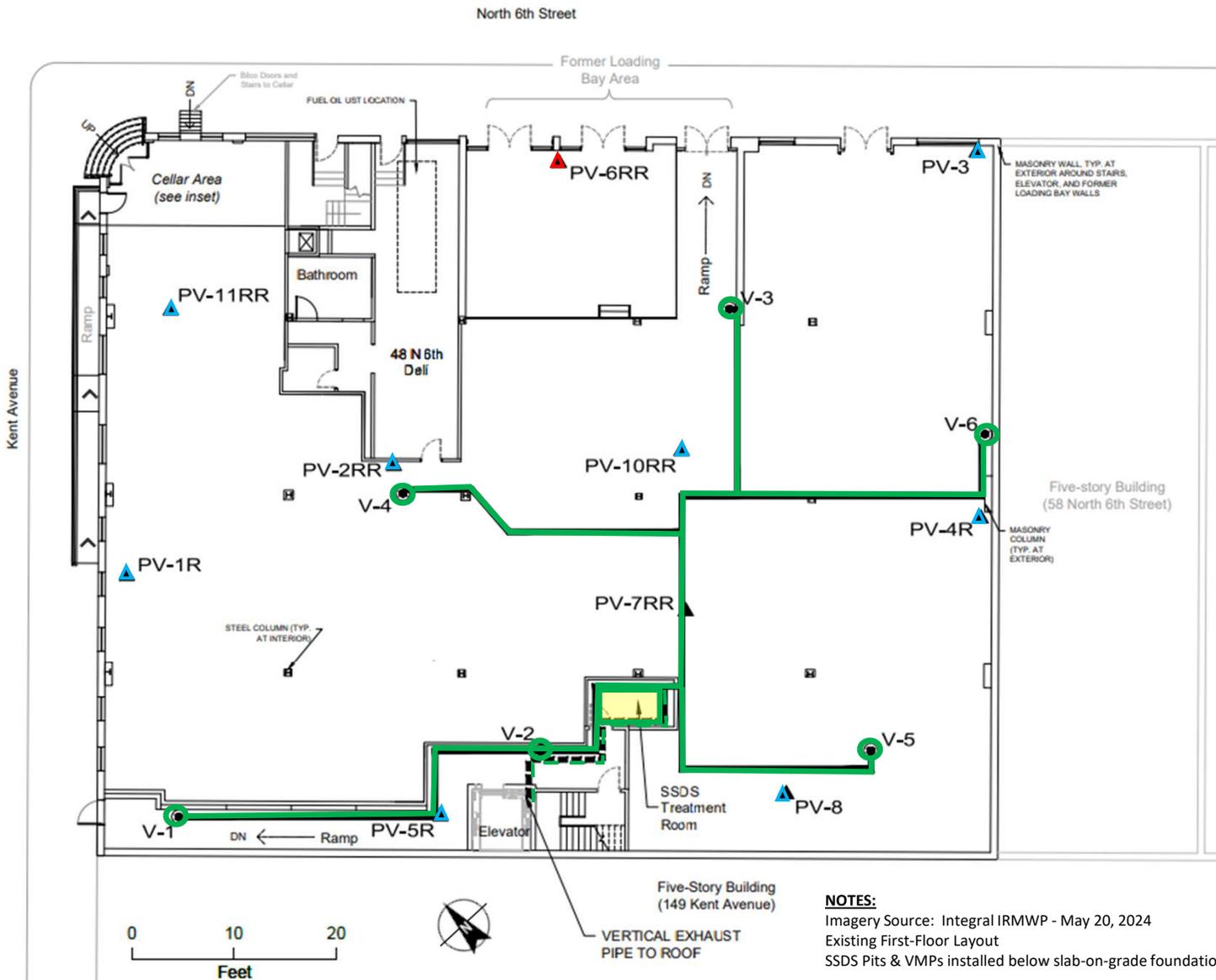
Is Sensaphone operating: **YES**

Evidence of tampering, vandalism or damage to SSDS Equipment Room: **NO**

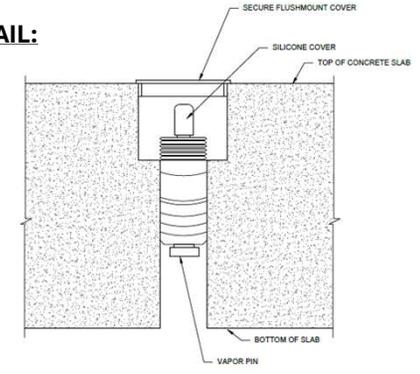
Evidence of tampering, vandalism or damage to SSDS Riser Exhaust Stack: **NO**



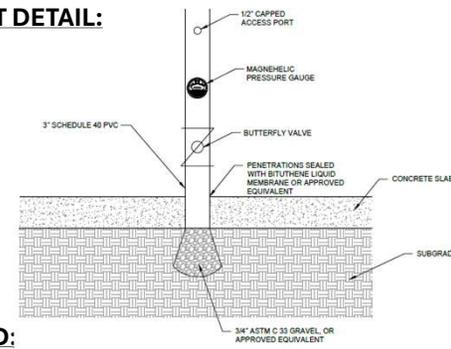
FIGURES



VMP DETAIL:



SSDS PIT DETAIL:



LEGEND:

- SSDS Pit
- ▲ Functional Vapor Monitoring Point
- ▲ Vapor Monitoring Point Requiring Replacement
- Above Slab SSDS Piping
- - - Riser Pipe
- SSDS Equipment Room (Blower/GAC Drums)

NOTES:
 Imagery Source: Integral IRMWP - May 20, 2024
 Existing First-Floor Layout
 SSDS Pits & VMPs installed below slab-on-grade foundation

135 KENT AVENUE, BROOKLYN, NY

FIGURE 1 – EXISTING SSDS LAYOUT (SSDS PIT & VMP LOCATIONS)

JANUARY 2025