



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

From: Robert Bennett

Date: March 10, 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 February 2025.

ACTIONS COMPLETED DURING THIS REPORTING PERIOD

During this reporting period we have completed the following actions:

1. Rock Enviro submitted a Health & Safety Plan to NYSDEC on February 4, 2025.
2. Rock Enviro submitted a formal Notification Letter to the drum disposal contractor (Veolia E.S. Technical Solutions, LLC (Veolia) on February 12, 2025. The notification letter included a summary of the general scope of work, anticipated waste volumes (soil & concrete), and specified the hazardous levels of chlorinated solvents (most notably, PCE) in soil across the Site. The letter clearly indicated that all waste drums (soil & concrete) will require disposal as hazardous materials.
3. Veolia submitted a contract with rate schedule for services to Rock Enviro on February 18, 2025. The contract indicates their awareness that the waste from this Site is hazardous and the scope of work details procedures to comply with all federal, state and local regulations and laws. Veolia conducts periodic, unannounced inspections to ensure that the generator, customer, and all associated parties are filling drums in accordance with all applicable laws and regulations pertaining to generators of hazardous waste. Veolia will not accept improperly identified or unidentified materials. Furthermore, Veolia tests the soil upon arrival at their disposal facility(ies) to verify that the drum contents are consistent with data provided prior to their contract and quotation for services.



4. The PE certified 2024 Annual Report (Periodic Review Report – PRR) was submitted to NYSDEC and NYSDOH on February 14, 2025.
5. A BCP Fact Sheet summarizing the proposed scope of work was drafted and submitted to DEC for review on February 18, 2025.
6. Waste Characterization samples for soil and concrete were collected by Rock Enviro on February 24, 2025. Additional analysis for TCLP Lead was requested but confirmed to be non-hazardous. Total PCE was detected at 36,000 ug/kg in the 5-point composite soil sample and 37,000 in the grab soil sample. TCLP PCE was non-detect in both the composite and grab soil sample. Total PCE was detected at 3,700 ug/kg in the 5-point composite slab/concrete sample and 1,700 ug/kg in the grab slab/concrete sample. The sample results were submitted to the drum disposal contractor for review.
7. 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 February 24, 2025. SSDS suction pits and vapor monitoring points are shown in the attached **Figure 1**.
8. Prepared for implementation of tasks listed in the engineering control modifications work plan.
9. Inspected the slab integrity across the Site and visually inspected for possible exposure pathways.
10. Collected pressure and PID readings from the system before and after activated carbon drums.
11. Inspected all system piping and looked for leaks.
12. Water was noted in riser piping between vapor pits, V1, V2 and the equipment compound during the February 24, 2025, annual inspection. Rock Enviro drained liquid from two weep holes at the base of pitched riser piping between V-1 and V2. A total of approximately 300 milliliters (mL) of liquids were collected from the system's piping. The liquid was collected by Rock Enviro in laboratory-supplied glassware and placed in a cooler with ice. Rock Enviro labeled the sample (sample ID: SSDS-L2) and put it in a freezer in case laboratory analysis is requested by NYSDEC.
13. An onsite Pre-Construction meeting was held onsite on February 25, 2025 to review the scope of work with all contractors. Rock Enviro, 135 Kent LLC, and all subcontractors (including Coastal Environmental Solutions and Veolia North America) were in attendance.
14. A review of the Site-specific HASP was completed after the scope of work was discussed. This included PPE requirements (Level D; however, laborers that will be working in the enclosures should be ready with Level C if dust and VOC levels become elevated), site-specific contaminants and exposure, work site safety hazards, work area enclosures, air monitoring, waste stream management, and many more components of the HASP.
15. Rock Enviro initially requested the delivery of brand new 55-gallon drums for delivery on February 19, 2025. However, this was postponed and the drums were delivered on February 28, 2025.
16. Rock Enviro initially requested the delivery of ¾-inch bluestone for February 19, 2025. However, this was postponed until the first week of March.

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 February 24, 2025. The following summarizes monitoring results:

Table 1 – SSDS Suction Pits

Location	Airflow/Velocity (ft per minute - fpm)
V-1	1,174
V-2	1,095
V-3	1,228
V-4	1,216
V-5	898
V-6	803

Table 2 – Vapor Monitoring Points (VMPs)

Location	Differential Pressure/Vacuum (inches water column – in WC)
PV-1RR	-0.033
PV-2RRR	-0.117
PV-3R	-0.124
PV-4RR	-0.051
PV-5RR	0.000
PV-6RRR	0.000
PV-7RRR	-0.036
PV-8R	-0.020
PV-10RRR	-0.024
PV-11RRR	-0.010

Notes:

1. The VMPs replaced in January 2025 appear to be functioning well with the exception of PV-5RR and PV-6RRR.
2. Each “R” following the VMP# (PV-#) represents a replacement. For example, PV-5RR has been replaced two times.
3. The location of SSDS suction pits and vapor monitoring points are shown in the attached Figure 1.



4. 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.
5. 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.
6. Pressure/vacuum readings were collected from vapor monitoring points (VMPs) installed across the slab-on-grade foundation area. Eight of the ten new VMPs had measurable differential pressures. However, VMPs PV-5RR & PV-6RRR, had no measurable differential pressures (0.000 inches WC).
7. Differential pressure readings were collected using a Fluke 922 digital manometer with resolution accuracy to 0.001 in WC. This unit was factory calibrated within the last 2 months and field calibrated prior to this monitoring event.

ENGINEERING CONTROL MODIFICATIONS

A Pre-Construction teleconference was held between NYSDEC, NYSDOH, Rock Enviro, Matrix, representatives from 135 Kent Ave LLC and all subcontractors (135 Kent LLC contracting team, Coastal Environmental Solutions and Veolia North America) on February 4, 2025, to discuss the scope of work, health and safety concerns, procedures to protect workers, occupants, and the residential occupants on the second floor of the building. The scope of work specified in the IRMWP and ECMWP was summarized to ensure that all parties agreed and understood these report's requirements and objectives. Specific topics of discussion included the use of enclosures with negative air machines at all slab openings, air monitoring with two CAMP stations on the first floor and one CAMP station on the second floor, waste management, stone import, tenant notifications, distribution of the BCP Fact Sheet, the anticipated project schedule, and more. The six current tenants living on the second floor of the building were notified that work was tentatively scheduled to begin in February 2025, pending DOB approval of updated mechanical plans that include the proposed SSDS modifications. At the time of the Pre-Construction teleconference, work was anticipated to begin in mid-late February 2025, pending DOB approval of some amended plans. However, the actual start date was March 6, 2025.

PLANED ACTIVITIES FOR THE NEXT REPORTING PERIOD

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

- March 2025 monthly monitoring will be performed in the 3rd or 4th week of March, and the monthly report will be submitted no later than April 10, 2025.
- Rock Enviro and 135 Kent LLC have coordinated the implementation of the IRM and ECMWP work will start on March 6, 2025.
- Rock Enviro has subcontracted with a disposal contractor (Veolia North America) that has provided drums and will collect waste derived from remedial tasks. Waste stream disposal anticipated for this project includes RCRA waste code F002 (spent halogenated solvents) or toxic compound code U210 (for Tetrachloroethylene). All drums (soil and concrete) will be labeled as Hazardous Material and contain one or both codes.
- Rock Enviro has submitted a RCRA Subtitle C Site Identification Form to the EPA and are awaiting the EPA ID number. This number will also be added to the drum labels and waste tracking documents.
- Rock Enviro worked with 135 Kent LLC to develop a suitable construction design for containment tents for the ramp area and the SSDS pit installation areas. The tents comply with the



specifications detailed in the “Special Requirements Community Air Monitoring Plan” document, prepared by Integral, dated May 2024.

- Three CAMP stations will be operated during the EC modifications (e.g., SSDS pit installations & ramp removal area). Two CAMP stations will be located on the first floor and a third will be located on the third floor. The CAMP data will be reported to NYSDEC and NYSDOH in daily status reports (DSRs) that will be submitted the following day before close of business. The decision to discontinue the third CAMP station on the second floor will only be made after NYSDOH determines that nuisance dust and PID readings have remained low, and there is no potential for exposure to the residential tenants on the second floor of the building.
- 135 Kent LLC only plans to conduct the SSDS modifications (new pit install/relocation and SSDS equipment compound relocation) and the ramp removal and repavement (Slab Modification Area 2) during the month of March. Additional work including trenching will be scheduled at a later date.
- Rock Enviro has ordered a prefilter and muffler that will be placed on the blower when it is relocated to the rooftop noise mitigating enclosure. The prefilter will prevent dust/debris from being pulled into the intake. Also, the muffler will provide an additional level of noise attenuation.
- Rock Enviro has purchased activated carbon and will be replacing the carbon in the two GAC drums during the relocation to the rooftop.
- Rock Enviro has purchased magnehelic gauges (Dwyer Model 2005) that will be installed below the ball valve at each riser pipe after the completion of SSDS pit installation and the connection of overhead piping. This will provide real time vacuum measurements within the riser piping just above the slab-on-grade surface for each suction pit.
- Rock Enviro plans to contact the ownership/management for the adjacent building at 58 North 6th Street and the environmental consultant for 60 North 6th Street building in March-April 2025. Those communications will include (Cc) NYSDEC and NYSDOH representatives.

Additional details regarding March 2025 activities will be provided in the next monthly monitoring report, due April 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 (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. 135 Kent LLC is currently in discussion with 58 North 6th Street management regarding the 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. According to 135 Kent LLC, there has been no response from 58 N. 6th Street management for



several months. Rock Enviro plans to contact building management in March-April 2025 to follow up on the prior discussion regarding the SSDS layout. NYSDEC and NYSDOH representatives will be Cc'd on all correspondences between Rock Enviro, 135 Kent LLC, and 58 N. 6th Street management.

60 NORTH 6TH STREET VAPOR MITIGATION

Integral was previously 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. Rock Enviro plans to contact P.W. Grosser in March-April 2025 to follow up on the prior discussion regarding the floor plan request. NYSDEC and NYSDOH representatives will be Cc'd on all correspondence between Rock Enviro, 135 Kent LLC, and P.W. Grosser.

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: 02/24/2025

Start Time: 11:30

End Time: 13:15

**Field Technician: Jason Gellati
 (Rock Enviro Field Manager)**

Vapor Monitoring Point (VMP)	Pressure Reading (inches WC)
PV-1RR	-0.033
PV-2RRR	-0.117
PV-3R	-0.124
PV-4RR	-0.051
PV-5RR	0.000
PV-6RRR	0.000
PV-7RRR	-0.036
PV-8R	-0.020
PV-10RRR	-0.024
PV-11RRR	-0.010

SSDS Pit ID	Airflow/Velocity (ft/min)	Valve Position (degrees)
V-1	1,174	15°
V-2	1,095	15°
V-3	1,228	30°
V-4	1,216	0°
V-5	898	15°
V-6	803	0°

1. All ten VMPs were replaced on January 29, 2025. The monthly monitoring was conducted the following day.
2. Each "R" following the VMP# (PV-#) represents a replacement. For example, PV-5RR has been replaced two times.

SSDS Treatment Room	Monitoring Point	Pressure (inches WC)	PID Reading (ppm)	Notes
Before Lead Drum	Gauge PI102	44	No Port	
Before Lag Drum	Gauge PI103 Sample Port	36	2.0	
After Lag Drum	Gauge PI104 Sample Port	18	1.3	
Ambient Air	NA	NA	0.0	

Is SSDS blower operating: **YES**

Is heat exhaust fan operating: **YES**

Is Sensaphone operating: **YES** (Reprogrammed to contact Rock Enviro during shut-off)

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

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



FIGURES



LEGEND:

- Property Boundary
- SSDS Suction Pit
- Vapor Monitoring Point
- Above-Slab System Piping between Pits (2" PVC)
- Piping between Blower/Drums & Riser (2" PVC)
- Vertical Riser Pipe within Elevator Shaft (2" PVC)
- 55-Gallon Activated Carbon Drums
- Regenerative Blower

NOTES:

1. SITE TAX MAP ID: BLOCK 2333, LOT 5
- IMAGERY SOURCE: Cellar Plan, First Floor Plan and Mezzanine Plan, Sheet A-2, Franklin Estrella R.A., March 31, 2006

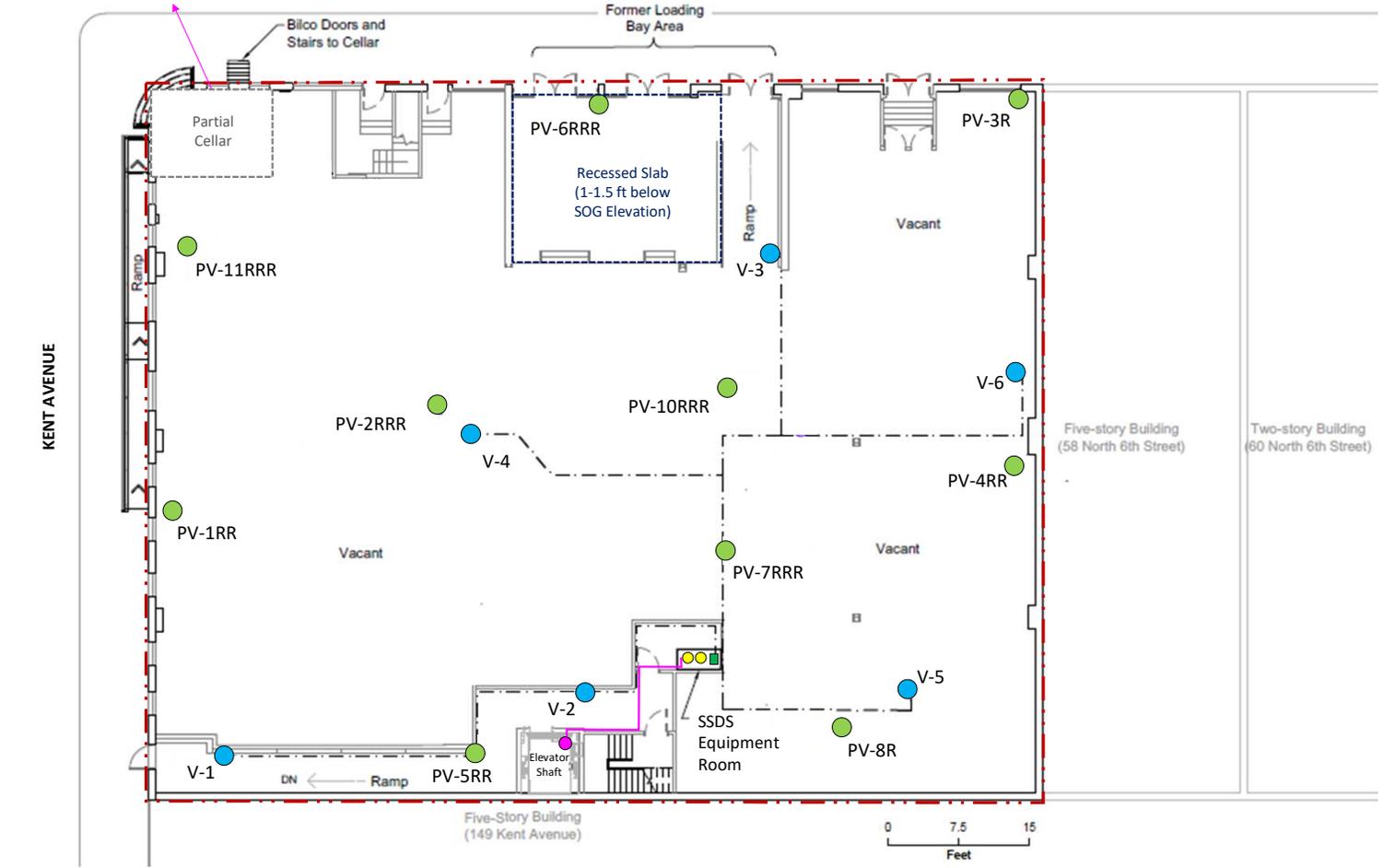
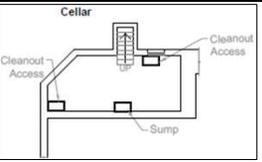
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ROCKENVIRO

135 KENT AVENUE, BRONX, NY

FIGURE 1- SITE PLAN / EXISTING SSDS LAYOUT (FIRST FLOOR & CELLAR)

FEBRUARY 2025



KENT AVENUE

NORTH 6TH STREET

Five-Story Building
(149 Kent Avenue)

Five-story Building
(58 North 6th Street)

Two-story Building
(60 North 6th Street)

0 7.5 15
Feet