



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

From: Robert Bennett

Date: April 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 March 2025.

ACTIONS COMPLETED DURING THIS REPORTING PERIOD

During this reporting period we have completed the following actions:

1. New 55-gallon drums were delivered to the Site on March 3, 2025, prior to the start of SSDS pit installation and slab modification work.
2. Between February 25 and March 3, 2025, enclosures were constructed around the proposed new SSDS pit areas across the first-floor renovation space, and at a ramp located on the northeast portion of the building in the former shipping and receiving area along N. 6th Street (e.g., Slab Modification Area 2, as referenced in the Engineering Control Modifications Work Plan, dated August 6, 2024). These enclosures were ready to be connected to negative air machines on the planned start date of March 6, 2025.
3. Seven cubic yards (9.86 tons) of ¾" bluestone (ASTM5) was delivered to the Site on March 6, 2025, for use in the SSDS pits and a sub-base layer for the ramp area, after removal, and prior to paving.
4. Between March 6 and March 7, 2025, the ramp area in the former shipping and receiving area along N. 6th Street (e.g., Slab Modification Area 2) had all concrete and a few drums worth of soil removed. A total of 17 concrete drums and 3 drums of soil were removed from the ramp area. After removal, a 3–4-inch sub-base layer of ¾-inch bluestone (ASTM5) was placed across the former ramp area and it was paved to match the surrounding slab grade across the recessed slab area. This work was completed by the end of the workday on March 7, 2025.



5. From March 6 through March 7, 2025, three (3) existing SSDS pits (V-3, V-4 & V-5) were replaced with new pits installed within close proximity (within 10-20 ft) so they were in line with structural columns. These pits were relocated so that the vertical riser pipes could be installed within wall plenums during upcoming renovation work for commercial tenant spaces on the first-floor level.
6. On March 7, 2025, one new SSDS pit (V-7) was installed at the northwest portion of the first-floor area to provide improved coverage in an area which had historically low to non-existent sub-slab differential pressures.
7. Between March 7 and March 10, 2025, the former shipping and receiving area (which has a recessed slab level approximately 12-18 inches below the slab across the remaining first floor slab), was confirmed to have a steel plate present between two layers of concrete. As such, it was determined that the proposed SSDS pit location, V-8, could not be installed. Furthermore, it seems as if this area would represent a dead zone that would be infeasible to induce sub-slab differential pressures. This explains why differential pressure measurements could not be obtained at vapor monitoring point, PV-6RR. Slab Modification Area 2 (the ramp area) which was recently replaced did not have a steel plate beneath it; however, because it was in such close vicinity to SSDS pit, V-3, we decided it was not an ideal location for V-8. It was decided to continue the SSDS modifications without the addition of SSDS pit, V-8.
 - a. All SSDS pits, the ramp/slab modification area, and other features described above are shown in **Figure 1**.
8. Conducted air monitoring (CAMP) with two air monitoring stations on the first floor and a second station on the third floor.
9. From March 10 through March 14, 2025, the above slab piping associated with the four new SSDS pits was tied into the existing riser piping. Ball valves and airflow velocity port holes were installed in the piping just above the new SSDS pits.
10. Drums were staged in the former shipping and receiving area in a quarantined area which remained locked and secured after SSDS pit installation/slab modifications. A total of 32 drums including 20 concrete and 12 soil drums were labeled hazardous waste on March 10, 2025, pending pickup by the disposal facility.
11. An EPA ID was updated on March 24, 2025. We had initially requested a new EPA ID; however, because this Site already had an existing EPA ID Number, our request was withdrawn, and the existing ID number records were updated. US EPA Region 2 advised us to continue the use of Handler ID NYR000113480 for all waste generated during work at the Site. After confirmation of an EPA ID number, we requested that the disposal facility pick up the drums ASAP.
12. On March 14, 2025, the SSDS equipment (e.g., blower, carbon drums, etc) were relocated from a room on the south side of the first floor to a sound enclosure on the rooftop. This required a new electrical connection, and the activated carbon was replaced in the two drums. The system was reactivated by the end of the day with the system only being turned off for approximately 8 hours.
 - a. The rooftop location is shown in **Figure 2**.



13. Rock Enviro returned to the Site on March 17, 2025, and found the SSDS to be operating properly. The system was to be inspected and monitored on a weekly basis, until the NYSDEC was satisfied that it was operating properly.
14. The first weekly inspection was conducted on March 21, 2025. This included an inspection of drum storage area and confirmed it is secure and tamper free. An inspection of all system piping and ensured all piping was airtight. A round of airflow-velocity measurements and at all SSDS pits – first week after the SSDS equipment was relocated. A round of differential pressure measurements at all monitoring points – first week after the SSDS equipment was relocated. Additionally, two (2) air-tight plugs were installed in horizontal/pitched piping in hallway on the south side of the first floor. These plugs were installed for ongoing maintenance of the system where liquids were observed to accumulate within system piping.
15. Collected a total of twenty-two (22) indoor air quality (IAQ) samples before the end of the 2024/2025 heating season. A total of 20 indoor ambient air samples (including one duplicate sample) and 2 outdoor ambient air samples. Samples were collected between March 24 and March 25, 2025, and submitted to the lab on 3/26/2025 for standard turnaround time analysis of VOCs by EPA Method TO-15.
 - a. First floor sample locations are shown in **Figure 3**, and second floor sample locations are shown in **Figure 4**.
16. The second weekly inspection was conducted on March 28, 2025, and included an inspection of drum storage area and confirmed it is secure and tamper free, an inspection of all system piping and ensured all piping was airtight, a second round of airflow-velocity measurements and differential pressure measurements was conducted the second week after the SSDS equipment was relocated.
17. Installed differential pressure gauges at all SSDS pit locations on March 28, 2025.
18. 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 March 30, 2025. SSDS suction pits and vapor monitoring points are shown in the attached Figure 1.
19. Inspected the slab integrity across the Site and visually inspected for possible exposure pathways.
20. Collected pressure and PID readings from the system before and after activated carbon drums.
21. Inspected all system piping and looked for leaks.
22. The drums were rescheduled for pick up on April 9, 2025. The drum pick up had to be rescheduled as the drum contractor could not access the drum storage space along North 6th Street due to construction activities at the development site (133 Kent Avenue) which blocked access to N. 6th Street during the initial pickup.

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 March 30, 2025. The following summarizes monitoring results:

Table 1 – SSDS Suction Pits

Location	Airflow/Velocity (ft per minute - fpm)	Differential Pressure Gauge Reading (in WC)
V-1	1,804	1.8
V-2	1,094	1.8
V-3	1,147	2.1
V-4	1,219	1.9
V-5	1,010	1.8
V-6	1,075	2.4
V-7	1,066	1.6

Table 2 – Vapor Monitoring Points (VMPs)

Vapor Monitoring Point (VMP)	Pressure Reading (inches WC)
PV-1RR	-0.029
PV-2RRR	-0.099
PV-3R	-0.112
PV-4RR	-0.063
PV-5RR	-0.001
PV-6RRR	0.000*
PV-7RRR	-0.038
PV-8R	-0.026
PV-10RRR	-0.032
PV-11RRR	-0.030

1. All ten VMPs were replaced on January 29, 2025. The monthly monitoring was conducted the following day.
2. Each “R” following the VMP# represents a replacement (PV-#R = single replacement, PV-#RR = two replacements).
3. The SSDS Modifications (SSDS Pit Replacement/Installations & Ramp Removal) were completed 3/6-3/11/2025.
4. The SSDS Equipment was relocated to the rooftop on 3/14/2025.
5. Differential Pressure Gauges were added to the SSDS risers on 3/28/2025.
6. * = PV-6RRR is located in a dead zone, possibly within a structural footing, and in an area where a steel plate covers a large area (across most of the recessed slab area).



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 (ECMs). The scope of work specified in the IRMWPs and ECMWPs was summarized to ensure that all parties agreed and understood these report's requirements and objectives. Per the request of NYSDEC, Matrix prepared IRMWPs Addendum #3 on January 14, 2025, detailing how noise/vibration associated with the proposed rooftop location for SSDS equipment will be mitigated. Rock Enviro replaced all ten VMPs across the Site on January 29, 2025. 135 Kent LLC sent an email notification to the residential tenants on the second floor on January 23, 2025. The notification advised clients that SSDS and slab modifications were tentatively scheduled to begin as soon as February 3 or February 5, 2025. However, the SSDS and slab modifications did not commence until March 6, 2025. The residential tenants on the second floor of the building were provided with updated contact information including phone numbers and emails for Rock Enviro and Matrix staff. Rock Enviro created a flyer/notice that was hung on walls in public corridors throughout the building prior to the start of SSDS modifications work. A Pre-Construction teleconference was held on February 4, 2025. Representatives of NYSDEC, NYSDOH, Rock Enviro, Matrix, 135 Kent LLC, and all subcontractors (including Coastal Environmental Solutions and Veolia North America) were in attendance. The EC Modifications were tentatively scheduled for February 2025; however, the work was rescheduled until after the DOB approved updated mechanical plans which include details for the proposed SSDS modifications. The SSDS and slab modification work was conducted in March 2025 and is described as follows:

1. Between February 25 and March 3, 2025, enclosures were constructed around the proposed new SSDS pit areas across the first-floor renovation space, and at a ramp located on the northeast portion of the building in the former shipping and receiving area along N. 6th Street. These enclosures were ready to be connected to negative air machines on the planned start date of March 6, 2025.
2. New 55-gallon drums were delivered to the Site on March 3, 2025, prior to the start of SSDS pit installation and slab modification work.
3. ¾" bluestone (ASTM5) was delivered to the Site on March 6, 2025, for use in the SSDS pits and a sub-base layer for the ramp area, after removal, and prior to paving.
4. Between March 6 and March 7, 2025, the ramp area in the former shipping and receiving area along N. 6th Street (e.g., Slab Modification Area 2) had all concrete and a few drums worth of soil removed. After removal, a 3–4-inch sub-base layer of ¾-inch bluestone (ASTM5) was placed across the former ramp area and it was paved to match the surrounding slab grade across the recessed slab area.
5. From March 6 through March 7, 2025, three (3) existing SSDS pits (V-3, V-4 & V-5) were replaced with new pits installed within close proximity (within 10-20 ft) so they were in line with structural columns. These pits were relocated so that the vertical riser pipes could be installed within wall plenums during upcoming renovation work for commercial tenant spaces on the first-floor level.



6. On March 7, 2025, one new SSDS pit (V-7) was installed at the northwest portion of the first-floor area to provide improved coverage in an area which had historically low to non-existent sub-slab differential pressures.
7. Between March 7 and March 10, 2025, the former shipping and receiving area (which has a recessed slab level approximately 12-18 inches below the slab across the remaining first floor slab), was confirmed to have a steel plate present between two layers of concrete. As such, it was determined that the proposed SSDS pit location, V-8, could not be installed. Furthermore, it seems as if this area would represent a dead zone that would be infeasible to induce sub-slab differential pressures. All SSDS pits, the ramp/slab modification area, and other features described above are shown in **Figure 1**.
8. Conducted air monitoring (CAMP) with two air monitoring stations on the first floor and a second station on the third floor.
9. From March 10 through March 14, 2025, the above slab piping associated with the four new SSDS pits was tied into the existing riser piping. Ball valves and airflow velocity port holes were installed in the piping just above the new SSDS pits.
10. Drums were staged in the former shipping and receiving area in a quarantined area which remained locked and secured after SSDS pit installation/slab modifications.
11. An EPA ID was updated on March 24, 2025.
12. On March 14, 2025, the SSDS equipment (e.g., blower, carbon drums, etc) were relocated from a room on the south side of the first floor to a sound enclosure on the rooftop. The rooftop location is shown in **Figure 2**.
13. Rock Enviro returned to the Site on March 17, 2025, and found the SSDS to be operating properly.
14. The first weekly inspection was conducted on March 21, 2025.
15. Conducted indoor air quality (IAQ) sampling before the end of the 2024/2025 heating season. Samples were collected between March 24 and March 25, 2025, and submitted to the lab on 3/26/2025 for standard turnaround time analysis of VOCs by EPA Method TO-15. First floor sample locations are shown in **Figure 3**, and second floor sample locations are shown in **Figure 4**.
16. The second weekly inspection was conducted on March 28, 2025.
17. Installed differential pressure gauges at all SSDS pit locations on March 28, 2025.
18. Conducted a monthly monitoring event on March 30, 2025.

PLANNED ACTIVITIES FOR THE NEXT REPORTING PERIOD

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

- Drums are scheduled for pick up on April 9, 2025. The drum pick up had to be rescheduled as the drum contractor could not access the drum storage space along North 6th Street due to construction activities at the development site (133 Kent Avenue) which blocked access to N. 6th Street during the initial pickup. The disposal contractor (Veolia North America) that provided



sealable drums will treat hazardous soil and concrete waste. Waste disposal anticipated for this project includes RCRA PCE soil (F002/U210) via Stabilization Process Code OT46, and RCRA PCE concrete microencapsulation Process Code LF24.

- The SSDS will continue to be inspected and monitored on a weekly basis, until the NYSDEC is satisfied that the system is operating properly.
- The results of the March 24-March 25, 2025, indoor air quality (IAQ) sampling will be reported to NYSDEC & NYSDOH. This will include tenant notification letters for all spaces where sampling was conducted.
- The differential pressure gauges installed do not appear to be maintaining consistent readings and therefore may require replacement. The specified magnehelic gauges (Dwyer Model 2005) worked well; however, it was difficult to secure a 4-5-inch wide by 2 ¼-inch thick gauge that weigh 1.5 pounds to 2-inch diameter PVC piping. The Model 2005-gauge installation was flimsy and seemed likely to be damaged. As such, we installed 2.5-inch diameter gauges. However, the most accurate gauges we could find in that size read from 0 to -30 inches water column (in WC) and they were liquid filled. I believe these would be more appropriate for installations where a higher vacuum reading was consistently present. The instructions said in low vacuum conditions, you can remove the gauges and “burp” the gauge by removing the gauge, opening the rubber seal at the top of the gauge to release any internal pressure, and then reinstall. This worked (as you can see in photo exhibits 1-4), but it didn’t hold for more than a couple of days. We are currently searching for some new gauges in a 2.5-inch diameter size with more accuracy at low differential pressure levels.
- 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 April 2025. Those communications will include (Cc) NYSDEC and NYSDOH representatives.

Additional details regarding April 2025 activities will be provided in the next monthly monitoring report, due May 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. NYSDEC and NYSDOH representatives will be Cc'd on all correspondences between Rock Enviro, 135 Kent LLC, and 58 N. 6th Street management moving forward.

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. NYSDEC and NYSDOH representatives will be Cc'd on all correspondence between Rock Enviro, 135 Kent LLC, and P.W. Grosser moving forward.

MONTHLY SSDS MONITORING INFO FROM MARCH 2025 IS 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: 03/30/2025

Start Time: 09:35

End Time: 12:40

Field Technician: Jason Gellati
 (Rock Enviro Field Manager)

Vapor Monitoring Point (VMP)	Pressure Reading (inches WC)
PV-1RR	-0.029
PV-2RRR	-0.099
PV-3R	-0.112
PV-4RR	-0.063
PV-5RR	-0.001
PV-6RRR	0.000*
PV-7RRR	-0.038
PV-8R	-0.026
PV-10RRR	-0.032
PV-11RRR	-0.030

SSDS Pit ID	Airflow/Velocity (ft/min)	Valve Position (degrees)	Differential Pressure Gauge Reading (in WC)
V-1	1,804	15°	1.8
V-2	1,094	15°	1.8
V-3	1,147	0°	2.1
V-4	1,219	0°	1.9
V-5	1,010	0°	1.8
V-6	1,075	0°	2.4
V-7	1,066	15°	1.6

- All ten VMPs were replaced on January 29, 2025. The monthly monitoring was conducted the following day.
- Each "R" following the VMP# represents a replacement (PV-#R = single replacement, PV-#RR = two replacements).
- The SSDS Modifications (SSDS Pit Replacement/Installations & Ramp Removal) were completed 3/6-3/11/2025.
- The SSDS Equipment was relocated to the rooftop on 3/14/2025.
- Differential Pressure Gauges were added to the SSDS risers on 3/28/2025. All gauges had to be "burped" to recalibrate gauges and get readings.
- * = PV-6RRR is located in a dead zone, possibly within a structural footing, and in an area where a steel plate covers a large area (across most of the recessed slab area).

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	0.7	
After Lag Drum	Gauge PI104 Sample Port	18	0.2	
Ambient Air	NA	NA	0.0	

- New carbon added to drums on 3/14/2025 during equipment relocation.

Is SSDS blower operating: **YES**

Is heat exhaust fan operating: **YES**

Is Sensaphone operating: **YES**

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

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

Figure 1 – First Floor (Post SSDS Mods)

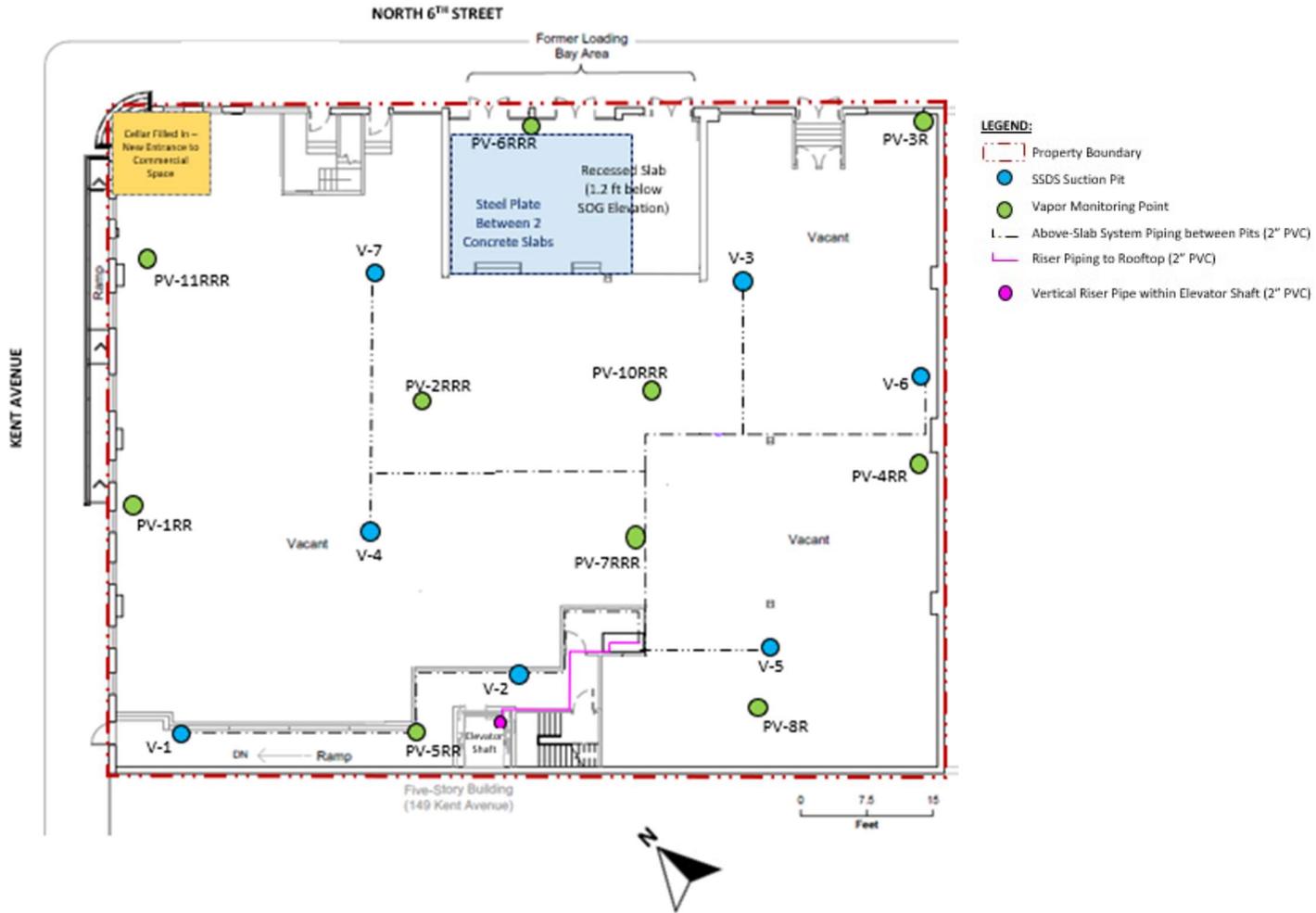


Figure 2 – Rooftop (Post SSDS Mods)

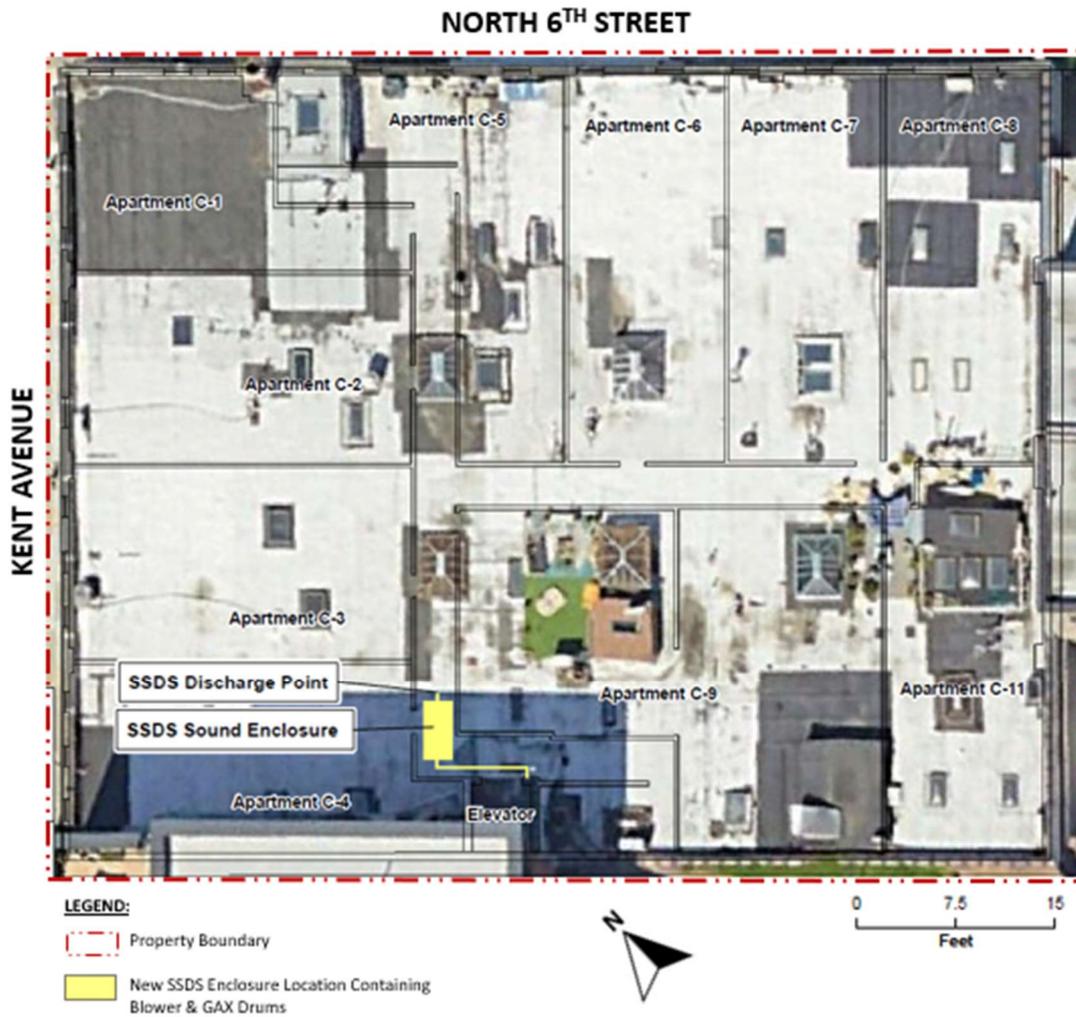


Figure 3 – First Floor IAQ Sample Locations Map

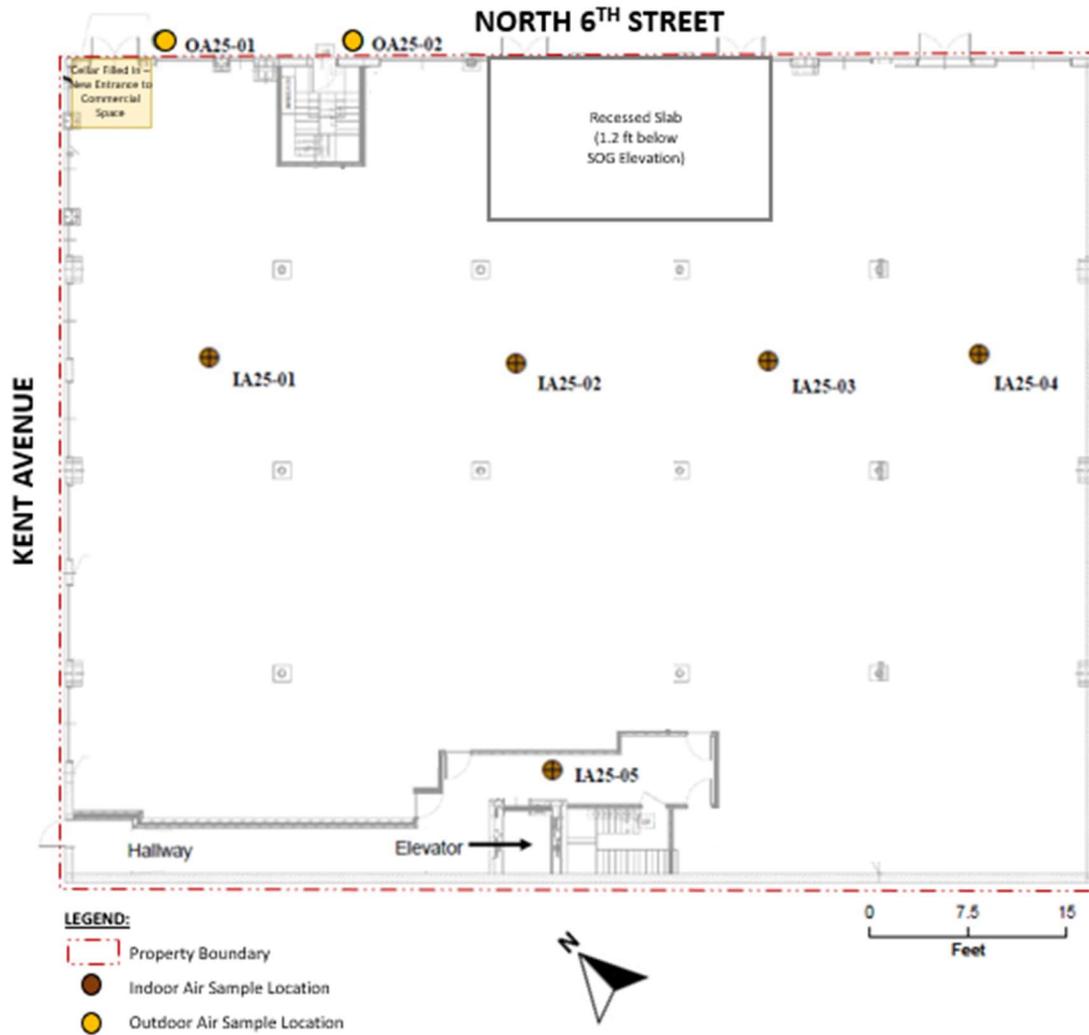


Figure 4 – Second Floor IAQ Sample Locations Map

