



Department
of Health

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Acting Executive Deputy Commissioner

October 12, 2023

Scott Deyette, Director
Remedial Bureau B
Division of Environmental Remediation
NYS Department of Environmental Conservation
625 Broadway, Albany, NY 12233

Re: **Decision Document &
Remedial Action Work Plan**
318 Nevins Street
Site #C224350
Brooklyn, Kings County

Dear Scott Deyette,

We reviewed the October 2023 *Decision Document* and September 2023 *Remedial Action Work Plan* (RAWP) for the referenced site to determine whether the proposed remedy is protective of public health. On-site soil is contaminated with coal tar/Non-aqueous Phase Liquids (NAPL), semi volatile organic compounds (SVOCs), and metals. Groundwater is contaminated with NAPL, SVOCs, dissolved metals, perfluorooctanesulfonic acid (PFOS) and perfluorooctanoic acid (PFOA) exceeding applicable *Ambient Water Quality Standards*. Soil vapor is contaminated with chlorinated VOCs with trichloroethene (TCE) detected in the soil vapor at concentrations up to 1,396 ug/m³ and tetrachloroethene at concentrations up to 813.5 ug/m³. I understand that human exposures to this contamination will be addressed by the remedy as follows.

- **Soil:** Source material will be removed from portions of the site at depths up to 21 feet below grade. Contaminated soils exceeding 6 NYCRR Part 375 soil cleanup objectives for restricted residential use in will be excavated across the remaining areas of the site from the top two feet. Clean fill meeting the requirements for 6 NYCRR Part 375-6.7(d) will be brought in to replace the excavated soil and establish the designed grades at the site. A site cover meeting requirements for restricted residential use will be required. In-situ solidification (ISS) will be evaluated as a remedial approach to address coal tar contamination in the on-site soil. In areas where ISS is not feasible, In-situ Geochemical Stabilization (ISGS) will be evaluated as an alternative remedial measure to address coal tar impacts in soil. Use and development of the site will be limited to restricted residential, commercial, and industrial uses. A *Site Management Plan* including an excavation plan and community air monitoring plan will be developed to manage the potential for human exposures to residual contamination.
- **Groundwater:** The soil remedial measures listed above (ISS and ISGS) will aim to address the potential sources of groundwater contamination. Use of groundwater at the site, without

appropriate water quality treatment, will be restricted by an environmental easement placed on the site.

- Soil Vapor: Any on-site buildings will be required to have a sub-slab depressurization system, or other acceptable measures, to mitigate the potential for migration of vapors into the building from the subsurface.

Periodic reviews will be completed to certify that the elements of the remedy are in place and remain effective. Based on this information, I believe the remedy is protective of public health and concur with the *Decision Document*. Additionally, I have no further comments on the RAWP and find this document acceptable. Please contact me at (518) 402-7874 if you have any questions.

Sincerely,



Scarlett Messier-McLaughlin
Chief, Regions 2 & 7
Bureau of Environmental Exposure Investigation

ec: C. Vooris / A. Ghosh / e-file
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