May 14, 2025

Mr. Rafi Alam
New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway, 12th Floor
Albany, New York 12233

Re: 410 Kingsland Avenue Spill Response Summary and Closure Request
NYSDEC Spill # 25-00706
ExxonMobil Greenpoint Petroleum Remediation Project (EMGPRP)
Site Code: S224150
Brooklyn, New York

Dear Mr. Alam:

Roux Environmental Engineering and Geology, D.P.C. (Roux), for ExxonMobil Environmental and Property Solutions Company, on behalf of ExxonMobil Oil Corporation (collectively, ExxonMobil), has prepared this Spill Response Summary and Closure Request for NYSDEC Spill Number 25-00706 (the spill). The spill involved an overflow of untreated influent water from the onsite groundwater treatment facility and occurred at 410 Kingsland Avenue, Brooklyn NY 11222 (Site). The Site is located within OU-4 of the ExxonMobil Greenpoint Petroleum Remediation Project (EMGPRP). The EMGPRP includes the environmental investigation, monitoring, and remediation activities that ExxonMobil is performing within the project area, as defined in the Consent Decree between the State of New York and ExxonMobil, filed on March 1, 2011, in the United States District Court, Eastern District of New York (Consent Decree). Additional details are provided below.

Background

The spill occurred at approximately 2:00 AM on April 25, 2025. The Former Brooklyn Terminal Free-Product Recovery and Containment System (RCS) groundwater treatment facility, located at 410 Kingsland Avenue, Brooklyn, NY 11222 (Kingsland Yard), experienced a power disruption event at approximately 11:25 PM on April 24, 2025. As a result of the power disruption event, the RCS facility transfer pumps stopped pumping and the level in the aeration / equalization tank (T-201) began to rise. The power disruption event appears to have triggered communication faults or losses around the entire Site, followed by a subsequent power failure at the T-201 remote input/output (RIO) panel used by the RCS control system. While a high-level alarm was initiated at the T-201 RIO panel, the loss of power and communication with the RIO panel prevented the corresponding system shutdown interlock from being triggered in the RCS programmable logic controller (PLC) located in the RCS Main Control Panel (MCP). This allowed the associated recovery wells to continue to pump groundwater to the RCS. With continued pumping, the aeration / equalization tank, which is located on the exterior of the RCS building, overflowed into the secondary containment (bermed area). Once the secondary containment was full (at approximately 2:00 AM), the untreated influent groundwater proceeded to overflow and spill into the northeast area of Kingsland Yard. The Roux System Operation Manager arrived onsite at approximately 5:00 AM on April 25, 2025, and identified the overflow, at which point the recovery wells that pump groundwater to the RCS were shut down and spill response actions were initiated. The NYSDEC case manager was notified of the spill and site conditions via voicemail at 7:43 AM and

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California ■ Illinois ■ Massachusetts ■ New Jersey ■ New York ■ Texas ■ Virginia

then by e-mail at 9:57 AM on April 25, 2025. As the NYSDEC case manager for the EMGPRP was not reachable via phone in the short term, the NYSDEC Spill Hotline was contacted and notified.

Spill Response/Clean Up Activities

Immediate spill response actions following shutdown of the RCS recovery wells included deployment of sorbent boom adjacent to the property bulkhead to prevent any separate-phase LNAPL, if present, from discharging into Newtown Creek, as well as within Kingsland Yard to prevent waters from migrating to additional areas. No visible LNAPL was observed in the spilled waters, but a trace of LNAPL may have been present, as indicated by oil sheen in the puddles on Site.

A trash pump was then set up in the northeast corner of the property to transfer water into an onsite frac tank for future treatment by the RCS. Cleanup activities throughout the rest of the day on April 25, 2025, consisted of continued use of trash pumps and the use of a vacuum truck to recover any pooled process water from the property, as well as from within the tank secondary containment area (bermed area). Approximately 6,000 gallons of process water were recovered and transferred to the onsite frac tank. The remaining water infiltrated into the ground in the northeast portion of the Site. Based on the RCS influent flow rate at the time the incident occurred (315 gpm) and the estimated time between the overflow of containment and the discovery of the overflow (approximately 3 hours), Roux estimates that approximately 56,700 gallons of untreated water were released beyond secondary contaminant to the Site.

Upon completion of the cleanup of the pooled water, an inspection of the property indicated potential staining of the soil / gravel within several low-lying areas where the spilled water had pooled prior to collection. On April 29, 2025, approximately three inches of soil / gravel in the areas with observed staining were excavated and stored in a designated stockpile area at the Site. A total of 12 locations within the northeast portion of the Site were excavated, generating approximately three cubic yards of material. Community Air Monitoring was performed during all excavation activities in accordance with the New York State Department of Health Generic Community Air Monitoring Plan (CAMP) included as Appendix 1A to DER-10. No exceedances for volatile organic compounds (VOCs) or dust were detected during the excavation activities. A CAMP report is provided in Attachment 1.

The spilled water consisted of untreated influent groundwater. The RCS system influent is routinely sampled on a bi-monthly (i.e., twice a month) basis as part of the Site's State Pollutant Discharge Elimination System (SPDES) requirements and reported to the NYSDEC in Discharge Monitoring Reports. The most recent sampling of the RCS influent water occurred on April 22, 2025, and will be submitted to the NYSDEC as part of the monthly DMR report by May 28, 2025.

Incident Investigation and Action Items

The investigation results indicate that the root cause of the overflow was the inability of the control system to identify and react to the loss of communication between the MCP and remote process-critical devices (i.e., the RIO panel) that occurred due to the power disruption event. To address this finding, additional safeguards have and will be implemented to prevent future recurrence of an overflow.

The RCS and associated recovery wells remained offline until the investigation and troubleshooting activities were completed and additional safeguards implemented. The RCS facility was then restarted, first in recirculation mode and then back to normal operation with discharge through the SPDES-permitted outfall on May 6, 2025. The Off-Site Free-Product Recovery System (ORS) and Soil Vapor Extraction system (SVE) were unaffected by the RCS downtime.

The stockpiled excavated soil will be sampled for waste characterization and transported offsite for proper off-Site disposal.

Summary

At this time, the spill is considered remediated, and no further action is proposed. The excavated soils will be transported off-Site for disposal at a waste facility at a future date. This spill did not have a material effect on the environmental conditions at the Site and does not change the overall remedial strategy nor does it affect the remedial alternatives presented in the OU-4 Alternative Analysis Report, submitted to the NYSDEC on December 21, 2021.

Should you have any questions, please do not hesitate to contact us.

Sincerely,

ROUX ENVIRONMENTAL ENGINEERING AND GEOLOGY, D.P.C.

Justin Kennedy, PE
Senior Engineer II

Dennis G. Shin, PE
Senior Engineer II

Andrew Baris, PG
Principal Hydrogeologist / Executive Vice President

Attachments:

- Attachment 1 – CAMP Report- April 29, 2025

cc: Andrew G. Frank, Esq., New York State Office of the Attorney General
Deborah Gorman, NYSDEC
Michael Murphy, NYSDEC
Lisa Gorton, P.E., NYSDEC
Heidi Dudek, NYSDEC
Todd Ommen, Esq., Pace University School of Law
Richard Webster, Riverkeeper
Mike Dulong, Riverkeeper
Michael J. Burghardt, ExxonMobil
John Lee, ExxonMobil
Rene Gonzalez, ExxonMobil
Christopher Proce, Roux Environmental Engineering & Geology, D.P.C.

ATTACHMENT 1

CAMP Report, April 29 , 2025

Roux Environmental Engineering and Geology, D.P.C.
Community Air Monitoring Program - DUST

Project: ExxonMobil Greenpoint Petroleum Remediation Project
PM: Courtney Lind
Location: 410 Kingsland Ave, Brooklyn NY 11222
Date: 4/29/2025

Upwind Serial Number 8530141213
Downwind Serial Number 8530120611

Upwind		Downwind		Corrected Downwind	Comments
Time	Concentration [mg/m3]	Time	Concentration [mg/m3]	Concentration [mg/m3]	
8:22 AM	0.013	8:22 AM	0.009	-0.004	
8:37 AM	0.012	8:37 AM	0.005	-0.007	
8:52 AM	0.011	8:52 AM	0.005	-0.006	
9:07 AM	0.009	9:07 AM	0.004	-0.005	
9:22 AM	0.008	9:22 AM	0.004	-0.004	
9:37 AM	0.006	9:37 AM	0.004	-0.002	
9:52 AM	0.005	9:52 AM	0.005	0.000	
10:07 AM	0.005	10:07 AM	0.004	-0.001	
10:22 AM	0.005	10:22 AM	0.012	0.007	
10:37 AM	0.006	10:37 AM	0.006	0.000	
10:52 AM	0.006	10:52 AM	0.006	0.000	
11:07 AM	0.007	11:07 AM	0.006	-0.001	
11:22 AM	0.006	11:22 AM	0.008	0.002	
11:37 AM	0.007	11:37 AM	0.007	0.000	
11:52 AM	0.009	11:52 AM	0.007	-0.002	
12:07 PM	0.008	12:07 PM	0.007	-0.001	
12:22 PM	0.006	12:22 PM	0.007	0.001	
12:37 PM	0.003	12:37 PM	0.006	0.003	
12:52 PM	0.004	12:52 PM	0.006	0.002	
1:07 PM	0.005	1:07 PM	0.007	0.002	
1:22 PM	0.007	1:22 PM	0.008	0.001	

Notes:
1. Corrected downwind concentration is based on the difference of the upwind meter concentration and respective downwind meter location.

Roux Environmental Engineering and Geology, D.P.C.
Community Air Monitoring Program - VOC

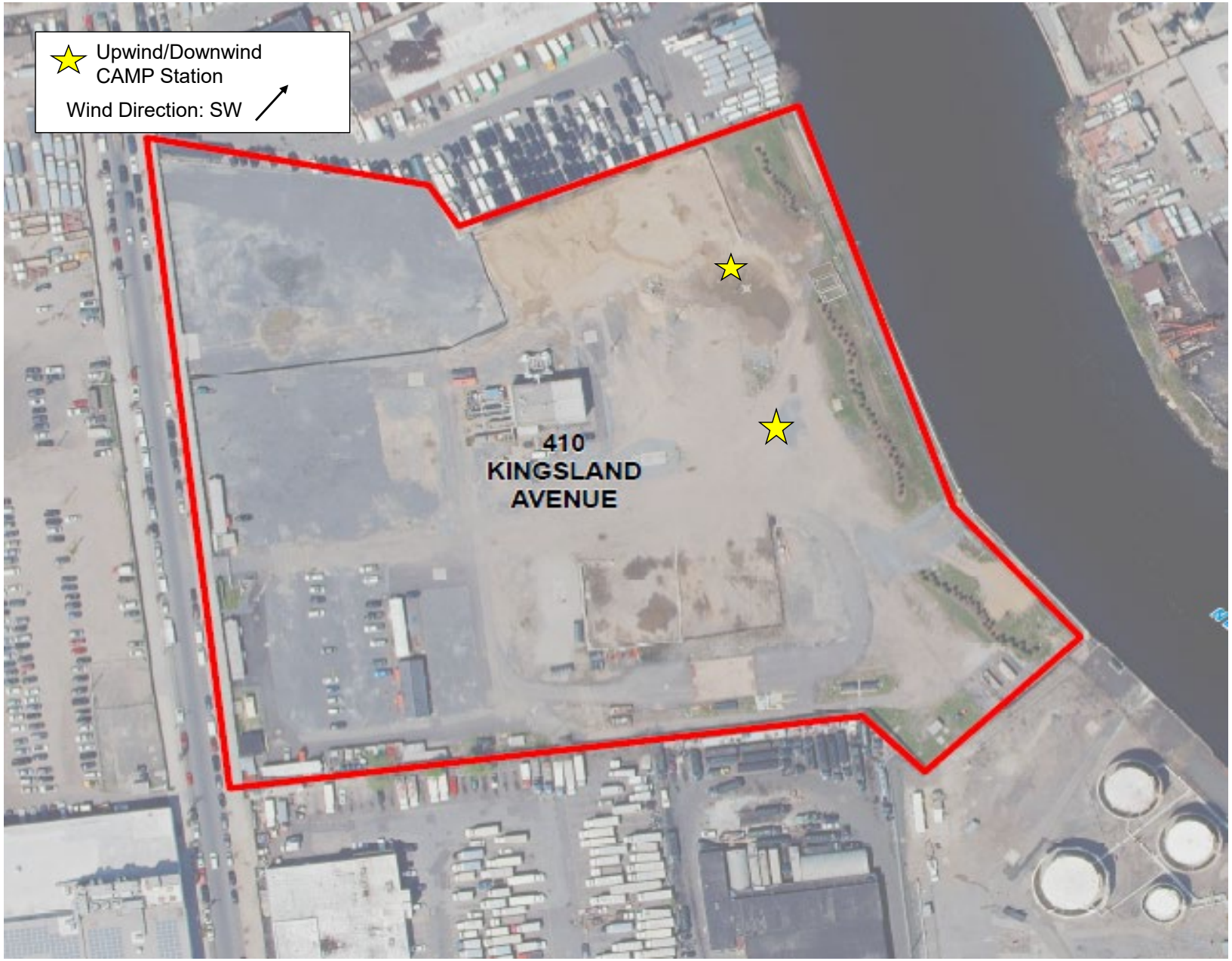
Project: ExxonMobil Greenpoint Petroleum Remediation Project
PM: Courtney Lind
Location: 410 Kingsland Ave, Brooklyn NY 11222
Date: 4/29/2025

Upwind Serial Number 592-919151
Downwind Serial Number 592-927196

Upwind		Downwind		Corrected[1] Downwind	Comments
Time	VOC Average (ppm)	Time	VOC Average (ppm)	VOC Average (ppm)	
NR	NR	8:23 AM	0.0	0.0	Upwind datalog not running
NR	NR	8:38 AM	0.0	0.0	
NR	NR	8:53 AM	0.0	0.0	
NR	NR	9:08 AM	0.0	0.0	
NR	NR	9:23 AM	0.0	0.0	
NR	NR	9:38 AM	0.0	0.0	
NR	NR	9:53 AM	0.0	0.0	
NR	NR	10:08 AM	0.0	0.0	
NR	NR	10:23 AM	0.0	0.0	
10:31 AM	0.0	10:27 AM	0.0	0.0	Upwind datalogging start
10:46 AM	0.0	10:42 AM	0.0	0.0	
11:01 AM	0.0	10:57 AM	0.0	0.0	
11:16 AM	0.0	11:12 AM	0.0	0.0	
11:31 AM	0.0	11:27 AM	0.0	0.0	
11:46 AM	0.0	11:42 AM	0.0	0.0	
12:01 PM	0.0	11:57 AM	0.0	0.0	
12:16 PM	0.0	12:12 PM	0.0	0.0	
12:31 PM	0.0	12:27 PM	0.0	0.0	
12:46 PM	0.0	12:42 PM	0.0	0.0	
1:01 PM	0.0	12:57 PM	0.0	0.0	
1:16 PM	0.0	1:12 PM	0.0	0.0	
1:31 PM	0.0	1:27 PM	0.0	0.0	

Notes:

1. Corrected downwind concentration is based on the difference of the upwind meter concentration and respective downwind meter location.
2. NR - Not Recorded



410 Kingsland Ave Property Map

Attachment 1 - CAMP Report.xls