



HALEY & ALDRICH OF NEW YORK
1441 Broadway, Suite 6031
New York, NY 10018
646.518.7735

7 February 2019
File No. 133110-002

Via Email: yukyin.wong@dec.ny.gov
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 2
47-40 21st Street
Long Island City, New York 11101

Attention: Mr. Bryan Wong

Subject: Project Status Report
Former NuHart Plastics Manufacturing Site # 224136
280 Franklin Street
Brooklyn, New York

Dear Mr. Wong:

Haley & Aldrich of New York is pleased to present this Project Status Report on behalf of Dupont Street Developers, LLC for the above referenced Site. Copies of this Project Status Report have also been provided to Dawn Hettrick of the New York State Department of Health. The Project Status Report is for December 2018 to January 2019. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Senior Associate

CC:

Dawn Hettrick (NYSDOH)
Dupont Street Developers, LLC
Jane O'Connell (NYSDEC)
Wendy A. Marsh

Email: dawn.hettrick@health.ny.gov
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Email: jane.oconnell@dec.ny.gov
Email: wmarsh@hancocklaw.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from December 2018 through January 2019. Activities during this period were conducted by Haley and Aldrich of New York (HANY). A Site Plan showing the general Site layout, nearby area, and associated wells is included as Figure 1.

Interim remedial measure (IRM) activities for monitoring and removal of light non-aqueous-phase liquid (LNAPL) at the Site were performed during the monitoring period in general conformance with the New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (Monthly) were performed by HANY on 6 February 2019. The apparent LNAPL thickness measurement table is provided as Attachment A. Additionally, a Well Location Map showing the extent of LNAPL based on the monitoring date is shown as **Figure 1**.

Maintenance Activities

General maintenance activities include collection of spent IRM-related absorbent materials in the vicinity of recovery wells, placing new absorbent materials, general housekeeping activities and proper labeling of waste containers generated during this IRM event. Both skimming systems associated with recovery wells RW-8 and RW-12 were found to be operational during the Site visit.

Monitoring and LNAPL Removal

Gauging of onsite and offsite monitoring and recovery wells associated with the Site was performed and the wells that could not be accessed and/or gauged are identified on **Attachment A**. No changes were observed in the lateral extent of the LNAPL plume. On 6 February 2019, high tide was observed from 10:33 AM to 4:33 PM partially during the well gauging period (by NOAA/NOS/CO-OPS Station ID (8517673) Hunters Point, Newtown Creek, NY). The depths to the water table were variable relative to the depths noted in the previous status reports, with some wells showing increases and some wells showing decreases. LNAPL apparent thicknesses were also variable, with increases generally noted in wells where the depth to water increased and decreases noted in wells where the depth to water decreased.

The product recovery holding reservoirs were emptied during this event. The amount of LNAPL removed from the wells was estimated at 65 gallons, including LNAPL from the drums associated with the skimmers on recovery wells RW-8 and RW-12. Based on previous LNAPL estimates, an estimated 2,815 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed. The removed LNAPL is stored in intermediate bulk container (IBC) tanks located in the Site building, pending pickup and offsite disposal. When the IBC tanks are nearly full and/or the containerized spent absorbent materials require disposal, the designated waste management company will be contacted and waste disposal requested.

Eastern Environmental Solutions, Inc. (Eastern) is presently contracted to conduct waste management activities for disposal of product from the IBC tanks at the Site. To date, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous

waste. No waste was transported from the Site during this period and transportation and disposal information will continue to be included in the progress reports following the months during which disposal activities occur.

Feasibility Study and Proposed Remedial Action Work Plan (PRAP)

The Feasibility study prepared by GZA was submitted to the NYSDEC in January 2017. The NYSDEC issued the proposed remedial action work plan (PRAP) in September 2018. A public comment hearing was held on 4 October 2018 to discuss the proposed remedy for the Site. The public comment period ended on 9 November 2018.

Site Soil Management Report

There were no requests for evaluation of potential work in the LNAPL plume area during this period.

Attachments

Attachment A – Apparent Thickness of LNAPL

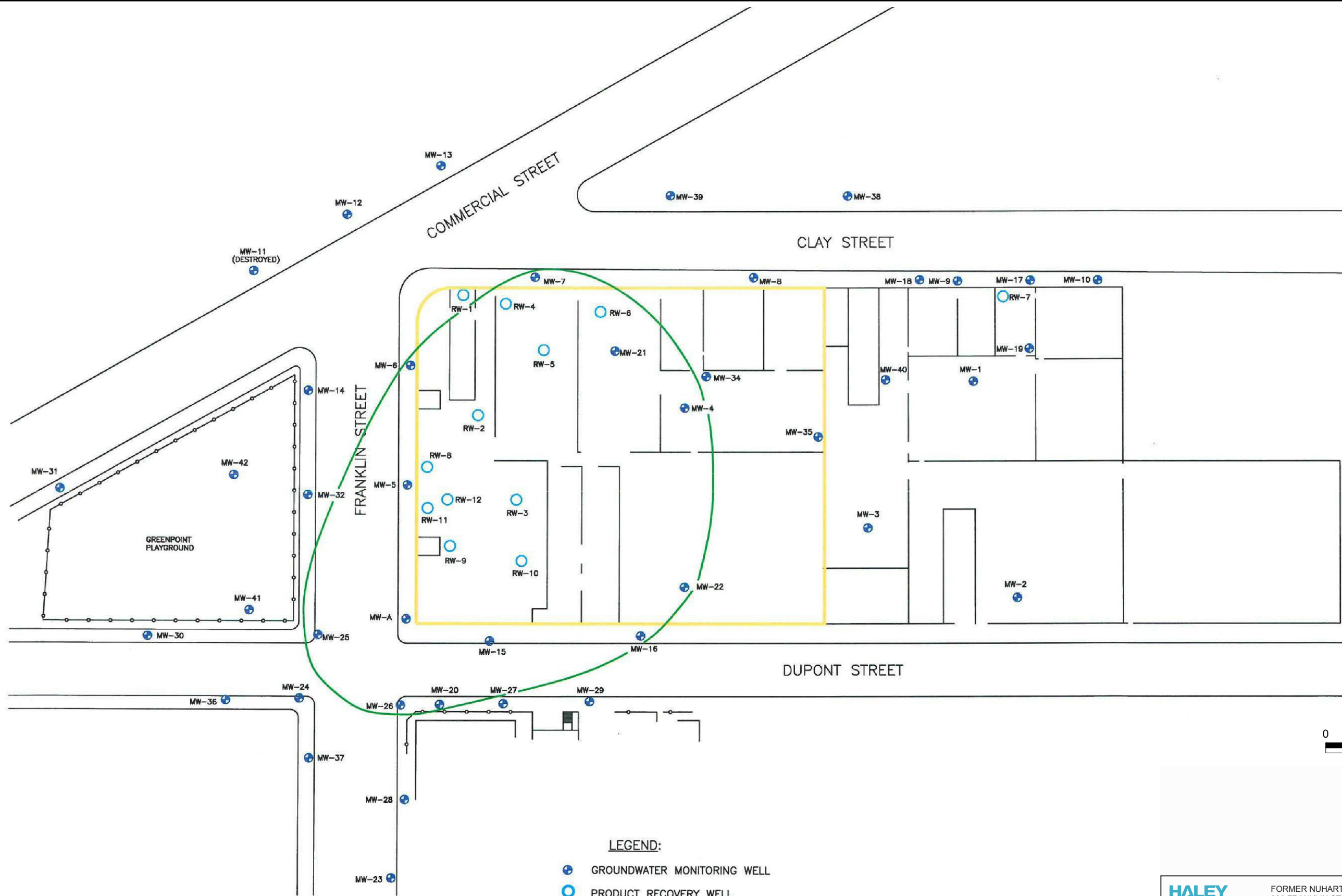
Attachment B – Well Location Map showing areal extent of LNAPL on groundwater

Attachment A

Apparent Thickness of LNAPL

Attachment B

Site Figure



- LEGEND:**
- + GROUNDWATER MONITORING WELL
 - PRODUCT RECOVERY WELL
 - IHWDS BOUNDARY
 - EXTENT OF LNAPL ON GROUNDWATER

NOTES:

1. THE BASE MAP WAS DEVELOPED FROM AN ELECTRONIC FILE PROVIDED BY DUPONT STREET DEVELOPERS, LLC, ENTITLED "AERIAL EXTENT OF LNAPL ON GROUNDWATER," DATED MARCH 23, 2015, ORIGINAL SCALE 1" = 60'.

HALEY ALDRICH FORMER NUHART PLASTIC MANUFACTURING
280 FRANKLIN STREET
BROOKLYN, NEW YORK

AERIAL EXTENT OF LNAPL ON GROUNDWATER

FEBRUARY 2018

FIGURE 1



HALEY & ALDRICH OF NEW YORK
1441 Broadway, Suite 6031
New York, NY 10018
646.518.7735

8 March 2019
File No. 133110-002

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The product recovery holding reservoirs were emptied during this event. The amount of LNAPL removed from the wells was estimated at 75 gallons, including LNAPL from the drums associated with the skimmers on recovery wells RW-8 and RW-12. Based on previous LNAPL estimates, an estimated 2,890 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed. The removed LNAPL is stored in intermediate bulk container (IBC) tanks located in the Site building, pending pickup and offsite disposal. When the IBC tanks are nearly full and/or the containerized spent absorbent materials require disposal, the designated waste management company will be contacted and waste disposal requested.

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Dupont Street Developers, LLC

8 March 2019

Page 3

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Attachment B – Well Location Map showing areal extent of LNAPL on groundwater

Attachment A

Apparent Thickness of LNAPL

Table 1:
 Attachment A: Apparent Thickness of LNAPL
 Former NuHart Plastic Manufacturing Site, NYSDEC #224136
 280 Franklin Street
 Brooklyn, NY

Readings taken 3/6/19 between 7:00
 am and 10:00 am (High tide @ 9:33
 AM and Low tide @ 3:26 PM)

Well Number	*Depth to Water (feet)	*Depth to Product (feet)	Apparent Thickness of LNAPL (feet)																																	
			2019			2018										2017										2016										
			Mar-19	Feb-19	Jan-19	Dec-18	Oct-18	Jun-18	May-18	Apr-18	Mar-18	Feb-18	Jan-18	Nov-17	Oct-17	Sep-17	Aug-17	Jul-17	Jun-17	May-17	Apr-17	Mar-17	Feb-17	Jan-17	Dec-16	Nov-16	Oct-16	Sep-16	Aug-16	Jul-16	Jun-16	May-16	Apr-16	Mar-16		
MW-4	ND*	ND*	ND*	ND*	ND*	ND*	ND*	0.12	1.13	0.65	0.73	ND*	0.92	2.12	0.81	1.76	1.73	1.23	1.77	ND*	1.32	1.61	1.13	1.31	1.30	1.00	1.18	1.35	1.71	1.73	1.80	1.53	1.73	1.43		
MW-5	11.57	9.31	2.26	3.28	2.62	2.83	4.12	1.66	1.83	2.77	2.19	2.21	4.65	5.83	2.19	4.44	4.4	3.71	3.54	2.81	2.80	3.13	4.05	3.00	3.55	4.43	3.64	3.22	4.31	4.03	4.29	3.07	3.18	3.14		
MW-6	ND	8.29	##	##	##	##	ND	0.55	0.50	2.47	0.74	##	##	##	1.22	3.19	3.15	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##		
MW-7	8.85	8.59	0.26	1.54	1.14	0.93	0.54	1.89	1.99	1.80	2.03	2.55	3.32	4.91	1.48	1.45	1.41	0.9	0.00	1.50	1.92	2.53	3.71	1.28	0.78	1.73	0.91	0.04	1.89	1.58	2.22	2.11	1.90	1.66		
MW-8	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—		
MW-12	6.90	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—		
MW-13	7.31	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-14	8.19	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-15	10.89	9.81	1.08	1.00	0.84	0.26	0.12	0.04	0.04	0.07	0.07	0.08	3.16	1.78	0.31	0.29	0.26	0.26	0.24	0.12	0.22	0.28	0.40	0.31	0.20	0.80	0.20	0.17	0.81	0.07	0.48	0.22	0.71	0.03		
MW-16	10.41	10.34	0.07	0.39	0.17	0.19	0.20	0.06	0.10	0.13	—	0.1	0.34	0.25	0.35	0.37	0.35	0.08	0.28	0.03	0.10	0.23	0.20	0.31	ND	ND	ND	ND	ND	0.01	0.25	0.02	0.01	0.02		
MW-20	11.98	9.81	2.17	2.43	2.77	3.49	2.51	1.4	1.55	2.52	1.77	1.02	3.15	3.99	2.52	2.58	2.63	2.9	2.83	2.61	2.94	2.33	3.02	3.02	2.88	3.28	2.90	3.16	2.89	2.88	2.85	2.22	2.49	2.43		
MW-21	11.70	10.69	1.01	1.57	1.48	2.81	1.73	1.43	1.42	1.62	1.38	2.29	3.83	4.79	3.26	3.35	2.13	1.45	2.75	3.31	3.30	3.04	3.62	3.27	3.32	2.39	3.61	2.96	2.95	2.63	4.18	2.68				
MW-22	12.45	11.40	1.05	1.83	1.68	0.83	0.69	0.97	0.89	0.76	1.11	0.28	0.37	1.77	1.25	1.24	1.21	0.75	0.66	0.66	0.78	0.64	0.65	0.50	0.51	0.38	0.30	0.01	0.51	0.87	0.62	0.45	0.48	0.44		
MW-23	10.59	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-24	9.84	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-25	13.73	9.54	4.19	4.77	3.86	3.89	3.44	2.85	2.89	4.03	3.45	3.44	3.66	4.54	4.03	4.05	4.02	3.73	4.09	3.85	3.70	3.74	3.89	3.62	3.60	4.20	3.79	3.65	4.01	3.75	3.55	3.33	3.42			
MW-26	12.51	9.57	2.94	3.37	3.14	3.84	3.45	0.75	2.35	3.14	2.48	3.19	3.95	5.59	3.81	3.82	3.79	3.65	3.42	3.29	3.73	3.64	3.24	3.14	3.20	3.56	4.00	3.28	4.26	3.58	3.82	3.41	3.37	2.97		
MW-27	10.84	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-28	10.32	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-29	10.29	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-30	9.29	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-31	8.71	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	—	—	—	—	ND	ND	ND	ND	ND		
MW-32	9.28	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	—	—	—	—	ND	ND	ND	ND	ND		
MW-34	10.71	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-35	13.71	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-36	10.14	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-37	10.56	ND	ND	ND	ND	ND*	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-38	8.85	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	—	—	—	—	—	ND	ND	ND	ND	ND	
MW-39	7.92	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-40	6.14	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-41	—	—	—	—	—	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-42	8.51	ND	ND	ND	ND	ND*	ND*	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
RW-1	7.78	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
RW-2	11.31	10.04	1.27	4.73	5.12	1.63	5.54	0.06	0.08	1.65	0.08	5.52	4.01	5.19	0.56	0.58	0.53	6.09	6.25	0.42	1.13	2.90	3.09	3.53	1.65	1.18	1.26	1.35	1.88	2.05	2.41	3.02	2.12	3.34		
RW-3	16.60	14.34	2.26	4.71	2.22	2.63	3.77	2.08	2.03	2.52	2.12	3.03	ND	3.31	3.17	3.15	3.22	2.28	3.44	2.85	2.71	3.46	2.98	3.10	1.91	3.95	2.40	2.50	3.08	1.97	2.49	1.64	2.17	2.09		
RW-4	14.38	11.53	2.85	##	##	03.37	2.85	2.96	2.97	3.80	3.01	02.39	2.85	4.32	4.33	4.17	4.18	3.1	4.1	03.69	3.65	3.69	3.67	3.05	3.80	2.80	2.77	3.30	2.73	2.65	2.32	2.02	2.22	2.93		
RW-5	ND	10.10	##	##	##	##	ND*	0.44	0.33	0.65	0.34	4.64	##	4.49	5.28	5.27	5.26	5.42	3.75	5.00	5.44	5.10	0.70	2.95	1.55	3.05	0.42	0.36	0.50	4.97	2.76	2.47	2.66	3.21		
RW-6	11.90	11.41	0.49	02.33	0.91	00.73	1.91	0.83	0.88	0.96	0.91	00.90	2.61	1.64	0.73	0.6	1.61	0.93	5.35	1.05	1.27	1.22	0.90	0.90	0.85	0.68	0.87	0.92	1.46	1.29	0.81	0.67	0.73	0.74		
RW-8**	—	—	—	—	—	—	—	0.02	0.02	0.03	0.03	0.96	1.99	—	1.15	2.2	3.62	1.2	2.34	0.02	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
RW-9	15.19	12.96	2.23	3.79	1.53	3.45	4.52	0.11	2.38	2.28	1.51	2.88	4.32	5.58	3.72	3.77	3.69	2.84	3.25	2.70	2.69	3.50	3.66	2.47	3.09	3.57	2.45	2.35	3.19	2.15	3.18	2.75	3.09	3.81		
RW-10	15.62	12.38	3.24	4.53	3.80	4.06	2.46	1.52	1.60	3.70	0.66	3.48	4.64	4.28	3.65	3.67	3.71	3.67	3.78	4.07	3.79	4.27	4.70	4.15	3.86	3.45	3.80	3.36	4.44	3.91	3.69	3.74	3.66	3.67		
RW-11	15.19	12.84	2.35	4.74	2.69	3.02	2.21	2.51	2.52	4.34	2.41	2.50	5.01	5.5	2.97	4.57	3.93	2.33	3.00	2.92	3.00	3.55	3.73	2.65	1.90	2.04	2.43	2.12	3.66	2.98	3.43	3.08	2.94	3.05		
RW-12**	—	—	—	—	—	—	—	0.11	0.02	2.61	0.02	1.12	1.5	5.96	3.65	5.4	2.68	0.01	0.03	0.01	0.02	0.80	3.89	—	—	—	—	—	—	—	—	—	—	—	—	
MW-1	NG	NG	NG	NG	—	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	NG	
MW-9	NG	NG	NG	NG																																

Table 1: Attachment A: Apparent Thickness of LNAPL Former NuHart Plastic Manufacturing Site, NYSDEC #224136 280 Franklin Street Brooklyn, NY

Readings taken 3/6/19 between 7:00 am and 10:00 am (High tide @ 9:33 AM and Low tide @ 3:26 PM)

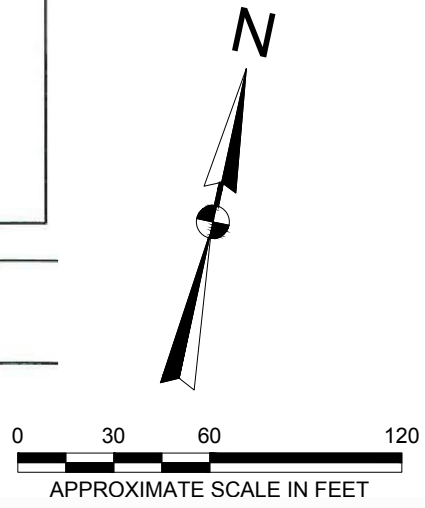
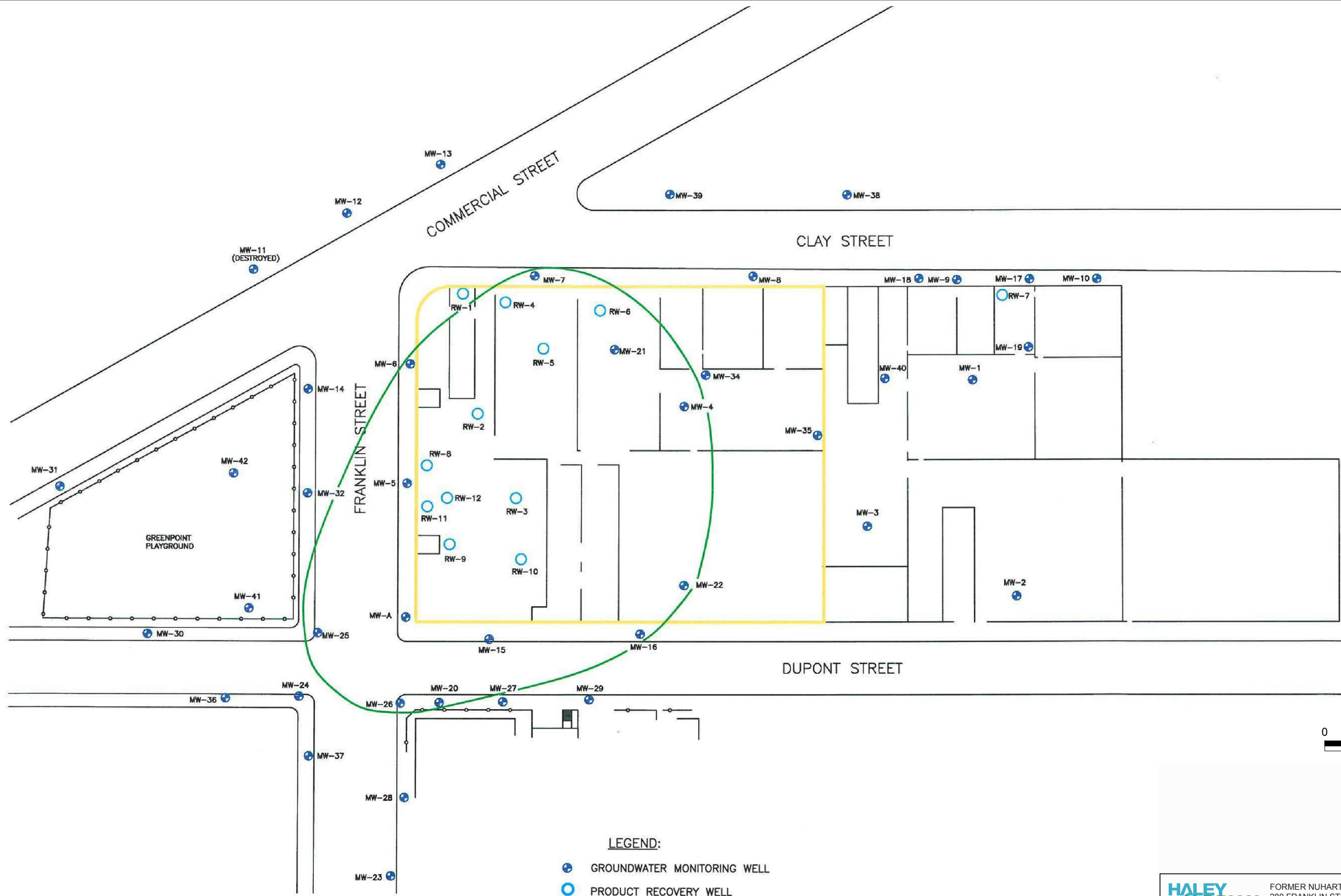
Table with columns for Well Number, *Depth to Water (feet), *Depth to Product (feet), and Apparent Thickness of LNAPL (feet) for years 2016, 2015, 2014, 2013, and 2012. Rows list wells MW-4 through MW-42 and RW-1 through RW-12.

Notes: Data Recorded using an oil/water interface probe, measurements from the tops of well casings ## = NAPL observed, apparent thickness not determined NI = Not Installed ND = Not Detected NG = Not Gauged Wells MW-1, MW-2, MW-9, MW-10, MW-17, MW-18, MW-19, and RW-7 are associated with NYSDEC Spill 06-01852 and are under a separate investigation Total of 75 gallons of product removed from product recovery system: RW-8 = 20 gal, RW-12 = 55 gal Well-34 has uneven casing top est= Estimated Value * = Well was dry ** = Well equipped with automated product recovery system _ = Data not recorded due to access issues Wells were gauged on March 6, 2019

Attachment B

Site Figure

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- LEGEND:**
- ⊕ GROUNDWATER MONITORING WELL
 - ⊙ PRODUCT RECOVERY WELL
 - IHWDS BOUNDARY
 - EXTENT OF LNAPL ON GROUNDWATER

NOTES:

1. THE BASE MAP WAS DEVELOPED FROM AN ELECTRONIC FILE PROVIDED BY DUPONT STREET DEVELOPERS, LLC, ENTITLED "AERIAL EXTENT OF LNAPL ON GROUNDWATER," DATED MARCH 23, 2015, ORIGINAL SCALE 1" = 60'.

HALEY ALDRICH
 FORMER NUHART PLASTIC MANUFACTURING
 280 FRANKLIN STREET
 BROOKLYN, NEW YORK

AERIAL EXTENT OF LNAPL ON GROUNDWATER

MARCH 2019

FIGURE 1



HALEY & ALDRICH OF NEW YORK
1441 Broadway, Suite 6031
New York, NY 10018
646.518.7735

22 April 2019
File No. 133110-002

Via Email: yukyin.wong@dec.ny.gov
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 2
47-40 21st Street
Long Island City, New York 11101

Attention: Mr. Bryan Wong

Subject: Project Status Report
Former NuHart Plastics Manufacturing Site # 224136
280 Franklin Street
Brooklyn, New York

Dear Mr. Wong:

Haley & Aldrich of New York is pleased to present this Project Status Report on behalf of Dupont Street Developers, LLC for the above referenced Site. Copies of this Project Status Report have also been provided to Dawn Hettrick of the New York State Department of Health. The Project Status Report is for February 2019 to March 2019. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Senior Associate

CC:

Dawn Hettrick (NYSDOH)
Dupont Street Developers, LLC
Jane O'Connell (NYSDEC)
Wendy A. Marsh

Email: dawn.hettrick@health.ny.gov
Email: bojinzhu@gmail.com
Email: jane.oconnell@dec.ny.gov
Email: wmarsh@hancocklaw.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from February 2019 through March 2019. Activities during this period were conducted by Haley and Aldrich of New York (HANY). A Site Plan showing the general Site layout, nearby area, and associated wells is included as Figure 1.

Interim remedial measure (IRM) activities for monitoring and removal of light non-aqueous-phase liquid (LNAPL) at the Site were performed during the monitoring period in general conformance with the New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (Monthly) were performed by HANY on 4 April 2019. The apparent LNAPL thickness measurement table is provided as Attachment A. Additionally, a Well Location Map showing the extent of LNAPL based on the monitoring date is shown as **Figure 1**.

Maintenance Activities

General maintenance activities include collection of spent IRM-related absorbent materials in the vicinity of recovery wells, placing new absorbent materials, general housekeeping activities and proper labeling of waste containers generated during this IRM event. Both skimming systems associated with recovery wells RW-8 and RW-12 were found to be operational during the Site visit.

Monitoring and LNAPL Removal

Gauging of onsite and offsite monitoring and recovery wells associated with the Site was performed and the wells that could not be accessed and/or gauged are identified on **Attachment A**. No changes were observed in the lateral extent of the LNAPL plume. On 4 April 2019, high tide was observed from 10:04 AM to 3:51 PM partially during the well gauging period (by NOAA/NOS/CO-OPS Station ID (8517673) Hunters Point, Newtown Creek, NY). The depths to the water table were variable relative to the depths noted in the previous status reports, with some wells showing increases and some wells showing decreases. LNAPL apparent thicknesses were also variable, with increases generally noted in wells where the depth to water increased and decreases noted in wells where the depth to water decreased.

The product recovery holding reservoirs were emptied during this event. The amount of LNAPL removed from the wells was estimated at 65 gallons, including LNAPL from the drums associated with the skimmers on recovery wells RW-8 and RW-12. Based on previous LNAPL estimates, an estimated 2,955 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed. The removed LNAPL is stored in intermediate bulk container (IBC) tanks located in the Site building, pending pickup and offsite disposal. When the IBC tanks are nearly full and/or the containerized spent absorbent materials require disposal, the designated waste management company will be contacted and waste disposal requested.

Eastern Environmental Solutions, Inc. (Eastern) is presently contracted to conduct waste management activities for disposal of product from the IBC tanks at the Site. To date, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. No waste was transported from the Site during this period and transportation and disposal

information will continue to be included in the progress reports following the months during which disposal activities occur.

Feasibility Study and Proposed Remedial Action Work Plan (PRAP)

The Feasibility study prepared by GZA was submitted to the NYSDEC in January 2017. The NYSDEC issued the proposed remedial action work plan (PRAP) in September 2018. A public comment hearing was held on 4 October 2018 to discuss the proposed remedy for the Site. The public comment period ended on 9 November 2018.

Site Soil Management Report

There were no requests for evaluation of potential work in the LNAPL plume area during this period.

Attachments

Attachment A – Apparent Thickness of LNAPL

Attachment B – Well Location Map showing areal extent of LNAPL on groundwater

Attachment A

Apparent Thickness of LNAPL

Table 1: Attachment A: Apparent Thickness of LNAPL Former NuHart Plastic Manufacturing Site, NYSDEC #224136 280 Franklin Street Brooklyn, NY

Readings taken 4/4/19 between 7:00 am and 11:00 am (High tide @ 10:04 AM and Low tide @ 3:51 PM)

Table with columns for Well Number, Depth to Water (feet), Depth to Product (feet), and Apparent Thickness of LNAPL (feet) for years 2019, 2018, 2017, and 2016. Rows include MW-4 through MW-42 and RW-1 through RW-12.

Notes: Data Recorded using an oil/water interface probe, measurements from the tops of well casings ## = NAPL observed, apparent thickness not determined NI = Not Installed ND = Not Detected NG = Not Gauged Wells MW-1, MW-2, MW-9, MW-10, MW-17, MW-18, MW-19, and RW-7 are associated with NYSDEC Spill 06-01852 and are under a separate investigation Total of 65 gallons of product removed from product recovery system: RW-8 = 15 gal, RW-12 = 50 gal Well-34 has uneven casing top est= Estimated Value * = Well was dry ** = Well equipped with automated product recovery system _ = Data not recorded due to access issues Wells were gauged on April 4, 2019

Table 1:

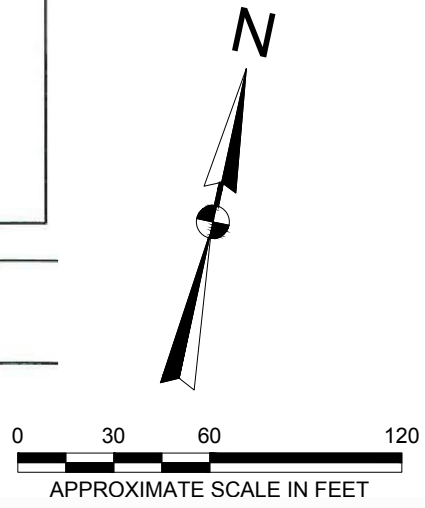
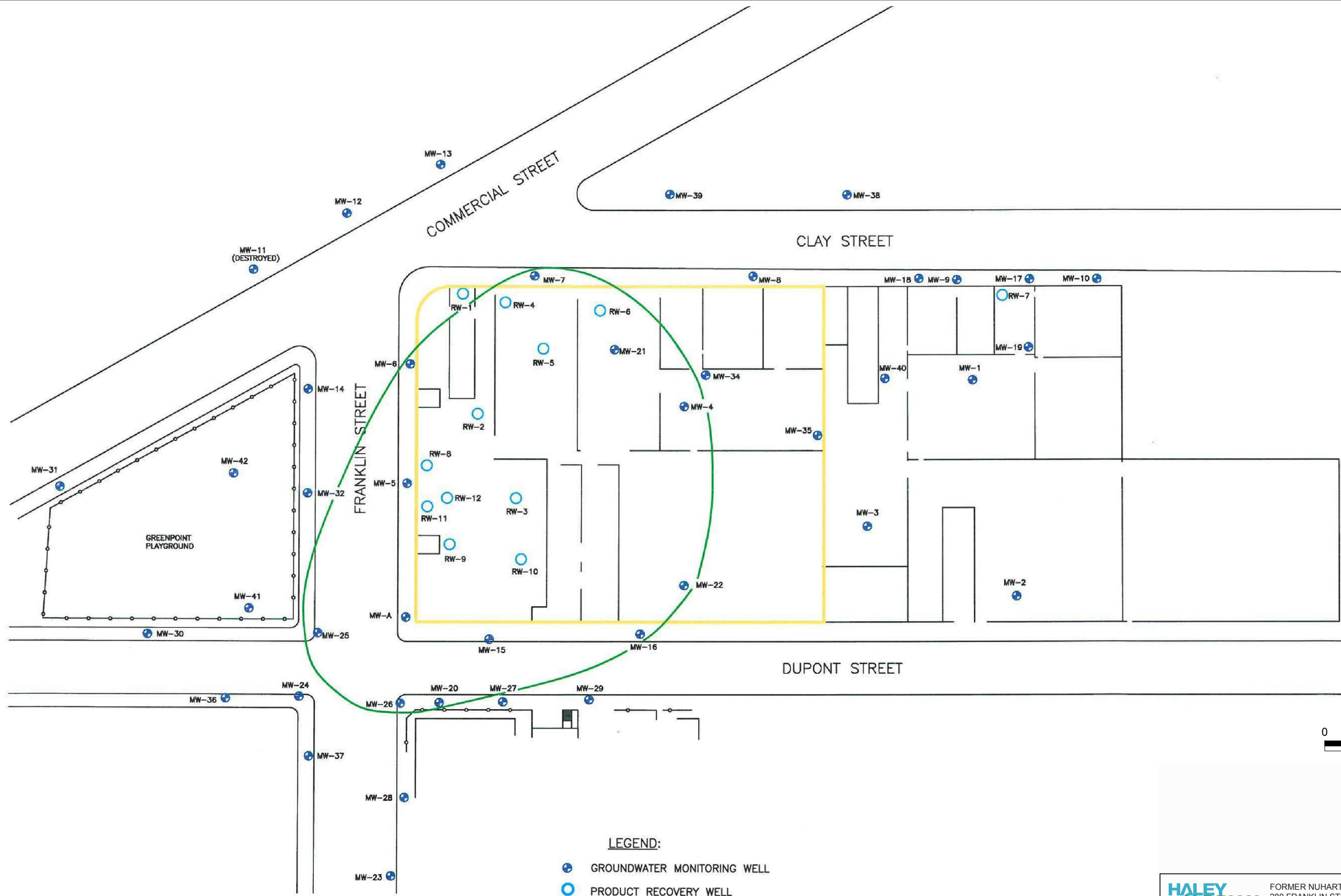
Attachment A: Apparent Thickness of LNAPL
 Former NuHart Plastic Manufacturing Site, NYSDEC #224136
 280 Franklin Street
 Brooklyn, NY

Well Number	*Depth to Water (feet)	*Depth to Product (feet)	Apparent Thickness of LNAPL (feet)																																						
			2016				2015								2014								2013								2012										
			Feb-16	Jan-16	Dec-15	Nov-15	Oct-15	Sep-15	Aug-15	Jul-15	Jun-15	May-15	Apr-15	Mar-15	Jan-15	Sep-14	Aug-14	Jul-14	Jun-14	May-14	Apr-14	Mar-14	Feb-14	Jan-14	Dec-13	Nov-13	Oct-13	Sep-13	Aug-13	Jul-13	Apr-13	Mar-13	Feb-13	Jan-13	Dec-12	Nov-12	Oct-12	Sep-12			
MW-4	ND*	ND*	1.85	1.77	1.96	2.04	1.99	1.77	2.22	4.27	0.35	0.44	—	0.56	—	1.75	1.90	1.24	Trace	—	0.01	Trace	0.23	0.22	0.30	0.66	0.78	##	3.49	2.22	0.59	0.67	0.44	0.44	0.80	0.31	0.33	3.13			
MW-5	11.98	9.52	1.85	3.24	4.83	5.41	4.16	4.26	4.45	4.22	2.30	2.41	2.55	3.10	4.40	4.79	5.03	1.97	3.39	—	3.14	2.80	2.98	—	6.46	7.17	5.54	##	5.08	3.92	3.00	2.39	4.32	3.00	4.11	3.50	3.41	5.58			
MW-6	ND	8.57	##	##	##	##	##	##	##	##	2.30	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##	2.42	2.82	—	—	—	—	—	—	—	3.49	2.14		
MW-7	9.24	8.89	2.31	2.47	3.44	3.31	2.58	1.46	1.28	0.99	1.58	ND	1.94	1.79	##	2.01	2.16	0.60	0.01	—	0.17	0.17	—	—	4.78	4.70	4.00	##	2.77	1.06	1.92	4.92	5.45	1.30	1.36	2.00	1.84	1.83			
MW-8	9.25	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	—	ND	ND	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-12	7.36	ND	—	—	ND	ND	—	—	—	—	—	—	ND	ND	—	ND	—	—	ND	ND	—	—	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-13	7.82	ND	—	—	ND	ND	—	—	—	—	—	—	ND	ND	—	ND	—	—	ND	ND	—	—	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-14	8.35	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	—	—	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-15	10.17	10.09	0.04	0.60	3.08	3.07	1.97	1.05	1.05	ND	1.24	1.21	1.56	1.67	1.71	2.19	2.32	##	0.45	—	0.61	0.30	0.38	—	3.11	3.19	3.34	##	2.14	0.70	—	0.32	1.07	—	1.56	0.99	0.76	2.67			
MW-16	11.26	10.53	0.16	0.02	0.11	0.02	0.12	0.05	0.05	0.14	0.13	0.15	0.03	0.08	0.02	—	0.03	0.99	Trace	—	0.01	0.01	0.10	—	0.23	0.22	0.19	##	0.05	0.07	0.02	0.01	0.10	0.25	0.20	ND	0.24	0.20			
MW-20	11.58	10.11	1.99	2.46	3.52	3.02	3.33	3.25	3.12	2.88	2.58	2.79	3.84	4.38	5.13	1.87	1.71	2.92	2.06	—	1.47	2.90	2.58	4.19	5.07	4.90	4.11	##	3.33	1.37	3.32	1.20	1.10	1.35	1.38	3.39	3.15	3.80			
MW-21	12.21	10.96	2.42	2.97	4.46	3.85	4.51	3.63	3.32	2.97	2.53	2.77	2.98	3.46	3.23	3.62	4.64	4.90	1.99	—	2.69	2.47	2.48	3.37	3.13	3.72	4.66	##	4.37	3.66	3.38	3.43	3.75	4.10	4.23	2.89	2.04	4.15			
MW-22	12.63	11.60	0.15	0.22	1.33	1.01	0.49	1.17	1.04	0.79	0.86	0.84	0.74	1.33	1.27	1.03	1.02	0.54	0.85	—	0.74	0.86	0.75	1.22	1.07	0.69	0.50	##	1.12	0.86	0.50	0.62	1.15	1.20	0.18	0.21	0.18	1.80			
MW-23	10.76	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-24	10.06	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-25	13.63	9.82	3.32	3.43	3.68	3.53	3.63	3.53	3.68	3.53	2.81	3.24	3.36	1.07	1.03	3.16	4.02	3.65	3.48	—	3.91	3.75	—	—	5.66	5.56	4.01	##	4.41	3.58	3.96	3.96	4.34	3.70	2.82	7.86	4.40	3.96			
MW-26	12.29	9.83	3.82	3.41	4.23	4.08	3.77	4.00	3.70	3.65	3.18	3.33	3.64	4.14	4.11	3.84	3.70	4.50	3.02	—	2.71	3.48	3.80	4.34	4.44	4.47	4.62	##	4.18	3.69	2.86	2.33	1.00	2.45	1.62	—	2.61	4.02			
MW-27	10.03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-28	10.52	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NI	NI	NI	NI	
MW-29	10.49	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NI	NI	NI	NI	
MW-30	9.55	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	NI	NI	NI	NI	NI	NI	NI	
MW-31	8.94	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	—	—	ND	ND	ND	ND	ND	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	
MW-32	9.54	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	—	—	ND	ND	ND	ND	ND	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	
MW-34	10.92	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	
MW-35	13.89	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI
MW-36	10.38	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	
MW-37	10.78	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	
MW-38	9.08	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	
MW-39	8.12	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	
MW-40	6.37	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	
MW-41	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	
MW-42	8.79	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	
RW-1	8.49	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	
RW-2	13.09	11.62	2.70	2.83	4.28	—	2.64	2.97	3.41	5.54	5.28	5.44	2.82	4.19	4.52	4.52	4.53	4.52	0.11	—	1.30	3.05	2.31	2.80	3.19	5.09	3.86	##	4.07	2.96	2.92	3.48	3.75	4.20	2.52	1.92	1.50	5.85			
RW-3	16.76	14.65	1.64	2.37	4.27	2.92	4.14	1.39	2.14	4.31	2.23	2.23	1.81	3.28	3.41	3.50	3.45	3.56	4.12	—	1.58	2.90	2.28	4.60 (est)	3.60	3.33	1.68	##	2.96	1.44	3.90	3.20	3.34	3.70	3.58	2.84	3.50	3.88			
RW-4	12.29	11.76	2.03	2.51	2.82	2.31	1.99	1.09	2.02	3.65	3.66	3.53	3.53	1.43	1.35	2.78	2.88	##	2.86	—	1.81	3.25	3.27	2.45	2.67	2.30	1.46	##	2.75	1.08	3.06	3.15	3.00	3.05	2.95	—	3.45	3.35			
RW-5	ND	11.23	2.53	1.92	1.96	5.64	4.18	2.03	5.79	4.87	4.69	4.75	0.70	0.85	0.91	0.85	0.43	0.17	0.17	—	0.12	0.93	0.43	0.52	0.60	0.79	0.54	##	0.69	0.51	2.62	—	—	—	—	—	—	—			
RW-6	12.14	11.59	0.76	0.74	0.77	0.65	0.66	0.65	0.61	0.78	1.96	2.35	0.71	1.19	1.14	0.71	0.64	0.78	0.79	—	0.45	1.28	0.96	0.41	0.94	1.30	0.67	##	0.10	0.08	0.45	0.50	0.21	0.40	0.15	0.90	0.22	0.06			
RW-8**	—	—	—	—	—	—	—	—	—	—	—	—	—	2.14	2.93	2.92	4.01	4.48	##	2.95	—	0.65	1.47	0.86	2.37	2.46	3.92	4.13	##	4.59	3.64	—	—	—	—	—	—	—	—		
RW-9	15.33	13.60	2.42	3.46	4.62	4.37	3.52	2.68	3.23	3.04	4.82	4.79	4.28	5.68	5.65	4.81	4.59	4.92	4.14	—	1.02	2.90	2.71	4.34	5.25	4.88	3.08	##	4.09	2.37	4.40	2.62	3.11	3.50	3.08	3.83	2.98	5.33			

Attachment B

Site Figure

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- LEGEND:**
- ⊕ GROUNDWATER MONITORING WELL
 - PRODUCT RECOVERY WELL
 - IHWDS BOUNDARY
 - EXTENT OF LNAPL ON GROUNDWATER

NOTES:

1. THE BASE MAP WAS DEVELOPED FROM AN ELECTRONIC FILE PROVIDED BY DUPONT STREET DEVELOPERS, LLC, ENTITLED "AERIAL EXTENT OF LNAPL ON GROUNDWATER," DATED MARCH 23, 2015, ORIGINAL SCALE 1" = 60'.

HALEY ALDRICH
 FORMER NUHART PLASTIC MANUFACTURING
 280 FRANKLIN STREET
 BROOKLYN, NEW YORK

AERIAL EXTENT OF LNAPL ON GROUNDWATER

APRIL 2019

FIGURE 1



HALEY & ALDRICH OF NEW YORK
1441 Broadway, Suite 6031
New York, NY 10018
646.518.7735

16 May 2019
File No. 133110-002

Via Email: yukyin.wong@dec.ny.gov
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 2
47-40 21st Street
Long Island City, New York 11101

Attention: Mr. Bryan Wong

Subject: Project Status Report
Former NuHart Plastics Manufacturing Site # 224136
280 Franklin Street
Brooklyn, New York

Dear Mr. Wong:

Haley & Aldrich of New York is pleased to present this Project Status Report on behalf of Dupont Street Developers, LLC for the above referenced Site. Copies of this Project Status Report have also been provided to Dawn Hettrick of the New York State Department of Health. The Project Status Report is for March 2019 to April 2019. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Senior Associate

CC:

Dawn Hettrick (NYSDOH)
Dupont Street Developers, LLC
Jane O'Connell (NYSDEC)
Wendy A. Marsh

Email: dawn.hettrick@health.ny.gov
Email: bojinzhu@gmail.com
Email: jane.oconnell@dec.ny.gov
Email: wmarsh@hancocklaw.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from March 2019 through April 2019. Activities during this period were conducted by Haley and Aldrich of New York (HANY). A Site Plan showing the general Site layout, nearby area, and associated wells is included as Figure 1.

Interim remedial measure (IRM) activities for monitoring and removal of light non-aqueous-phase liquid (LNAPL) at the Site were performed during the monitoring period in general conformance with the New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (Monthly) were performed by HANY on 1 May 2019. The apparent LNAPL thickness measurement table is provided as Attachment A. Additionally, a Well Location Map showing the extent of LNAPL based on the monitoring date is shown as **Figure 1**.

Maintenance Activities

General maintenance activities include collection of spent IRM-related absorbent materials in the vicinity of recovery wells, placing new absorbent materials, general housekeeping activities and proper labeling of waste containers generated during this IRM event. Both skimming systems associated with recovery wells RW-8 and RW-12 were found to be operational during the Site visit.

Monitoring and LNAPL Removal

Gauging of onsite and offsite monitoring and recovery wells associated with the Site was performed and the wells that could not be accessed and/or gauged are identified on **Attachment A**. No changes were observed in the lateral extent of the LNAPL plume. On 1 May 2019, high tide was observed from 8:11 AM to 1:54 PM partially during the well gauging period (by NOAA/NOS/CO-OPS Station ID (8517673) Hunters Point, Newtown Creek, NY). The depths to the water table were variable relative to the depths noted in the previous status reports, with some wells showing increases and some wells showing decreases. LNAPL apparent thicknesses were also variable, with increases generally noted in wells where the depth to water increased and decreases noted in wells where the depth to water decreased.

The product recovery holding reservoirs were emptied during this event. The amount of LNAPL removed from the wells was estimated at 50 gallons, including LNAPL from the drums associated with the skimmers on recovery wells RW-8 and RW-12. Based on previous LNAPL estimates, an estimated 3,045 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed. The removed LNAPL is stored in intermediate bulk container (IBC) tanks located in the Site building, pending pickup and offsite disposal. When the IBC tanks are nearly full and/or the containerized spent absorbent materials require disposal, the designated waste management company will be contacted and waste disposal requested.

Eastern Environmental Solutions, Inc. (Eastern) is presently contracted to conduct waste management activities for disposal of product from the IBC tanks at the Site. To date, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. No waste was transported from the Site during this period and transportation and disposal

information will continue to be included in the progress reports following the months during which disposal activities occur.

Feasibility Study, Proposed Remedial Action Work Plan (PRAP) and Record of Decision

The Feasibility study prepared by GZA was submitted to the NYSDEC in January 2017. The NYSDEC issued the proposed remedial action work plan (PRAP) in September 2018. A public comment hearing was held on 4 October 2018 to discuss the proposed remedy for the Site. The public comment period ended on 9 November 2018. The Record of Decision was issued by the NYSDEC in March 2019 and received by the repositories in April 2019. The translated fact sheet was sent to the NYSDEC for review on 16 May 2017.

Site Soil Management Report

There were no requests for evaluation of potential work in the LNAPL plume area during this period.

Attachments

Attachment A – Apparent Thickness of LNAPL

Attachment B – Well Location Map showing areal extent of LNAPL on groundwater

Attachment A

Apparent Thickness of LNAPL

Table 1:

Attachment A: Apparent Thickness of LNAPL
 Former NuHart Plastic Manufacturing Site, NYSDEC #224136
 280 Franklin Street
 Brooklyn, NY

Readings taken 5/1/19 between 7:00
 am and 11:00 am (High tide @ 8:11
 AM and Low tide @ 1:54 PM)

Well Number	*Depth to Water (feet)	*Depth to Product (feet)	Apparent Thickness of LNAPL (feet)																																				
			2019					2018						2017									2016																
			May-19	Apr-19	Mar-19	Feb-19	Jan-19	Dec-18	Oct-18	Jun-18	May-18	Apr-18	Mar-18	Feb-18	Jan-18	Nov-17	Oct-17	Sep-17	Aug-17	Jul-17	Jun-17	May-17	Apr-17	Mar-17	Feb-17	Jan-17	Dec-16	Nov-16	Oct-16	Sep-16	Aug-16	Jul-16	Jun-16	May-16	Apr-16	Mar-16			
MW - 4	ND*	9.29	##	ND*	ND*	ND*	ND*	ND*	ND*	0.12	1.13	0.65	0.73	ND*	0.92	2.12	0.81	1.76	1.73	1.23	1.77	ND*	1.32	1.61	1.13	1.31	1.30	1.00	1.18	1.35	1.71	1.73	1.80	1.53	1.73	1.43			
MW - 5	10.75	7.86	2.89	2.46	2.26	3.28	2.62	2.83	4.12	1.66	1.83	2.77	2.19	2.21	4.65	5.83	2.19	4.44	2.77	4.4	3.71	3.54	2.81	2.80	3.13	4.05	3.00	3.55	4.43	3.64	3.22	4.31	4.03	4.29	3.07	3.18	3.14		
MW - 6	10.94	8.59	2.35	##	##	##	##	##	ND	0.55	0.50	2.47	0.74	##	##	##	1.22	3.19	3.15	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##
MW - 7	9.10	8.96	0.14	0.35	0.26	1.54	1.14	0.93	0.54	1.89	1.99	1.80	2.03	2.55	3.32	4.91	1.48	1.45	1.41	0.9	0.00	1.50	1.92	2.53	3.71	1.28	0.78	1.73	0.91	0.04	1.89	1.58	2.22	2.11	1.90	1.66			
MW - 8	9.25	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 12	7.25	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 13	7.62	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 14	8.39	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 15	10.29	10.21	0.08	0.08	1.08	1.00	0.84	0.26	0.12	0.04	0.04	0.07	0.07	0.08	3.16	1.78	0.31	0.29	0.26	0.26	0.24	0.12	0.22	0.28	0.40	0.31	0.20	0.80	0.20	0.17	0.81	0.07	0.48	0.22	0.71	0.03			
MW - 16	11.21	10.76	0.45	0.73	0.07	0.39	0.17	0.19	0.20	0.06	0.10	0.13	---	0.1	0.34	0.25	0.35	0.37	0.35	0.08	0.28	0.03	0.10	0.23	0.20	0.31	ND	ND	ND	ND	ND	0.01	0.25	0.02	0.01	0.02			
MW - 20	11.76	10.31	1.45	1.47	2.17	2.43	2.77	3.49	2.51	1.4	1.55	2.52	1.77	1.02	3.15	3.99	2.52	2.58	2.63	2.9	2.83	2.61	2.94	2.33	3.02	2.88	3.28	2.90	3.16	2.89	2.88	2.85	2.22	2.49	2.43				
MW - 21	11.52	11.00	0.52	1.25	1.01	1.57	1.48	2.81	1.73	1.43	1.42	1.62	1.38	2.29	3.83	4.79	3.26	3.35	2.13	1.45	2.75	3.31	3.30	3.04	3.62	7.59	3.27	3.32	3.19	3.61	2.96	2.95	2.63	4.18	2.68				
MW - 22	14.87	11.89	2.98	1.03	1.05	1.83	1.68	0.83	0.69	0.97	0.89	0.76	1.11	0.28	0.37	1.77	1.25	1.24	1.21	0.75	0.66	0.66	0.78	0.64	0.65	0.50	0.51	0.38	0.30	0.01	0.51	0.87	0.62	0.45	0.48	0.44			
MW - 23	10.86	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 24	10.14	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 25	13.55	9.79	3.76	3.81	4.19	4.77	3.86	3.89	3.44	2.85	2.89	4.03	3.45	3.44	3.66	4.54	4.03	4.05	4.02	3.73	4.09	3.85	3.70	3.74	3.47	3.89	3.62	3.60	4.20	3.79	3.65	4.01	3.75	3.55	3.33	3.42			
MW - 26	10.71	10.02	0.69	2.46	2.94	3.37	3.14	3.84	3.45	0.75	2.35	3.14	2.48	3.19	3.95	5.59	3.81	3.82	3.79	3.65	3.42	3.29	3.73	3.64	3.24	3.14	3.20	3.56	4.00	3.28	4.26	3.58	3.82	3.41	3.37	2.97			
MW - 27	10.23	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 28	10.65	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW - 29	10.29	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW - 30	10.57	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW - 31	8.96	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW - 32	9.59	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW - 34	11.03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW - 35	13.91	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW - 36	10.40	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW - 37	10.84	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW - 38	9.03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW - 39	8.09	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW - 40	6.42	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW - 41	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
MW - 42	08.80	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
RW - 1	08.54	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
RW - 2	13.41	11.77	1.64	1.47	1.27	4.73	5.12	1.63	5.54	0.06	0.08	1.65	0.08	5.52	4.01	5.19	0.56	0.58	0.53	6.09	6.25	0.42	1.13	2.90	3.09	3.53	1.65	1.18	1.26	1.35	1.88	2.05	2.41	3.02	2.12	3.34			
RW - 3	16.42	14.81	1.61	2.11	2.26	4.71	2.22	2.63	3.77	2.08	2.03	2.52	2.12	3.03	ND	3.31	3.17	3.15	3.22	2.28	3.44	2.85	2.71	3.46	2.98	3.10	1.91	3.95	2.40	2.50	3.08	1.97	2.49	1.64	2.17	2.09			
RW - 4	12.96	11.83	1.13	0.53	2.85	##	##	03.37	2.85	2.96	2.97	3.80	3.01	02.39	3.06	4.32	4.33	4.17	4.18	3.1	4.1	03.69	3.65	3.69	3.67	3.05	3.80	2.77	3.30	2.73	2.65	2.32	2.02	2.22	2.93	2.93			
RW - 5	11.95	11.24	0.71	##	##	##	##	##	ND*	0.44	0.33	0.65	0.34	4.64	0.49	4.49	5.28	5.27	5.26	5.42	3.75	5.00	5.44	5.10	0.70	2.95	1.55	3.05	0.42	0.36	0.50	4.97	2.76	2.47	2.66	3.21			
RW - 6	11.94	11.66	0.28	0.55	0.49	02.33	0.91	00.73	1.91	0.83	0.88	0.96	0.91	00.90	2.61	1.64	0.73	0.6	1.61	0.93	5.35	1.05	1.27	1.22	0.90	0.90	0.85	0.68	0.87	0.92	1.46	1.29	0.81	0.67	0.73	0.74			
RW - 8 **	---	---	---	---	---	---	---	---	---	0.02	0.02	0.03	0.03	0.96	1.99	---	1.15	2.2	3.62	1.2	2.34	0.02	0.01	---	---	---	---	---	---	---	---	---	---	---	---	---	---		
RW - 9	15.44	13.12	2.32	1.73	2.23	3.79	1.53	3.45	4.52	0.11	2.38	2.28	1.51	2.88	4.32	5.58	3.72	3.77	3.69	2.84	3.25	2.70	2.69	3.50	3.66	2.47	3.09	3.57	2.45	2.35	3.19	2.15	3.18	2.75	3.09	3.81			
RW - 10	15.98	12.73	3.25	3.11	3.24	4.53	3.80	4.06	2.46	1.52	1.60	3.70	0.66	3.48	4.64	4.28	3.65	3.67	3.71	3.67	3.78	4.07	3.79	4.27	4.70	4.15	3.86	3.45											

Table 1:

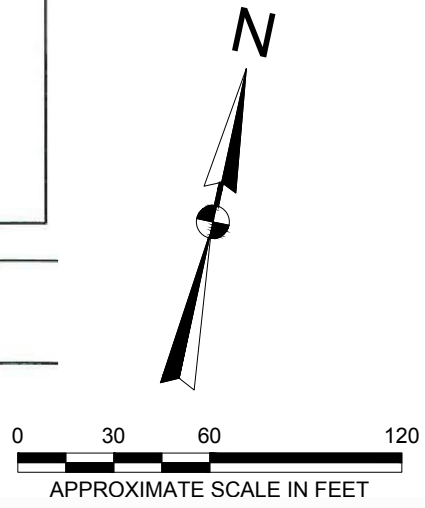
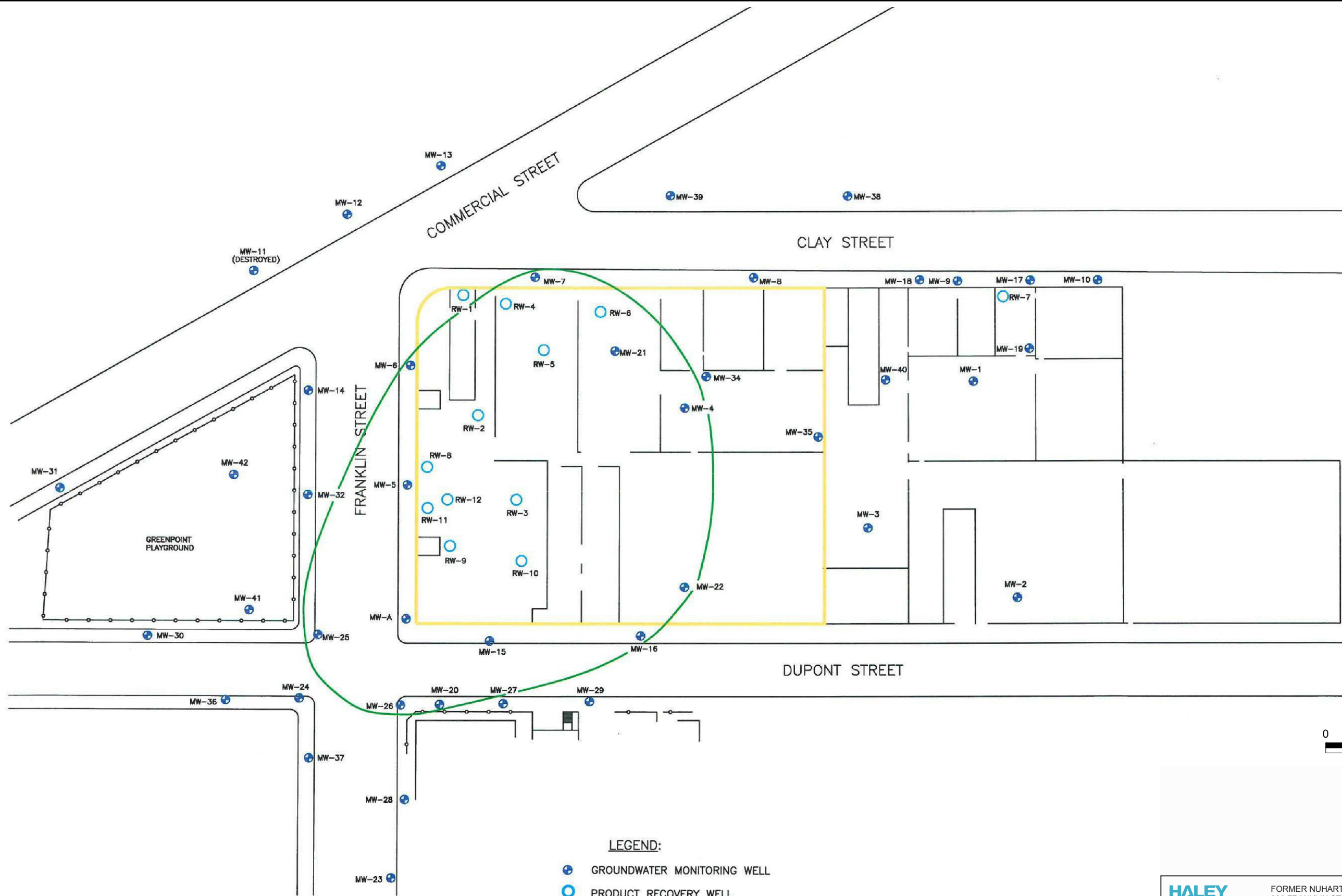
Attachment A: Apparent Thickness of LNAPL
Former NuHart Plastic Manufacturing Site, NYSDEC #224136
280 Franklin Street
Brooklyn, NY

Readings taken 5/1/19 between 7:00
am and 11:00 am (High tide @ 8:11
AM and Low tide @ 1:54 PM)

Well Number	*Depth to Water (feet)	*Depth to Product (feet)	Apparent Thickness of LNAPL (feet)																																						
			2016			2015								2014								2013								2012											
			Feb-16	Jan-16	Dec-15	Nov-15	Oct-15	Sep-15	Aug-15	Jul-15	Jun-15	May-15	Apr-15	Mar-15	Jan-15	Sep-14	Aug-14	Jul-14	Jun-14	May-14	Apr-14	Mar-14	Feb-14	Jan-14	Dec-13	Nov-13	Oct-13	Sep-13	Aug-13	Jul-13	Apr-13	Mar-13	Feb-13	Jan-13	Dec-12	Nov-12	Oct-12	Sep-12			
MW-4	ND*	9.29	1.85	1.77	1.96	2.04	1.99	1.77	2.22	4.27	0.35	0.44	—	0.56	—	1.75	1.90	1.24	Trace	—	0.01	Trace	0.23	0.22	0.30	0.66	0.78	###	3.49	2.22	0.59	0.67	0.44	0.44	0.80	0.31	0.33	3.13			
MW-5	10.75	7.86	1.85	3.24	4.83	5.41	4.16	4.26	4.45	4.22	2.30	2.41	2.55	3.10	4.40	4.79	5.03	1.97	3.39	—	3.14	2.80	2.98	—	6.46	7.17	5.54	###	5.08	3.92	3.00	2.39	4.32	3.00	4.11	3.50	3.41	5.58			
MW-6	10.94	8.59	###	###	###	###	###	###	###	###	2.30	###	###	###	###	###	###	###	###	—	—	2.84	3.43	—	2.89	2.76	2.00	###	2.42	2.82	—	—	—	—	—	—	—	3.49	2.14		
MW-7	9.10	8.96	2.31	2.47	3.44	3.31	2.58	1.46	1.28	0.99	1.58	ND	1.94	1.79	###	2.01	2.16	0.60	0.01	—	0.17	0.17	—	—	4.78	4.70	4.00	###	2.77	1.06	1.92	4.92	5.45	1.30	1.36	2.00	1.84	1.83			
MW-8	9.25	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	—	ND	ND	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-12	7.25	ND	—	—	ND	ND	—	—	—	—	—	—	ND	ND	—	ND	—	—	—	—	ND	ND	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-13	7.62	ND	—	—	ND	ND	—	—	—	—	—	—	ND	ND	—	ND	—	—	—	—	ND	ND	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-14	8.39	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	—	ND	ND	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-15	10.29	10.21	0.04	0.60	3.08	3.07	1.97	1.05	1.05	ND	1.24	1.21	1.56	1.67	1.71	2.19	2.32	###	0.45	—	0.61	0.30	0.38	—	3.11	3.19	3.34	###	2.14	0.70	—	0.32	1.07	—	1.56	0.99	0.76	2.67			
MW-16	11.21	10.76	0.16	0.02	0.11	0.02	0.12	0.05	0.05	0.14	0.13	0.15	0.03	0.08	0.02	—	0.03	0.99	Trace	—	0.01	0.01	0.10	—	0.23	0.22	0.19	###	0.05	0.07	0.02	0.01	0.10	0.25	0.20	ND	0.24	0.20			
MW-20	11.76	10.31	1.99	2.46	3.52	3.02	3.33	3.25	3.12	2.88	2.58	2.79	3.84	4.38	5.13	1.87	1.71	2.92	2.06	—	1.47	2.90	2.58	4.19	5.07	4.90	4.11	###	3.33	1.37	3.32	1.20	1.10	1.35	1.38	3.39	3.15	3.80			
MW-21	11.52	11.00	2.42	2.97	4.46	3.85	4.51	3.63	3.32	2.97	2.53	2.77	2.98	3.46	3.23	3.62	4.64	4.90	1.99	—	2.69	2.47	2.48	3.37	3.13	3.72	4.66	###	4.37	3.66	3.38	3.43	3.75	4.10	4.23	2.89	2.04	4.15			
MW-22	14.87	11.89	0.15	0.22	1.33	1.01	0.49	1.17	1.04	0.79	0.86	0.84	0.74	1.33	1.27	1.03	1.02	0.54	0.85	—	0.74	0.86	0.75	1.22	1.07	0.69	0.50	###	1.12	0.86	0.50	0.62	1.15	1.20	0.18	0.21	0.18	1.80			
MW-23	10.86	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-24	10.14	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-25	13.55	9.79	3.32	3.43	3.68	3.53	3.63	3.53	3.68	3.53	2.81	3.24	3.36	1.07	1.03	3.16	4.02	3.65	3.48	—	3.91	3.75	—	—	5.66	5.56	4.01	###	4.41	3.58	3.96	3.96	4.34	3.70	2.82	7.86	4.40	3.96			
MW-26	10.71	10.02	3.82	3.41	4.23	4.08	3.77	4.00	3.70	3.65	3.18	3.33	3.64	4.14	4.11	3.84	3.70	4.50	3.02	—	2.71	3.48	3.80	4.34	4.44	4.47	4.62	###	4.18	3.69	2.86	2.33	1.00	2.45	1.62	—	2.61	4.02			
MW-27	10.23	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-28	10.65	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-29	10.29	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-30	10.57	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-31	8.96	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-32	9.59	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-34	11.03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-35	13.91	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-36	10.40	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-37	10.84	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-38	9.03	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-39	8.09	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-40	6.42	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-41	—	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-42	08.80	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
RW-1	08.54	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
RW-2	13.41	11.77	2.70	2.83	4.28	—	2.64	2.97	3.41	5.54	5.28	5.44	2.82	4.19	4.52	4.52	4.53	4.52	0.11	—	1.30	3.05	2.31	2.80	3.19	5.09	3.86	###	4.07	2.96	2.92	3.48	3.75	4.20	2.52	1.92	1.50	5.85			
RW-3	16.42	14.81	1.64	2.37	4.27	2.92	4.14	1.39	2.14	4.31	2.23	2.23	1.81	3.28	3.41	3.50	3.45	3.56	4.12	—	1.58	2.90	2.28	4.60 (est)	3.60	3.33	1.68	###	2.96	1.44	3.90	3.20	3.34	3.70	3.58	2.84	3.50	3.88			
RW-4	12.96	11.83	2.03	2.51	2.82	2.31	1.99	1.09	2.02	3.65	3.66	3.53	3.53	1.43	1.35	2.78	2.88	###	2.86	—	1.81	3.25	3.27	2.45	2.67	2.30	1.46	###	2.75	1.08	3.06	3.15	3.00	3.05	—	3.45	3.35				
RW-5	11.95	11.24	2.53	1.92	1.96	5.64	4.18	2.03	5.79	4.87	4.69	4.75	0.70	0.85	0.91	0.85	0.43	0.17	0.17	—	0.12	0.93	0.43	0.52	0.60	0.79	0.54	###	0.69	0.51	2.62	—	—	—	2.35	3.00	1.88	—			
RW-6	11.94	11.66	0.76	0.74	0.77	0.65	0.66	0.65	0.61	0.78	1.96	2.35	0.71	1.19	1.14	0.71	0.64	0.78	0.79	—	0.45	1.28	0.96	0.41	0.94	1.30	0.67	###	0.10	0.08	0.45	0.50	0.21	0.40	0.15	0.90	0.22	0.06			
RW-8**	—	—	—	—	—	—	—	—	—	—	—	—	2.14	2.93	2.92	4.01	4.48	###	2.95	—	0.65	1.47	0.86	2.37	2.46	3.92	4.13	###	4.59	3.64	—	—	—	—	—	—	—	—			
RW-9	15.44	13.12	2.42	3.46	4.62	4.37	3.52	2.68	3.23	3.04	4.82	4.79	4.28	5.68	5.65	4.81	4.59	4.92	4.14	—	1.02	2.90																			

Attachment B

Site Figure



- LEGEND:**
- ⊕ GROUNDWATER MONITORING WELL
 - ⊙ PRODUCT RECOVERY WELL
 - IHWDS BOUNDARY
 - EXTENT OF LNAPL ON GROUNDWATER

NOTES:

1. THE BASE MAP WAS DEVELOPED FROM AN ELECTRONIC FILE PROVIDED BY DUPONT STREET DEVELOPERS, LLC, ENTITLED "AERIAL EXTENT OF LNAPL ON GROUNDWATER," DATED MARCH 23, 2015, ORIGINAL SCALE 1" = 60'.

HALEY ALDRICH FORMER NUHART PLASTIC MANUFACTURING
 280 FRANKLIN STREET
 BROOKLYN, NEW YORK

AERIAL EXTENT OF LNAPL ON GROUNDWATER

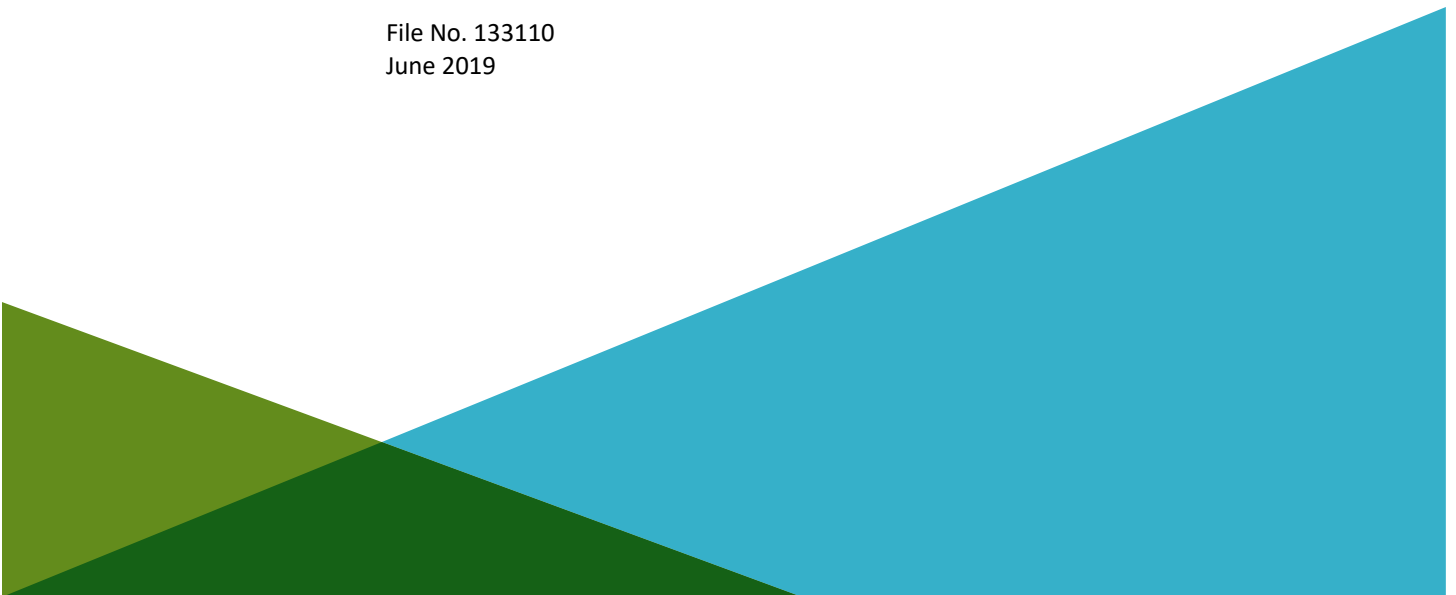
MAY 2019 FIGURE 1

REPORT ON
NUHART PLASTICS SITE
49 DUPONT STREET
BROOKLYN, NEW YORK

by
Haley & Aldrich of New York
New York, New York

for
Dupont Street Developers, LLC
Elmhurst, New York

File No. 133110
June 2019





HALEY & ALDRICH OF NEW YORK
1441 Broadway, Suite 6031
New York, NY 10018
646.518.7735

12 June 2019
File No. 133110-002

Via Email: yukyin.wong@dec.ny.gov
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 2
47-40 21st Street
Long Island City, New York 11101

Attention: Mr. Bryan Wong

Subject: Project Status Report
Former NuHart Plastics Manufacturing Site # 224136
280 Franklin Street
Brooklyn, New York

Dear Mr. Wong:

Haley & Aldrich of New York is pleased to present this Project Status Report on behalf of Dupont Street Developers, LLC for the above referenced Site. Copies of this Project Status Report have also been provided to Dawn Hettrick of the New York State Department of Health. The Project Status Report is for April 2019 to May 2019. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Senior Associate

CC:

Dawn Hettrick (NYSDOH)
Dupont Street Developers, LLC
Jane O'Connell (NYSDEC)
Wendy A. Marsh

Email: dawn.hettrick@health.ny.gov
Email: bojinzhu@gmail.com
Email: jane.oconnell@dec.ny.gov
Email: wmarsh@hancocklaw.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from April 2019 through May 2019. Activities during this period were conducted by Haley and Aldrich of New York (HANY). A Site Plan showing the general Site layout, nearby area, and associated wells is included as Figure 1.

Interim remedial measure (IRM) activities for monitoring and removal of light non-aqueous-phase liquid (LNAPL) at the Site were performed during the monitoring period in general conformance with the New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (Monthly) were performed by HANY on 5 June 2019. The apparent LNAPL thickness measurement table is provided as Attachment A. Additionally, a Well Location Map showing the extent of LNAPL based on the monitoring date is shown as **Figure 1**.

Maintenance Activities

General maintenance activities include collection of spent IRM-related absorbent materials in the vicinity of recovery wells, placing new absorbent materials, general housekeeping activities and proper labeling of waste containers generated during this IRM event. Both skimming systems associated with recovery wells RW-8 and RW-12 were found to be operational during the Site visit.

Monitoring and LNAPL Removal

Gauging of onsite and offsite monitoring and recovery wells associated with the Site was performed and the wells that could not be accessed and/or gauged are identified on **Attachment A**. No changes were observed in the lateral extent of the LNAPL plume. On 5 June 2019, high tide was observed from 11:52 AM to 5:34 PM following the well gauging period (by NOAA/NOS/CO-OPS Station ID (8517673) Hunters Point, Newtown Creek, NY). The depths to the water table were variable relative to the depths noted in the previous status reports, with some wells showing increases and some wells showing decreases. LNAPL apparent thicknesses were also variable, with increases generally noted in wells where the depth to water increased and decreases noted in wells where the depth to water decreased.

The product recovery holding reservoirs were emptied during this event. The amount of LNAPL removed from the wells was estimated at 52 gallons, including LNAPL from the drums associated with the skimmers on recovery wells RW-8 and RW-12. Based on previous LNAPL estimates, an estimated 3,097 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed. The removed LNAPL is stored in intermediate bulk container (IBC) tanks located in the Site building, pending pickup and offsite disposal. When the IBC tanks are nearly full and/or the containerized spent absorbent materials require disposal, the designated waste management company will be contacted and waste disposal requested.

Eastern Environmental Solutions, Inc. (Eastern) is presently contracted to conduct waste management activities for disposal of product from the IBC tanks at the Site. To date, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. No waste was transported from the Site during this period and transportation and disposal

information will continue to be included in the progress reports following the months during which disposal activities occur.

Feasibility Study, Proposed Remedial Action Work Plan (PRAP) and Record of Decision

The Feasibility study prepared by GZA was submitted to the NYSDEC in January 2017. The NYSDEC issued the proposed remedial action work plan (PRAP) in September 2018. A public comment hearing was held on 4 October 2018 to discuss the proposed remedy for the Site. The public comment period ended on 9 November 2018. The Record of Decision was issued by the NYSDEC in March 2019 and received by the repositories in April 2019. The translated fact sheet was sent to the NYSDEC for review on 16 May 2017 and finalized on 30 May 2019. Translated fact sheets were distributed to applicable site contacts on 3 June 2019.

Site Soil Management Report

There were no requests for evaluation of potential work in the LNAPL plume area during this period.

Attachments

Attachment A – Apparent Thickness of LNAPL

Attachment B – Well Location Map showing areal extent of LNAPL on groundwater

Attachment A

Apparent Thickness of LNAPL

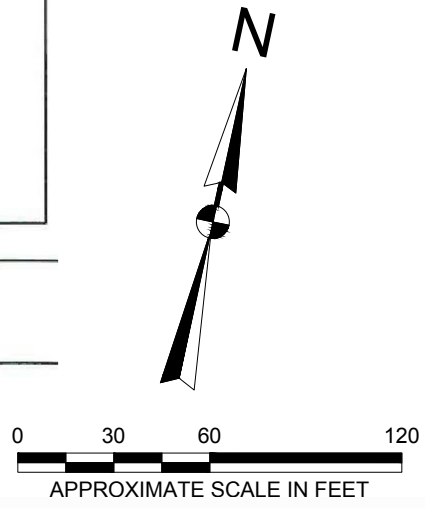
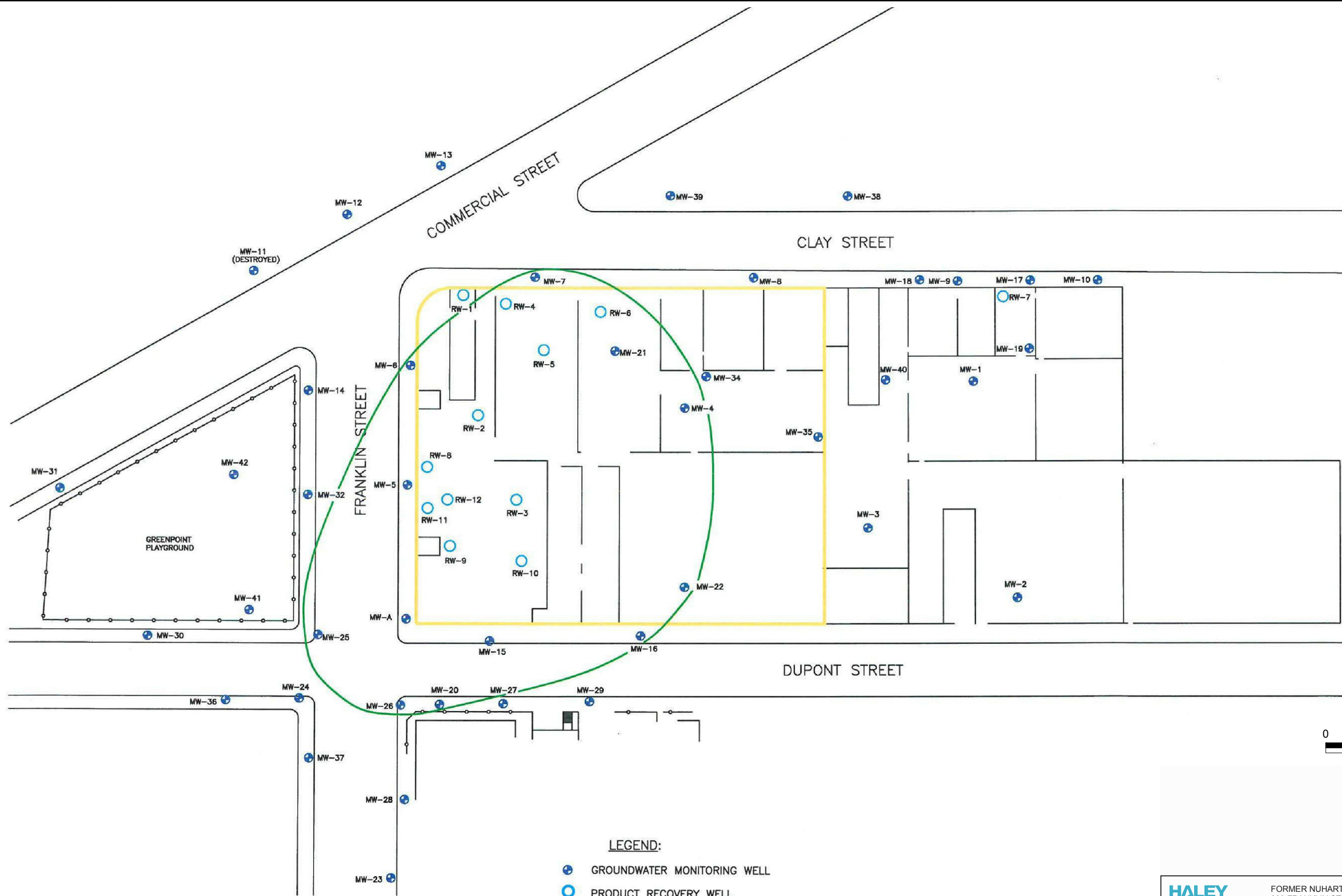
Table 1:
Attachment A: Apparent Thickness of LNAPL
Former NuHart Plastic Manufacturing Site, NYSDEC #224136
280 Franklin Street
Brooklyn, NY

Readings taken 6/5/19 between 7:00
am and 11:00 am (High tide @ 11:52
AM and Low tide @ 5:34 PM)

Well Number	*Depth to Water (feet)	*Depth to Product (feet)	Apparent Thickness of LNAPL (feet)																																		
			2019							2018							2017							2016													
			Jun-19	May-19	Apr-19	Mar-19	Feb-19	Jan-19	Dec-18	Oct-18	Jun-18	May-18	Apr-18	Mar-18	Feb-18	Jan-18	Nov-17	Oct-17	Sep-17	Aug-17	Jul-17	Jun-17	May-17	Apr-17	Mar-17	Feb-17	Jan-17	Dec-16	Nov-16	Oct-16	Sep-16	Aug-16	Jul-16	Jun-16	May-16		
MW-4	ND*	ND	ND*	##	ND*	ND*	ND*	ND*	ND*	ND*	0.12	1.13	0.65	0.73	ND*	0.92	2.12	0.81	1.76	1.73	1.23	1.77	ND*	1.32	1.61	1.13	1.31	1.30	1.00	1.18	1.35	1.71	1.73	1.80	1.53		
MW-5	14.58	9.43	5.15	2.89	2.46	2.26	3.28	2.62	2.83	4.12	1.66	1.83	2.77	2.19	2.21	4.65	5.83	2.19	4.44	4.4	3.71	3.54	2.81	2.80	3.13	4.05	3.00	3.55	4.43	3.64	4.31	4.03	4.29	3.07			
MW-6	8.62	8.12	0.50	2.35	##	##	##	##	##	ND	0.55	0.50	2.47	0.74	##	##	##	1.22	3.19	3.15	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##		
MW-7	10.15	8.85	1.30	0.14	0.35	0.26	1.54	1.14	0.93	0.54	1.89	1.99	1.80	2.03	2.55	3.32	4.91	1.48	1.45	1.41	0.9	0.00	1.50	1.92	2.53	3.71	1.28	0.78	1.73	0.91	0.04	1.89	1.58	2.22	2.11		
MW-8	9.26	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-12	7.08	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-13	7.51	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-14	8.26	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-15	11.07	10.20	0.87	0.08	0.08	1.08	1.00	0.84	0.26	0.12	0.04	0.04	0.07	0.07	0.08	3.16	1.78	0.31	0.29	0.26	0.26	0.24	0.12	0.22	0.28	0.40	0.31	0.20	0.80	0.20	0.17	0.81	0.07	0.48	0.22		
MW-16	11.94	10.77	1.17	0.45	0.73	0.07	0.39	0.17	0.19	0.20	0.06	0.10	0.13	—	0.1	0.34	0.25	0.35	0.37	0.35	0.08	0.28	0.03	0.10	0.23	0.20	0.31	ND	ND	ND	ND	ND	0.01	0.25	0.02		
MW-20	13.86	10.20	3.66	1.45	1.47	2.17	2.43	2.77	3.49	2.51	1.4	1.55	2.52	1.77	1.02	3.15	3.99	2.52	2.58	2.63	2.9	2.83	2.61	2.94	2.33	3.02	3.02	2.88	3.28	2.90	3.16	2.89	2.88	2.85	2.22		
MW-21	12.86	11.02	1.84	0.52	1.25	1.01	1.57	1.48	2.81	1.73	1.43	1.42	1.62	1.38	2.29	3.83	4.79	3.26	3.35	2.13	1.45	2.75	3.31	3.30	3.04	3.62	7.59	3.27	3.32	1.25	2.39	3.61	2.96	2.95	2.63		
MW-22	13.93	11.65	2.28	2.98	1.03	1.05	1.83	1.68	0.83	0.69	0.97	0.89	0.76	1.11	0.28	0.37	1.77	1.25	1.24	1.21	0.75	0.66	0.66	0.78	0.64	0.65	0.50	0.51	0.38	0.30	0.01	0.51	0.87	0.62	0.45		
MW-23	10.83	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-24	10.10	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-25	14.34	9.73	4.61	3.76	3.81	4.19	4.77	3.86	3.89	3.44	2.85	2.89	4.03	3.45	3.44	3.66	4.54	4.03	4.05	4.02	3.73	4.09	3.85	3.70	3.74	3.47	3.89	3.62	3.60	4.20	3.79	3.65	4.01	3.75	3.55		
MW-26	14.75	9.85	4.90	0.69	2.46	2.94	3.37	3.14	3.84	3.45	0.75	2.35	3.14	2.48	3.19	3.95	5.59	3.81	3.82	3.79	3.65	3.42	3.29	3.73	3.64	3.24	3.14	3.20	3.56	4.00	3.28	4.26	3.58	3.82	3.41		
MW-27	10.18	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-28	10.82	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-29	10.72	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-30	8.97	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-31	8.77	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	—	—	—	—	—	—	—	—	
MW-32	9.50	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-34	10.84	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-35	13.88	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-36	10.35	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-37	10.82	ND	ND	ND	ND	ND	ND	ND	ND	ND*	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-38	9.02	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	—	—	—	—	—	—	—	—	—	
MW-39	8.02	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-40	6.39	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
MW-42	8.55	ND	ND	ND	ND	ND	ND	ND	ND*	ND*	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
RW-1	8.47	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
RW-2	15.61	11.53	4.08	1.64	1.47	1.27	4.73	5.12	1.63	5.54	0.06	0.08	1.65	0.08	5.52	4.01	5.19	0.56	0.58	0.53	6.09	6.25	0.42	1.13	2.90	3.09	3.53	1.65	1.18	1.26	1.35	1.88	2.05	2.41	3.02		
RW-3	18.60	14.64	3.96	1.61	2.11	2.26	4.71	2.22	2.63	3.77	2.08	2.03	2.52	2.12	3.03	ND	3.31	3.17	3.15	3.22	2.28	3.44	2.85	2.71	3.46	2.98	3.10	1.91	3.95	2.40	2.50	3.08	1.97	2.49	1.64		
RW-4	16.49	11.77	4.72	1.13	0.53	2.85	##	##	03.37	2.85	2.96	2.97	3.80	3.01	02.39	3.06	4.32	4.33	4.17	4.18	3.1	4.1	03.69	3.65	3.69	3.67	3.05	3.80	2.80	2.77	3.30	2.73	2.65	2.32	2.02		
RW-5	ND	8.77	##	0.71	##	##	##	##	##	ND*	0.44	0.33	0.65	0.34	4.64	0.49	4.49	5.28	5.27	5.26	5.42	3.75	5.00	5.44	5.10	0.70	2.95	1.55	3.05	0.42	0.36	0.50	4.97	2.76	2.47		
RW-6	13.18	11.61	1.57	0.28	0.55	0.49	02.33	0.91	00.73	1.91	0.83	0.88	0.96	0.91	00.90	2.61	1.64	0.73	0.6	1.61	0.93	5.35	1.05	1.27	1.22	0.90	0.90	0.85	0.68	0.87	0.92	1.46	1.29	0.81	0.67		
RW-8**	—	—	—	—	—	—	—	—	—	—	0.02	0.02	0.03	0.03	0.96	1.99	—	1.15	2.2	3.62	1.2	2.34	0.02	0.01	—	—	—	—	—	—	—	—	—	—	—		
RW-9	17.51	12.94	4.57	2.32	1.73	2.23	3.79	1.53	3.45	4.52	0.11	2.38	2.28	1.51	2.88	4.32	5.58	3.72	3.77	3.69	2.84	3.25	2.70	2.69	3.50	3.66	2.47	3.09	3.57	2.45	2.35	3.19	2.15	3.18	2.75		
RW-10	16.97	13.05	3.92	3.25	3.11	3.24	4.53	3.80	4.06	2.46	1.52	1.60	3.70	0.66	3.48	4.64	4.28	3.65	3.67	3.71	3.67	3.78	4.07	3.79	4.27	4.70	4.15	3.86	3.45	3.80	3.36	4.44	3.91	3.69	3.74		
RW-11	16.99	12.34	4.65	3.32	1.92	2.35	4.74	2.69	3.02	2.21	2.51	2.52	4.34	2.41	2.50	5.01	5.5	2.97	4.57	3.93	2.33	3.00	2.92	3.00	3.55	3.73	2.65	1.90	2.04	2.43	2.12	3.66	2.98	3.43	3.08		
RW-12**	—	—	—	—	—	—	—	—	—	—	0.11	0.02	2.61	0.02	1.12	1.5	5.96	3.65	5.4	2.68	0.01																

Attachment B

Site Figure



- LEGEND:**
- + GROUNDWATER MONITORING WELL
 - PRODUCT RECOVERY WELL
 - IHWDS BOUNDARY
 - EXTENT OF LNAPL ON GROUNDWATER

NOTES:

1. THE BASE MAP WAS DEVELOPED FROM AN ELECTRONIC FILE PROVIDED BY DUPONT STREET DEVELOPERS, LLC, ENTITLED "AERIAL EXTENT OF LNAPL ON GROUNDWATER," DATED MARCH 23, 2015, ORIGINAL SCALE 1" = 60'.

HALEY ALDRICH
 FORMER NUHART PLASTIC MANUFACTURING
 280 FRANKLIN STREET
 BROOKLYN, NEW YORK

AERIAL EXTENT OF LNAPL ON GROUNDWATER

JUNE 2019

FIGURE 1



HALEY & ALDRICH OF NEW YORK
1441 Broadway, Suite 6031
New York, NY 10018
646.518.7735

17 July 2019
File No. 133110-002

Via Email: yukyin.wong@dec.ny.gov
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 2
47-40 21st Street
Long Island City, New York 11101

Attention: Mr. Bryan Wong

Subject: Project Status Report
Former NuHart Plastics Manufacturing Site # 224136
280 Franklin Street
Brooklyn, New York

Dear Mr. Wong:

Haley & Aldrich of New York is pleased to present this Project Status Report on behalf of Dupont Street Developers, LLC for the above referenced Site. Copies of this Project Status Report have also been provided to Dawn Hettrick of the New York State Department of Health. The Project Status Report is for May 2019 to June 2019. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Senior Associate

CC:

Dawn Hettrick (NYSDOH)
Dupont Street Developers, LLC
Jane O'Connell (NYSDEC)
Wendy A. Marsh

Email: dawn.hettrick@health.ny.gov
Email: bojinzhu@gmail.com
Email: jane.oconnell@dec.ny.gov
Email: wmarsh@hancocklaw.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from May 2019 through June 2019. Activities during this period were conducted by Haley and Aldrich of New York (HANY). A Site Plan showing the general Site layout, nearby area, and associated wells is included as Figure 1.

Interim remedial measure (IRM) activities for monitoring and removal of light non-aqueous-phase liquid (LNAPL) at the Site were performed during the monitoring period in general conformance with the New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (Monthly) were performed by HANY on 16 July 2019. The apparent LNAPL thickness measurement table is provided as Attachment A. Additionally, a Well Location Map showing the extent of LNAPL based on the monitoring date is shown as **Figure 1**.

Maintenance Activities

General maintenance activities include collection of spent IRM-related absorbent materials in the vicinity of recovery wells, placing new absorbent materials, general housekeeping activities and proper labeling of waste containers generated during this IRM event. Both skimming systems associated with recovery wells RW-8 and RW-12 were found to be operational during the Site visit.

Monitoring and LNAPL Removal

Gauging of onsite and offsite monitoring and recovery wells associated with the Site was performed and the wells that could not be accessed and/or gauged are identified on **Attachment A**. No changes were observed in the lateral extent of the LNAPL plume. On 16 July 2019, high tide was observed from 10:10 AM to 3:49 PM partially during the well gauging period (by NOAA/NOS/CO-OPS Station ID (8517673) Hunters Point, Newtown Creek, NY). The depths to the water table were variable relative to the depths noted in the previous status reports, with some wells showing increases and some wells showing decreases. LNAPL apparent thicknesses were also variable, with increases generally noted in wells where the depth to water increased and decreases noted in wells where the depth to water decreased.

The product recovery holding reservoirs were emptied during this event. The amount of LNAPL removed from the wells was estimated at 55 gallons, including LNAPL from the drums associated with the skimmers on recovery wells RW-8 and RW-12. Based on previous LNAPL estimates, an estimated 3,152 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed. The removed LNAPL is stored in intermediate bulk container (IBC) tanks located in the Site building, pending pickup and offsite disposal. When the IBC tanks are nearly full and/or the containerized spent absorbent materials require disposal, the designated waste management company will be contacted and waste disposal requested.

Eastern Environmental Solutions, Inc. (Eastern) is presently contracted to conduct waste management activities for disposal of product from the IBC tanks at the Site. To date, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. No waste was transported from the Site during this period and transportation and disposal

information will continue to be included in the progress reports following the months during which disposal activities occur.

Feasibility Study, Proposed Remedial Action Work Plan (PRAP) and Record of Decision

The Feasibility study prepared by GZA was submitted to the NYSDEC in January 2017. The NYSDEC issued the proposed remedial action work plan (PRAP) in September 2018. A public comment hearing was held on 4 October 2018 to discuss the proposed remedy for the Site. The public comment period ended on 9 November 2018. The Record of Decision was issued by the NYSDEC in March 2019 and received by the repositories in April 2019. The translated fact sheet was sent to the NYSDEC for review on 16 May 2017 and finalized on 30 May 2019. Translated fact sheets were distributed to applicable site contacts on 3 June 2019.

Site Soil Management Report

There were no requests for evaluation of potential work in the LNAPL plume area during this period.

Attachments

Attachment A – Apparent Thickness of LNAPL

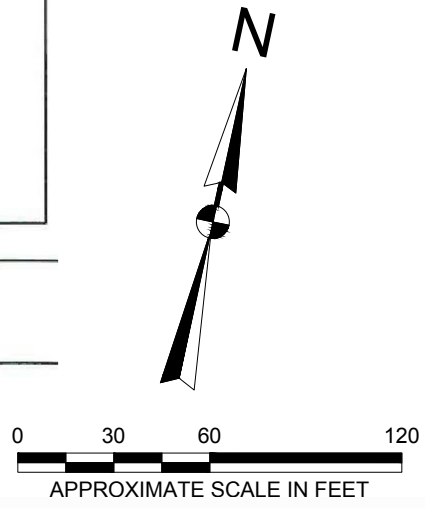
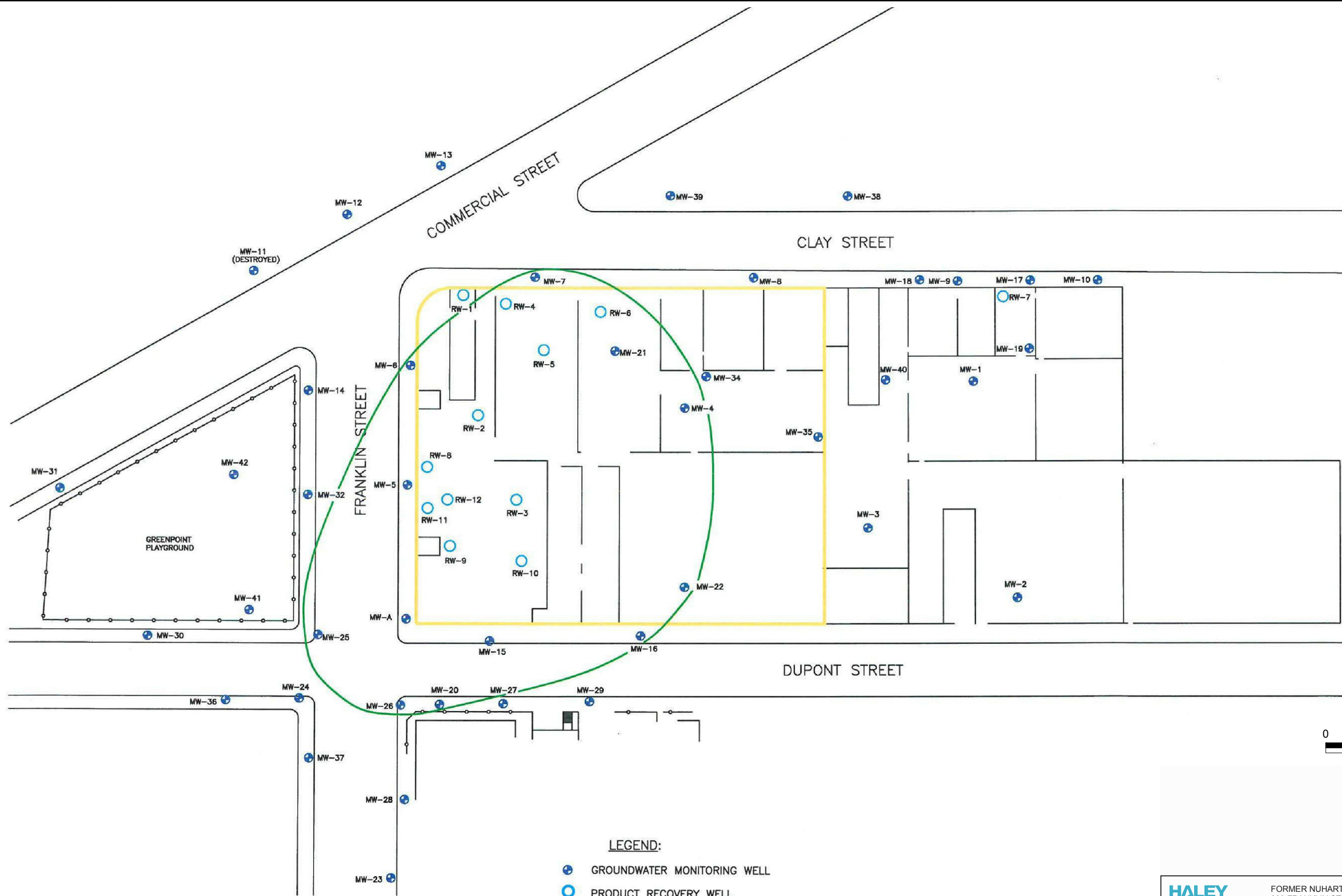
Attachment B – Well Location Map showing areal extent of LNAPL on groundwater

Attachment A

Apparent Thickness of LNAPL

Attachment B

Site Figure



- LEGEND:**
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HALEY ALDRICH FORMER NUHART PLASTIC MANUFACTURING
 280 FRANKLIN STREET
 BROOKLYN, NEW YORK

AERIAL EXTENT OF LNAPL ON GROUNDWATER

FEBRUARY 2018 FIGURE 1



HALEY & ALDRICH OF NEW YORK
1441 Broadway, Suite 6031
New York, NY 10018
646.518.7735

16 August 2019
File No. 133110-002

Via Email: yukyin.wong@dec.ny.gov
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 2
47-40 21st Street
Long Island City, New York 11101

Attention: Mr. Bryan Wong

Subject: Project Status Report
Former NuHart Plastics Manufacturing Site # 224136
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Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Senior Associate

CC:

Dawn Hettrick (NYSDOH)
Dupont Street Developers, LLC
Jane O'Connell (NYSDEC)
Wendy A. Marsh

Email: dawn.hettrick@health.ny.gov
Email: bojinzhu@gmail.com
Email: jane.oconnell@dec.ny.gov
Email: wmarsh@hancocklaw.com

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The product recovery holding reservoirs were emptied during this event. The amount of LNAPL removed from the wells was estimated at 55 gallons, including LNAPL from the drums associated with the skimmers on recovery wells RW-8 and RW-12. Based on previous LNAPL estimates, an estimated 3,207 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed. The removed LNAPL is stored in intermediate bulk container (IBC) tanks located in the Site building, pending pickup and offsite disposal. When the IBC tanks are nearly full and/or the containerized spent absorbent materials require disposal, the designated waste management company will be contacted and waste disposal requested.

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Site Soil Management Report

There were no requests for evaluation of potential work in the LNAPL plume area during this period.

Attachments

Attachment A – Apparent Thickness of LNAPL

Attachment B – Well Location Map showing areal extent of LNAPL on groundwater

Attachment A

Apparent Thickness of LNAPL

Table 1:
Attachment A: Apparent Thickness of LNAPL
Former NuHart Plastic Manufacturing Site, NYSDEC #224136
280 Franklin Street
Brooklyn, NY

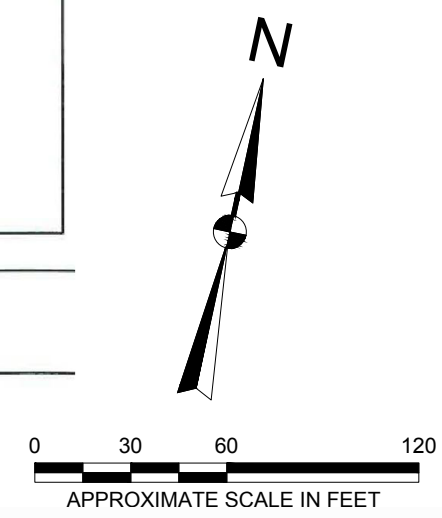
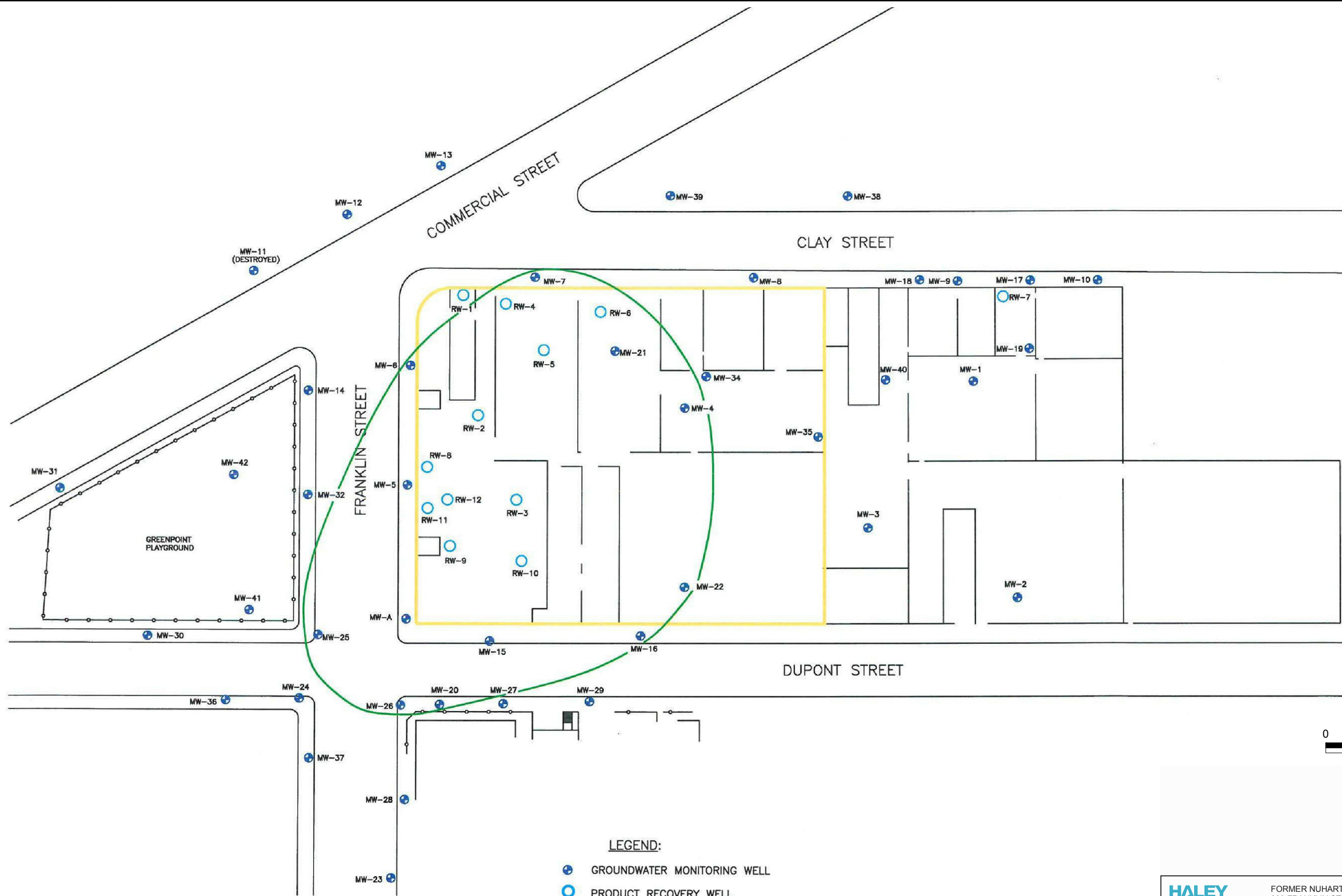
Readings taken 8/16/19 between
7:00 am and 11:00 am (High tide @
11:10 AM and Low tide @ 4:50 PM)

Well Number	*Depth to Water (feet)	*Depth to Product (feet)	Apparent Thickness of LNAPL (feet)																																				
			2019								2018								2017								2016												
			Aug-19	Jul-19	Jun-19	May-19	Apr-19	Mar-19	Feb-19	Jan-19	Dec-18	Oct-18	Jun-18	May-18	Apr-18	Mar-18	Feb-18	Jan-18	Nov-17	Oct-17	Sep-17	Aug-17	Jul-17	Jun-17	May-17	Apr-17	Mar-17	Feb-17	Jan-17	Dec-16	Nov-16	Oct-16	Sep-16	Aug-16	Jul-16	Jun-16	May-16		
MW-4	9.55	ND	ND	ND*	ND*	##	ND*	ND*	ND*	ND*	ND*	ND*	0.12	1.13	0.65	0.73	ND*	0.92	2.12	0.81	1.76	1.73	1.23	1.77	ND*	1.32	1.61	1.13	1.31	1.30	1.00	1.18	1.35	1.71	1.73	1.80	1.53		
MW-5	10.84	9.54	1.30	3.73	5.15	2.89	2.46	2.26	3.28	2.62	2.83	4.12	1.66	1.83	2.77	2.19	2.21	4.65	5.83	2.19	4.44	4.4	3.71	3.54	2.81	2.80	3.13	4.05	3.00	3.55	4.43	3.64	3.22	4.31	4.03	4.29	3.07		
MW-6	ND	8.61	##	##	0.50	2.35	##	##	##	##	ND	0.55	0.50	2.47	0.74	##	##	##	##	1.22	3.19	3.15	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##		
MW-7	9.86	9.02	0.84	0.45	1.30	0.14	0.35	0.26	1.54	1.14	0.93	0.54	1.89	1.99	1.80	2.03	2.55	3.32	4.91	1.48	1.45	1.41	0.9	0.00	1.50	1.92	2.53	3.71	1.28	0.78	1.73	0.91	0.04	1.89	1.58	2.22	2.11		
MW-8	9.67	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-12	7.24	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-13	7.79	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-14	8.26	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-15	10.23	10.20	0.03	0.11	0.87	0.08	0.08	1.08	1.00	0.84	0.26	0.12	0.04	0.04	0.07	0.07	0.08	3.16	1.78	0.31	0.29	0.26	0.26	0.24	0.12	0.22	0.28	0.40	0.31	0.20	0.80	0.20	0.17	0.81	0.07	0.48	0.22		
MW-16	10.90	10.89	0.01	0.04	1.17	0.45	0.73	0.07	0.39	0.17	0.19	0.20	0.06	0.10	0.13	—	0.1	0.34	0.25	0.35	0.37	0.35	0.08	0.28	0.03	0.10	0.23	0.20	0.31	ND	ND	ND	ND	ND	0.01	0.25	0.02		
MW-20	12.48	10.19	2.29	2.09	3.66	1.45	1.47	2.17	2.43	2.77	3.49	2.51	1.4	1.55	2.52	1.77	1.02	3.15	3.99	2.52	2.58	2.63	2.9	2.83	2.61	2.94	2.33	3.02	3.02	2.88	3.28	2.90	3.16	2.89	2.88	2.85	2.22		
MW-21	12.56	11.05	1.51	1.41	1.84	0.52	1.25	1.01	1.57	1.48	2.81	1.73	1.43	1.42	1.62	1.38	2.29	3.83	4.79	3.26	3.35	2.13	1.45	2.75	3.31	3.30	3.04	3.62	7.59	3.27	3.32	1.25	2.39	3.61	2.96	2.95	2.63		
MW-22	12.52	11.83	0.69	0.51	2.28	2.98	1.03	1.05	1.83	1.68	0.83	0.69	0.97	0.89	0.76	1.11	0.28	0.37	1.77	1.25	1.24	1.21	0.75	0.66	0.66	0.78	0.64	0.65	0.50	0.51	0.38	0.30	0.01	0.51	0.87	0.62	0.45		
MW-23	10.89	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-24	10.08	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-25	13.20	9.82	3.38	3.83	4.61	3.76	3.81	4.19	4.77	3.86	3.89	3.44	2.85	2.89	4.03	3.45	3.44	3.66	4.54	4.03	4.05	4.02	3.73	4.09	3.85	3.70	3.74	3.47	3.89	3.62	3.60	4.20	3.79	3.65	4.01	3.75	3.55		
MW-26	13.34	9.91	3.43	3.19	4.90	0.69	2.46	2.94	3.37	3.14	3.84	3.45	0.75	2.35	3.14	2.48	3.19	3.95	5.59	3.81	3.82	3.79	3.65	3.42	3.29	3.73	3.64	3.24	3.14	3.20	3.56	4.00	3.28	4.26	3.58	3.82	3.41		
MW-27	10.27	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-28	10.64	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-29	10.88	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-30	8.84	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-31	8.74	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-32	9.51	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-34	11.22	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-35	14.16	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-36	10.35	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-37	10.80	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-38	9.52	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-39	8.68	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-40	6.83	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
MW-42	8.54	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
RW-1	5.60	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
RW-2	13.20	11.79	1.41	0.66	4.08	1.64	1.47	1.27	4.73	5.12	1.63	5.54	0.06	0.08	1.65	0.08	5.52	4.01	5.19	0.56	0.58	0.53	6.09	6.25	0.42	1.13	2.90	3.09	3.53	1.65	1.18	1.26	1.35	1.88	2.05	2.41	3.02		
RW-3	18.21	14.71	3.50	3.25	3.96	1.61	2.11	2.26	4.71	2.22	2.63	3.77	2.08	2.03	2.52	2.12	3.03	ND	3.31	3.17	3.15	3.22	2.28	3.44	2.85	2.71	3.46	2.98	3.10	1.91	3.95	2.40	2.50	3.08	1.97	2.49	1.64		
RW-4	14.72	11.16	3.56	3.07	4.72	1.13	0.53	2.85	##	##	03.37	2.85	2.96	2.97	3.80	3.01	02.39	3.06	4.32	4.33	4.17	4.18	3.1	4.1	03.69	3.65	3.69	3.67	3.05	3.80	2.80	2.77	3.30	2.73	2.65	2.32	2.02		
RW-5	ND	11.40	##	##	##	0.71	##	##	##	##	##	ND*	0.44	0.33	0.65	0.34	4.64	0.49	4.49	5.28	5.27	5.26	5.42	3.75	5.00	5.44	5.10	0.70	2.95	1.55	3.05	0.42	0.36	0.50	4.97	2.76	2.47		
RW-6	12.47	11.77	0.70	0.46	1.57	0.28	0.55	0.49	02.33	0.91	00.73	1.91	0.83	0.88	0.96	0.91	00.90	2.61	1.64	0.73	0.6	1.61	0.93	5.35	1.05	1.27	1.22	0.90	0.90	0.85	0.68	0.87	0.92	1.46	1.29	0.81	0.67		
RW-8**	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
RW-9	16.00	13.01	2.99	3.55	4.57	2.32	1.73	2.23	3.79	1.53	3.45	4.52	0.11	2.38	2.28	1.51	2.88	4.32	5.58	3.72	3.77	3.69	2.84	3.25	2.70	2.69	3.50	3.66	2.47	3.09	3.57	2.45	2.35	3.19	2.15	3.18	2.75		
RW-10	13.53	12.77	0.76	3.04	3.92	3.25	3.11	3.24	4.53	3.80	4.06	2.46	1.52	1.60	3.70	0.66	3.48	4.64	4.28	3.65	3.67	3.71	3.67	3.78	4.07</														

Attachment B

Site Figure

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- LEGEND:**
- + GROUNDWATER MONITORING WELL
 - PRODUCT RECOVERY WELL
 - IHWDS BOUNDARY
 - EXTENT OF LNAPL ON GROUNDWATER

NOTES:

1. THE BASE MAP WAS DEVELOPED FROM AN ELECTRONIC FILE PROVIDED BY DUPONT STREET DEVELOPERS, LLC, ENTITLED "AERIAL EXTENT OF LNAPL ON GROUNDWATER," DATED MARCH 23, 2015, ORIGINAL SCALE 1" = 60'.

HALEY ALDRICH FORMER NUHART PLASTIC MANUFACTURING
280 FRANKLIN STREET
BROOKLYN, NEW YORK

AERIAL EXTENT OF LNAPL ON GROUNDWATER

AUGUST 2019

FIGURE 1



HALEY & ALDRICH OF NEW YORK
1441 Broadway, Suite 6031
New York, NY 10018
646.518.7735

10 September 2019
File No. 133110-002

Via Email: yukyin.wong@dec.ny.gov
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 2
47-40 21st Street
Long Island City, New York 11101

Attention: Mr. Bryan Wong

Subject: Project Status Report
Former NuHart Plastics Manufacturing Site # 224136
280 Franklin Street
Brooklyn, New York

Dear Mr. Wong:

Haley & Aldrich of New York is pleased to present this Project Status Report on behalf of Dupont Street Developers, LLC for the above referenced Site. Copies of this Project Status Report have also been provided to Dawn Hettrick of the New York State Department of Health. The Project Status Report is for July 2019 to August 2019. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Senior Associate

CC:

Dawn Hettrick (NYSDOH)
Dupont Street Developers, LLC
Jane O'Connell (NYSDEC)
Wendy A. Marsh

Email: dawn.hettrick@health.ny.gov
Email: bojinzhu@gmail.com
Email: jane.oconnell@dec.ny.gov
Email: wmarsh@hancocklaw.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from July 2019 through August 2019. Activities during this period were conducted by Haley and Aldrich of New York (HANY). A Site Plan showing the general Site layout, nearby area, and associated wells is included as Figure 1.

Interim remedial measure (IRM) activities for monitoring and removal of light non-aqueous-phase liquid (LNAPL) at the Site were performed during the monitoring period in general conformance with the New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (Monthly) were performed by HANY on 30 August 2019. The apparent LNAPL thickness measurement table is provided as Attachment A. Additionally, a Well Location Map showing the extent of LNAPL based on the monitoring date is shown as **Figure 1**.

Maintenance Activities

General maintenance activities include collection of spent IRM-related absorbent materials in the vicinity of recovery wells, placing new absorbent materials, general housekeeping activities and proper labeling of waste containers generated during this IRM event. Both skimming systems associated with recovery wells RW-8 and RW-12 were found to be operational during the Site visit.

Monitoring and LNAPL Removal

Gauging of onsite and offsite monitoring and recovery wells associated with the Site was performed and the wells that could not be accessed and/or gauged are identified on **Attachment A**. No changes were observed in the lateral extent of the LNAPL plume. On 30 August 2019, high tide was observed from 10:07 AM to 3:59 PM after the well gauging period (by NOAA/NOS/CO-OPS Station ID (8517673) Hunters Point, Newtown Creek, NY). The depths to the water table were variable relative to the depths noted in the previous status reports, with some wells showing increases and some wells showing decreases. LNAPL apparent thicknesses were also variable, with increases generally noted in wells where the depth to water increased and decreases noted in wells where the depth to water decreased.

The product recovery holding reservoirs were emptied during this event. The amount of LNAPL removed from the wells was estimated at 55 gallons, including LNAPL from the drums associated with the skimmers on recovery wells RW-8 and RW-12. Based on previous LNAPL estimates, an estimated 3,262 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed. The removed LNAPL is stored in intermediate bulk container (IBC) tanks located in the Site building, pending pickup and offsite disposal. When the IBC tanks are nearly full and/or the containerized spent absorbent materials require disposal, the designated waste management company will be contacted and waste disposal requested.

Eastern Environmental Solutions, Inc. (Eastern) is presently contracted to conduct waste management activities for disposal of product from the IBC tanks at the Site. To date, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. No waste was transported from the Site during this period and transportation and disposal

information will continue to be included in the progress reports following the months during which disposal activities occur.

Feasibility Study, Proposed Remedial Action Work Plan (PRAP) and Record of Decision

The Feasibility study prepared by GZA was submitted to the NYSDEC in January 2017. The NYSDEC issued the proposed remedial action work plan (PRAP) in September 2018. A public comment hearing was held on 4 October 2018 to discuss the proposed remedy for the Site. The public comment period ended on 9 November 2018. The Record of Decision was issued by the NYSDEC in March 2019 and received by the repositories in April 2019. The translated fact sheet was sent to the NYSDEC for review on 16 May 2017 and finalized on 30 May 2019. Translated fact sheets were distributed to applicable site contacts on 3 June 2019.

Site Soil Management Report

There were no requests for evaluation of potential work in the LNAPL plume area during this period.

Attachments

Attachment A – Apparent Thickness of LNAPL

Attachment B – Well Location Map showing areal extent of LNAPL on groundwater

Attachment A

Apparent Thickness of LNAPL

Table 1:
 Attachment A: Apparent Thickness of LNAPL
 Former NuHart Plastic Manufacturing Site, NYSDEC #224136
 280 Franklin Street
 Brooklyn, NY

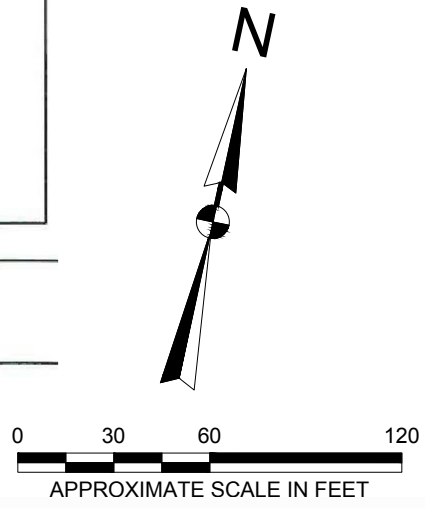
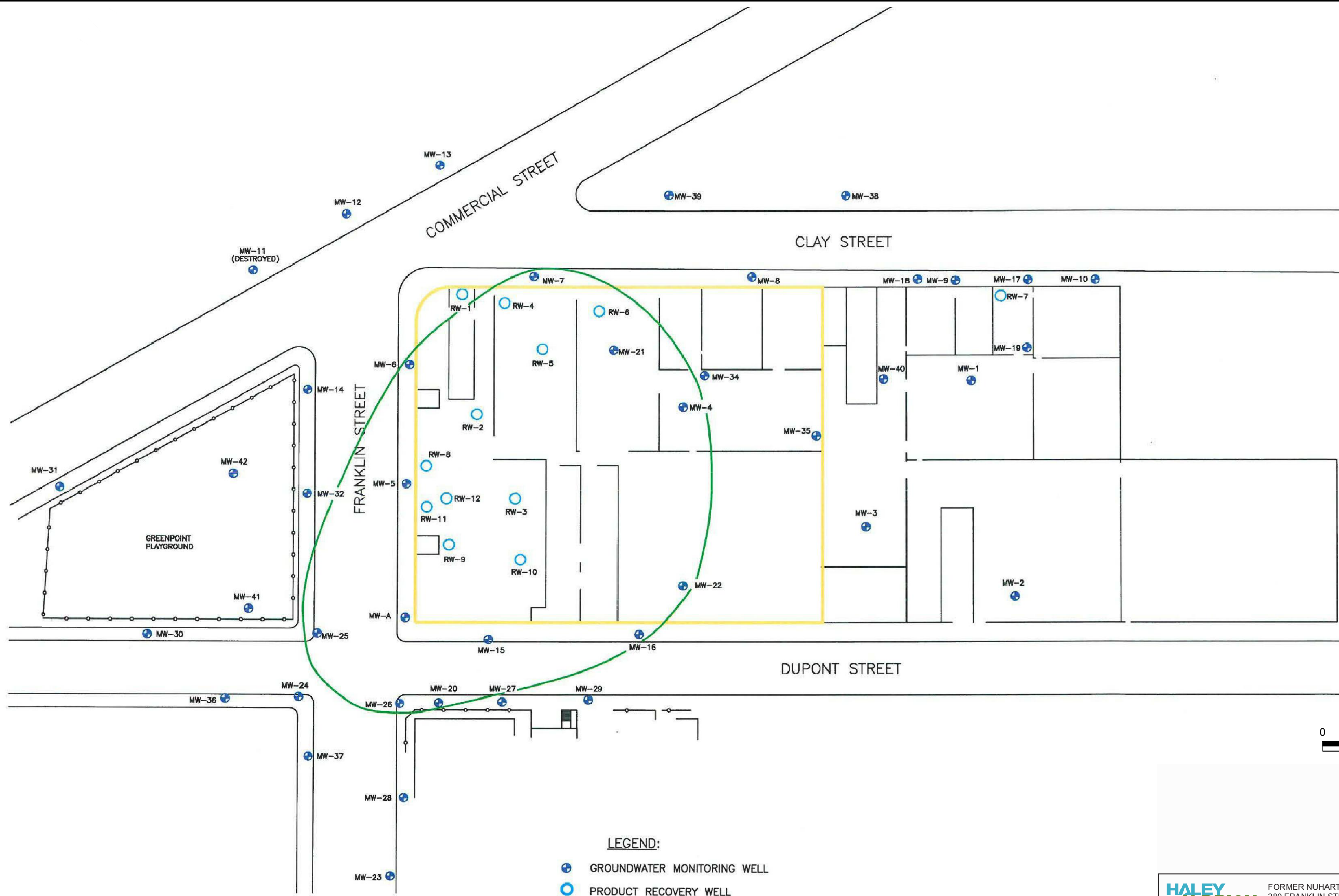
Readings taken 8/30/19 between
 7:00 am and 11:00 am (High tide @
 10:07 AM and Low tide @ 3:59 PM)

Well Number	*Depth to Water (feet)	*Depth to Product (feet)	Apparent Thickness of LNAPL (feet)																																					
			2019										2018										2017										2016							
			Sep-19	Aug-19	Jul-19	Jun-19	May-19	Apr-19	Mar-19	Feb-19	Jan-19	Dec-18	Oct-18	Jun-18	May-18	Apr-18	Mar-18	Feb-18	Jan-18	Nov-17	Oct-17	Sep-17	Aug-17	Jul-17	Jun-17	May-17	Apr-17	Mar-17	Feb-17	Jan-17	Dec-16	Nov-16	Oct-16	Sep-16	Aug-16	Jul-16	Jun-16	May-16		
MW-4	ND*	ND	ND*	ND	ND*	ND*	##	ND*	ND*	ND*	ND*	ND*	ND*	0.12	1.13	0.65	0.73	ND*	0.92	2.12	0.81	1.76	1.73	1.23	1.77	ND*	1.32	1.61	1.13	1.31	1.30	1.00	1.18	1.35	1.71	1.73	1.80	1.53		
MW-5	14.80	9.62	5.18	1.30	3.73	5.15	2.89	2.46	2.26	3.28	2.62	2.83	4.12	1.66	1.83	2.77	2.19	2.21	4.65	5.83	2.19	4.44	4.4	3.71	3.54	2.81	2.80	3.13	4.05	3.00	3.55	4.43	3.64	3.22	4.31	4.03	4.29	3.07		
MW-6	ND	8.68	##	##	##	0.50	2.35	##	##	##	##	##	##	ND	0.55	0.50	2.47	0.74	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##	
MW-7	10.96	9.00	1.96	0.84	0.45	1.30	0.14	0.35	0.26	1.54	1.14	0.93	0.54	1.89	1.99	1.80	2.03	2.55	3.32	4.91	1.48	1.45	1.41	0.9	0.00	1.50	1.92	2.53	3.71	1.28	0.78	1.73	0.91	0.04	1.89	1.58	2.22	2.11		
MW-8	9.79	ND	ND	ND	ND	ND	ND	ND	—	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-12	7.19	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-13	7.35	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-14	8.41	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-15	11.52	11.34	0.18	0.03	0.11	0.87	0.08	0.08	1.08	1.00	0.84	0.26	0.12	0.04	0.04	0.07	0.07	0.08	3.16	1.78	0.31	0.29	0.26	0.26	0.24	0.12	0.22	0.28	0.40	0.31	0.20	0.80	0.20	0.17	0.81	0.07	0.48	0.22		
MW-16	11.82	11.01	0.81	0.01	0.04	1.17	0.45	0.73	0.07	0.39	0.17	0.19	0.20	0.06	0.10	0.13	—	0.1	0.34	0.25	0.35	0.37	0.35	0.08	0.28	0.03	0.10	0.23	0.20	0.31	ND	ND	ND	ND	ND	ND	0.01	0.25	0.02	
MW-20	13.55	10.30	3.25	2.29	2.09	3.66	1.45	1.47	2.17	2.43	2.77	3.49	2.51	1.4	1.55	2.52	1.77	1.02	3.15	3.99	2.52	2.58	2.63	2.9	2.83	2.61	2.94	2.33	3.02	3.02	2.88	3.28	2.90	3.16	2.89	2.88	2.85	2.22		
MW-21	13.24	11.25	1.99	1.51	1.41	1.84	0.52	1.25	1.01	1.57	1.48	2.81	1.73	1.43	1.42	1.62	1.38	2.29	3.83	4.79	3.26	3.35	2.13	1.45	2.75	3.31	3.30	3.04	3.62	7.59	3.27	3.32	1.25	2.39	3.61	2.96	2.95	2.63		
MW-22	14.90	11.95	2.95	0.69	0.51	2.28	2.98	1.03	1.05	1.83	1.68	0.83	0.69	0.97	0.89	0.76	1.11	0.28	0.37	1.77	1.25	1.24	1.21	0.75	0.66	0.66	0.78	0.64	0.65	0.50	0.51	0.38	0.30	0.01	0.51	0.87	0.62	0.45		
MW-23	9.90	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-24	10.20	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-25	14.20	11.02	3.18	3.38	3.83	4.61	3.76	3.81	4.19	4.77	3.86	3.89	3.44	2.85	2.89	4.03	3.45	3.44	3.66	4.54	4.03	4.05	4.02	3.73	4.09	3.85	3.70	3.74	3.47	3.89	3.62	3.60	4.20	3.79	3.65	4.01	3.75	3.55		
MW-26	15.20	9.99	5.21	3.43	3.19	4.90	0.69	2.46	2.94	3.37	3.14	3.84	3.45	0.75	2.35	3.14	2.48	3.19	3.95	5.59	3.81	3.82	3.79	3.65	3.42	3.29	3.73	3.64	3.24	3.14	3.20	3.56	4.00	3.28	4.26	3.58	3.82	3.41		
MW-27	10.43	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-28	11.77	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-29	11.01	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-30	8.95	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-31	8.85	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-32	9.62	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-34	11.47	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-35	14.30	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-36	10.47	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-37	10.91	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-38	9.66	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-39	8.79	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-40	6.94	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
MW-41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
MW-42	8.70	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
RW-1	8.66	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
RW-2	14.19	12.00	2.19	0.41	0.66	4.08	1.64	1.47	1.27	4.73	5.12	1.63	5.54	0.06	0.08	1.65	0.08	5.52	4.01	5.19	0.56	0.58	0.53	6.09	6.25	0.42	1.13	2.90	3.09	3.53	1.65	1.18	1.26	1.35	1.88	2.05	2.41	3.02		
RW-3	18.94	14.85	4.09	3.50	3.25	3.96	1.61	2.11	2.26	4.71	2.22	2.63	3.77	2.08	2.03	2.52	2.12	3.03	ND	3.31	3.17	3.15	3.22	2.28	3.44	2.85	2.71	3.46	2.98	3.10	1.91	3.95	2.40	2.50	3.08	1.97	2.49	1.64		
RW-4	16.20	11.99	4.21	3.56	3.07	4.72	1.13	0.53	2.85	##	##	03.37	2.85	2.96	2.97	3.80	3.01	02.39	3.06	4.32	4.33	4.17	4.18	3.1	4.1	03.69	3.65	3.69	3.67	3.05	3.80	2.80	2.77	3.30	2.73	2.65	2.32	2.02		
RW-5	17.39	11.65	5.74	##	##	##	0.71	##	##	##	##	##	ND*	0.44	0.33	0.65	0.34	4.64	0.49	4.49	5.28	5.27	5.26	5.42	3.75	5.00	5.44	5.10	0.70	2.95	1.55	3.05	0.42	0.36	0.50	4.97	2.76	2.47		
RW-6	13.48	11.99	1.49	0.7	0.46	1.57	0.28	0.55	0.49	02.33	0.91	00.73	1.91	0.83	0.88	0.96	0.91	00.90	2.61	1.64	0.73	0.6	1.61	0.93	5.35	1.05	1.27	1.22	0.90	0.90	0.85	0.68	0.87	0.92	1.46	1.29	0.81	0.67		
RW-8**	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
RW-9	17.34	13.11	4.23	2.99	3.55	4.57	2.32	1.73	2.23	3.79	1.53	3.45	4.52	0.11	2.38	2.28	1.51	2.88	4.32	5.58	3.72	3.77	3.69	2.84	3.25	2.70	2.69													

Attachment B

Site Figure

©2016 - GZA GeoEnvironmental, Inc. GZA-J:\76400's\12.0076485.00\Figures\CAD\76485.00.003.dwg [1] September 07, 2016 - 11:26am miguel.torres



- LEGEND:**
- ⊕ GROUNDWATER MONITORING WELL
 - ⊙ PRODUCT RECOVERY WELL
 - IHWDS BOUNDARY
 - EXTENT OF LNAPL ON GROUNDWATER

NOTES:

1. THE BASE MAP WAS DEVELOPED FROM AN ELECTRONIC FILE PROVIDED BY DUPONT STREET DEVELOPERS, LLC, ENTITLED "AERIAL EXTENT OF LNAPL ON GROUNDWATER," DATED MARCH 23, 2015, ORIGINAL SCALE 1" = 60'.

HALEY ALDRICH
 FORMER NUHART PLASTIC MANUFACTURING
 280 FRANKLIN STREET
 BROOKLYN, NEW YORK

AERIAL EXTENT OF LNAPL ON GROUNDWATER

FEBRUARY 2018

FIGURE 1



HALEY & ALDRICH OF NEW YORK
1441 Broadway, Suite 6031
New York, NY 10018
646.518.7735

10 October 2019
File No. 133110-002

Via Email: yukyin.wong@dec.ny.gov
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 2
47-40 21st Street
Long Island City, New York 11101

Attention: Mr. Bryan Wong

Subject: Project Status Report
Former NuHart Plastics Manufacturing Site # 224136
280 Franklin Street
Brooklyn, New York

Dear Mr. Wong:

Haley & Aldrich of New York is pleased to present this Project Status Report on behalf of Dupont Street Developers, LLC for the above referenced Site. Copies of this Project Status Report have also been provided to Dawn Hettrick of the New York State Department of Health. The Project Status Report is for August 2019 to September 2019. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Senior Associate

CC:

Dawn Hettrick (NYSDOH)
Dupont Street Developers, LLC
Jane O'Connell (NYSDEC)
Wendy A. Marsh

Email: dawn.hettrick@health.ny.gov
Email: bojinzhu@gmail.com
Email: jane.oconnell@dec.ny.gov
Email: wmarsh@hancocklaw.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from August 2019 through September 2019. Activities during this period were conducted by Haley and Aldrich of New York (HANY). A Site Plan showing the general Site layout, nearby area, and associated wells is included as Figure 1.

Interim remedial measure (IRM) activities for monitoring and removal of light non-aqueous-phase liquid (LNAPL) at the Site were performed during the monitoring period in general conformance with the New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (Monthly) were performed by HANY on 1 October 2019. The apparent LNAPL thickness measurement table is provided as Attachment A. Additionally, a Well Location Map showing the extent of LNAPL based on the monitoring date is shown as **Figure 1**.

Maintenance Activities

General maintenance activities include collection of spent IRM-related absorbent materials in the vicinity of recovery wells, placing new absorbent materials, general housekeeping activities and proper labeling of waste containers generated during this IRM event. Both skimming systems associated with recovery wells RW-8 and RW-12 were found to be operational during the Site visit.

Monitoring and LNAPL Removal

Gauging of onsite and offsite monitoring and recovery wells associated with the Site was performed and the wells that could not be accessed and/or gauged are identified on **Attachment A**. No changes were observed in the lateral extent of the LNAPL plume. On 1 October 2019, high tide was observed from 12:17 PM to 6:16 PM after the well gauging period (by NOAA/NOS/CO-OPS Station ID (8517673) Hunters Point, Newtown Creek, NY). The depths to the water table were variable relative to the depths noted in the previous status reports, with some wells showing increases and some wells showing decreases. LNAPL apparent thicknesses were also variable, with increases generally noted in wells where the depth to water increased and decreases noted in wells where the depth to water decreased.

The product recovery holding reservoirs were emptied during this event. The amount of LNAPL removed from the wells was estimated at 35 gallons, including LNAPL from the drums associated with the skimmers on recovery wells RW-8 and RW-12. Based on previous LNAPL estimates, an estimated 3,297 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed. The removed LNAPL is stored in intermediate bulk container (IBC) tanks located in the Site building, pending pickup and offsite disposal. When the IBC tanks are nearly full and/or the containerized spent absorbent materials require disposal, the designated waste management company will be contacted and waste disposal requested.

Eastern Environmental Solutions, Inc. (Eastern) is presently contracted to conduct waste management activities for disposal of product from the IBC tanks at the Site. To date, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. No waste was transported from the Site during this period and transportation and disposal

information will continue to be included in the progress reports following the months during which disposal activities occur.

Feasibility Study, Proposed Remedial Action Work Plan (PRAP) and Record of Decision

The Feasibility study prepared by GZA was submitted to the NYSDEC in January 2017. The NYSDEC issued the proposed remedial action work plan (PRAP) in September 2018. A public comment hearing was held on 4 October 2018 to discuss the proposed remedy for the Site. The public comment period ended on 9 November 2018. The Record of Decision was issued by the NYSDEC in March 2019 and received by the repositories in April 2019. The translated fact sheet was sent to the NYSDEC for review on 16 May 2017 and finalized on 30 May 2019. Translated fact sheets were distributed to applicable site contacts on 3 June 2019.

☐

Site Soil Management Report

There were no requests for evaluation of potential work in the LNAPL plume area during this period.

Attachments

Attachment A – Apparent Thickness of LNAPL

Attachment B – Well Location Map showing areal extent of LNAPL on groundwater

Attachment A

Apparent Thickness of LNAPL

Table 1: Attachment A: Apparent Thickness of LNAPL Former NuHart Plastic Manufacturing Site, NYSDEC #224136 280 Franklin Street Brooklyn, NY

Readings taken 10/1/19 between 8:00 am and 11:00 am (High tide @ 12:17 PM and Low tide @ 6:16 PM)

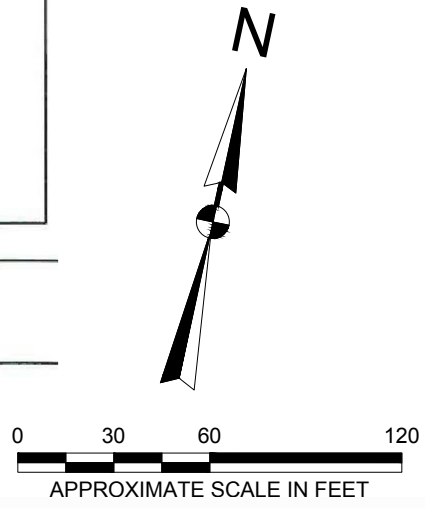
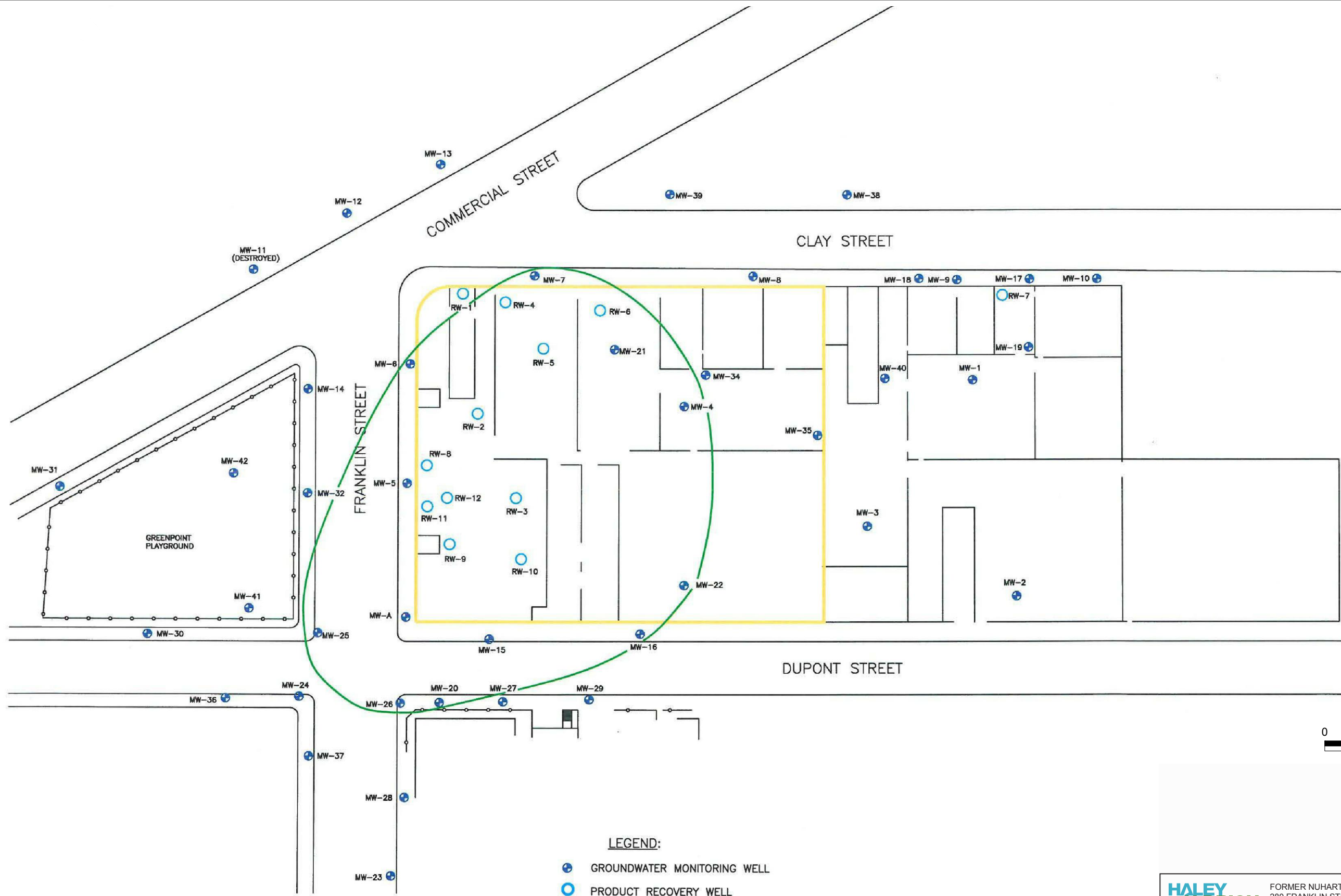
Table with 48 columns (Well Number, Depth to Water, Depth to Product, months from 2019 to 2016) and 45 rows of data for various monitoring wells (MW-4 to MW-37, RW-1 to RW-12).

Notes: Data Recorded using an oil/water interface probe, measurements from the tops of well casings ## = NAPL observed, apparent thickness not determined NI = Not Installed ND = Not Detected NG = Not Gauged Wells MW-1, MW-2, MW-9, MW-10, MW-17, MW-18, MW-19, and RW-7 are associated with NYSDEC Spill 06-01852 and are under a separate investigation Total of 35 gallons of product removed from product recovery system Well-34 has uneven casing top est= Estimated Value * = Well was dry ** = Well equipped with automated product recovery system _ = Data not recorded due to access issues Wells were gauged on October 1, 2019

Attachment B

Site Figure

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- LEGEND:**
- ⊕ GROUNDWATER MONITORING WELL
 - ⊙ PRODUCT RECOVERY WELL
 - IHWDS BOUNDARY
 - EXTENT OF LNAPL ON GROUNDWATER

NOTES:

1. THE BASE MAP WAS DEVELOPED FROM AN ELECTRONIC FILE PROVIDED BY DUPONT STREET DEVELOPERS, LLC, ENTITLED "AERIAL EXTENT OF LNAPL ON GROUNDWATER," DATED MARCH 23, 2015, ORIGINAL SCALE 1" = 60'.

HALEY ALDRICH FORMER NUHART PLASTIC MANUFACTURING
280 FRANKLIN STREET
BROOKLYN, NEW YORK

AERIAL EXTENT OF LNAPL ON GROUNDWATER

OCTOBER 2019

FIGURE 1



HALEY & ALDRICH OF NEW YORK
1441 Broadway, Suite 6031
New York, NY 10018
646.518.7735

12 November 2019
File No. 133110-002

Via Email: yukyin.wong@dec.ny.gov
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 2
47-40 21st Street
Long Island City, New York 11101

Attention: Mr. Bryan Wong

Subject: Project Status Report
Former NuHart Plastics Manufacturing Site # 224136
280 Franklin Street
Brooklyn, New York

Dear Mr. Wong:

Haley & Aldrich of New York is pleased to present this Project Status Report on behalf of Dupont Street Developers, LLC for the above referenced Site. Copies of this Project Status Report have also been provided to Dawn Hettrick of the New York State Department of Health. The Project Status Report is for September 2019 to October 2019. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Senior Associate

CC:

Dawn Hettrick (NYSDOH)
Dupont Street Developers, LLC
Jane O'Connell (NYSDEC)
Wendy A. Marsh

Email: dawn.hettrick@health.ny.gov
Email: bojinzhu@gmail.com
Email: jane.oconnell@dec.ny.gov
Email: wmarsh@hancocklaw.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from September 2019 through October 2019. Activities during this period were conducted by Haley and Aldrich of New York (HANY). A Site Plan showing the general Site layout, nearby area, and associated wells is included as Figure 1.

Interim remedial measure (IRM) activities for monitoring and removal of light non-aqueous-phase liquid (LNAPL) at the Site were performed during the monitoring period in general conformance with the New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (Monthly) were performed by HANY on 6 November 2019. The apparent LNAPL thickness measurement table is provided as Attachment A. Additionally, a Well Location Map showing the extent of LNAPL based on the monitoring date is shown as **Figure 1**.

Maintenance Activities

General maintenance activities include collection of spent IRM-related absorbent materials in the vicinity of recovery wells, placing new absorbent materials, general housekeeping activities and proper labeling of waste containers generated during this IRM event. Both skimming systems associated with recovery wells RW-8 and RW-12 were found to be operational during the Site visit.

Monitoring and LNAPL Removal

Gauging of onsite and offsite monitoring and recovery wells associated with the Site was performed and the wells that could not be accessed and/or gauged are identified on **Attachment A**. No changes were observed in the lateral extent of the LNAPL plume. On 6 November 2019, high tide was observed from 5:00 AM to 10:48 AM during the well gauging period (by NOAA/NOS/CO-OPS Station ID (8517673) Hunters Point, Newtown Creek, NY). The depths to the water table were variable relative to the depths noted in the previous status reports, with some wells showing increases and some wells showing decreases. LNAPL apparent thicknesses were also variable, with increases generally noted in wells where the depth to water increased and decreases noted in wells where the depth to water decreased.

The product recovery holding reservoirs were emptied during this event. The amount of LNAPL removed from the wells was estimated at 30 gallons, including LNAPL from the drums associated with the skimmers on recovery wells RW-8 and RW-12. Based on previous LNAPL estimates, an estimated 3,327 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed. The removed LNAPL is stored in intermediate bulk container (IBC) tanks located in the Site building, pending pickup and offsite disposal. When the IBC tanks are nearly full and/or the containerized spent absorbent materials require disposal, the designated waste management company will be contacted and waste disposal requested.

Eastern Environmental Solutions, Inc. (Eastern) is presently contracted to conduct waste management activities for disposal of product from the IBC tanks at the Site. To date, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. No waste was transported from the Site during this period and transportation and disposal

information will continue to be included in the progress reports following the months during which disposal activities occur.

Feasibility Study, Proposed Remedial Action Work Plan (PRAP) and Record of Decision

The Feasibility study prepared by GZA was submitted to the NYSDEC in January 2017. The NYSDEC issued the proposed remedial action work plan (PRAP) in September 2018. A public comment hearing was held on 4 October 2018 to discuss the proposed remedy for the Site. The public comment period ended on 9 November 2018. The Record of Decision was issued by the NYSDEC in March 2019 and received by the repositories in April 2019. The translated fact sheet was sent to the NYSDEC for review on 16 May 2017 and finalized on 30 May 2019. Translated fact sheets were distributed to applicable site contacts on 3 June 2019.

Site Soil Management Report

There were no requests for evaluation of potential work in the LNAPL plume area during this period.

Attachments

Attachment A – Apparent Thickness of LNAPL

Attachment B – Well Location Map showing areal extent of LNAPL on groundwater

Attachment A

Apparent Thickness of LNAPL

Table 1: Attachment A: Apparent Thickness of LNAPL Former NuHart Plastic Manufacturing Site, NYSDEC #224136 280 Franklin Street Brooklyn, NY

Readings taken 11/6/19 between 8:00 am and 11:00 am (High tide @ 5:00 AM and Low tide @ 10:48 AM)

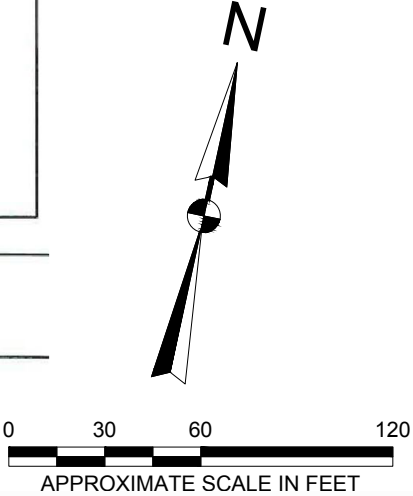
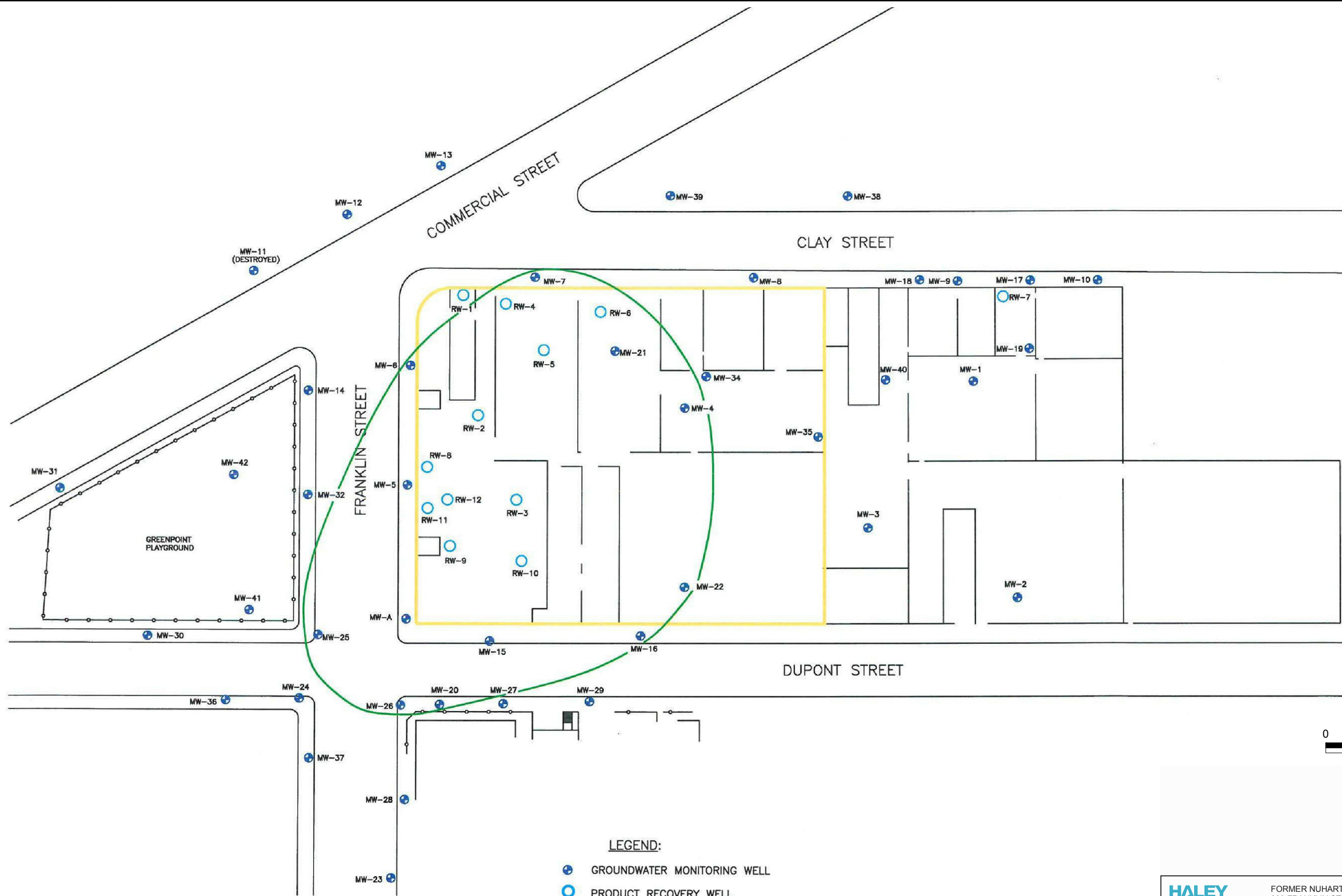
Apparent Thickness of LNAPL (feet)

Table with columns for Well Number, Depth to Water (feet), Depth to Product (feet), and Apparent Thickness of LNAPL (feet) for years 2019, 2018, 2017, and 2016. Rows include MW-4 through MW-37, MW-39, MW-40, MW-41, MW-42, RW-1 through RW-12, and MW-9 through MW-18, RW-7.

Notes: Data Recorded using an oil/water interface probe, measurements from the tops of well casings ## = NAPL observed, apparent thickness not determined NI = Not Installed ND = Not Detected NG = Not Gauged Wells MW-1, MW-2, MW-9, MW-10, MW-17, MW-18, MW-19, and RW-7 are associated with NYSDEC Spill 06-01852 and are under a separate investigation Total of 30 gallons of product removed from product recovery system Well-34 has uneven casting top est = Estimated Value * = Well was dry ** = Well equipped with automated product recovery system _ = Data not recorded due to access issues Wells were gauged on November 6, 2019

Attachment B

Site Figure



- LEGEND:**
- + GROUNDWATER MONITORING WELL
 - PRODUCT RECOVERY WELL
 - IHWDS BOUNDARY
 - EXTENT OF LNAPL ON GROUNDWATER

NOTES:

1. THE BASE MAP WAS DEVELOPED FROM AN ELECTRONIC FILE PROVIDED BY DUPONT STREET DEVELOPERS, LLC, ENTITLED "AERIAL EXTENT OF LNAPL ON GROUNDWATER," DATED MARCH 23, 2015, ORIGINAL SCALE 1" = 60'.

**HALEY
ALDRICH**

FORMER NUHART PLASTIC MANUFACTURING
280 FRANKLIN STREET
BROOKLYN, NEW YORK

**AERIAL EXTENT OF LNAPL
ON GROUNDWATER**

FEBRUARY 2018

FIGURE 1



HALEY & ALDRICH OF NEW YORK
1441 Broadway, Suite 6031
New York, NY 10018
646.518.7735

10 December 2019
File No. 133110-002

Via Email: yukyin.wong@dec.ny.gov
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 2
47-40 21st Street
Long Island City, New York 11101

Attention: Mr. Bryan Wong

Subject: Project Status Report
Former NuHart Plastics Manufacturing Site # 224136
280 Franklin Street
Brooklyn, New York

Dear Mr. Wong:

Haley & Aldrich of New York is pleased to present this Project Status Report on behalf of Dupont Street Developers, LLC for the above referenced Site. Copies of this Project Status Report have also been provided to Dawn Hettrick of the New York State Department of Health. The Project Status Report is for October 2019 to November 2019. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Senior Associate

CC:

Dawn Hettrick (NYSDOH)
Dupont Street Developers, LLC
Jane O'Connell (NYSDEC)
Wendy A. Marsh

Email: dawn.hettrick@health.ny.gov
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This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from October 2019 through November 2019. Activities during this period were conducted by Haley and Aldrich of New York (HANY). A Site Plan showing the general Site layout, nearby area, and associated wells is included as Figure 1.

Interim remedial measure (IRM) activities for monitoring and removal of light non-aqueous-phase liquid (LNAPL) at the Site were performed during the monitoring period in general conformance with the New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (Monthly) were performed by HANY on 6 December 2019. To confirm presence of groundwater, as per request of from NYSDEC, MW-6 was gauged again on 10 December 2019.

The apparent LNAPL thickness measurement table is provided as **Attachment A**. Additionally, a Well Location Map showing the extent of LNAPL based on the monitoring date is shown as **Figure 1**.

Maintenance Activities

General maintenance activities include collection of spent IRM-related absorbent materials in the vicinity of recovery wells, placing new absorbent materials, general housekeeping activities and proper labeling of waste containers generated during this IRM event. Both skimming systems associated with recovery wells RW-8 and RW-12 were found operational during the Site visit.

Monitoring and LNAPL Removal

Gauging of onsite and offsite monitoring and recovery wells associated with the Site was performed and the wells that could not be accessed and/or gauged are identified on **Attachment A**. No changes were observed in the lateral extent of the LNAPL plume. On 6 December 2019, high tide was observed from 5:08 AM to 11:03 AM during the well gauging period (by NOAA/NOS/CO-OPS Station ID (8517673) Hunters Point, Newtown Creek, NY). On 10 December 2019, high tide was observed from 7:56 AM to 2:06 PM during the MW-6 well gauging period (by NOAA/NOS/CO-OPS Station ID (8517673) Hunters Point, Newtown Creek, NY). The depths to the water table were variable relative to the depths noted in the previous status reports, with some wells showing increases and some wells showing decreases. LNAPL apparent thicknesses were also variable, with increases generally noted in wells where the depth to water increased and decreases noted in wells where the depth to water decreased.

The product recovery holding reservoirs were emptied during this event. The amount of LNAPL removed from the wells was estimated at 48 gallons, including LNAPL from the drums associated with the skimmers on recovery wells RW-8 and RW-12. Based on previous LNAPL estimates, an estimated 3,375 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed. The removed LNAPL is stored in intermediate bulk container (IBC) tanks located in the Site building, pending pickup and offsite disposal. When the IBC tanks are nearly full and/or the containerized spent absorbent materials require disposal, the designated waste management company will be contacted and waste disposal requested.

Eastern Environmental Solutions, Inc. (Eastern) is presently contracted to conduct waste management activities for disposal of product from the IBC tanks at the Site. To date, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. No waste was transported from the Site during this period and transportation and disposal information will continue to be included in the progress reports following the months during which disposal activities occur.

Feasibility Study, Proposed Remedial Action Work Plan (PRAP) and Record of Decision

The Feasibility study prepared by GZA was submitted to the NYSDEC in January 2017. The NYSDEC issued the proposed remedial action work plan (PRAP) in September 2018. A public comment hearing was held on 4 October 2018 to discuss the proposed remedy for the Site. The public comment period ended on 9 November 2018. The Record of Decision was issued by the NYSDEC in March 2019 and received by the repositories in April 2019. The translated fact sheet was sent to the NYSDEC for review on 16 May 2017 and finalized on 30 May 2019. Translated fact sheets were distributed to applicable site contacts on 3 June 2019.

Site Soil Management Report

There were no requests for evaluation of potential work in the LNAPL plume area during this period.

Attachments

Attachment A – Apparent Thickness of LNAPL

Attachment B – Well Location Map showing areal extent of LNAPL on groundwater

Attachment A

Apparent Thickness of LNAPL

Attachment A: Apparent Thickness of LNAPL
 Former NuHart Plastic Manufacturing Site, NYSDEC #224136
 280 Franklin Street
 Brooklyn, NY

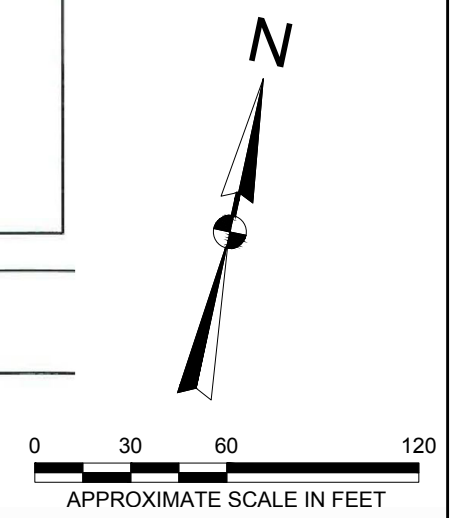
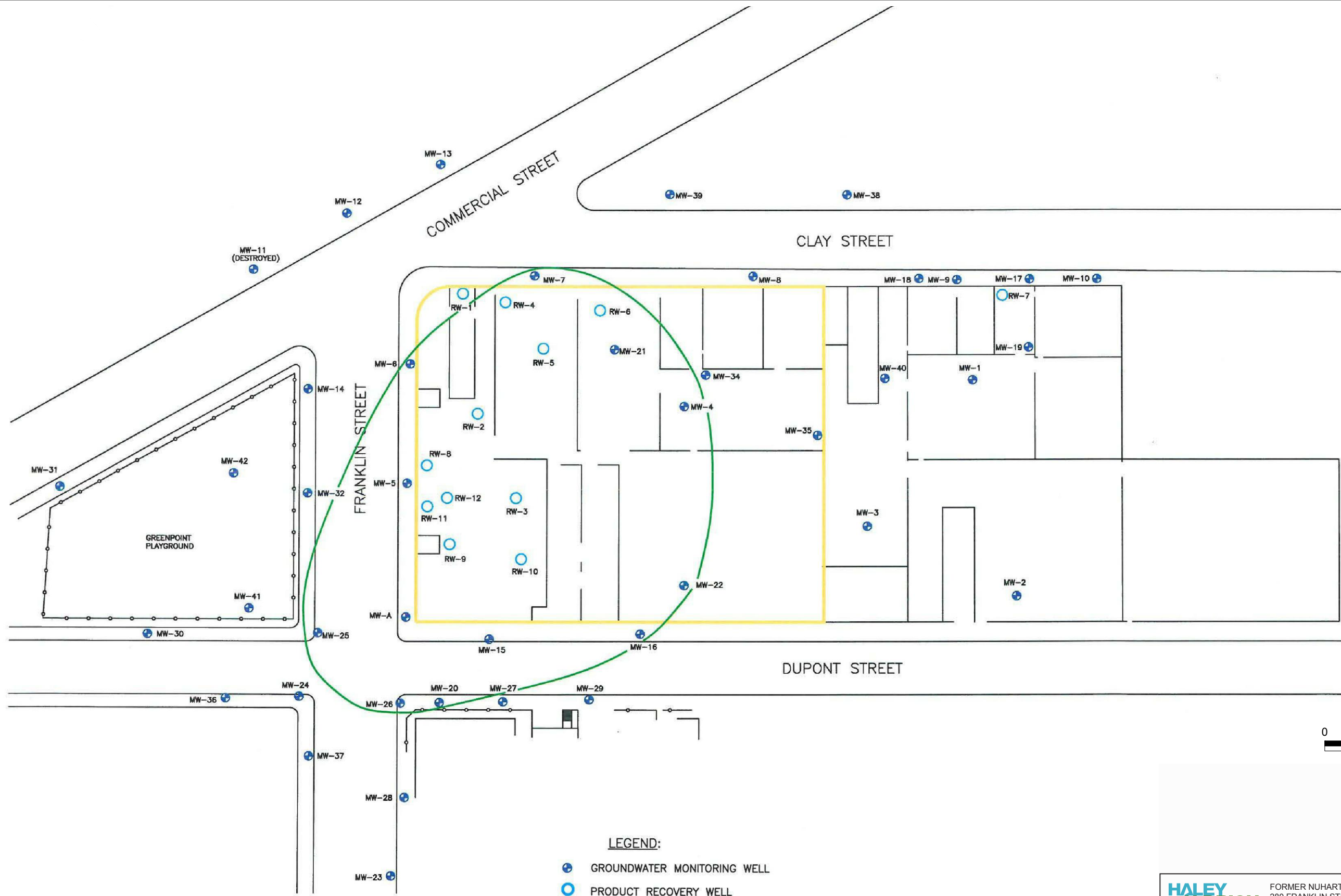
Readings taken 11/6/19 between
 8:00 am and 11:00 am (High tide @
 5:08 AM and Low tide @ 11:00 AM)

Well Number	*Depth to Water (feet)	*Depth to Product (feet)	Apparent Thickness of LNAPL (feet)																																															
			2019												2018												2017												2016											
			Dec-19	Nov-19	Oct-19	Sep-19	Aug-19	Jul-19	Jun-19	May-19	Apr-19	Mar-19	Feb-19	Jan-19	Dec-18	Oct-18	Jun-18	May-18	Apr-18	Mar-18	Feb-18	Jan-18	Nov-17	Oct-17	Sep-17	Aug-17	Jul-17	Jun-17	May-17	Apr-17	Mar-17	Feb-17	Jan-17	Dec-16	Nov-16	Oct-16	Sep-16	Aug-16	Jul-16	Jun-16	May-16									
MW-4	ND*	ND	ND*	ND*	ND*	ND*	ND	ND*	ND*	##	ND*	ND*	ND*	ND*	ND*	ND*	0.12	1.13	0.65	0.73	ND*	0.92	2.12	0.81	1.76	1.73	1.23	1.77	ND*	1.32	1.61	1.13	1.31	1.30	1.00	1.18	1.35	1.71	1.73	1.80	1.53									
MW-5	14.72	10.25	4.47	4.61	5.65	5.18	1.30	3.73	5.15	2.89	2.46	2.26	3.28	2.62	2.83	4.12	1.66	1.83	2.77	2.19	2.21	4.65	5.83	2.19	4.44	4.4	3.71	3.54	2.81	2.80	3.13	4.05	3.00	3.55	4.43	3.64	3.22	4.31	4.03	4.29	3.07									
MW-6***	11.05	10.20	0.85	##	##	##	##	##	0.50	2.35	##	##	##	##	##	ND	0.55	0.50	2.47	0.74	##	##	##	##	1.22	3.19	3.15	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##	##							
MW-7	11.25	9.58	1.67	1.59	1.63	1.96	0.84	0.45	1.30	0.14	0.35	0.26	1.54	1.14	0.93	0.54	1.89	1.99	1.80	2.03	2.55	3.32	4.91	1.48	1.45	1.41	0.9	0.00	1.50	1.92	2.53	3.71	1.28	0.78	1.73	0.91	0.04	1.89	1.58	2.22	2.11									
MW-8	10.28	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND								
MW-12	8.13	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND							
MW-13	8.64	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND						
MW-14	8.96	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND					
MW-15	11.65	10.80	0.85	1.08	1.99	0.18	0.03	0.11	0.87	0.08	0.08	1.08	1.00	0.84	0.26	0.12	0.04	0.04	0.07	0.07	0.08	3.16	1.78	0.31	0.29	0.26	0.26	0.24	0.12	0.22	0.28	0.40	0.31	0.20	0.80	0.20	0.17	0.81	0.07	0.48	0.22									
MW-16	11.57	ND	ND	1.95	0.56	0.81	0.01	0.04	1.17	0.45	0.73	0.07	0.39	0.17	0.19	0.20	0.06	0.10	0.13	—	0.1	0.34	0.25	0.35	0.37	0.35	0.08	0.28	0.03	0.10	0.23	0.20	0.31	ND	ND	ND	ND	ND	0.01	0.25	0.02									
MW-20	13.61	10.79	2.82	3.73	3.37	3.25	2.29	2.09	3.66	1.45	1.47	2.17	2.43	2.77	3.49	2.51	1.4	1.55	2.52	1.77	1.02	3.15	3.99	2.52	2.58	2.63	2.9	2.83	2.61	2.94	2.33	3.02	3.02	2.88	3.28	2.90	3.16	2.89	2.88	2.85	2.22									
MW-21	14.70	11.82	2.88	3.07	3.13	1.99	1.51	1.41	1.84	0.52	1.25	1.01	1.57	1.48	2.81	1.73	1.43	1.42	1.62	1.38	2.29	3.83	4.79	3.26	3.35	2.13	1.45	2.75	3.31	3.30	3.04	3.62	7.59	3.27	3.32	1.25	2.39	3.61	2.96	2.95	2.63									
MW-22	13.77	12.55	1.22	1.06	1.94	2.95	0.69	0.51	2.28	2.98	1.03	1.05	1.83	1.68	0.83	0.69	0.97	0.89	0.76	1.11	0.28	0.37	1.77	1.25	1.24	1.21	0.75	0.66	0.66	0.78	0.64	0.65	0.50	0.51	0.38	0.30	0.01	0.51	0.87	0.62	0.45									
MW-23	11.53	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND						
MW-24	10.68	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND					
MW-25	15.06	10.40	4.66	4.93	4.31	3.18	3.38	3.83	4.61	3.76	3.81	4.19	4.77	3.86	3.89	3.44	2.85	2.89	4.03	3.45	3.44	3.66	4.54	4.03	4.05	4.02	3.73	4.09	3.85	3.70	3.74	3.47	3.89	3.62	3.60	4.20	3.79	3.65	4.01	3.75	3.55									
MW-26	15.29	10.64	4.65	4.02	4.62	5.21	3.43	3.19	4.90	0.69	2.46	2.94	3.37	3.14	3.84	3.45	0.75	2.35	3.14	2.48	3.19	3.95	5.59	3.81	3.82	3.79	3.65	3.42	3.29	3.73	3.64	3.24	3.14	3.20	3.56	4.00	3.28	4.26	3.58	3.82	3.41									
MW-27	11.08	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND					
MW-28	11.24	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND				
MW-29	11.50	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND				
MW-30	10.22	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND			
MW-31	9.55	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND			
MW-32	10.13	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-34	12.00	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-35	14.94	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-36	11.15	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-37	11.34	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-38	10.46	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-39	9.30	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND		
MW-40	8.58	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
MW-41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—		
MW-42	9.30	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
RW-1	9.32	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
RW-2	16.80	12.31	4.49	02.42	5.03	2.19	01.41	0.66	4.08	1.64	1.47	1.27	4.73	5.12	1.63	5.54	0.06	0.08	1.65	0.08	5.52	4.01	5.19	0.56	0.58	0.53	6.09	6.25	0.42	1.13	2.90	3.09	3.53	1.65	1.18	1.26	1.35	1.88	2.05	2.41	3.02	—	—	—	—					
RW-3	17.91	15.29	2.62	04.30	4.03	4.09	3.50	3.25	3.96	1.61	2.11	2.26	4.71	2.22	2.63	3.77	2.08	2.03	2.52	2.12	3.03	ND	3.31	3.17	3.15	3.22	2.28	3.44	2.85	2.71	3.46	2.98	3.10	1.91	3.95	2.40	2.50	3.08	1.97	2.49	1.64	—	—	—	—					
RW-4	15.50	12.48	3.02	04.15	##	4.21	3.56	3.07	4.72	1.13	0.53	2.85	##	##	03.37	2.85	2.96																																	

Attachment B

Site Figure

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- LEGEND:**
- ⊕ GROUNDWATER MONITORING WELL
 - ⊙ PRODUCT RECOVERY WELL
 - IHWDS BOUNDARY
 - EXTENT OF LNAPL ON GROUNDWATER

NOTES:

1. THE BASE MAP WAS DEVELOPED FROM AN ELECTRONIC FILE PROVIDED BY DUPONT STREET DEVELOPERS, LLC, ENTITLED "AERIAL EXTENT OF LNAPL ON GROUNDWATER," DATED MARCH 23, 2015, ORIGINAL SCALE 1" = 60'.

HALEY ALDRICH
 FORMER NUHART PLASTIC MANUFACTURING
 280 FRANKLIN STREET
 BROOKLYN, NEW YORK

AERIAL EXTENT OF LNAPL ON GROUNDWATER



HALEY & ALDRICH OF NEW YORK
1441 Broadway, Suite 6031
New York, NY 10018
646.518.7735

15 January 2020
File No. 133110-002

Via Email: yukyin.wong@dec.ny.gov
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 2
47-40 21st Street
Long Island City, New York 11101

Attention: Mr. Bryan Wong

Subject: Project Status Report
Former NuHart Plastics Manufacturing Site # 224136
280 Franklin Street
Brooklyn, New York

Dear Mr. Wong:

Haley & Aldrich of New York is pleased to present this Project Status Report on behalf of Dupont Street Developers, LLC for the above referenced Site. Copies of this Project Status Report have also been provided to Dawn Hettrick of the New York State Department of Health. The Project Status Report is for November 2019 to December 2019. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Senior Associate

CC:

Dawn Hettrick (NYSDOH)
Dupont Street Developers, LLC
Jane O'Connell (NYSDEC)
Wendy A. Marsh

Email: dawn.hettrick@health.ny.gov
Email: bojinzhu@gmail.com
Email: jane.oconnell@dec.ny.gov
Email: wmarsh@hancocklaw.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from November 2019 through December 2019. Activities during this period were conducted by Haley and Aldrich of New York (HANY). A Site Plan showing the general Site layout, nearby area, and associated wells is included as Figure 1.

Interim remedial measure (IRM) activities for monitoring and removal of light non-aqueous-phase liquid (LNAPL) at the Site were performed during the monitoring period in general conformance with the New York State Department of Environmental Conservation (NYSDEC)-approved Operation, Maintenance and Monitoring Plan (OM&M Plan) for the product recovery system.

Interim Remedial Measure Activities

The IRM routine activities (Monthly) were performed by HANY on 9 January 2020.

The apparent LNAPL thickness measurement table is provided as **Attachment A**. Additionally, a Well Location Map showing the extent of LNAPL based on the monitoring date is shown as **Figure 1**.

Maintenance Activities

General maintenance activities include collection of spent IRM-related absorbent materials in the vicinity of recovery wells, placing new absorbent materials, general housekeeping activities and proper labeling of waste containers generated during this IRM event. Both skimming systems associated with recovery wells RW-8 and RW-12 were found operational during the Site visit.

Monitoring and LNAPL Removal

Gauging of onsite and offsite monitoring and recovery wells associated with the Site was performed and the wells that could not be accessed and/or gauged are identified on **Attachment A**. No changes were observed in the lateral extent of the LNAPL plume. On 9 January 2020, high tide was observed from 8:03 AM to 2:28 PM during the well gauging period (by NOAA/NOS/CO-OPS Station ID (8517673) Hunters Point, Newtown Creek, NY). The depths to the water table were variable relative to the depths noted in the previous status reports, with some wells showing increases and some wells showing decreases. LNAPL apparent thicknesses were also variable, with increases generally noted in wells where the depth to water increased and decreases noted in wells where the depth to water decreased.

The product recovery holding reservoirs were emptied during this event. The amount of LNAPL removed from the wells was estimated at 35 gallons, including LNAPL from the drums associated with the skimmers on recovery wells RW-8 and RW-12. Based on previous LNAPL estimates, an estimated 3,410 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed. The removed LNAPL is stored in intermediate bulk container (IBC) tanks located in the Site building, pending pickup and offsite disposal. When the IBC tanks are nearly full and/or the containerized spent absorbent materials require disposal, the designated waste management company will be contacted and waste disposal requested.

Eastern Environmental Solutions, Inc. (Eastern) is presently contracted to conduct waste management activities for disposal of product from the IBC tanks at the Site. To date, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous

waste. No waste was transported from the Site during this period and transportation and disposal information will continue to be included in the progress reports following the months during which disposal activities occur.

Feasibility Study, Proposed Remedial Action Work Plan (PRAP) and Record of Decision

The Feasibility study prepared by GZA was submitted to the NYSDEC in January 2017. The NYSDEC issued the proposed remedial action work plan (PRAP) in September 2018. A public comment hearing was held on 4 October 2018 to discuss the proposed remedy for the Site. The public comment period ended on 9 November 2018. The Record of Decision was issued by the NYSDEC in March 2019 and received by the repositories in April 2019. The translated fact sheet was sent to the NYSDEC for review on 16 May 2017 and finalized on 30 May 2019. Translated fact sheets were distributed to applicable site contacts on 3 June 2019.

Site Soil Management Report

There were no requests for evaluation of potential work in the LNAPL plume area during this period.

Attachments

Attachment A – Apparent Thickness of LNAPL

Attachment B – Well Location Map showing areal extent of LNAPL on groundwater

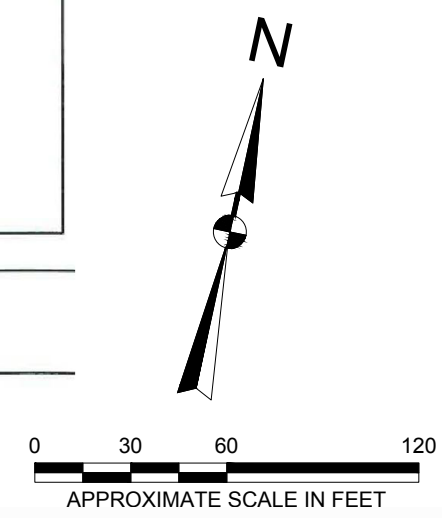
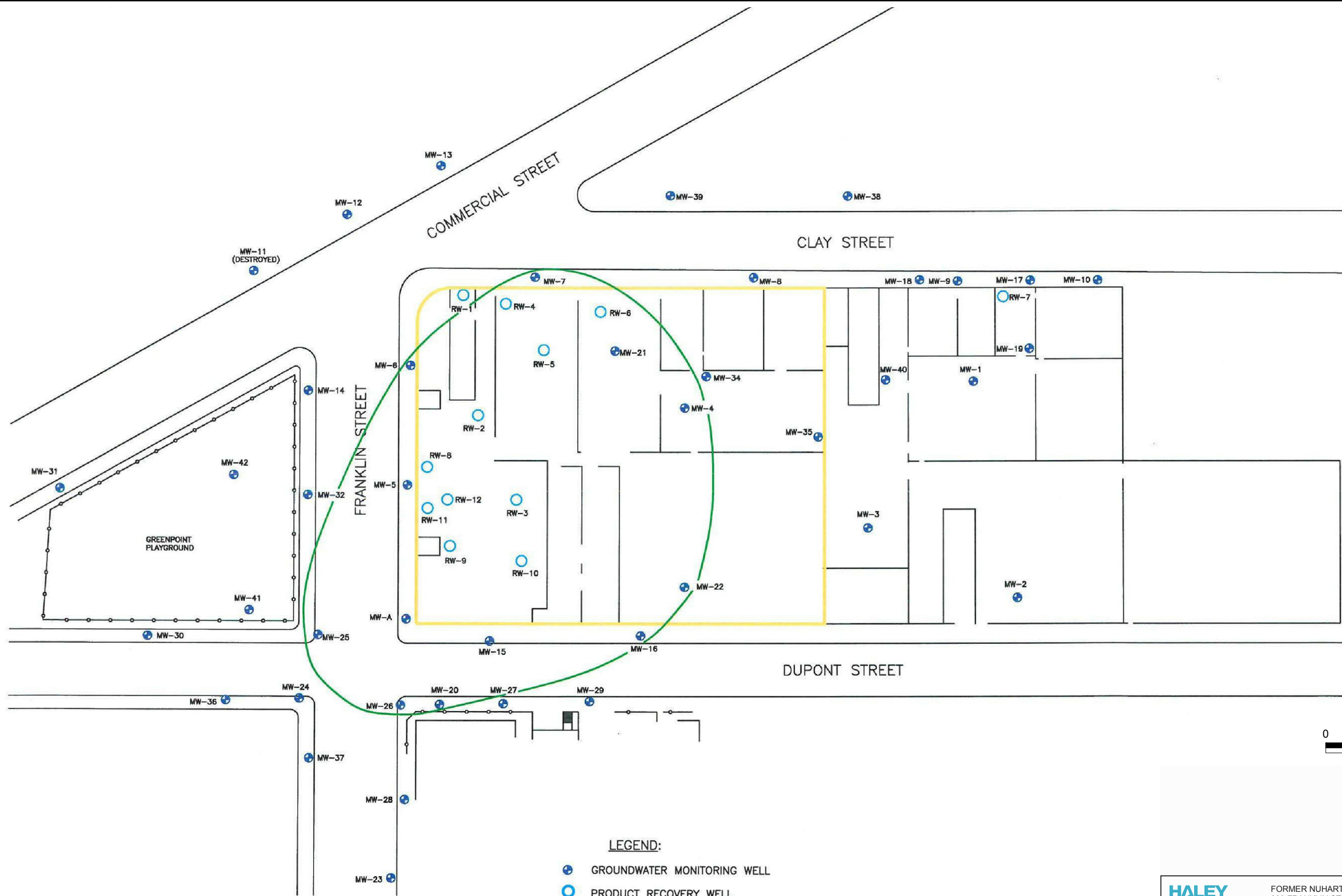
Attachment A

Apparent Thickness of LNAPL

Attachment B

Site Figure

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LEGEND:

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HALEY ALDRICH FORMER NUHART PLASTIC MANUFACTURING
 280 FRANKLIN STREET
 BROOKLYN, NEW YORK

**AERIAL EXTENT OF LNAPL
 ON GROUNDWATER**

DECEMBER 2019 FIGURE 1