



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

12 February 2020  
File No. 133110-002

Via Email: [yukyin.wong@dec.ny.gov](mailto:yukyin.wong@dec.ny.gov)  
New York State Department of Environmental Conservation  
Division of Environmental Remediation, Region 2  
47-40 21<sup>st</sup> 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 2019 to January 2020. 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](mailto:dawn.hettrick@health.ny.gov)  
Email: [bojinzhu@gmail.com](mailto:bojinzhu@gmail.com)  
Email: [jane.oconnell@dec.ny.gov](mailto:jane.oconnell@dec.ny.gov)  
Email: [wmarsh@hancocklaw.com](mailto:wmarsh@hancocklaw.com)

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from December 2019 through January 2020. 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 12 February 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 12 February 2020, high tide was observed from 11:48 AM to 5:55 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 45 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 3,455 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 2/12/20 between 8:00 am and 11:00 am (High tide @ 11:48 AM and Low tide @ 5:55 PM)

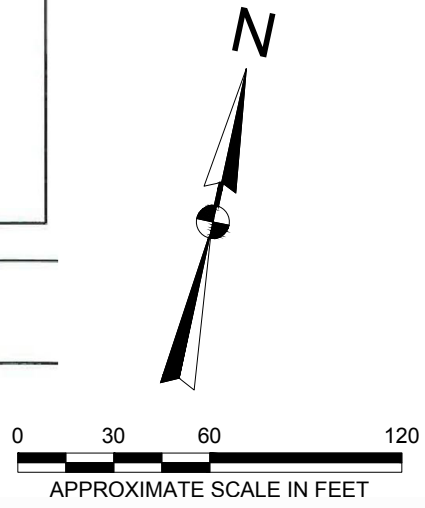
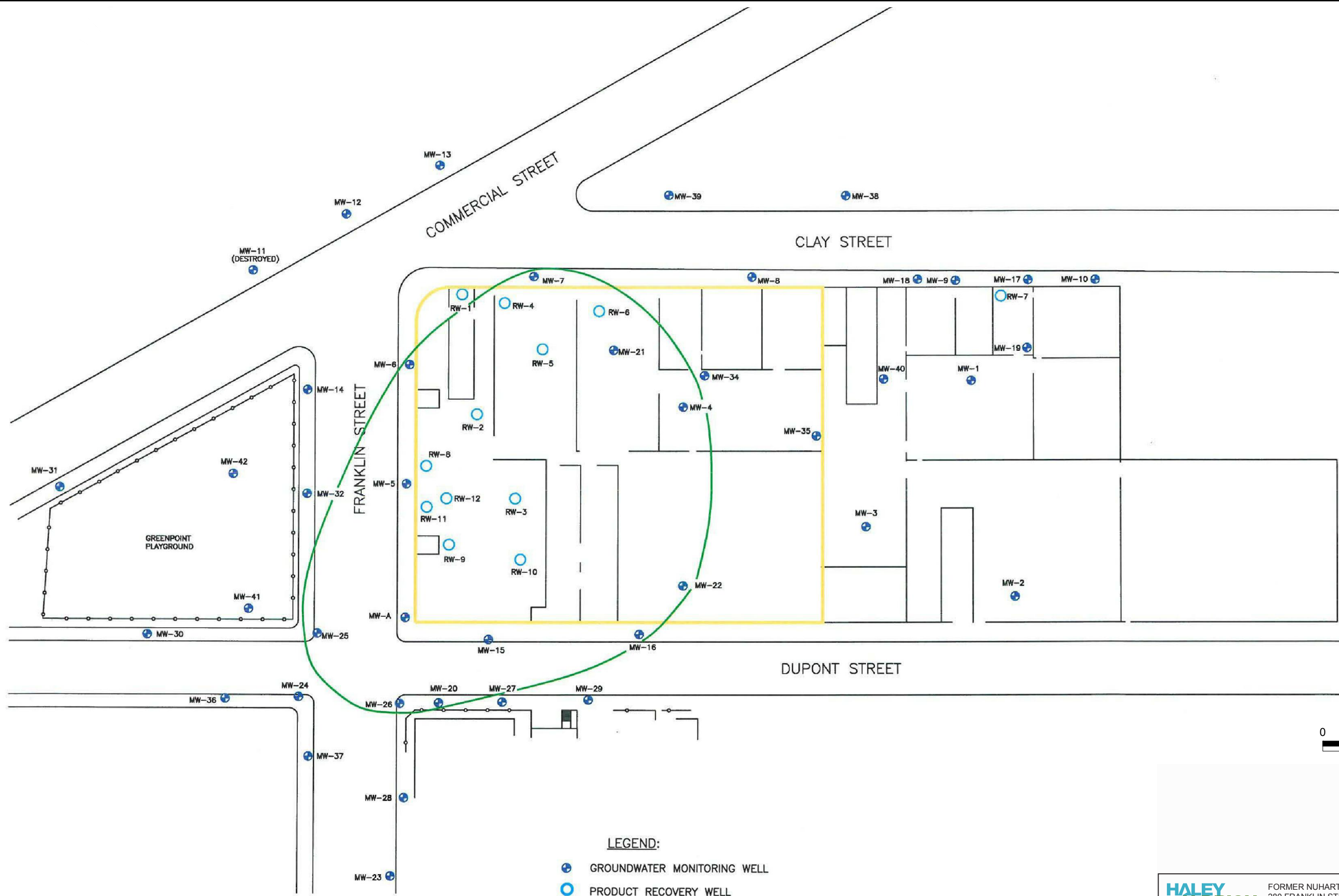
Table with columns for Well Number, Depth to Water, Depth to Product, and Apparent Thickness of LNAPL (feet) for years 2020, 2019, 2018, 2017, and 2016. Rows include MW-4 through MW-42 and RW-1 through RW-12.

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 45 gallons of product removed from product recovery system Well-34 has uneven casing top est= Estimated Value -- = Data not recorded due to access issues \* = Well was dry \*\* = Well equipped with automated product recovery system Wells were gauged on February 12, 2020



**Attachment B**

**Site Figure**



- LEGEND:**
- + GROUNDWATER MONITORING WELL
  - o 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**

JANUARY 2020 FIGURE 1





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

13 March 2020  
File No. 133110-002

Via Email: [yukyin.wong@dec.ny.gov](mailto:yukyin.wong@dec.ny.gov)  
New York State Department of Environmental Conservation  
Division of Environmental Remediation, Region 2  
47-40 21<sup>st</sup> Street  
Long Island City, New York 11101

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Former NuHart Plastics Manufacturing Site # 224136  
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James Bellew  
Senior Associate

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Dupont Street Developers, LLC  
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Email: [bojinzhu@gmail.com](mailto:bojinzhu@gmail.com)  
Email: [jane.oconnell@dec.ny.gov](mailto:jane.oconnell@dec.ny.gov)  
Email: [wmarsh@hancocklaw.com](mailto:wmarsh@hancocklaw.com)

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from January 2020 through February 2020. 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 March 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 6 March 2020, high tide was observed from 6:17 AM to 12:46 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 34 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 3,489 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 3/6/20 between 8:00 am and 11:00 am (High tide @ 6:17 AM and Low tide @ 12:46 PM)

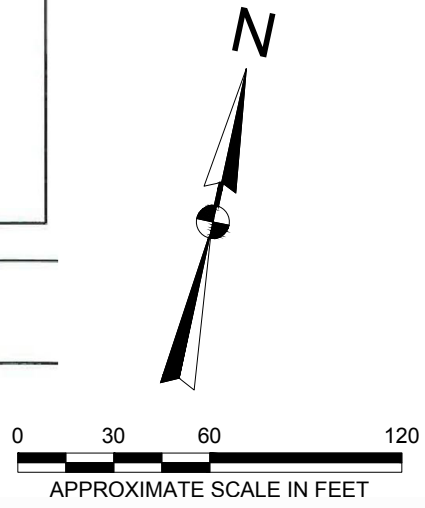
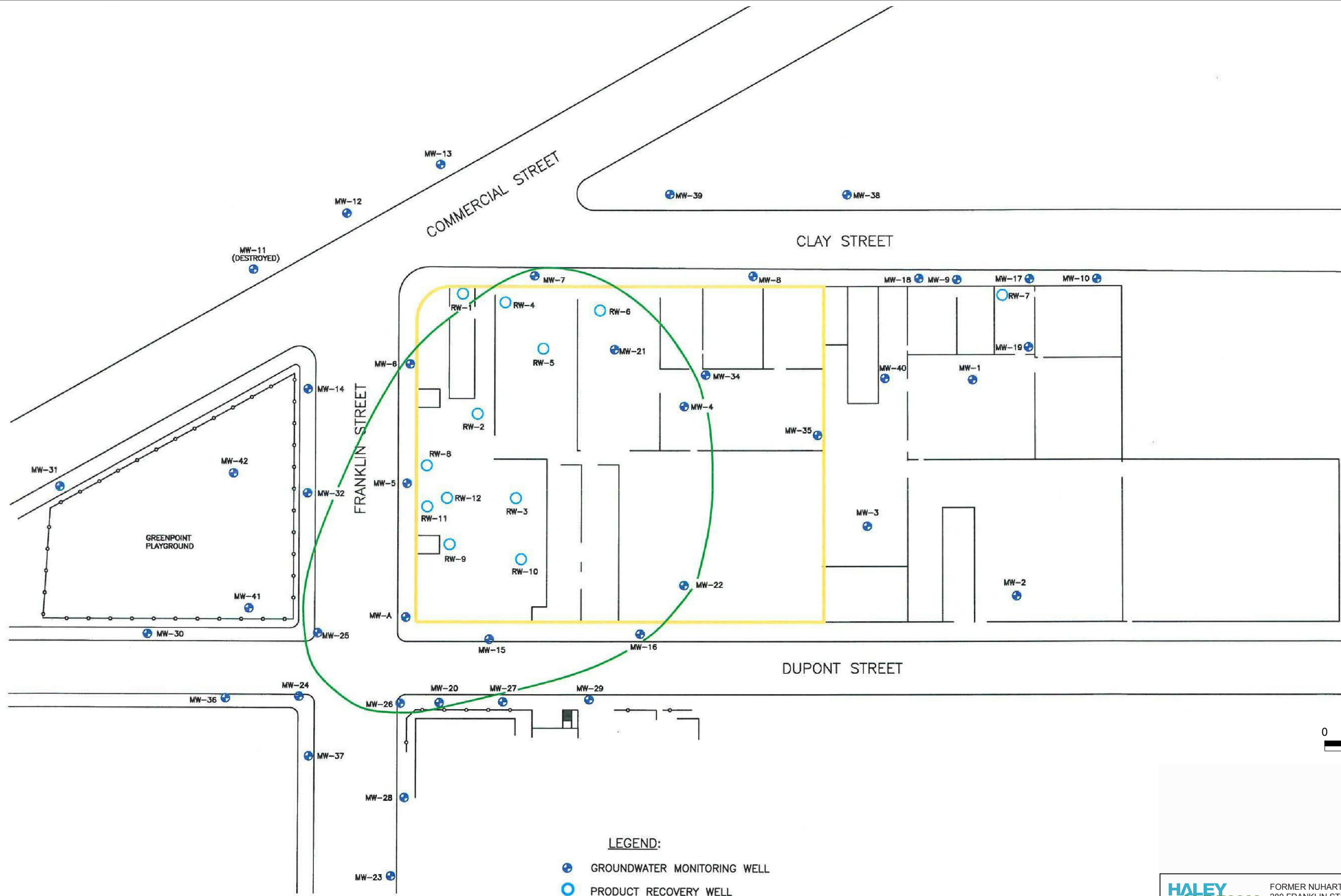
Table with columns for Well Number, Depth to Water (feet), Depth to Product (feet), and Apparent Thickness of LNAPL (feet) for years 2020 through 2016. The table lists data for 42 wells (MW-4 to MW-42 and RW-1 to RW-12).

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 34 gallons of product removed from product recovery system Well-34 has uneven casing top est= Estimated Value -- = Data not recorded due to access issues \* = Well was dry \*\* = Well equipped with automated product recovery system Wells were gauged on March 6, 2020



**Attachment B**

**Site Figure**



- LEGEND:**
- + GROUNDWATER MONITORING WELL
  - o 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 2020 FIGURE 1





HALEY & ALDRICH OF NEW YORK  
237 West 35<sup>th</sup> Street  
16<sup>th</sup> Floor  
New York, NY 10123  
646.518.7735

10 April 2020  
File No. 133110-002

Via Email: [yukyin.wong@dec.ny.gov](mailto:yukyin.wong@dec.ny.gov)  
New York State Department of Environmental Conservation  
Division of Environmental Remediation, Region 2  
47-40 21<sup>st</sup> Street  
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Senior Associate

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Jane O'Connell (NYSDEC)  
Richard Guishard

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Email: [statedesignsny@gmail.com](mailto:statedesignsny@gmail.com)

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from February 2020 through March 2020. 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 2 April 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 2 April 2020, high tide was observed from 4:18 AM to 11:28 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 3,519 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

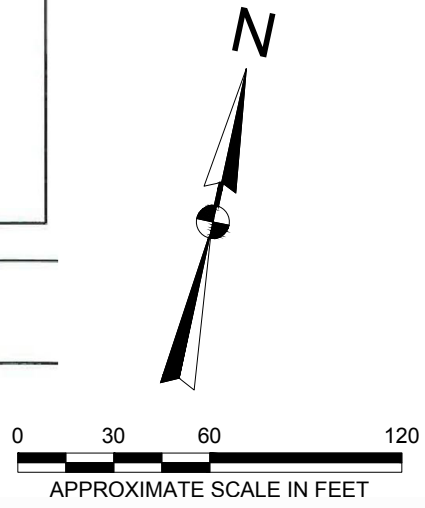
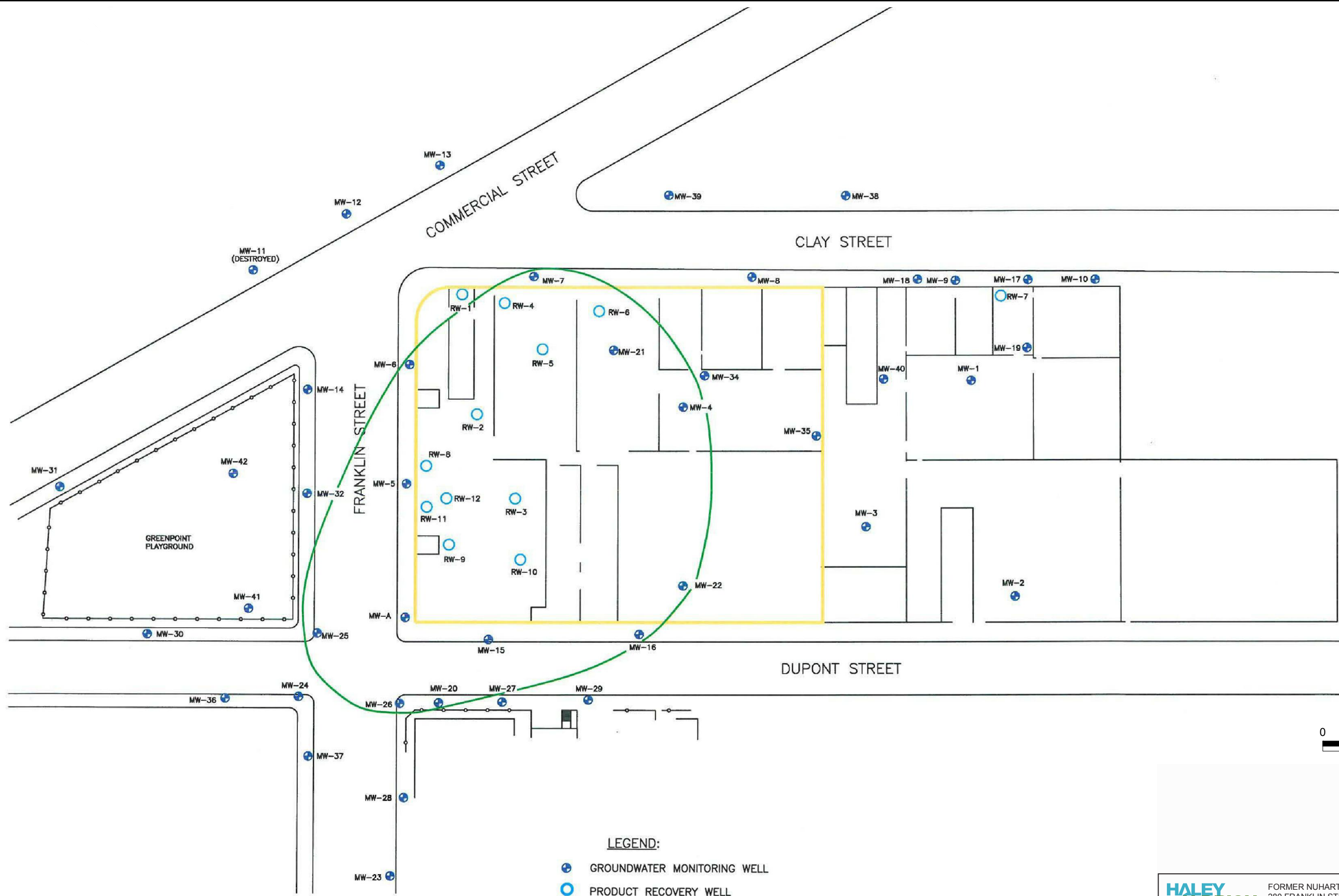
Table with 42 columns: Well Number, Depth to Water (feet), Depth to Product (feet), and Apparent Thickness of LNAPL (feet) for years 2016, 2015, 2014, 2013, and 2012. Rows include wells MW-4 through MW-42 and RW-1 through RW-12.

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 30 gallons of product removed from product recovery system Well-34 has uneven casing top est= Estimated Value Data not recorded due to access issues \* = Well was dry \*\* = Well equipped with automated product recovery system Wells were gauged on April 2, 2020

**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**

MARCH 2020

FIGURE 1





HALEY & ALDRICH OF NEW YORK  
237 West 35<sup>th</sup> Street  
16<sup>th</sup> Floor  
New York, NY 10123  
646.518.7735

8 May 2020  
File No. 133110-002

Via Email: [yukyin.wong@dec.ny.gov](mailto:yukyin.wong@dec.ny.gov)  
New York State Department of Environmental Conservation  
Division of Environmental Remediation, Region 2  
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James Bellew  
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Email: [jane.oconnell@dec.ny.gov](mailto:jane.oconnell@dec.ny.gov)  
Email: [statedesignsny@gmail.com](mailto:statedesignsny@gmail.com)

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from March 2020 through April 2020. 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

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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

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### Monitoring and LNAPL Removal

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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 40 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 3,559 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.

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

**Attachment A**

**Apparent Thickness of LNAPL**



Table 1:

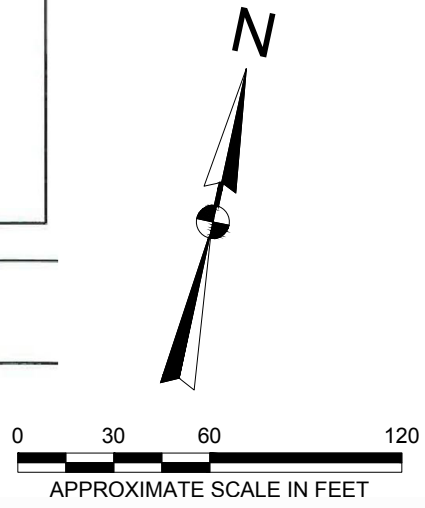
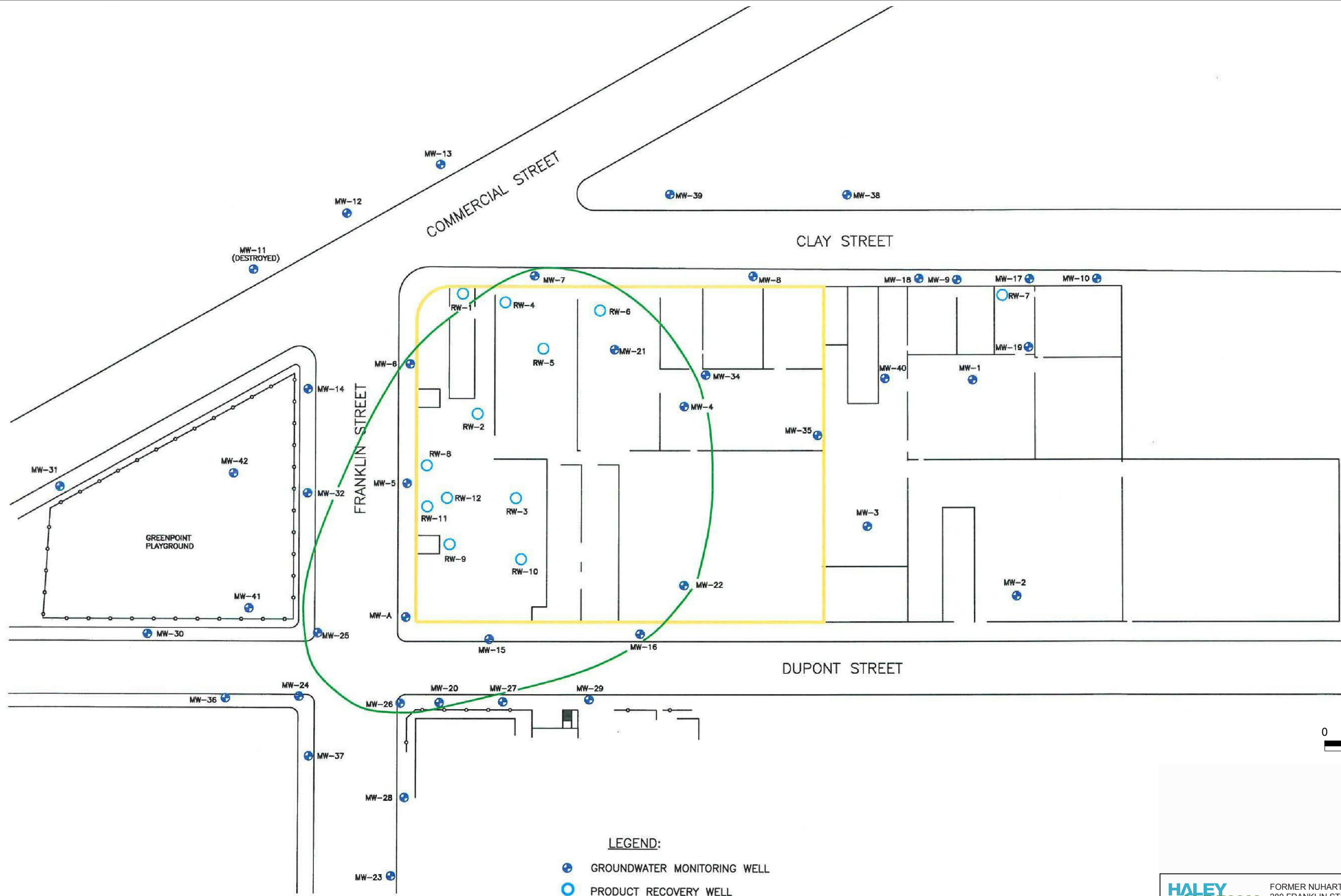
Attachment A: Apparent Thickness of LNAPL  
Former NuHart Plastic Manufacturing Site, NYSDEC #224136  
280 Franklin Street  
Brooklyn, NY

Table with columns for Well Number, Depth to Water (feet), Depth to Product (feet), and Apparent Thickness of LNAPL (feet) for years 2012-2016. The table contains multiple rows of data for various monitoring wells (MW-4 to MW-42, RW-1 to RW-12, MW-1 to MW-18).

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 40 gallons of product removed from product recovery system  
Well-34 has uneven casing top  
Est= Estimated Value -- = Data not recorded due to access issues  
\* = Well was dry \*\* = Well equipped with automated product recovery system  
Wells were gauged on 6 May 2020

**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**

APRIL 2020

FIGURE 1





HALEY & ALDRICH OF NEW YORK  
237 West 35<sup>th</sup> Street  
16<sup>th</sup> Floor  
New York, NY 10123  
646.518.7735

5 June 2020  
File No. 133110-002

Via Email: [yukyin.wong@dec.ny.gov](mailto:yukyin.wong@dec.ny.gov)  
New York State Department of Environmental Conservation  
Division of Environmental Remediation, Region 2  
47-40 21<sup>st</sup> 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 Stephen Lawrence of the New York State Department of Health. The Project Status Report is for April 2020 to May 2020. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,  
HALEY & ALDRICH OF NEW YORK

  
James Bellew  
Senior Associate

CC:

Stephen Lawrence (NYSDOH)  
Dupont Street Developers, LLC  
Jane O'Connell (NYSDEC)  
Richard Guishard

Email: [Stephen.Lawrence@health.ny.gov](mailto:Stephen.Lawrence@health.ny.gov)  
Email: [bojinzhu@gmail.com](mailto:bojinzhu@gmail.com)  
Email: [jane.oconnell@dec.ny.gov](mailto:jane.oconnell@dec.ny.gov)  
Email: [statedesignsny@gmail.com](mailto:statedesignsny@gmail.com)

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from April 2020 through May 2020. 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 29 May 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 6 May 2020, high tide was observed from 2:45 AM to 9:28 AM 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 3,614 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 5/29/20 between 8:00 am and 11:00 am (High tide @ 2:45 AM and Low tide @ 9:28 AM)

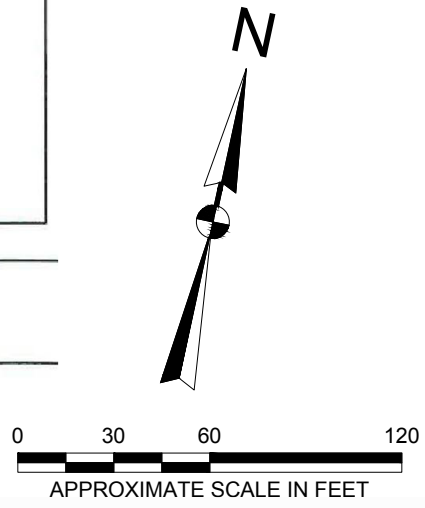
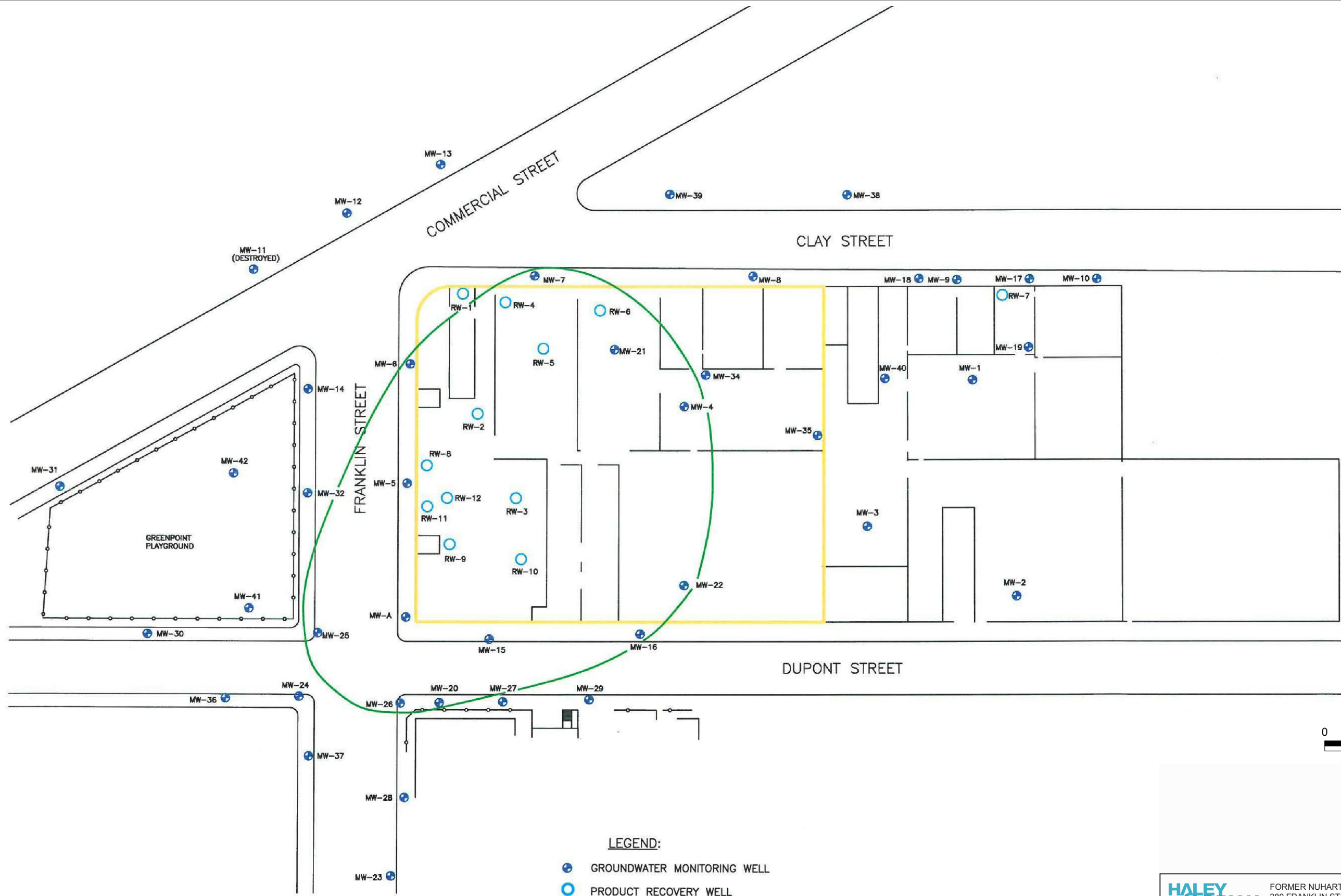
Table with columns for Well Number, Depth to Water (feet), Depth to Product (feet), and Apparent Thickness of LNAPL (feet) for years 2020, 2019, 2018, 2017, and 2016. Rows list wells MW-4 through MW-34 and RW-1 through RW-12.

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 55 gallons of product removed from product recovery system Well-34 has uneven casing top est= Estimated Value \_\_\_ = Data not recorded due to access issues \* = Well was dry \*\* = Well equipped with automated product recovery system Wells were gauged on 29 May 2020



**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 2020

FIGURE 1





HALEY & ALDRICH OF NEW YORK  
237 West 35<sup>th</sup> Street  
16<sup>th</sup> Floor  
New York, NY 10123  
646.518.7735

17 July 2020  
File No. 133110-002

Via Email: [yukyin.wong@dec.ny.gov](mailto:yukyin.wong@dec.ny.gov)  
New York State Department of Environmental Conservation  
Division of Environmental Remediation, Region 2  
47-40 21<sup>st</sup> 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 Stephen Lawrence of the New York State Department of Health. The Project Status Report is for May 2020 to June 2020. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,  
HALEY & ALDRICH OF NEW YORK

  
James Bellew  
Senior Associate

CC:

Stephen Lawrence (NYSDOH)  
Dupont Street Developers, LLC  
Jane O'Connell (NYSDEC)  
Richard Guishard

Email: [Stephen.Lawrence@health.ny.gov](mailto:Stephen.Lawrence@health.ny.gov)  
Email: [bojinzhu@gmail.com](mailto:bojinzhu@gmail.com)  
Email: [jane.oconnell@dec.ny.gov](mailto:jane.oconnell@dec.ny.gov)  
Email: [statedesignsny@gmail.com](mailto:statedesignsny@gmail.com)

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from May 2020 through June 2020. 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 15 July 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 15 July 2020, high tide was observed from 6:04 AM to 11:53 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 42 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 3,656 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**

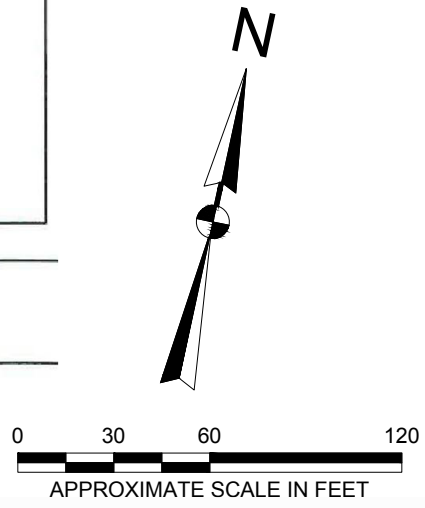
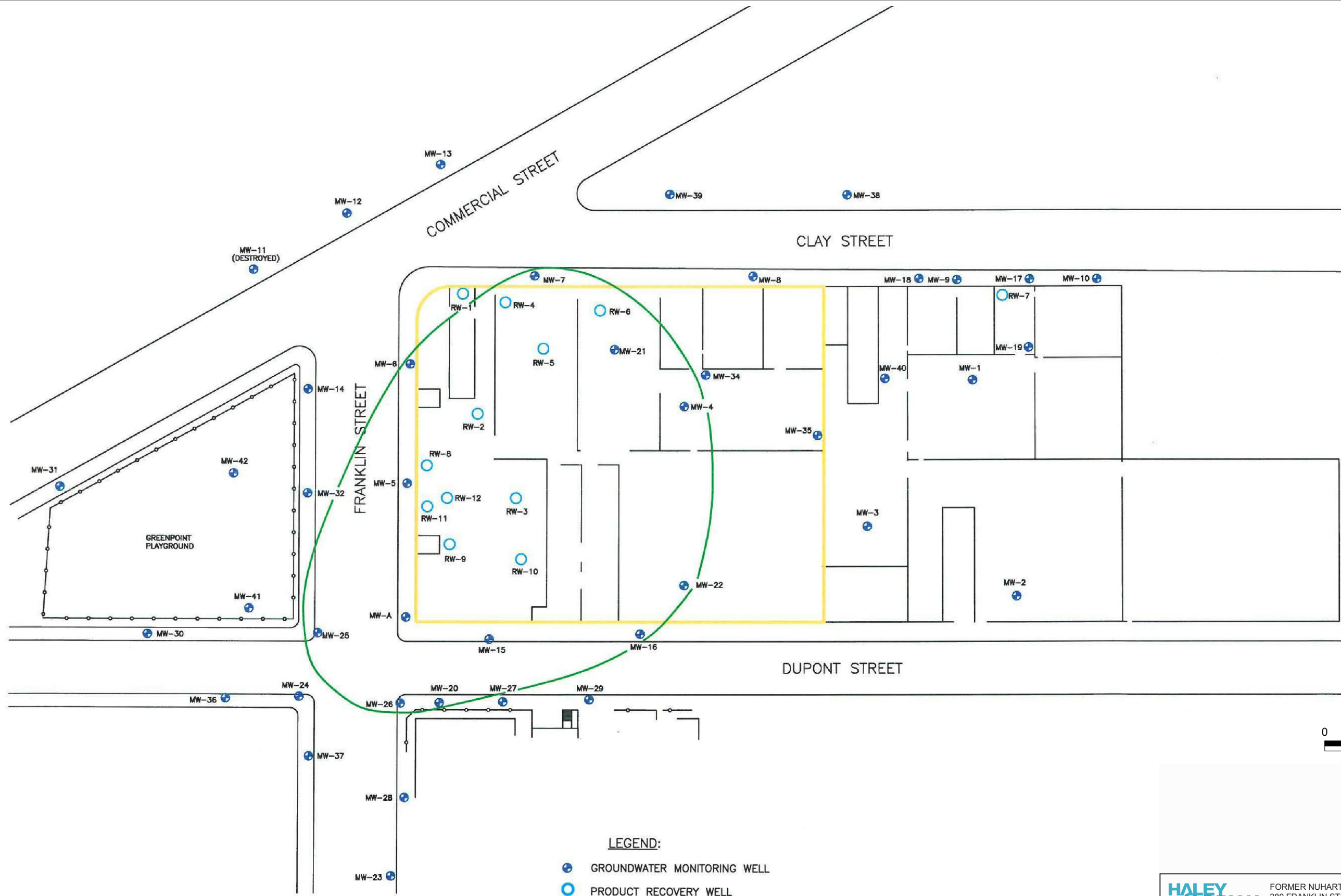
**Apparent Thickness of LNAPL**





**Attachment B**

**Site Figure**



- LEGEND:**
- ⊕ 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 2020

FIGURE 1





HALEY & ALDRICH OF NEW YORK  
237 West 35<sup>th</sup> Street  
16<sup>th</sup> Floor  
New York, NY 10123  
646.518.7735

19 October 2020  
File No. 133110-002

Via Email: [yukyin.wong@dec.ny.gov](mailto:yukyin.wong@dec.ny.gov)  
New York State Department of Environmental Conservation  
Division of Environmental Remediation, Region 2  
47-40 21<sup>st</sup> Street  
Long Island City, New York 11101

Attention: Mr. Bryan Wong

Subject: REV-1 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 Stephen Lawrence of the New York State Department of Health. The Project Status Report is for July 2020 to September 2020. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,  
HALEY & ALDRICH OF NEW YORK

  
James Bellew  
Senior Associate

CC:

Stephen Lawrence (NYSDOH)  
Dupont Street Developers, LLC  
Jane O'Connell (NYSDEC)  
Richard Guishard

Email: [Stephen.Lawrence@health.ny.gov](mailto:Stephen.Lawrence@health.ny.gov)  
Email: [bojinzhu@gmail.com](mailto:bojinzhu@gmail.com)  
Email: [jane.oconnell@dec.ny.gov](mailto:jane.oconnell@dec.ny.gov)  
Email: [statedesignsny@gmail.com](mailto:statedesignsny@gmail.com)

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from July 2020 through September 2020. 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. There was a gap in the monthly reporting on the Site due to the pending transaction and a contractual discrepancy. During the site visit the belt skimmer system was not powered. The system was powered off to prevent any potential overflow of system during the resolution of the above.

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 October 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 inactive but operational and were reactivated during the maintenance activities.

### 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 October 2020, high tide was observed from 12:44 PM to 7:07 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 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 3,686 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 10/6/20 between 10:00 am and 2:00 pm (High tide @ 12:44 PM and Low tide @ 7:07 PM)

Table with columns for Well Number, Depth to Water (feet), Depth to Product (feet), and Apparent Thickness of LNAPL (feet) for years 2020, 2019, 2018, 2017, and 2016. Rows include wells MW-4 through MW-42 and RW-1 through RW-12.

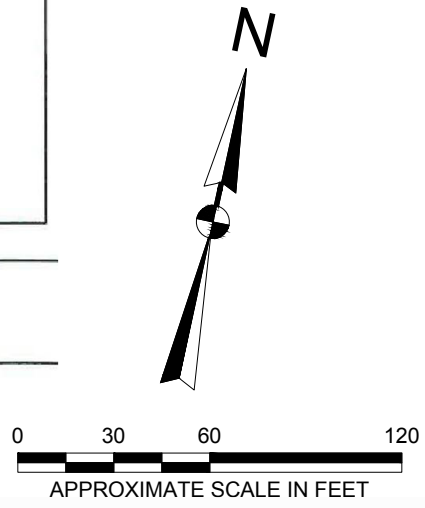
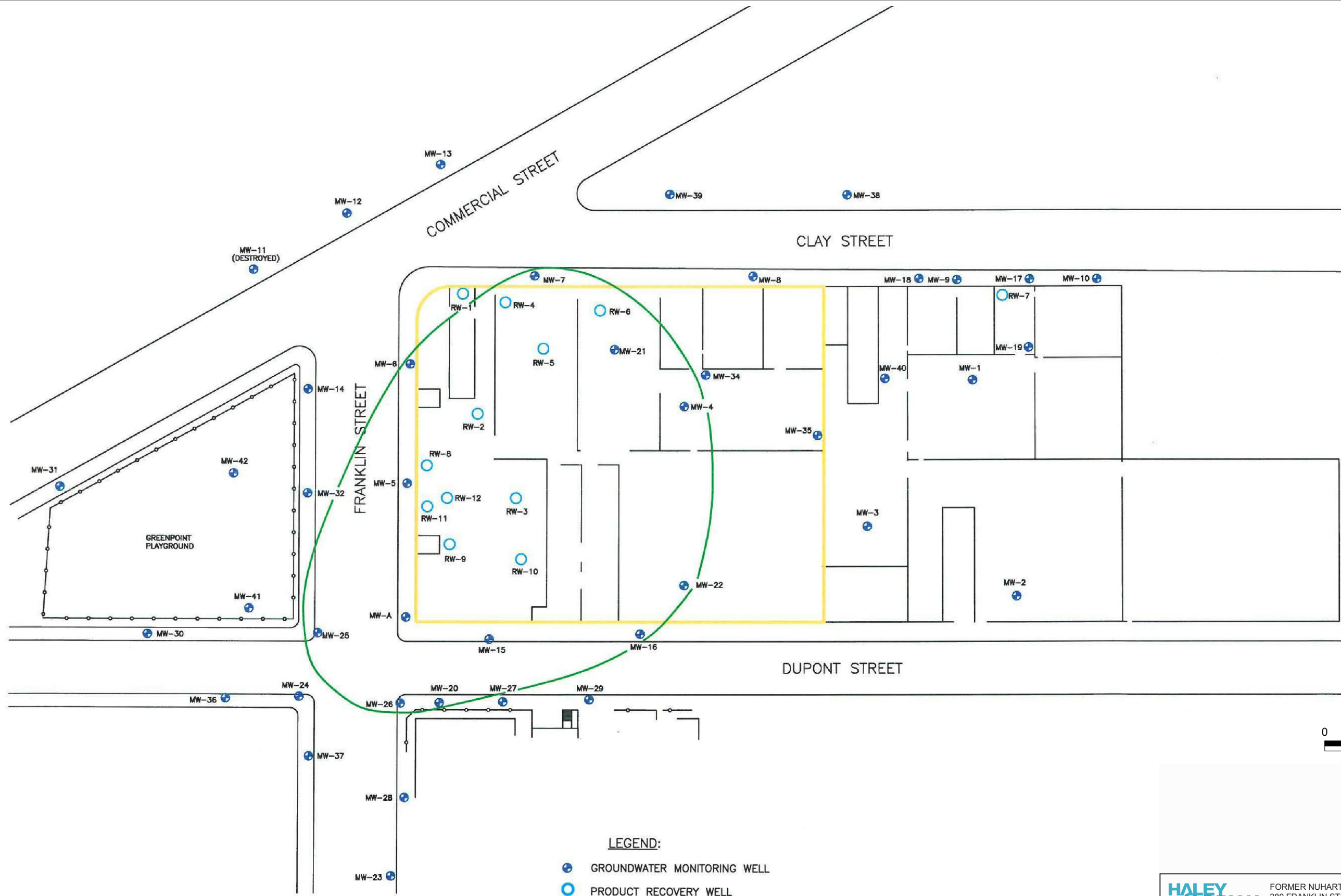
Notes: Data Recorded using an oil/water interface probe, measurements from the tops of well casings. ## = NAPL observed, apparent thickness not determined. NI = Not Installed, ND = Not Detected, NG = Not Gauged. Wells MW-1, MW-2, MW-9, MW-10, MW-17, MW-18, MW-19, and RW-7 are associated with NYSDEC Spill 06-01852 and are under a separate investigation. Total of 30 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. Wells were gauged on 6 October 2020.



**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**

MAY 2020

FIGURE 1





HALEY & ALDRICH OF NEW YORK  
237 West 35<sup>th</sup> Street  
16<sup>th</sup> Floor  
New York, NY 10123  
646.518.7735

12 November 2020  
File No. 133110-002

Via Email: [yukyin.wong@dec.ny.gov](mailto:yukyin.wong@dec.ny.gov)  
New York State Department of Environmental Conservation  
Division of Environmental Remediation, Region 2  
47-40 21<sup>st</sup> 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 Stephen Lawrence of the New York State Department of Health. The Project Status Report is for September 2020 to October 2020. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,  
HALEY & ALDRICH OF NEW YORK

  
James Bellew  
Senior Associate

CC:

Stephen Lawrence (NYSDOH)  
Dupont Street Developers, LLC  
Jane O'Connell (NYSDEC)  
Richard Guishard

Email: [Stephen.Lawrence@health.ny.gov](mailto:Stephen.Lawrence@health.ny.gov)  
Email: [bojinzhu@gmail.com](mailto:bojinzhu@gmail.com)  
Email: [jane.oconnell@dec.ny.gov](mailto:jane.oconnell@dec.ny.gov)  
Email: [statedesignsny@gmail.com](mailto:statedesignsny@gmail.com)

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from September 2020 through October 2020. 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 November 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. Of note, upon arrival Haley & Aldrich observed evidence of activity inside the building including refuse and newly painted graffiti. Prior to completion of the routine activities all accessible doors on the ground level were checked and secured.

### 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 November 2020, high tide was observed from 3:39 PM to 10:31 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 54 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 3,740 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**

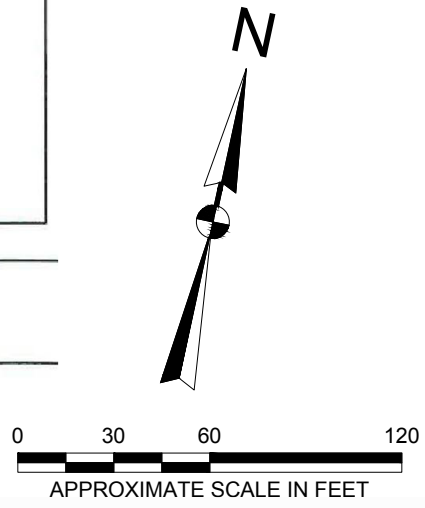
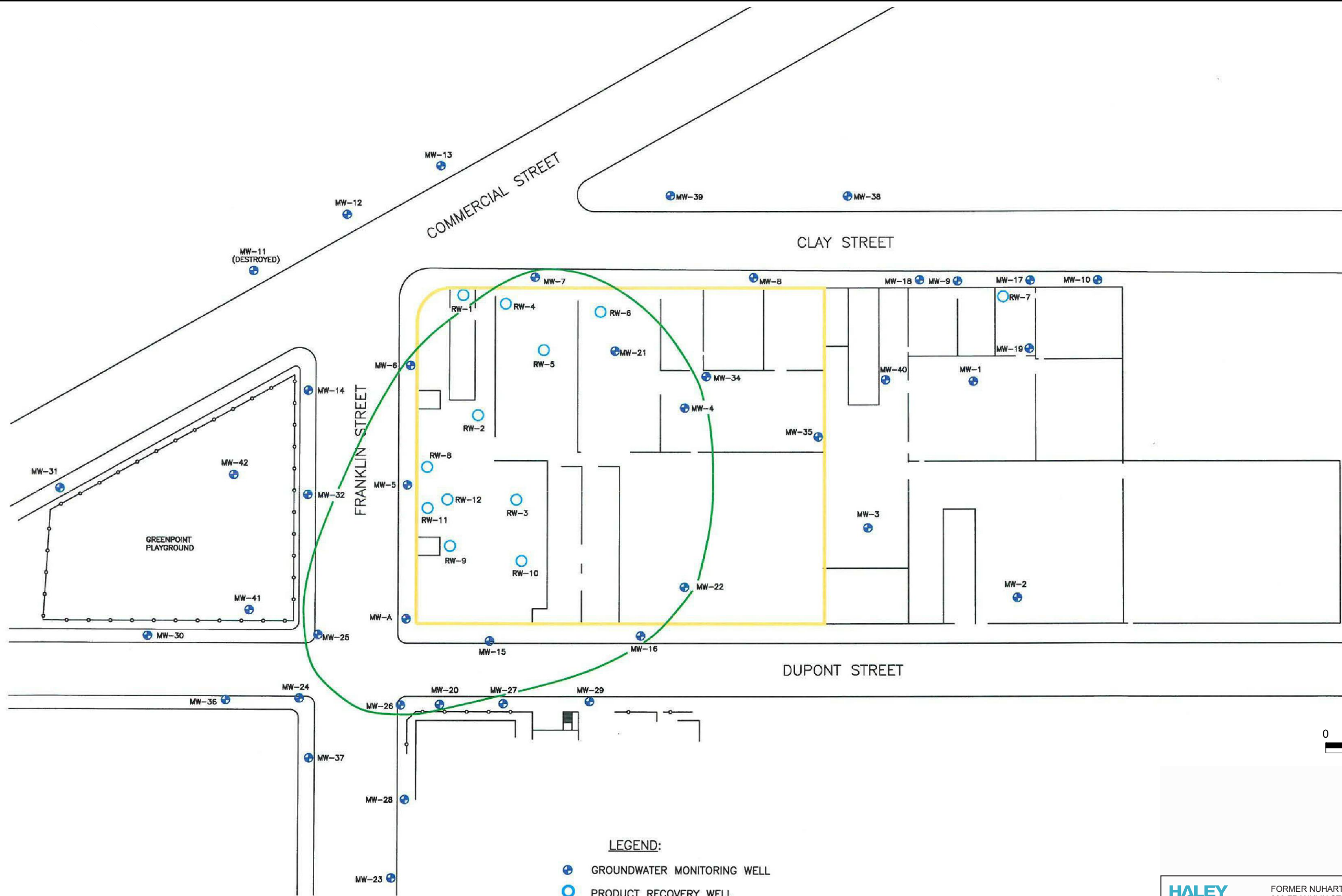
**Apparent Thickness of LNAPL**





**Attachment B**

**Site Figure**



- LEGEND:**
- ⊕ 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'.

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**AERIAL EXTENT OF LNAPL ON GROUNDWATER**

OCTOBER 2020 FIGURE 1