



Monthly Progress Report 2022 No. 12

Former NuHart West Site

10-14 Clay Street, 55-57 Dupont Street & 280 Franklin Street, Brooklyn, NY

NYSDEC Site No. 224136

Reporting Period: December 1, 2022 – January 1, 2022

1. Introduction

In accordance with the reporting requirements for the Former NuHart West Site, located at 10-14 Clay Street, 55-57 Dupont Street & 280 Franklin Street, Brooklyn, NY (Site), Haley & Aldrich of New York (Haley & Aldrich), has prepared this monthly progress report, on behalf of Dupont Street Owner LLC, to summarize the work performed at the Site from December 1, 2022, through January 1, 2022.

The Former NuHart West Site is located in the Greenpoint neighborhood of Brooklyn, NY and is identified as Block 2487 Lots 1, 10, 12, 72, and 78 on the New York City tax map. The Site is listed in the New York State Department of Environmental Conservation (NYSDEC) Inactive Hazardous Waste Registry as a Class 2 Site (Site No. 224136). The Site is underlain by sub-grade footings, utility networks, closed underground storage tanks (USTs), and piping and trench systems. The USTs and trench systems were cleaned out and the USTs were closed in accordance with applicable regulations in 2006. Former industrial operations at the Site have impacted onsite and offsite soil and groundwater with phthalates and lubricating oil (Hecla oil), most likely released from the tank and piping/trench systems. Phthalates and a phthalate/oil mixture are present in soil and as a light non-aqueous-phase liquid (LNAPL) plume floating on the groundwater surface primarily beneath Lots 1, 10, and 78 of the Site and extending somewhat offsite to the southwest. Groundwater is encountered at approximately 8 to 10 feet below ground surface (ft bgs). Currently, the site is a vacant 49,000-square foot lot with a concrete slab on grade.

Resource Conservation and Recovery Act (RCRA) closure activities were completed at the Site in May 2022. Interim remedial measure (IRM) activities are no longer being conducted at the Site since the product recovery systems were decommissioned as part of the RCRA Closure. IRM activities concluded in February 2022. Eastern Environmental Solutions, Inc. (Eastern) previously conducted waste management activities for disposal of product from the IBC tanks at the Site. Prior to 2022, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. In January 2022, ACV Environmental Services Inc. (ACV) transported and disposed a total of 2,529 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste.

2. Investigation or Remedial Actions Relative to the Site during this Reporting Period

- Demolition of the Site buildings is complete.
- Installation of the OU-2 LNAPL barrier wall began on 7 November 2022 and is ongoing.

3. Monthly On-Site and Off-Site Monitoring Well Gauging

Gauging of on-site and off-site monitoring wells associated with the Site was performed on 28 December 2022. Gauging results are included in the attached table. Monitoring wells MW-24, RW-10, RW-3, RW-1, and MW-21 were inaccessible due to storage of sheet piles or equipment. The wells that could not be accessed are identified in the attached figure.

4. Actions Relative to the Site Anticipated for the Next Reporting Period

- Continuing installation of the OU-2 LNAPL barrier wall.
- Mobilization for installation of the on-site LNAPL barrier walls.

5. Approved Activity Modifications (changes of work scope and/or schedule)

There have been no modifications to the work scope.

6. Results of Sampling, Testing and Other Relevant Data

Sampling was not conducted during this reporting period.

7. Deliverables Submitted During This Reporting Period

A request for reuse of material from the neighboring NuHart East Site was submitted to NYSDEC 29 December 2022. The revised 90% Remedial Design Report was submitted to NYSDEC during the previous reporting period on 30 November 2022.

8. Information Regarding Percentage of Completion

Installation of the OU-2 LNAPL barrier wall is approximately 20% complete

9. Unresolved Delays Encountered or Anticipated That May Affect the Schedule and Mitigation Efforts

None.

10. Community Participation (CP) Plan Activities during This Reporting Period

None.

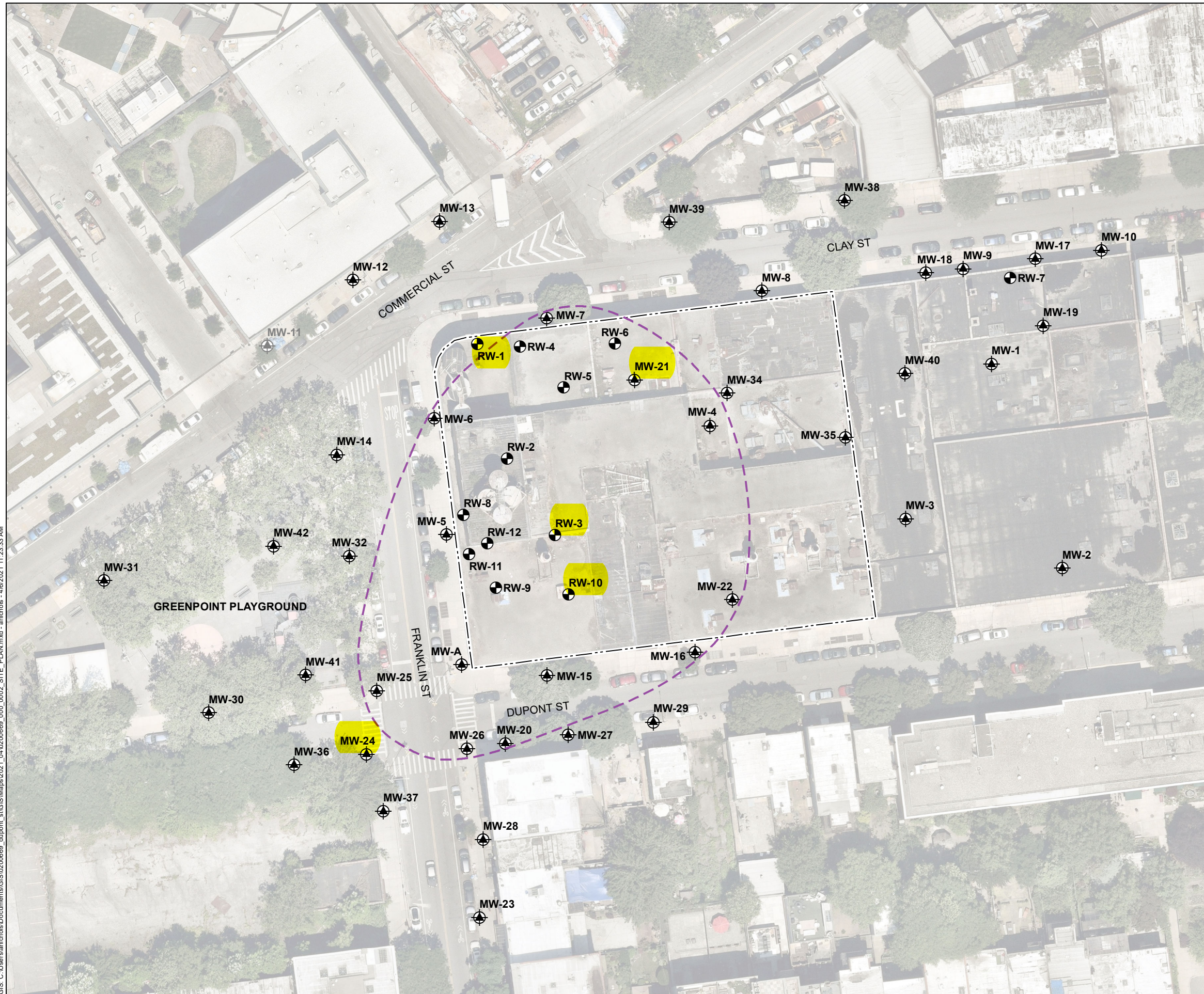
11. Activities Anticipated in Support of the CP Plan for the Next Reporting Period:

None.







12. Miscellaneous Information

None.

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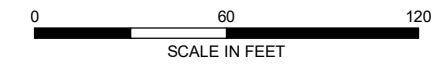


LEGEND

-  GROUNDWATER MONITORING WELL
-  PRODUCT RECOVERY WELL
-  GROUNDWATER MONITORING WELL, DESTROYED
-  EXTENT OF LIGHT NON-AQUEOUS PHASE LIQUID (LNAPL) ON GROUNDWATER
-  SITE BOUNDARY
-  YELLOW HIGHLIGHTED WELLS ARE INACCESSIBLE DUE TO STORAGE OF SHEETPILES OR EQUIPMENT

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. SITE BOUNDARY, GROUNDWATER MONITORING WELL LOCATIONS, PRODUCT RECOVERY WELL LOCATIONS, AND APPROXIMATE EXTENT OF LNAPL DIGITIZED FROM FIGURE TITLED, "FIGURE 1, AERIAL EXTENT OF LNAPL ON GROUNDWATER", PREPARED BY GZA, DATED AUGUST 2016.
3. AERIAL IMAGERY SOURCE: NEARMAP, 9 JUNE 2020



HALEY ALDRICH 49 DUPONT STREET
BROOKLYN, NEW YORK

SITE PLAN

FEBRUARY 2022

FIGURE 1



Monthly Progress Report 2022 No. 11

Former NuHart West Site

10-14 Clay Street, 55-57 Dupont Street & 280 Franklin Street, Brooklyn, NY

NYSDEC Site No. 224136

Reporting Period: November 10, 2022 – December 1, 2022

1. Introduction

In accordance with the reporting requirements for the Former NuHart West Site, located at 10-14 Clay Street, 55-57 Dupont Street & 280 Franklin Street, Brooklyn, NY (Site), Haley & Aldrich of New York (Haley & Aldrich), has prepared this monthly progress report, on behalf of Dupont Street Owner LLC, to summarize the work performed at the Site from November 10, 2022, through December 1, 2022.

The Former NuHart West Site is located in the Greenpoint neighborhood of Brooklyn, NY and is identified as Block 2487 Lots 1, 10, 12, 72, and 78 on the New York City tax map. The Site is listed in the New York State Department of Environmental Conservation (NYSDEC) Inactive Hazardous Waste Registry as a Class 2 Site (Site No. 224136). The Site is underlain by sub-grade footings, utility networks, closed underground storage tanks (USTs), and piping and trench systems. The USTs and trench systems were cleaned out and the USTs were closed in accordance with applicable regulations in 2006. Former industrial operations at the Site have impacted onsite and offsite soil and groundwater with phthalates and lubricating oil (Hecla oil), most likely released from the tank and piping/trench systems. Phthalates and a phthalate/oil mixture are present in soil and as a light non-aqueous-phase liquid (LNAPL) plume floating on the groundwater surface primarily beneath Lots 1, 10, and 78 of the Site and extending somewhat offsite to the southwest. Groundwater is encountered at approximately 8 to 10 feet below ground surface (ft bgs). Currently, the site is a vacant 49,000-square foot lot with a concrete slab on grade.

Resource Conservation and Recovery Act (RCRA) closure activities were completed at the Site in May 2022. Interim remedial measure (IRM) activities are no longer being conducted at the Site since the product recovery systems were decommissioned as part of the RCRA Closure. IRM activities concluded in February 2022. Eastern Environmental Solutions, Inc. (Eastern) previously conducted waste management activities for disposal of product from the IBC tanks at the Site. Prior to 2022, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. In January 2022, ACV Environmental Services Inc. (ACV) transported and disposed a total of 2,529 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste.

2. Investigation or Remedial Actions Relative to the Site during this Reporting Period

- Demolition of the Site buildings is complete.
- Installation of the OU-2 LNAPL barrier wall began on 7 November 2022 and is ongoing.

3. Monthly On-Site and Off-Site Monitoring Well Gauging

Gauging of on-site and off-site monitoring wells associated with the Site was performed on 29 November 2022. Gauging results are included in the attached table. Monitoring well MW-21 and recovery well RW-1 could not be located due to rubble from demolition activities, and MW-34 was destroyed. The wells that could not be accessed are identified in the attached figure.

4. Actions Relative to the Site Anticipated for the Next Reporting Period

- Continuing installation of the OU-2 LNAPL barrier wall.
- Mobilization for installation of the on-site LNAPL barrier walls.

5. Approved Activity Modifications (changes of work scope and/or schedule)

There have been no modifications to the work scope.

6. Results of Sampling, Testing and Other Relevant Data

Sampling was not conducted during this reporting period.

7. Deliverables Submitted During This Reporting Period

- A revised Remedial Design Change Requests Letter was submitted to NYSDEC on 7 November 2022 and was approved on 28 November 2022.
- The revised 90% Remedial Design Report was submitted to NYSDEC on 30 November 2022.

8. Information Regarding Percentage of Completion

Demolition activities are 100% complete.

9. Unresolved Delays Encountered or Anticipated That May Affect the Schedule and Mitigation Efforts

None.

10. Community Participation (CP) Plan Activities during This Reporting Period

On 28 November 2022, the Remedial Design Change Requests Letter was sent to the document repositories. The Letters of Transmittal and Certification of Mailing are attached.

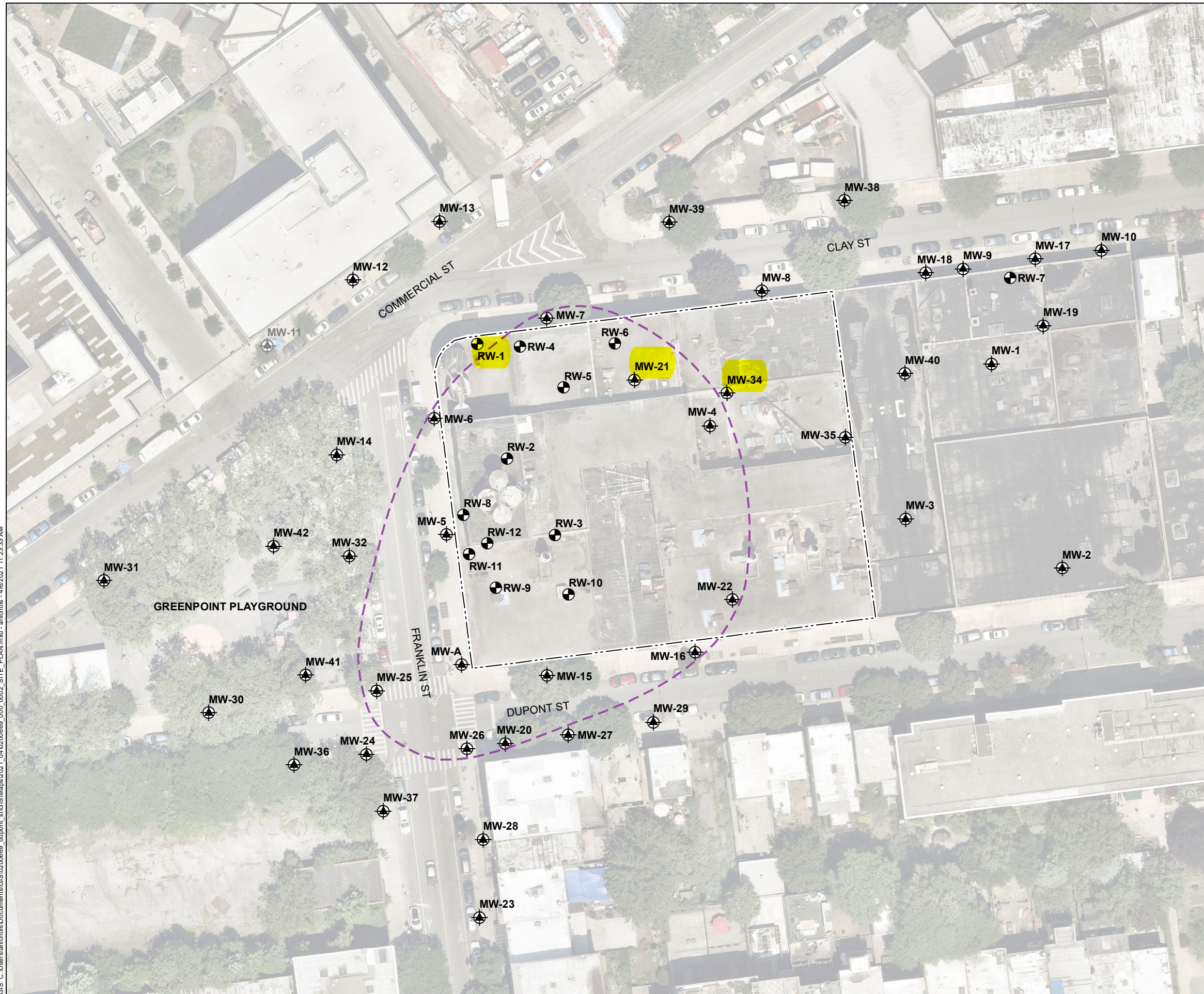
11. Activities Anticipated in Support of the CP Plan for the Next Reporting Period:

None.






12. Miscellaneous Information

None.

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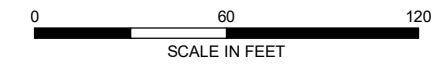


LEGEND

-  GROUNDWATER MONITORING WELL
-  PRODUCT RECOVERY WELL
-  GROUNDWATER MONITORING WELL, DESTROYED
-  EXTENT OF LIGHT NON-AQUEOUS PHASE LIQUID (LNAPL) ON GROUNDWATER
-  SITE BOUNDARY

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. SITE BOUNDARY, GROUNDWATER MONITORING WELL LOCATIONS, PRODUCT RECOVERY WELL LOCATIONS, AND APPROXIMATE EXTENT OF LNAPL DIGITIZED FROM FIGURE TITLED, "FIGURE 1, AERIAL EXTENT OF LNAPL ON GROUNDWATER", PREPARED BY GZA, DATED AUGUST 2016.
3. AERIAL IMAGERY SOURCE: NEARMAP, 9 JUNE 2020
4. MONITORING WELLS INDICATED IN YELLOW WERE INACCESSIBLE DUE TO DEMOLITION ACTIVITIES AND NOT GAUGED DURING THIS REPORTING PERIOD



HALEY ALDRICH
 49 DUPONT STREET
 BROOKLYN, NEW YORK

SITE PLAN

FEBRUARY 2022

FIGURE 1

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

Readings taken 11/29/2022 between 7:00 am and 3:15 pm (low tide @ 7:17am and high tide @ 1:58pm)

Table with columns for Well Number, Depth to Water (feet), Depth to Product (feet), and Apparent Thickness of LNAPL (feet) for years 2022, 2021, 2020, 2019, 2018, and 2017. Rows list wells MW-4 through MW-18 and RW-1 through RW-11.

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, NA = No Access. 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. ** = Water not detected; well filled with sediment, value is the total depth of the well. * = Well was dry. *** = Well recovery equipment dismantled in March 2022. Wells were gauged on 29 November 2022.

NG = Not Gauged



HALEY & ALDRICH OF NEW YORK
237 W 35th Street
16th Floor
New York, NY 10001
646.277.5685

Letter of Transmittal

Date 30 November 2022
File Number 0203497
From Sarah Commisso

To Brooklyn Community Board 1
435 Graham Avenue
Brooklyn, NY 11211
Attention Dealice Fuller
Subject Proposed Amendment to the Record of Decision – Former NuHart Plastics
Manufacturing Site, NYSDEC Site 224136 (NuHart West Site)

Copies	Date	Description
1	17 November 2022	Proposed Amendment to the Record of Decision – Former NuHart Plastics Manufacturing Site, NYSDEC Site 224136 (NuHart West Site)

Transmitted via First class mail Overnight express Hand delivery Other

Remarks:

Enclosed, please find a copy of the Proposed Amendment to the Record of Decision for the Former NuHart Plastics Manufacturing Site, NYSDEC Site 224136 (NuHart West Site).

Please place these items in your public document repository so the public may access them.

Should you have questions or comments, please feel free to contact me at SCommisso@HaleyAldrich.com or phone at 646-277-5693.



HALEY & ALDRICH OF NEW YORK
237 W 35th Street
16th Floor
New York, NY 10001
646.277.5685

Letter of Transmittal

Date 30 November 2022
File Number 0203497
From Sarah Commisso

To Brooklyn Public Library – Greenpoint Library
107 Norman Avenue
Brooklyn, NY 11222
Attention Abby Garnett
Subject Proposed Amendment to the Record of Decision – Former NuHart Plastics
Manufacturing Site, NYSDEC Site 224136 (NuHart West Site)

Copies	Date	Description
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HALEY & ALDRICH OF NEW YORK
237 W 35th Street
16th Floor
New York, NY 10001
646.277.5685

Letter of Transmittal

Date 30 November 2022
File Number 0203497
From Sarah Commisso

To Brooklyn Public Library – Williamsburg Branch
240 Division Avenue
Brooklyn, NY 11211
Attention Catherine Skryzpek
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Should you have questions or comments, please feel free to contact me at SCommisso@HaleyAldrich.com or phone at 646-277-5693.

CERTIFICATION OF MAILING

Site Name: Former NuHart West Site
Site No.: NYSDEC Site 224136

I certify that I mailed on November 30, 2022 a copy of the attached public notice by first class mail upon the person(s) on the attached mailing list, by depositing a true copy thereof, securely enclosed in a postpaid wrapper, in the Post Office box at 157 West 35th Street in the City of New York, 10001, New York, which box is under the exclusive care and custody of the United States Post Office.

Kristi Smith
Signature

11/30/2022
Date



Monthly Progress Report 2022 No. 10

Former NuHart West Site

10-14 Clay Street, 55-57 Dupont Street & 280 Franklin Street, Brooklyn, NY

NYSDEC Site No. 224136

Reporting Period: October 10, 2022 – November 10, 2022

1. Introduction

In accordance with the reporting requirements for the Former NuHart West Site, located at 10-14 Clay Street, 55-57 Dupont Street & 280 Franklin Street, Brooklyn, NY (Site), Haley & Aldrich of New York (Haley & Aldrich), has prepared this monthly progress report, on behalf of Dupont Street Owner LLC, to summarize the work performed at the Site from October 10, 2022, through November 10, 2022.

The Former NuHart West Site is located in the Greenpoint neighborhood of Brooklyn, NY and is identified as Block 2487 Lots 1, 10, 12, 72, and 78 on the New York City tax map. The Site is listed in the New York State Department of Environmental Conservation (NYSDEC) Inactive Hazardous Waste Registry as a Class 2 Site (Site No. 224136). The Site is underlain by sub-grade footings, utility networks, closed underground storage tanks (USTs), and piping and trench systems. The USTs and trench systems were cleaned out and the USTs were closed in accordance with applicable regulations in 2006. Former industrial operations at the Site have impacted onsite and offsite soil and groundwater with phthalates and lubricating oil (Hecla oil), most likely released from the tank and piping/trench systems. Phthalates and a phthalate/oil mixture are present in soil and as a light non-aqueous-phase liquid (LNAPL) plume floating on the groundwater surface primarily beneath Lots 1, 10, and 78 of the Site and extending somewhat offsite to the southwest. Groundwater is encountered at approximately 8 to 10 feet below ground surface (ft bgs). Currently, the site is a vacant 49,000-square foot lot with a concrete slab on grade.

Resource Conservation and Recovery Act (RCRA) closure activities were completed at the Site in May 2022. Interim remedial measure (IRM) activities are no longer being conducted at the Site since the product recovery systems were decommissioned as part of the RCRA Closure. IRM activities concluded in February 2022. Eastern Environmental Solutions, Inc. (Eastern) previously conducted waste management activities for disposal of product from the IBC tanks at the Site. Prior to 2022, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. In January 2022, ACV Environmental Services Inc. (ACV) transported and disposed a total of 2,529 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste.

2. Investigation or Remedial Actions Relative to the Site during this Reporting Period

- Demolition of the Site buildings is complete, and sorting and removal of demolition debris is ongoing.
- Waste characterization sampling was conducted in the location of the OU-2 LNAPL barrier wall on 26 October 2022 in accordance with the Off-Site Waste Characterization Work Plan submitted to NYSDEC on 20 October 2022.

- Mobilization for installation of the OU-2 LNAPL barrier wall began on 7 November 2022.

3. Monthly On-Site and Off-Site Monitoring Well Gauging

Gauging of on-site and off-site monitoring wells associated with the Site was performed on 8 November 2022. Gauging results are included in the attached table. The wells that could not be accessed due to demolition activities are identified in the attached figure.

4. Actions Relative to the Site Anticipated for the Next Reporting Period

- Installation of the OU-2 LNAPL barrier wall.
- Mobilization for installation of the on-site LNAPL barrier walls.
- Completion of demolition activities.

5. Approved Activity Modifications (changes of work scope and/or schedule)

There have been no modifications to the work scope.

6. Results of Sampling, Testing and Other Relevant Data

Waste Characterization sampling data for the OU-2 LNAPL barrier wall was sent to disposal facilities for approvals.

7. Deliverables Submitted During This Reporting Period

- An Off-Site Waste Characterization Work Plan was submitted to NYSDEC on 20 October 2022.
- A revised Remedial Design Change Requests Letter was submitted to NYSDEC on 7 November 2022.
- A revised Supplemental Contained-in Request 02 addressing below grade materials was submitted to NYSDEC on 24 October 2022 and a determination letter was received 31 October 2022.
- A revised LNAPL Physical Barriers Design Letter was submitted to NYSDEC on 11 October 2022 and approved on 24 October 2022.
- A 90% Remedial Design Report was submitted to NYSDEC on 18 October 2022.

8. Information Regarding Percentage of Completion

Demolition activities are 95% complete.

9. Unresolved Delays Encountered or Anticipated That May Affect the Schedule and Mitigation Efforts

None.

10. Community Participation (CP) Plan Activities during This Reporting Period

On 27 October 2022, the LNAPL Physical Barriers Design Letter was sent to the document repositories. The Letters of Transmittal and Certification of Mailing are attached.

A Community Board Meeting was held at Mary D's Housing for Seniors on 11 October 2022 and another Community Board Meeting was held on 7 November 2022 to discuss the next steps in the remediation.

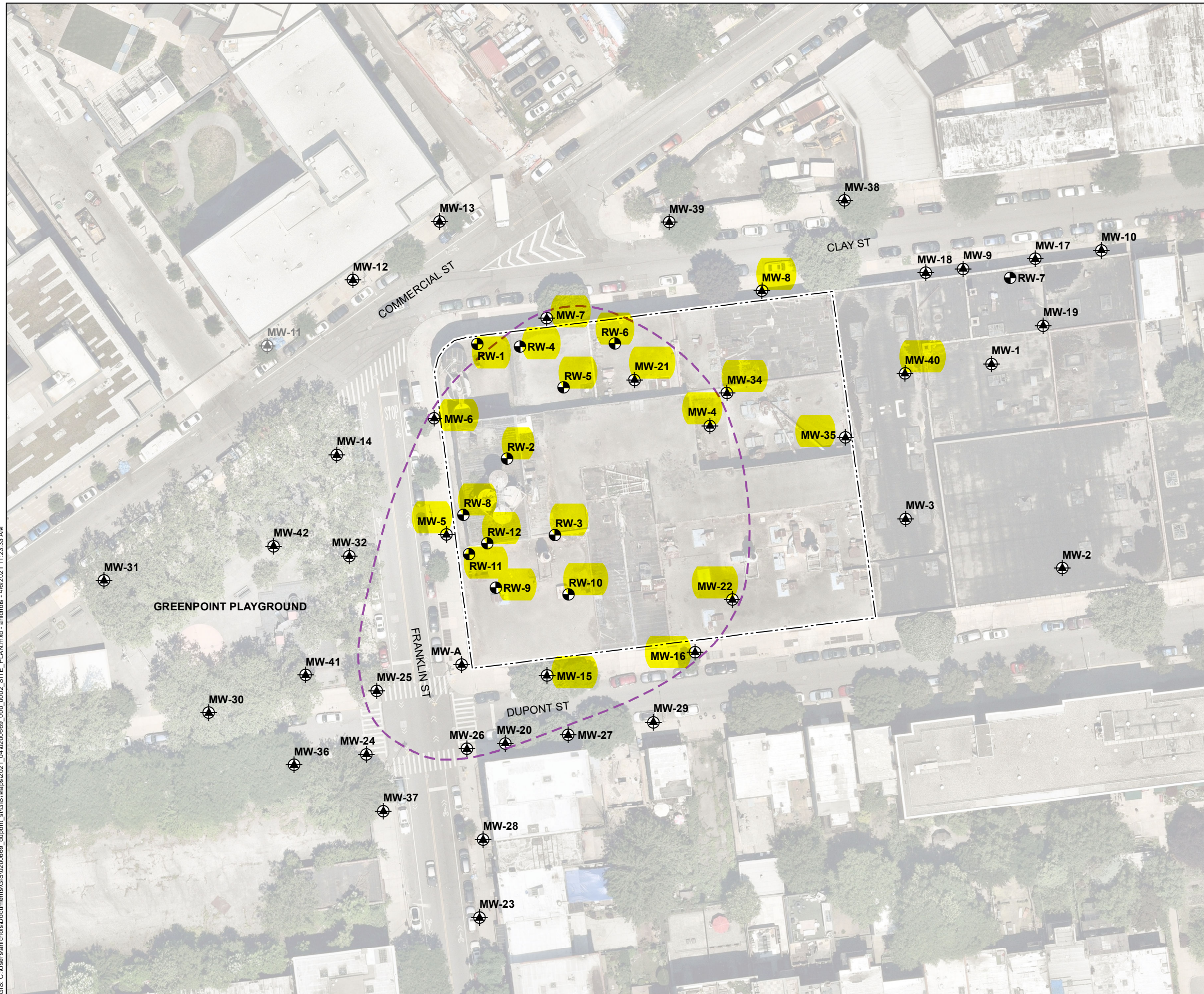
11. Activities Anticipated in Support of the CP Plan for the Next Reporting Period:

None.






12. Miscellaneous Information

None.

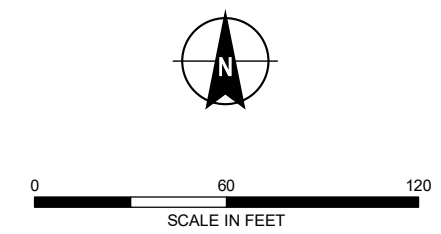
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LEGEND

-  GROUNDWATER MONITORING WELL
-  PRODUCT RECOVERY WELL
-  GROUNDWATER MONITORING WELL, DESTROYED
-  EXTENT OF LIGHT NON-AQUEOUS PHASE LIQUID (LNAPL) ON GROUNDWATER
-  SITE BOUNDARY

- NOTES**
1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
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HALEY ALDRICH 49 DUPONT STREET
BROOKLYN, NEW YORK

SITE PLAN

FEBRUARY 2022

FIGURE 1



HALEY & ALDRICH OF NEW YORK
237 W 35th Street
16th Floor
New York, NY 10001
646.277.5685

Letter of Transmittal

Date 27 October 2022
File Number 0203497
From Sarah Commisso

To Brooklyn Community Board 1
435 Graham Avenue
Brooklyn, NY 11211
Attention Dealice Fuller
Subject LNAPL Physical Barriers Design – Former NuHart Plastics Manufacturing Site, NYSDEC Site 224136 (NuHart West Site)

Copies	Date	Description
1	11 October 2022	LNAPL Physical Barriers Design – Former NuHart Plastics Manufacturing Site, NYSDEC Site 224136 (NuHart West Site)

Transmitted via First class mail Overnight express Hand delivery Other

Remarks:

Enclosed, please find a copy of the LNAPL Physical Barriers Design for the Former NuHart Plastics Manufacturing Site, NYSDEC Site 224136 (NuHart West Site).

Please place these items in your public document repository so the public may access them.

Should you have questions or comments, please feel free to contact me at SCommisso@HaleyAldrich.com or phone at 646-277-5693.



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Letter of Transmittal

Date 27 October 2022
File Number 0203497
From Sarah Commisso

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Should you have questions or comments, please feel free to contact me at SCommisso@HaleyAldrich.com or phone at 646-277-5693.

CERTIFICATION OF MAILING

Site Name: Former NuHart West Site
Site No.: NYSDEC Site 224136

I certify that I mailed on October 27, 2022 a copy of the attached public notice by first class mail upon the person(s) on the attached mailing list, by depositing a true copy thereof, securely enclosed in a postpaid wrapper, in the ~~Post~~ Drop OFF ~~Office box~~ at FEDEX OFFICE SHIP CENTER/157 W. 35th St. in the City of NEW YORK, 10001, New York, which box is under the exclusive care and custody of the United States Post Office.


Signature

10/27/2022
Date



HALEY & ALDRICH OF NEW YORK
237 West 35th Street
16th Floor
New York, NY 10123
646.277.5685

10 October 2022

File No. 0203497

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
10-14 Clay Street, 55-57 Dupont Street & 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 1 LLC/Dupont Street Owner 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 to October 2022. If you have any questions, please contact us at 646-277-5685.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK

James Bellew
Principal

Mari C. Conlon
Senior Project Manager

Sarah A. Commisso, G.I.T
Senior Geologist

CC:

Stephen Lawrence, NYSDOH
Jane O'Connell, NYSDEC
Cris-Sandra Maycock, NYSDEC
Zach Kadden, Dupont Street 1 LLC/Dupont Street Owner LLC
Shalom Silverman, Dupont Street 1 LLC/Dupont Street Owner LLC
Victoria Della Salla, Dupont Street 1 LLC/Dupont Street Owner LLC

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from September to October 2022. Activities during this period were conducted by Haley and Aldrich of New York (Haley & Aldrich). 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 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).

Interim Remedial Measure Activities

The IRM routine activities (monthly) were performed by Haley & Aldrich on 5 October 2022.

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**.

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 October 2022, high tide was observed from 6:20 AM to 12:14 PM before and 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 in the recovery holding reservoirs were not emptied during this event since the product recovery systems were decommissioned as part of the RCRA Closure activities at the Site. Based on previous LNAPL estimates, an estimated 4,342.5 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed.

Eastern Environmental Solutions, Inc. (Eastern) previously conducted waste management activities for disposal of product from the IBC tanks at the Site. Prior to 2022, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. In January 2022, ACV Environmental Services Inc. (ACV) transported and disposed a total of 2,529 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste.

Additional Environmental Activities

Demolition activities began on the NuHart East Site on 30 March 2022 and was completed on 06 June 2022. Air monitoring was conducted for the duration of all demolition work at the Site and daily reports have been submitted to NYSDEC. A monthly report for NuHart East is provided under a separate cover.

Site Preparation activities began on the NuHart West Site in June 2022 including removal of debris within the building with a Contained-in determination, installation of the construction fence around the Site, and scaffolding installation, and was completed in July 2022. Air monitoring was conducted for all Site preparation activities and daily reports were submitted to NYSDEC.

A Site walk with Stephen Lawrence from the Department of Health (DOH) was conducted on 7 July 2022. DOH observed that there were no odors in and around the building. Two days prior, Haley & Aldrich observed standing water in the northeast corner of the park along Franklin Street. While DOH was on-site, a water fountain for children to play in was running in the center of the park where clogged drainage was observed. Water was observed running off towards the northeast portion of the park which appears to be lower in elevation.

Demolition activities began on the NuHart West Site on 8 August 2022 and are currently ongoing. Air monitoring has been conducted for the duration of all demolition work at the Site and daily reports are submitted to NYSDEC and NYSDOH. Due to demolition activities, gauging of monitoring wells could not be completed in wells located on the NuHart West Site and at select wells located in the sidewalk surrounding the NuHart West Site, as indicated in Attachment A, and shown on Figure 1.

Upcoming Site Activities

Demolition activities will continue at the Site through the next reporting period. Delineation sampling for waste characterization is anticipated to be completed at the Site during the next reporting period.

Deliverables

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. A Notice of Violation (NOV) was issued by NYSDEC on 22 February 2021 for failure to properly maintain and implement the IRM activities and submit timely monthly reports. An administrative settlement conference was held on 17 March 2021 to discuss the NOV.

NYSDEC issued a letter on 16 February 2021 regarding a request for evaluation of offsite groundwater impacts made by NYSDEC in October 2018. A work plan for this request was submitted to NYSDEC on 12 April 2021 and comments were received on 4 June 2020. A revised work plan was submitted on 2 July 2021 and the subsequent approval was received on 13 September 2021. The work plan was executed in January 2022 and a draft Supplemental Investigation Report (SIR) was submitted to NYSDEC on 4 March 2022 and a revised SIR was submitted on 24 August 2022.

A RCRA Closure Plan was submitted to the NYSDEC on 07 September 2021. Comments were received on 01 October 2021 and the revised RCRA Closure Plan was submitted on 07 October 2021. Additional comments were discussed on a conference call with NYSDEC and NYSDOH on 29 October 2021. A revised RCRA Closure Plan was submitted on 11 November 2021. The public comment period began on 1 December 2021 and concluded on 31 December 2021. The plan was approved on 4 January 2022.

A Waste Characterization Plan Letter was submitted to NYSDEC on 19 January 2022. Comments were received and addressed on 21 January 2022. The plan was approved on 24 January 2022 and executed at the Site in January and February 2022.

A 30% Remedial Design Report was submitted to NYSDEC on 25 February 2022. Correspondence was received from NYSDEC on 21 March 2022. Comments were reviewed and addressed, and the 30% Remedial Design Report was resubmitted on 1 April 2022. Additional comments were received from NYSDEC on 15 July 2022.

A Contained-In Request for the Former NuHart West Site addressing above grade structures was submitted to NYSDEC on 23 March 2022 and a determination letter was received from NYSDEC on 25 April 2022.

A Supplemental Contained-in Request for the Former NuHart West Site addressing above grade structures was submitted to NYSDEC on 6 May 2022 and a determination letter was received from NYSDEC on 13 May 2022.

The RCRA Closure Report was submitted as draft on 16 May 2022 and the final report was submitted on 06 June 2022. Comments were received from NYSDEC on 12 July 2022 and the report was resubmitted on 13 July 2022. The report was approved by NYSDEC on 13 July 2022.

A Remedial Design Change Requests Letter was submitted to NYSDEC on 21 July 2022. Comments were received from NYSDEC on 29 July 2022 and was resubmitted on 11 August 2022. Additional comments were received from NYSDEC, and the letter was resubmitted on 4 October 2022.

A Supplemental Contained-in Request 02 for the NuHart West Site addressing below grade materials was submitted to NYSDEC on 28 September 2022.

An LNAPL Physical Barriers Design Letter to request approval by NYSDEC to install the LNAPL physical barriers associated with the Site was submitted to NYSDEC on 28 September 2022. Comments were received from NYSDEC on 5 October 2022.

Site Communication

Weekly communication for site updates was established by the Dupont Street Owner LLC. The updates are available to interested parties who register and includes a summary email transmitted every Friday. A link for sign up is posted on the North Brooklyn Neighbors Website under the NuHart Superfund Link. Additionally, the website for the NuHart Site has been made available to the community. Daily reports for the Site are available on the website.

A Community Board Meeting is scheduled for 11 October 2022 to discuss the next steps in the remediation at the Site.

During this reporting period a total of 19 daily reports were submitted to NYSDEC and NYSDOH summarizing the activities described above.

Attachments

Dupont Street Owner LLC

10 October 2022

Page 5

Attachment A – Apparent Thickness of LNAPL

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

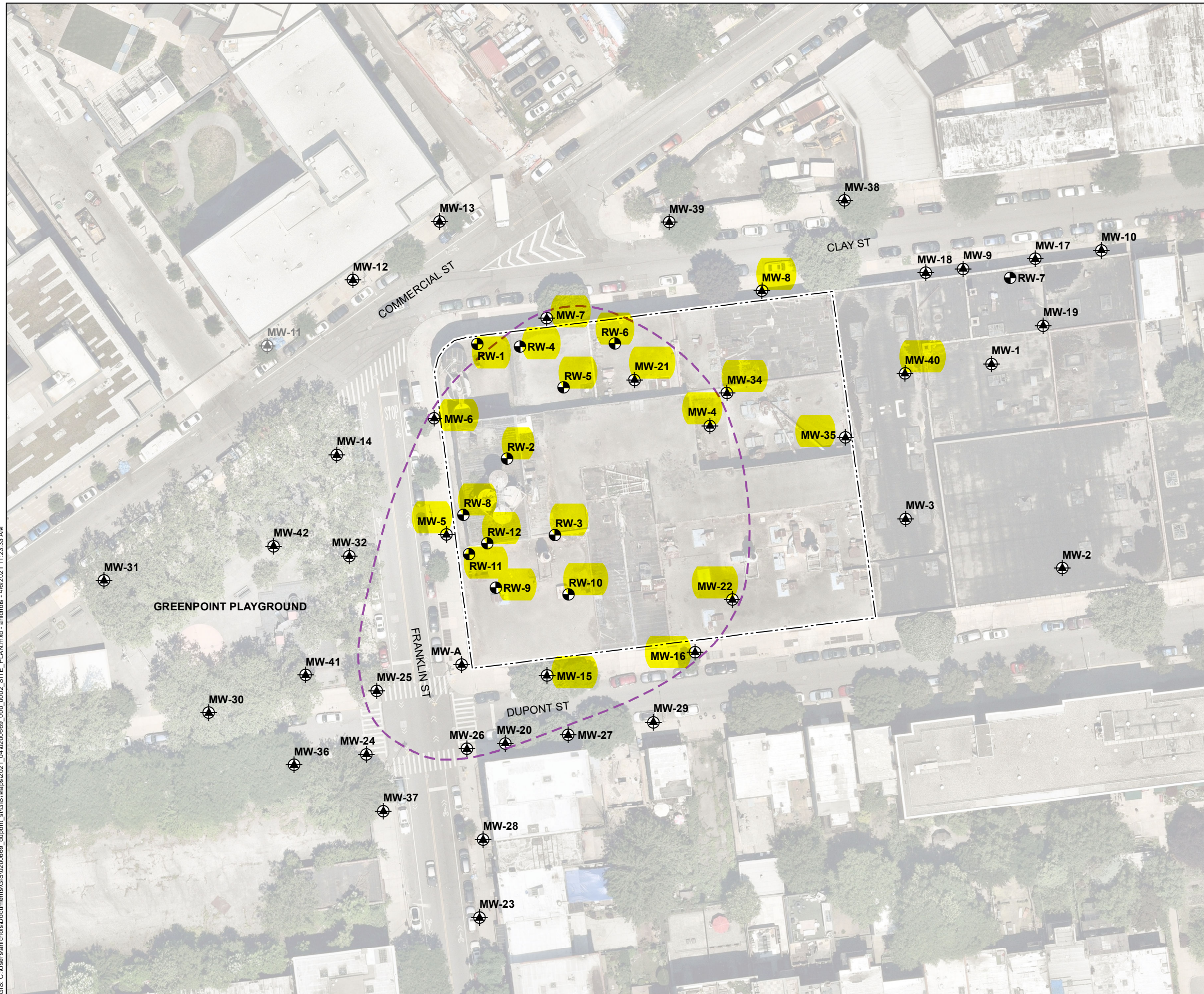
Attachment A

Apparent Thickness of LNAPL






Attachment B

Site Plan

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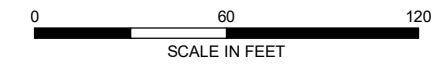


LEGEND

-  GROUNDWATER MONITORING WELL
-  PRODUCT RECOVERY WELL
-  GROUNDWATER MONITORING WELL, DESTROYED
-  EXTENT OF LIGHT NON-AQUEOUS PHASE LIQUID (LNAPL) ON GROUNDWATER
-  SITE BOUNDARY

NOTES

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3. AERIAL IMAGERY SOURCE: NEARMAP, 9 JUNE 2020
4. MONITORING WELLS INDICATED IN YELLOW WERE INACCESSIBLE DUE TO DEMOLITION ACTIVITIES AND NOT GAUGED DURING THIS REPORTING PERIOD



HALEY ALDRICH
 49 DUPONT STREET
 BROOKLYN, NEW YORK

SITE PLAN

FEBRUARY 2022

FIGURE 1



HALEY & ALDRICH OF NEW YORK
237 West 35th Street
16th Floor
New York, NY 10123
646.277.5685

9 September 2022
File No. 0203497

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
10-14 Clay Street, 55-57 Dupont Street & 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 1 LLC/Dupont Street Owner 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 August to September 2022. If you have any questions, please contact us at 646-277-5685.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK

James Bellew
Principal

Mari C. Conlon
Senior Project Manager

Sarah A. Commisso, G.I.T
Senior Geologist

CC:

Stephen Lawrence, NYSDOH
Jane O'Connell, NYSDEC
Cris-Sandra Maycock, NYSDEC
Zach Kadden, Dupont Street 1 LLC/Dupont Street Owner LLC
Shalom Silverman, Dupont Street 1 LLC/Dupont Street Owner LLC
Victoria Della Salla, Dupont Street 1 LLC/Dupont Street Owner LLC

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from August to September 2022. Activities during this period were conducted by Haley and Aldrich of New York (Haley & Aldrich). 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 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).

Interim Remedial Measure Activities

The IRM routine activities (monthly) were performed by Haley & Aldrich on 8 September 2022.

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**.

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 8 September 2022, high tide was observed from 8:33 AM to 2:18 PM before and 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 in the recovery holding reservoirs were not emptied during this event since the product recovery systems were decommissioned as part of the RCRA Closure activities at the Site. Based on previous LNAPL estimates, an estimated 4,342.5 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed.

Eastern Environmental Solutions, Inc. (Eastern) previously conducted waste management activities for disposal of product from the IBC tanks at the Site. Prior to 2022, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. In January 2022, ACV Environmental Services Inc. (ACV) transported and disposed a total of 2,529 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste.

Additional Environmental Activities

Demolition activities began on the NuHart East Site on 30 March 2022 and was completed on 06 June 2022. Air monitoring was conducted for the duration of all demolition work at the Site and daily reports have been submitted to NYSDEC. A monthly report for NuHart East is provided under a separate cover.

Site Preparation activities began on the NuHart West Site in June 2022 including removal of debris within the building with a Contained-in determination, installation of the construction fence around the Site, and scaffolding installation, and was completed in July 2022. Air monitoring was conducted for all Site preparation activities and daily reports were submitted to NYSDEC.

A Site walk with Stephen Lawrence from the Department of Health (DOH) was conducted on 7 July 2022. DOH observed that there were no odors in and around the building. Two days prior, Haley & Aldrich observed standing water in the northeast corner of the park along Franklin Street. While DOH was on-site, a water fountain for children to play in was running in the center of the park where clogged drainage was observed. Water was observed running off towards the northeast portion of the park which appears to be lower in elevation.

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Upcoming Site Activities

Demolition activities will continue at the Site through the next reporting period. Delineation sampling for waste characterization is anticipated to be completed at the Site during the next reporting period.

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During this reporting period a total of 20 daily reports were submitted to NYSDEC and NYSDOH summarizing the activities described above.

Attachments

Attachment A – Apparent Thickness of LNAPL

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

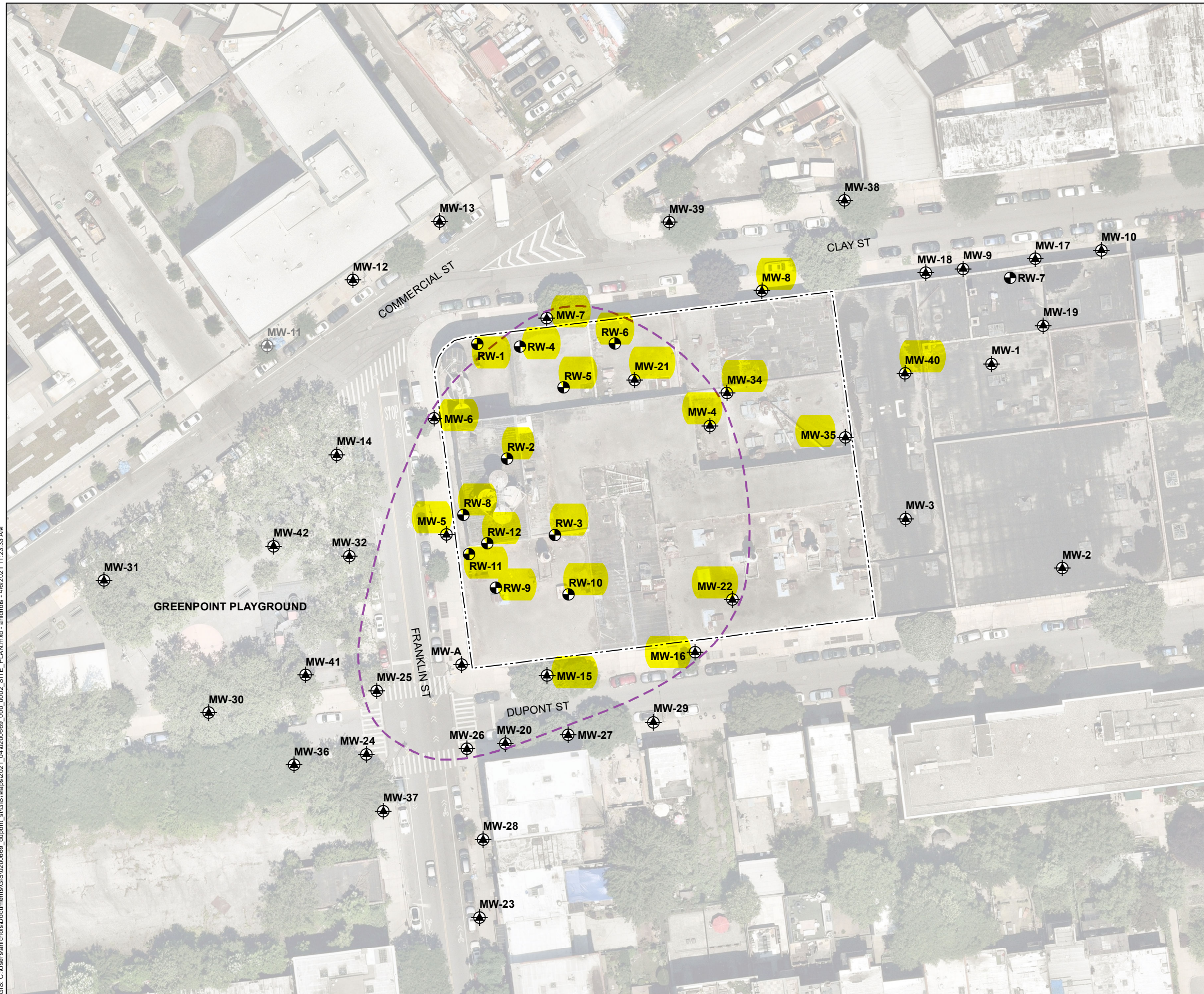
Attachment A

Apparent Thickness of LNAPL






Attachment B

Site Plan

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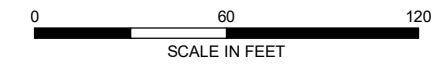


LEGEND

-  GROUNDWATER MONITORING WELL
-  PRODUCT RECOVERY WELL
-  GROUNDWATER MONITORING WELL, DESTROYED
-  EXTENT OF LIGHT NON-AQUEOUS PHASE LIQUID (LNAPL) ON GROUNDWATER
-  SITE BOUNDARY

NOTES

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HALEY ALDRICH
 49 DUPONT STREET
 BROOKLYN, NEW YORK

SITE PLAN

FEBRUARY 2022

FIGURE 1



HALEY & ALDRICH OF NEW YORK
237 West 35th Street
16th Floor
New York, NY 10123
646.277.5685

10 August 2022
File No. 0203497

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
10-14 Clay Street, 55-57 Dupont Street & 280 Franklin Street
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Dear Mr. Wong:

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James Bellew
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This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from July to August 2022. Activities during this period were conducted by Haley and Aldrich of New York (Haley & Aldrich). A Site Plan showing the general Site layout, nearby area, and associated wells is included as Figure 1.

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During this reporting period a total of 6 daily reports were submitted to NYSDEC and NYSDOH summarizing the activities described above.

Attachments

Attachment A – Apparent Thickness of LNAPL

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

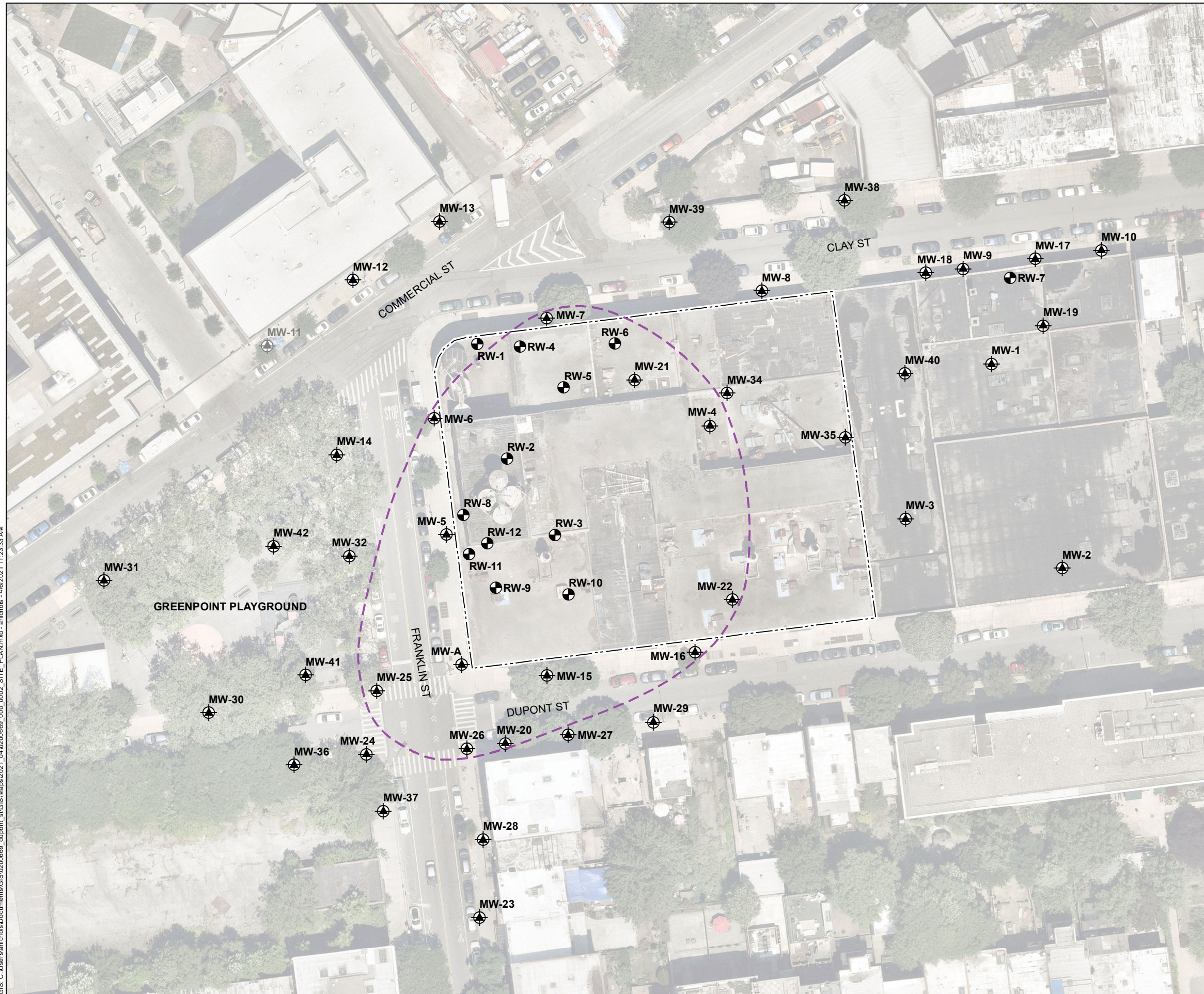
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Apparent Thickness of LNAPL






Attachment B

Site Plan

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LEGEND

-  GROUNDWATER MONITORING WELL
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HALEY ALDRICH 49 DUPONT STREET
BROOKLYN, NEW YORK

SITE PLAN

FEBRUARY 2022

FIGURE 1



HALEY & ALDRICH OF NEW YORK
237 West 35th Street
16th Floor
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646.518.7735

8 July 2022
File No. 0203497

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
10-14 Clay Street, 55-57 Dupont Street & 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 1 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 June to July 2022. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK

Handwritten signature of James M. Bellew in blue ink.

James Bellew
Principal

Handwritten signature of Sarah A. Commisso in black ink.

Sarah A. Commisso, G.I.T
Senior Geologist

CC:

Stephen Lawrence, NYSDOH
Jane O'Connell, NYSDEC
Cris-Sandra Maycock, NYSDEC
Zach Kadden, Dupont Street 1 LLC
Shalom Silverman, Dupont Street 1 LLC
Victoria Della Salla, Dupont Street 1 LLC

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from June to July 2022. Activities during this period were conducted by Haley and Aldrich of New York (Haley & Aldrich). 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 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).

Interim Remedial Measure Activities

The IRM routine activities (monthly) were performed by Haley & Aldrich on 7 July 2022.

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**.

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 7 July 2022, high tide was observed from 4:25 PM to 10:47 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 in the recovery holding reservoirs were not emptied during this event since the product recovery systems have been decommissioned as part of the RCRA Closure activities taking place at the Site. Based on previous LNAPL estimates, an estimated 4,342.5 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed.

Eastern Environmental Solutions, Inc. (Eastern) previously conducted waste management activities for disposal of product from the IBC tanks at the Site. Prior to 2022, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. In January 2022, ACV Environmental Services Inc. (ACV) transported and disposed a total of 2,529 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste.

Additional Environmental Activities

Demolition activities began on the NuHart East Site on 30 March 2022 and was completed on 06 June 2022. Air monitoring was conducted for the duration of all demolition work at the Site and daily reports have been submitted to NYSDEC. A monthly report for NuHart East is provided under a separate cover.

Site Preparation activities began on the NuHart West Site in June 2022 including removal of debris within the building with a Contained-in determination, installation of the construction fence around the Site, and

scaffolding installation. Air monitoring is being conducted for all site preparation activities and daily reports have been submitted to NYSDEC.

A Site walk with Steven Lawrence from the Department of Health (DOH) was conducted on 7 July 2022. DOH observed that there were no odors in and around the building. Two days prior, Haley & Aldrich observed standing water in the northeast corner of the park along Franklin Street. While DOH was on-site, a water fountain for children to play in was running in the center of the park where clogged drainage was observed. Water was observed running off towards the northeast portion of the park which appears to be lower in elevation.

Upcoming Site Activities

Demolition of the NuHart West Site is anticipated to begin in July. Air monitoring will be conducted for all demolition activities.

Deliverables

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. A Notice of Violation (NOV) was issued by NYSDEC on 22 February 2021 for failure to properly maintain and implement the IRM activities and submit timely monthly reports. An administrative settlement conference was held on 17 March 2021 to discuss the NOV.

NYSDEC issued a letter on 16 February 2021 regarding a request for evaluation of offsite groundwater impacts made by NYSDEC in October 2018. A work plan for this request was submitted to NYSDEC on 12 April 2021 and comments were received on 4 June 2020. A revised work plan was submitted on 2 July 2021 and the subsequent approval was received on 13 September 2021. The work plan was executed in January 2022 and a draft Supplemental Investigation Report was submitted to NYSDEC on 4 March 2022.

A RCRA Closure Plan was submitted to the NYSDEC on 07 September 2021. Comments were received on 01 October 2021 and the revised RCRA Closure Plan was submitted on 07 October 2021. Additional comments were discussed on a conference call with NYSDEC and NYSDOH on 29 October 2021. A revised RCRA Closure Plan was submitted on 11 November 2021. The public comment period began on 1 December 2021 and concluded on 31 December 2021. The plan was approved on 4 January 2022.

A Waste Characterization Plan Letter was submitted to NYSDEC on 19 January 2022. Comments were received and addressed on 21 January 2022. The plan was approved on 24 January 2022 and executed at the Site in January and February 2022.

A 30% Remedial Design Report was submitted to NYSDEC on 25 February 2022. Correspondence was received from NYSDEC on 21 March 2022. Comments have been reviewed and addressed and the 30% Remedial Design Report was resubmitted on 1 April 2022.

Dupont Street 1 LLC

8 July 2022

Page 4

A Contained-In Request for the Former NuHart West Site addressing above grade structures was submitted to NYSDEC on 23 March 2022 and a determination letter was received from NYSDEC on 25 April 2022.

A Supplemental Contained-in Request for the Former NuHart West Site addressing above grade structures was submitted to NYSDEC on 6 May 2022 and a determination letter was received from NYSDEC on 13 May 2022.

The RCRA Closure Report was submitted as draft on 16 May 2022 and the final report was submitted on 06 June 2022.

Site Communication

Weekly communication for site updates was established by the Dupont Street 1 LLC. The updates are available to interested parties who register and includes a summary email transmitted every Friday. A link for sign up is posted on the North Brooklyn Neighbors Website under the NuHart Superfund Link. Additionally, the website for the NuHart Site has been made available to the community. Daily reports for the Site will be available on the website.

During this reporting period a total of 14 daily reports were submitted to NYSDEC and NYSDOH summarizing the activities described above.

Attachments

Attachment A – Apparent Thickness of LNAPL

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

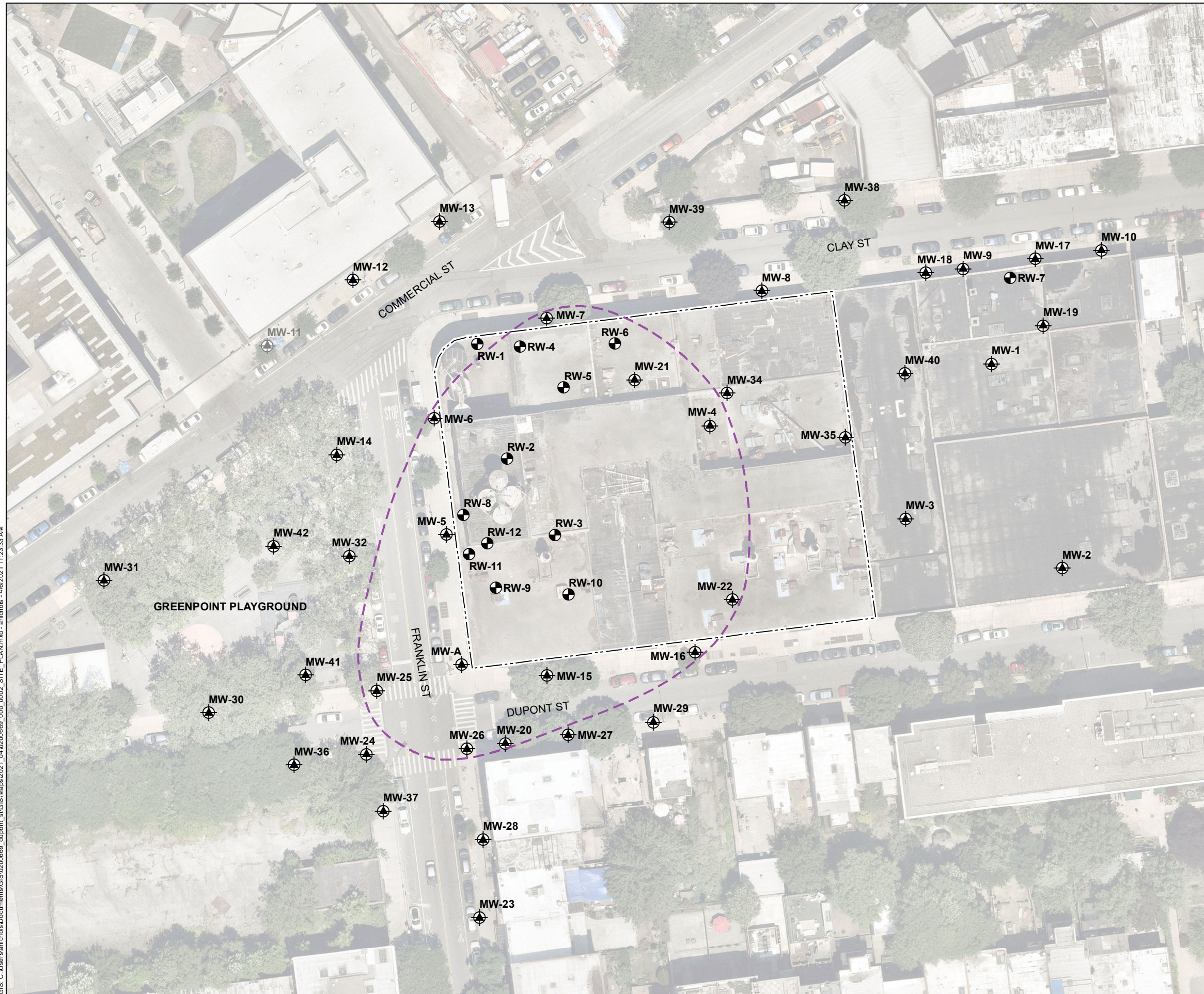
Attachment A

Apparent Thickness of LNAPL






Attachment B

Site Plan

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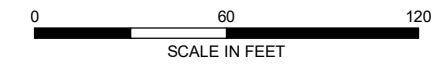


LEGEND

-  GROUNDWATER MONITORING WELL
-  PRODUCT RECOVERY WELL
-  GROUNDWATER MONITORING WELL, DESTROYED
-  EXTENT OF LIGHT NON-AQUEOUS PHASE LIQUID (LNAPL) ON GROUNDWATER
-  SITE BOUNDARY

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. SITE BOUNDARY, GROUNDWATER MONITORING WELL LOCATIONS, PRODUCT RECOVERY WELL LOCATIONS, AND APPROXIMATE EXTENT OF LNAPL DIGITIZED FROM FIGURE TITLED, "FIGURE 1, AERIAL EXTENT OF LNAPL ON GROUNDWATER", PREPARED BY GZA, DATED AUGUST 2016.
3. AERIAL IMAGERY SOURCE: NEARMAP, 9 JUNE 2020



HALEY ALDRICH 49 DUPONT STREET
BROOKLYN, NEW YORK

SITE PLAN

FEBRUARY 2022

FIGURE 1



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

10 June 2022
File No. 0203497

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

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10-14 Clay Street, 55-57 Dupont Street & 280 Franklin Street
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Dear Mr. Wong:

Haley & Aldrich of New York is pleased to present this Project Status Report on behalf of Dupont Street 1 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 to June 2022. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
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Jane O'Connell, NYSDEC
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Zach Kadden, Dupont Street 1 LLC
Shalom Silverman, Dupont Street 1 LLC
Victoria Della Salla, Dupont Street 1 LLC

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from May to June 2022. Activities during this period were conducted by Haley and Aldrich of New York (Haley & Aldrich). 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 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).

Interim Remedial Measure Activities

The IRM routine activities (monthly) were performed by Haley & Aldrich on 6 June 2022.

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**.

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 June 2022, high tide was observed from 3:43 PM to 8:57 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 in the recovery holding reservoirs were not emptied during this event since the product recovery systems have been decommissioned as part of the RCRA Closure activities taking place at the Site. Based on previous LNAPL estimates, an estimated 4,342.5 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed.

Eastern Environmental Solutions, Inc. (Eastern) previously conducted waste management activities for disposal of product from the IBC tanks at the Site. Prior to 2022, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. In January 2022, ACV Environmental Services Inc. (ACV) transported and disposed a total of 2,529 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. There is currently no stored LNAPL remaining at the Site with the exception of residual product removed from the belt skimmer systems during decommissioning.

Emerging Contaminant Investigation

In January 2022, groundwater samples were collected from select wells for volatile organic compounds and emerging contaminants, Per- and Polyfluoroalkyl Substances and 1,4-dioxane in accordance with the approved Supplemental Investigation Work Plan, approved by NYSDEC on 13 September 2021. A draft Supplemental Investigation Report was submitted to NYSDEC on 4 March 2022.

RCRA Closure Activities

RCRA closure activities, as detailed in the RCRA Closure Work Plan approved by NYSDEC on 4 January 2022, conducted during this reporting period included inspection and decontamination of waste pipelines, and off-site disposal of U-list hazardous waste. Community air monitoring was conducted during all RCRA closure activities and submitted in daily reports to NYSDEC and NYSDOH.

A Contained-In Request was submitted to NYSDEC on 23 March 2022 and a determination letter received from NYSDEC on 25 April 2022 and a Supplemental Contained-In Request was submitted to NYSDEC on 6 May 2022 and a determination letter was received from NYSDEC on 13 May 2022, both for the NuHart West Site in conformance with the RCRA Closure Plan for the NuHart West Site dated 11 November 2021 and approved by NYSDEC on 4 January 2022. The evaluation techniques and processes for waste stream determination presented in the Contained-in request was based on the teleconference with the NYSDEC (Divisions of Remediation and Solid Waste) on 29 October 2021 and the Site walkthrough held on 15 December 2021 that included NYSDEC (Divisions of Remediation and Solid Waste).

Additional Environmental Activities

Demolition activities began on the NuHart East Site on 30 March 2022. Air monitoring is being conducted for the duration of all demolition work at the Site and daily reports have been submitted to NYSDEC. A monthly report for NuHart East is provided under a separate cover.

Upcoming Site Activities

Site preparation activities, including installation of the construction fence around the NuHart West Site will begin during the next reporting period. Air monitoring will be conducted for all ground-intrusive activities as described in the Site Soil Materials Management Plan.

Deliverables

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. A Notice of Violation (NOV) was issued by NYSDEC on 22 February 2021 for failure to properly maintain and implement the IRM activities and submit timely monthly reports. An administrative settlement conference was held on 17 March 2021 to discuss the NOV.

NYSDEC issued a letter on 16 February 2021 regarding a request for evaluation of offsite groundwater impacts made by NYSDEC in October 2018. A work plan for this request was submitted to NYSDEC on 12 April 2021 and comments were received on 4 June 2020. A revised work plan was submitted on 2 July 2021 and the subsequent approval was received on 13 September 2021. The work plan was executed in January 2022 and a draft Supplemental Investigation Report was submitted to NYSDEC on 4 March 2022.

A RCRA Closure Plan was submitted to the NYSDEC on 07 September 2021. Comments were received on 01 October 2021 and the revised RCRA Closure Plan was submitted on 07 October 2021. Additional comments were discussed on a conference call with NYSDEC and NYSDOH on 29 October 2021. A revised RCRA Closure Plan was submitted on 11 November 2021. The public comment period began on 1 December 2021 and concluded on 31 December 2021. The plan was approved on 4 January 2022.

A Waste Characterization Plan Letter was submitted to NYSDEC on 19 January 2022. Comments were received and addressed on 21 January 2022. The plan was approved on 24 January 2022 and executed at the Site in January and February 2022.

A 30% Remedial Design Report was submitted to NYSDEC on 25 February 2022. Correspondence was received from NYSDEC on 21 March 2022. Comments have been reviewed and addressed and the 30% Remedial Design Report was resubmitted on 1 April 2022.

A Contained-In Request for the Former NuHart West Site addressing above grade structures was submitted to NYSDEC on 23 March 2022 and a determination letter was received from NYSDEC on 25 April 2022.

A Supplemental Contained-in Request for the Former NuHart West Site addressing above grade structures was submitted to NYSDEC on 6 May 2022 and a determination letter was received from NYSDEC on 13 May 2022.

The RCRA Closure Report was submitted as draft on 16 May 2022 and the final report was submitted on 06 June 2022.

Site Communication

Weekly communication for site updates was established by the Dupont Street 1 LLC. The updates are available to interested parties who register and includes a summary email transmitted every Friday. A link for sign up is posted on the North Brooklyn Neighbors Website under the NuHart Superfund Link.

During this reporting period a total of 9 daily reports were submitted to NYSDEC and NYSDOH summarizing the activities described above.

Attachments

Attachment A – Apparent Thickness of LNAPL

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

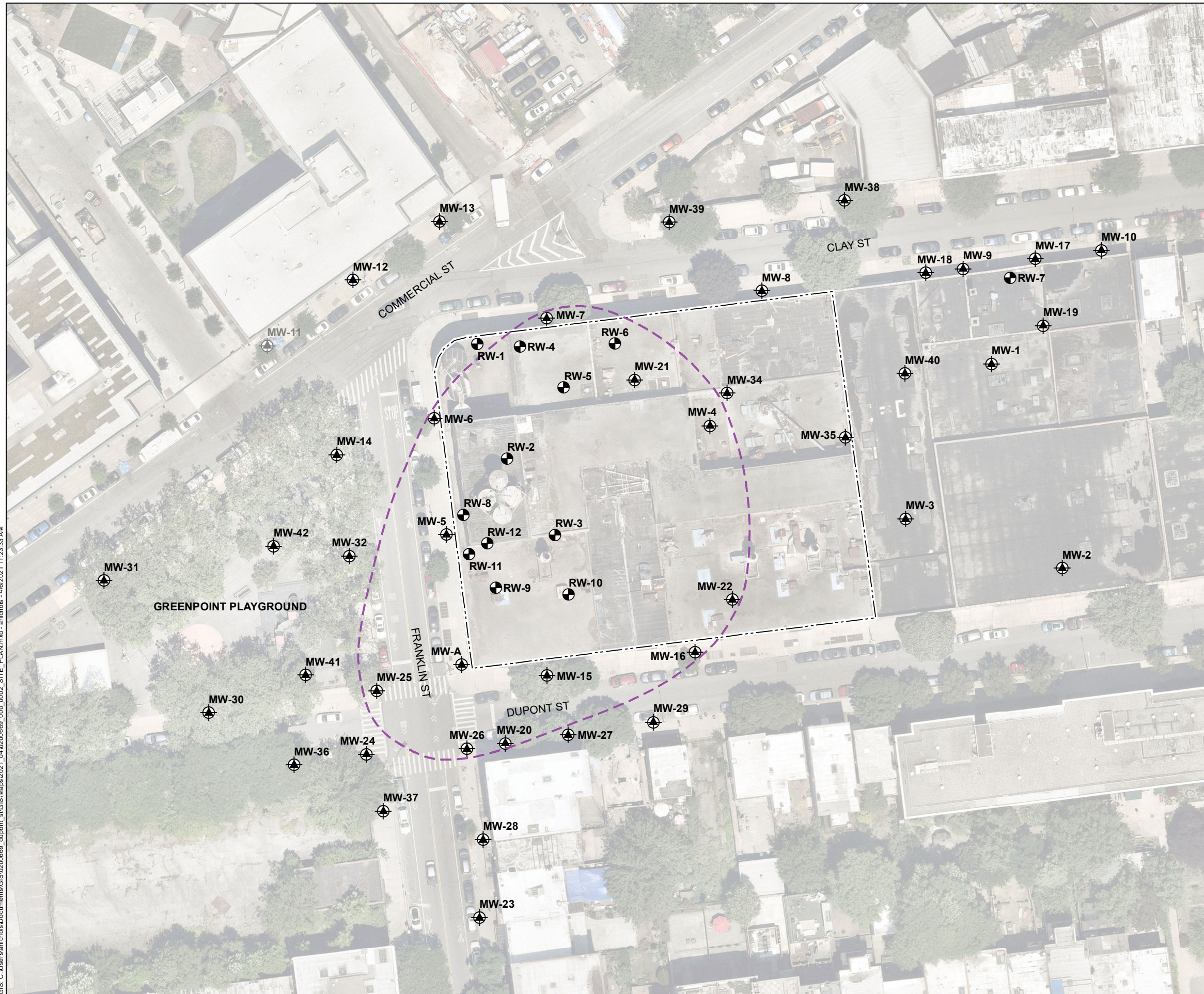
Attachment A

Apparent Thickness of LNAPL






Attachment B

Site Plan

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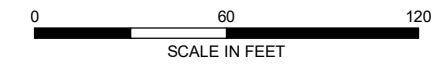


LEGEND

-  GROUNDWATER MONITORING WELL
-  PRODUCT RECOVERY WELL
-  GROUNDWATER MONITORING WELL, DESTROYED
-  EXTENT OF LIGHT NON-AQUEOUS PHASE LIQUID (LNAPL) ON GROUNDWATER
-  SITE BOUNDARY

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
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HALEY ALDRICH 49 DUPONT STREET
BROOKLYN, NEW YORK

SITE PLAN

FEBRUARY 2022

FIGURE 1



HALEY & ALDRICH OF NEW YORK
237 West 35th Street
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10 May 2022
File No. 0203497

Via Email: yukyin.wong@dec.ny.gov
New York State Department of Environmental Conservation
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Attention: Mr. Bryan Wong

Subject: Project Status Report
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10-14 Clay Street, 55-57 Dupont Street & 280 Franklin Street
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Dear Mr. Wong:

Haley & Aldrich of New York is pleased to present this Project Status Report on behalf of Dupont Street 1 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 March to April 2022. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK

A handwritten signature in blue ink that reads 'James M. Bellew'.

James Bellew
Principal

A handwritten signature in black ink that reads 'Sarah A. Commisso'.

Sarah A. Commisso, G.I.T
Staff Geologist

CC:

Stephen Lawrence, NYSDOH
Jane O'Connell, NYSDEC
Cris-Sandra Maycock, NYSDEC
Zach Kadden, Dupont Street 1 LLC
Shalom Silverman, Dupont Street 1 LLC
Victoria Della Salla, Dupont Street 1 LLC

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from April to May 2022. Activities during this period were conducted by Haley and Aldrich of New York (Haley & Aldrich). 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 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).

Interim Remedial Measure Activities

The IRM routine activities (monthly) were performed by Haley & Aldrich on 6 May 2022.

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**.

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 2022, high tide was observed from 2:47 PM to 7:28 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 in the recovery holding reservoirs were not emptied during this event since the product recovery systems have been decommissioned as part of the RCRA Closure activities taking place at the Site. Based on previous LNAPL estimates, an estimated 4,342.5 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed.

Eastern Environmental Solutions, Inc. (Eastern) previously conducted waste management activities for disposal of product from the IBC tanks at the Site. Prior to 2022, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. In January 2022, ACV Environmental Services Inc. (ACV) transported and disposed a total of 2,529 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. There is currently no stored LNAPL remaining at the Site with the exception of residual product removed from the belt skimmer systems during decommissioning.

Emerging Contaminant Investigation

In January 2022, groundwater samples were collected from select wells for volatile organic compounds and emerging contaminants, Per- and Polyfluoroalkyl Substances and 1,4-dioxane in accordance with the approved Supplemental Investigation Work Plan, approved by NYSDEC on 13 September 2021. A draft Supplemental Investigation Report was submitted to NYSDEC on 4 March 2022.

RCRA Closure Activities

RCRA closure activities, as detailed in the RCRA Closure Work Plan approved by NYSDEC on 4 January 2022, conducted during this reporting period included inspection and decontamination of waste pipelines, decontamination of processing equipment, and floor cleaning activities. Community air monitoring was conducted during all RCRA closure activities and submitted in daily reports to NYSDEC and NYSDOH.

A Contained-In Request was submitted to NYSDEC on 23 March 2022 and a determination letter received from NYSDEC on 25 April 2022 for the NuHart West Site in conformance with the RCRA Closure Plan for the NuHart West Site dated 11 November 2021 and approved by NYSDEC on 4 January 2022. The evaluation techniques and processes for waste stream determination presented in the Contained-in request was based on the teleconference with the NYSDEC (Divisions of Remediation and Solid Waste) on 29 October 2021 and the Site walkthrough held on 15 December 2021 that included NYSDEC (Divisions of Remediation and Solid Waste).

Additional Environmental Activities

Demolition activities began on the NuHart East Site on 30 March 2022. Air monitoring is being conducted for the duration of all demolition work at the Site and daily reports have been submitted to NYSDEC. A monthly report for NuHart East is provided under a separate cover.

Upcoming Site Activities

RCRA closure activities to be conducted in the coming reporting period will include removal of pipelines and U-list waste generated from RCRA closure activities at the Site. Air monitoring will continue to be conducted during all activities outlined in and as required by the RCRA Closure Plan.

Deliverables

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. A Notice of Violation (NOV) was issued by NYSDEC on 22 February 2021 for failure to properly maintain and implement the IRM activities and submit timely monthly reports. An administrative settlement conference was held on 17 March 2021 to discuss the NOV.

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A Contained-In Request for the Former NuHart West Site addressing above grade structures was submitted to NYSDEC on 23 March 2022 and a determination letter was received from NYSDEC on 25 April 2022

Anticipated deliverables during the next reporting period include a Supplemental Contained-In Request 01 Letter for above grade structures.

Site Communication

Weekly communication for site updates was established by the Dupont Street 1 LLC. The updates are available to interested parties who register and includes a summary email transmitted every Friday. A link for sign up is posted on the North Brooklyn Neighbors Website under the NuHart Superfund Link.

During this reporting period a total of 21 daily reports were submitted to NYSDEC and NYSDOH summarizing the activities described above.

Attachments

Attachment A – Apparent Thickness of LNAPL

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

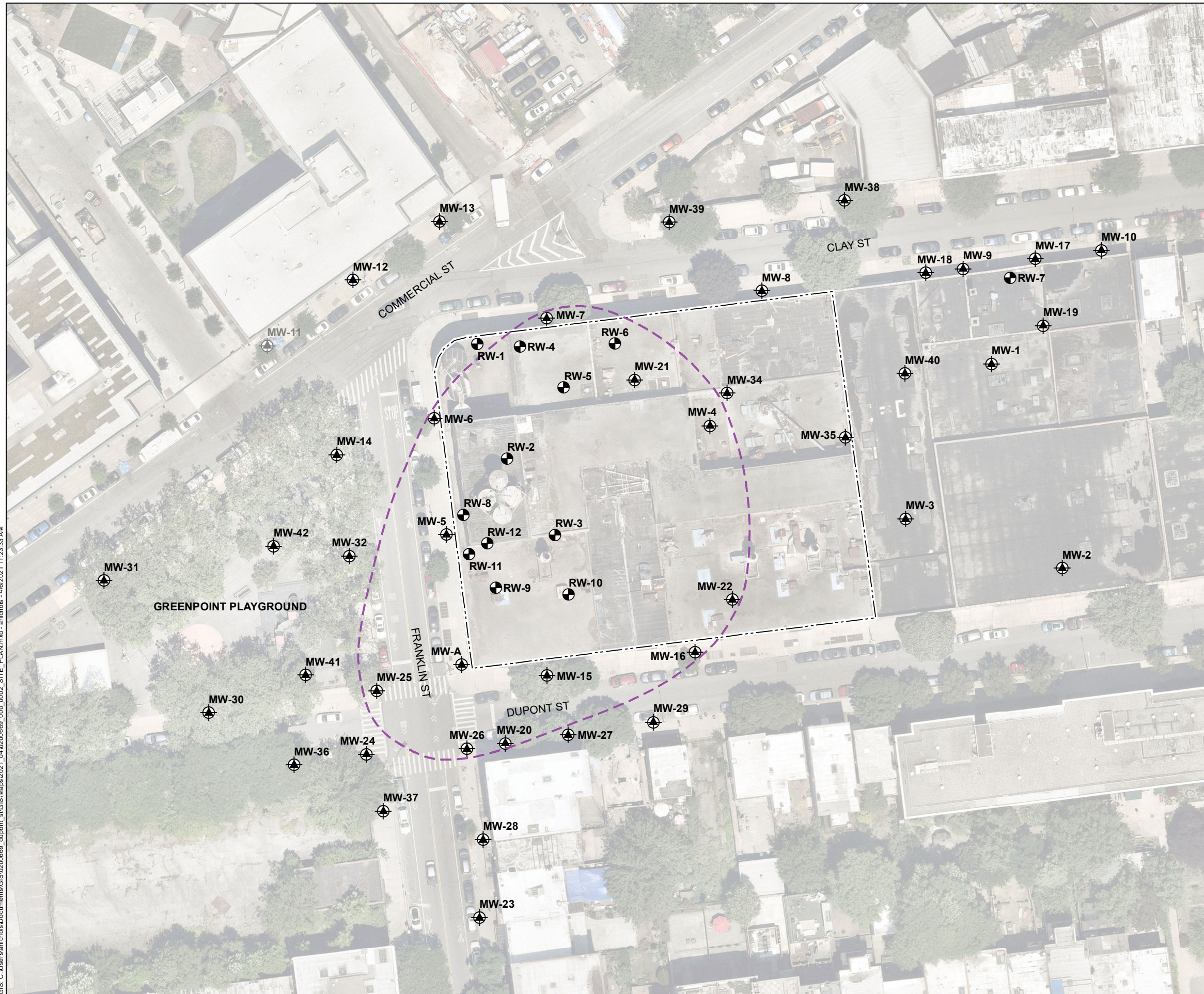
Attachment A

Apparent Thickness of LNAPL






Attachment B

Site Plan

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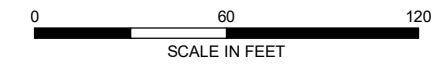


LEGEND

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BROOKLYN, NEW YORK

SITE PLAN

FEBRUARY 2022

FIGURE 1



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8 April 2022
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Brooklyn, New York

Dear Mr. Wong:

Haley & Aldrich of New York is pleased to present this Project Status Report on behalf of Dupont Street 1 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 March to April 2022. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Principal


Sarah A. Commisso, G.I.T
Staff Geologist

CC:

Stephen Lawrence, NYSDOH
Jane O'Connell, NYSDEC
Cris-Sandra Maycock, NYSDEC
Zach Kadden, Dupont Street 1 LLC
Shalom Silverman, Dupont Street 1 LLC
Victoria Della Salla, Dupont Street 1 LLC

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from March to April 2022. Activities during this period were conducted by Haley and Aldrich of New York (Haley & Aldrich). 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 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).

Interim Remedial Measure Activities

The IRM routine activities (monthly) were performed by Haley & Aldrich on 4 April 2022.

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**.

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 2022, high tide was observed from 12:47 PM to 6:17 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 in the recovery holding reservoirs were not emptied during this event since the product recovery systems have been decommissioned as part of the RCRA Closure activities taking place at the Site. Based on previous LNAPL estimates, an estimated 4,342.5 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed.

Eastern Environmental Solutions, Inc. (Eastern) previously conducted waste management activities for disposal of product from the IBC tanks at the Site. Prior to 2022, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. In January 2022, ACV Environmental Services Inc. (ACV) transported and disposed a total of 2,529 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. There is currently no stored LNAPL remaining at the Site with the exception of residual product removed from the belt skimmer systems during decommissioning.

Emerging Contaminant Investigation

In January 2022, groundwater samples were collected from select wells for volatile organic compounds and emerging contaminants, Per- and Polyfluoroalkyl Substances and 1,4-dioxane in accordance with the

approved Supplemental Investigation Work Plan, approved by NYSDEC on 13 September 2021. A draft Supplemental Investigation Report was submitted to NYSDEC on 4 March 2022.

RCRA Closure Activities

RCRA closure activities, as detailed in the RCRA Closure Work Plan approved by NYSDEC on 4 January 2022, conducted during this reporting period included inspection and decontamination of waste pipelines, decontamination of processing equipment, and floor cleaning activities. Community air monitoring was conducted during all RCRA closure activities and submitted in daily reports to NYSDEC and NYSDOH.

A Contained-In Request was submitted to NYSDEC on 23 March 2022 for the NuHart West Site in conformance with the RCRA Closure Plan for the NuHart West Site dated 11 November 2021 and approved by NYSDEC on 4 January 2022. The evaluation techniques and processes for waste stream determination presented in the contained-in request was based on the teleconference with the NYSDEC (Divisions of Remediation and Solid Waste) on 29 October 2021 and the Site walkthrough held on 15 December 2021 that included NYSDEC (Divisions of Remediation and Solid Waste).

Additional Environmental Activities

Demolition activities began on the NuHart East Site on 30 March 2022. Air monitoring is being conducted for the duration of all demolition work at the Site and daily reports have been submitted to NYSDEC. A monthly report for NuHart East is provided under a separate cover.

Upcoming Site Activities

RCRA closure activities to be conducted in the coming reporting period will include decontamination of above grade structures, pipelines, and the first-floor concrete slab, and confirmation rinsate sampling. Air monitoring will continue to be conducted during all activities outlined in and as required by the RCRA Closure Plan and the Site Soil Management Plan.

Deliverables

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. A Notice of Violation (NOV) was issued by NYSDEC on 22 February 2021 for failure to properly maintain and implement the IRM activities and submit timely monthly reports. An administrative settlement conference was held on 17 March 2021 to discuss the NOV.

NYSDEC issued a letter on 16 February 2021 regarding a request for evaluation of offsite groundwater impacts made by NYSDEC in October 2018. A work plan for this request was submitted to NYSDEC on 12 April 2021 and comments were received on 4 June 2020. A revised work plan was submitted on 2 July 2021 and the subsequent approval was received on 13 September 2021. The work plan was executed in January 2022 and a draft Supplemental Investigation Report was submitted to NYSDEC on 4 March 2022.

A RCRA Closure Plan was submitted to the NYSDEC on 07 September 2021. Comments were received on 01 October 2021 and the revised RCRA Closure Plan was submitted on 07 October 2021. Additional comments were discussed on a conference call with NYSDEC and NYSDOH on 29 October 2021. A revised RCRA Closure Plan was submitted on 11 November 2021. The public comment period began on 1 December 2021 and concluded on 31 December 2021. The plan was approved on 4 January 2022.

A Waste Characterization Plan Letter was submitted to NYSDEC on 19 January 2022. Comments were received and addressed on 21 January 2022. The plan was approved on 24 January 2022 and executed at the Site in January and February 2022.

A 30% Remedial Design Report was submitted to NYSDEC on 25 February 2022. Correspondence was received from NYSDEC on 21 March 2022. Comments have been reviewed and addressed and the 30% Remedial Design Report was resubmitted on 1 April 2022.

A Contained-In Request for the Former NuHart West Site addressing above grade structures was submitted to NYSDEC on 23 March 2022.

Anticipated deliverables during the next reporting period include a Supplemental Contained-In Request Letter for above grade structures.

Site Communication

Weekly communication for site updates was established by the Dupont Street 1 LLC. The updates are available to interested parties who register and includes a summary email transmitted every Friday. A link for sign up is posted on the North Brooklyn Neighbors Website under the NuHart Superfund Link.

During this reporting period a total of 23 daily reports were submitted to NYSDEC and NYSDOH summarizing the activities described above.

Attachments

Attachment A – Apparent Thickness of LNAPL

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

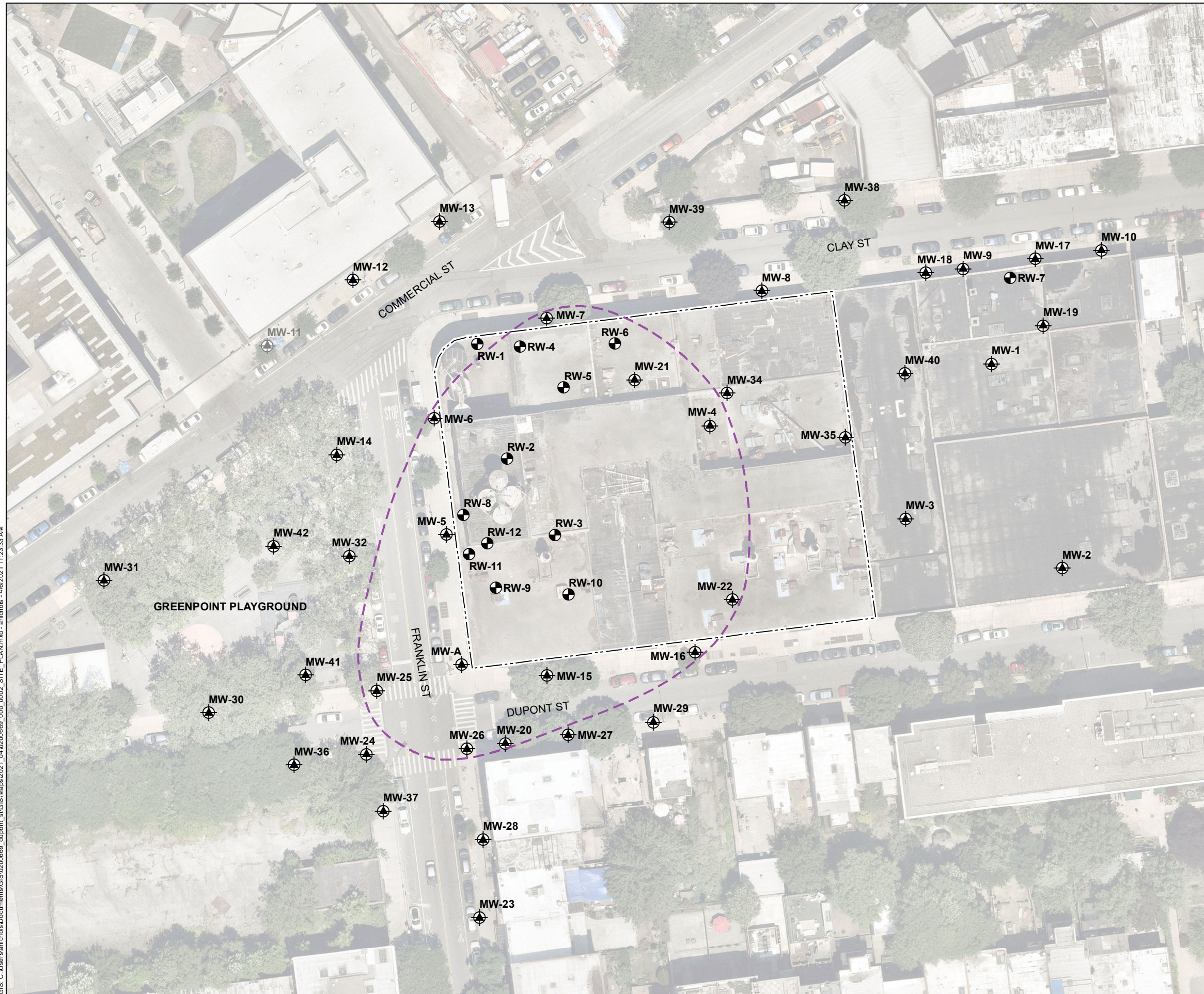
Attachment A

Apparent Thickness of LNAPL






Attachment B

Site Plan

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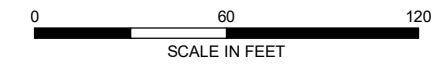


LEGEND

-  GROUNDWATER MONITORING WELL
-  PRODUCT RECOVERY WELL
-  GROUNDWATER MONITORING WELL, DESTROYED
-  EXTENT OF LIGHT NON-AQUEOUS PHASE LIQUID (LNAPL) ON GROUNDWATER
-  SITE BOUNDARY

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. SITE BOUNDARY, GROUNDWATER MONITORING WELL LOCATIONS, PRODUCT RECOVERY WELL LOCATIONS, AND APPROXIMATE EXTENT OF LNAPL DIGITIZED FROM FIGURE TITLED, "FIGURE 1, AERIAL EXTENT OF LNAPL ON GROUNDWATER", PREPARED BY GZA, DATED AUGUST 2016.
3. AERIAL IMAGERY SOURCE: NEARMAP, 9 JUNE 2020



HALEY ALDRICH 49 DUPONT STREET
BROOKLYN, NEW YORK

SITE PLAN

FEBRUARY 2022

FIGURE 1



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

10 March 2022
File No. 0203497

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 1 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 February to March 2022. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Principal


Mari C. Conlon, P.G.
Senior Project Manager

CC:

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

Email: Stephen.Lawrence@health.ny.gov
Email: bojinzhu@gmail.com
Email: jane.oconnell@dec.ny.gov
Email: statedesignsny@gmail.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from February to March 2022. Activities during this period were conducted by Haley and Aldrich of New York (Haley & Aldrich). 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 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).

Interim Remedial Measure Activities

The IRM routine activities (monthly) were performed by Haley & Aldrich on 8 March 2022.

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**.

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 8 March 2022, high tide was observed from 1:52 PM to 7:14 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 in the recovery holding reservoirs was not emptied during this event since the product recovery systems have been decommissioned as part of the RCRA Closure activities taking place at the Site. Based on previous LNAPL estimates, an estimated 4,342.5 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed.

Eastern Environmental Solutions, Inc. (Eastern) previously conducted waste management activities for disposal of product from the IBC tanks at the Site. Prior to 2022, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. In January 2022, ACV Environmental Services Inc. (ACV) transported and disposed a total of 2,529 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. There is currently no stored LNAPL remaining stored at the Site with the exception of residual product removed from the belt skimmer systems during decommissioning, scheduled to begin during the next reporting period.

Emerging Contaminant Investigation

In January 2022, groundwater samples were collected from select wells for volatile organic compounds and emerging contaminants, Per- and Polyfluoroalkyl Substances and 1,4-dioxane in accordance with the approved Supplemental Investigation Work Plan, approved by NYSDEC on 13 September 2021. A draft Supplemental Investigation Report will be submitted to NYSDEC during the next reporting period.

RCRA Closure Activities

RCRA closure activities, as detailed in the RCRA Closure Work Plan approved by NYSDEC on 4 January 2022, conducted during this reporting period include inspection of waste pipelines, decontamination of first and fourth floor hoppers and floor cleaning activities. Community air monitoring was conducted during all RCRA closure activities and submitted in daily reports to NYSDEC and NYSDOH.

A Contained-In letter request was submitted on 28 January 2022 for the NuHart East (considered under the NuHart Site in the RCRA Closure Work Plan) to include the flooring in this portion of the facility as non-hazardous. Approval was received on 22 February 2022 encompassing the majority of the floor in this area as non-hazardous. A Supplemental Contained-In request addressing the transition floor zone between NuHart West and NuHart East was submitted on 22 February 2022 and approved on 28 February 2022.

Additional Environmental Activities

Waste characterization was conducted in accordance with the Waste Characterization Plan approved by NYSDEC on 24 January 2022. Soil borings were installed by Eastern and overseen by Haley & Aldrich. Community air monitoring was conducted during all waste characterization activities and submitted in daily reports to NYSDEC and NYSDOH. Waste characterization activities were completed on 8 February 2022.

Offsite utility work, which included limited excavation and ground disturbance, was conducted from 1 February 2022 to 1 March 2022 by Plumbing Works Inc. to cut and cap water and sewer connections to the Site along Franklin Street, Clay Street and Dupont Street. Excavation work was completed in accordance with the Site approved Soil Materials Management Plan which includes air monitoring for the duration of intrusive work.

Construction fence installation, which included limited excavation and ground disturbance, was also conducted by AFS Fencing around the eastern portion of the Site from 23 February to 1 March 2022.

Air monitoring was conducted for the duration of all utility and fence installation related intrusive work in accordance with the approved Soil Materials Management plan.

Upcoming Site Activities

RCRA closure activities to be conducted in the coming reporting period will include decontamination of above grade structures, pipelines, and the first-floor concrete slab, and confirmation rinsate sampling. Air monitoring will continue to be conducted during all activities outlined in and as required by the RCRA Closure Plan and the Site Soil Management Plan.

Deliverables

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. A Notice of Violation (NOV) was issued by NYSDEC on 22 February 2021 for failure to properly maintain and implement the IRM activities and submit timely monthly reports. An administrative settlement conference was held on 17 March 2021 to discuss the NOV.

NYSDEC issued a letter on 16 February 2021 regarding a request for evaluation of offsite groundwater impacts made by NYSDEC in October 2018. A work plan for this request was submitted to NYSDEC on 12 April 2021 and comments were received on 4 June 2020. A revised work plan was submitted on 2 July 2021 and the subsequent approval was received on 13 September 2021. The work plan was executed in January 2022 and a draft Supplemental Investigation Report was submitted to NYSDEC on 4 March 2022.

A RCRA Closure Plan was submitted to the NYSDEC on 07 September 2021. Comments were received on 01 October 2021 and the revised RCRA Closure Plan was submitted on 07 October 2021. Additional comments were discussed on a conference call with NYSDEC and NYSDOH on 29 October 2021. A revised RCRA Closure Plan was submitted on 11 November 2021. The public comment period began on 1 December 2021 and concluded on 31 December 2021. The plan was approved on 4 January 2022.

A Waste Characterization Plan Letter was submitted to NYSDEC on 19 January 2022. Comments were received and addressed on 21 January 2022. The plan was approved on 24 January 2022.

Anticipated deliverables during the next reporting period include the Supplemental Investigation Report detailing VOC and emerging contaminant groundwater sampling data collected at the Site as well as a Contained In Request Letter for above grade structures addressed in the approved RCRA Closure Plan.

Site Communication

Weekly communication for site updates was established by the Dupont Street 1 LLC. The updates are available to interested parties who register and includes a summary email transmitted every Friday. A link for sign up is posted on the North Brooklyn Neighbors Website under the NuHart Superfund Link.

During this reporting period a total of 19 daily reports were submitted to NYSDEC and NYSDOH summarizing the activities described above.

Attachments

Attachment A – Apparent Thickness of LNAPL

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

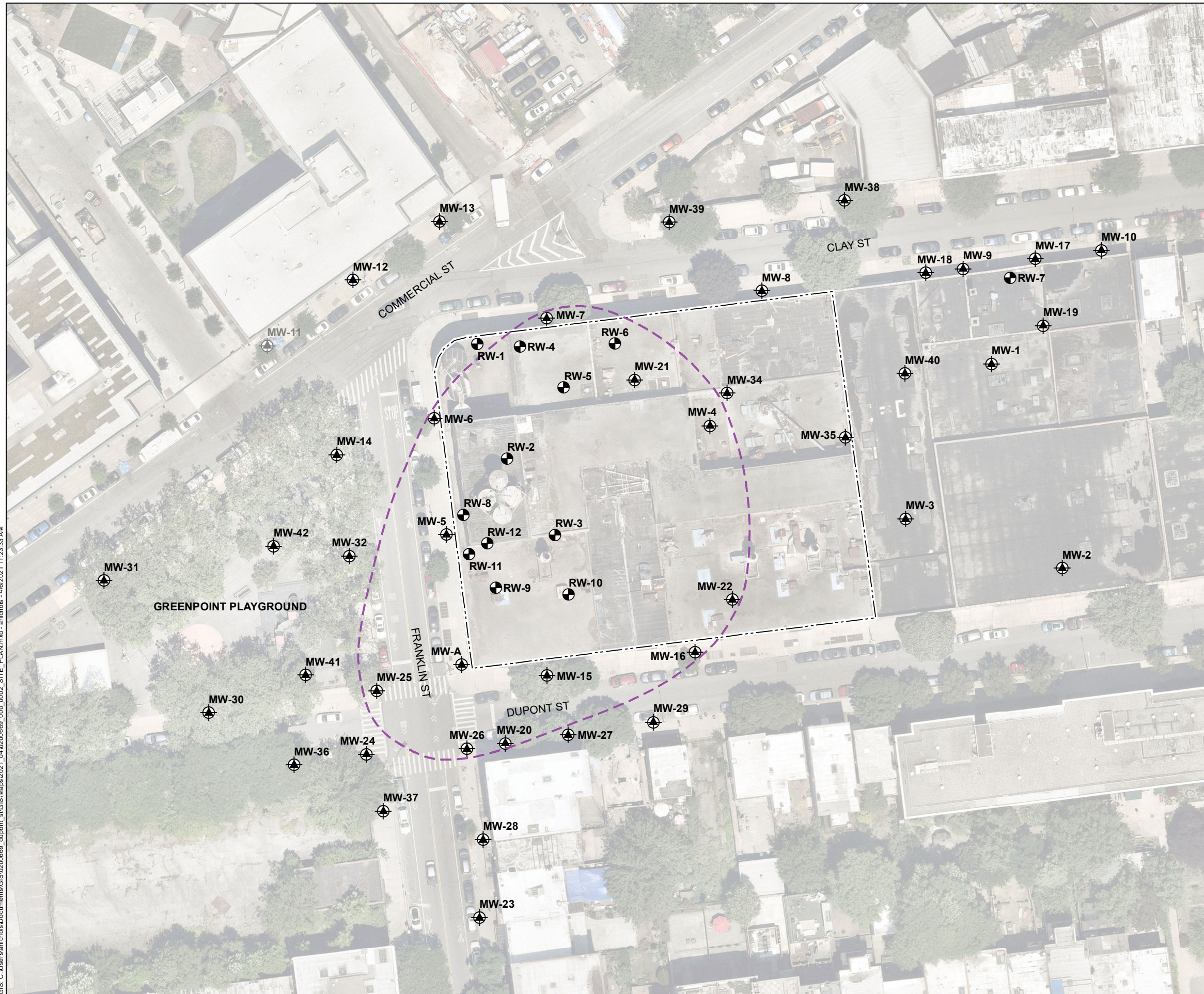
Attachment A

Apparent Thickness of LNAPL






Attachment B

Site Plan

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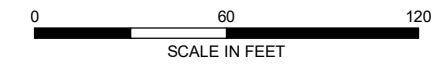


LEGEND

-  GROUNDWATER MONITORING WELL
-  PRODUCT RECOVERY WELL
-  GROUNDWATER MONITORING WELL, DESTROYED
-  EXTENT OF LIGHT NON-AQUEOUS PHASE LIQUID (LNAPL) ON GROUNDWATER
-  SITE BOUNDARY

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
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3. AERIAL IMAGERY SOURCE: NEARMAP, 9 JUNE 2020



HALEY ALDRICH 49 DUPONT STREET
BROOKLYN, NEW YORK

SITE PLAN

FEBRUARY 2022

FIGURE 1



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

10 February 2022

File No. 0203497

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 Stephen Lawrence of the New York State Department of Health. The Project Status Report is for January 2022 to February 2022. If you have any questions, please contact us at 646-518-7735.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK


James Bellew
Principal


Mari C. Conlon, P.G.
Senior Project Manager

CC:

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

Email: Stephen.Lawrence@health.ny.gov
Email: bojinzhu@gmail.com
Email: jane.oconnell@dec.ny.gov
Email: statedesignsny@gmail.com

This status report summarizes activities conducted at the Former NuHart Plastic Manufacturing Site (Site) from January 2022 to February 2022. Activities during this period were conducted by Haley and Aldrich of New York (Haley & Aldrich). 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 Haley & Aldrich on 7 February 2022.

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 7 February 2022, high tide was observed from 2:26 PM to 8:10 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 in the recovery holding reservoirs was not emptied during this event due to simultaneous RCRA closure work on-Site. Based on previous LNAPL estimates, an estimated 4,342.5 gallons of product have been removed from the subsurface since early 2015, with most of the LNAPL disposed.

Eastern Environmental Solutions, Inc. (Eastern) previously conducted waste management activities for disposal of product from the IBC tanks at the Site. Prior to 2022, Eastern has transported and disposed an estimated 2,116 gallons of product at the CycleChem facility in Elizabeth, NJ as hazardous waste. During this reporting period, ACV Environmental Services Inc. completed a LNAPL extraction event on 26 January 2022 and 28 January 2022 removing a total of 2,529 gallons of LNAPL. Product was transported via vacuum truck to the CycleChem facility in Elizabeth, NJ as hazardous waste. Daily reports summarizing these activities were sent to NYSDEC and NYSDOH including notes and photographs of the

events. Field manifests showing transportation details and volume. There is currently no stored LNAPL remaining stored at the Site with the exception of residual product stored in the belt skimmer systems.

Emerging Contaminant Investigation

In accordance with the approved Supplemental Investigation Work Plan, approved by NYSDEC on 13 September 2021, groundwater samples were collected from select wells for volatile organic compounds and emerging contaminants, Per- and Polyfluoroalkyl Substances and 1,4-dioxane. A draft report is currently in progress and will be submitted during the next reporting periods.

RCRA Closure Activities

RCRA closure activities, as detailed in the RCRA Closure Work Plan approved by NYSDEC on 4 January 2022, conducted during this reporting period include inspection of waste pipelines as well as monitoring well rehabilitation by Eastern Environmental Solutions, Inc. (Eastern). Eastern performed inspections to identify piping that was or was not used for delivery product, waste and/or raw materials throughout the facility. Eastern also rehabilitated damaged monitoring wells by installing missing or damaged road boxes, flush mount covers and re-sealing wells with bentonite pellet sealant. On 20 January 2022, Eastern also determined damage was beyond repair and reinstalled MW-40 to 20 ft bgs. During this monitoring period the concrete slab throughout the facility was also patched as needed. Community air monitoring was conducted during all RCRA closure activities and submitted in daily reports to NYSDEC and NYSDOH.

Additional Environmental Activities

Waste characterization was conducted in accordance with the Waste Characterization Plan approved by NYSDEC on 24 January 2022. Soil borings were installed by Eastern and overseen by Haley & Aldrich. Community air monitoring was conducted during all waste characterization activities and submitted in daily reports to NYSDEC and NYSDOH. Waste characterization activities will continue into the following reporting period.

Offsite excavation work commenced on 01 February 2022 by Plumbing Works Inc. to cut and cap water and sewer connections to the Site along Franklin Street, Clay Street and Dupont Street. Excavation work is being completed in accordance with the Site approved Soil Materials Management Plan which includes air monitoring for the duration of intrusive work.

Upcoming Site Activities

RCRA closure activities to be conducted in the coming reporting period will include continuation of pipeline inspection, washing of fourth floor silos and hoppers and decommissioning of the existing belt skimmer extraction system (temporary decommissioning during implementation of simultaneous RCRA closure activities). Waste characterization soil boring installation will continue through early into the coming reporting period. Offsite utility work including sewer line shut off activities will also be conducted during the next reporting period. Air monitoring will continue to be conducted during all activities outlined in and as required by the RCRA Closure Plan, Waste Characterization Work Plan Letter and the Site Soil Management Plan.

Deliverables

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. A Notice of Violation (NOV) was issued by NYSDEC on 22 February 2021 for failure to properly maintain and implement the IRM activities and submit timely monthly reports. An administrative settlement conference was held on 17 March 2021 to discuss the NOV.

NYSDEC issued a letter on 16 February 2021 regarding a request for evaluation of offsite groundwater impacts made by NYSDEC in October 2018. A work plan for this request was submitted to NYSDEC on 12 April 2021 and comments were received on 4 June 2020. A revised work plan was submitted on 2 July 2021 and the subsequent approval was received on 13 September 2021. The Site Investigation work is currently being coordinated with subcontractors.

A RCRA Closure Plan was submitted to the NYSDEC on 07 September 2021. Comments were received on 01 October 2021 and the revised RCRA Closure Plan was submitted on 07 October 2021. Additional comments were discussed on a conference call with NYSDEC and NYSDOH on 29 October 2021. A revised RCRA Closure Plan was submitted on 11 November 2021. The public comment period began on 1 December 2021 and concluded on 31 December 2021. The plan was approved on 4 January 2022.

A Waste Characterization Plan Letter was submitted to NYSDEC on 19 January 2022. Comments were received and addressed on 21 January 2022. The plan was approved on 24 January 2022.

Site Communication

Weekly communication for site updates was established by the Dupont Street 1 LLC. The updates are available to interested parties who register and includes a summary email transmitted every Friday. A link for sign up is posted on the North Brooklyn Neighbors Website under the NuHart Superfund Link.

During this reporting period a total of seven daily reports were submitted to NYSDEC and NYSDOH summarizing the activities described above.

Attachments

Attachment A – Apparent Thickness of LNAPL

Attachment B – LNAPL Disposal Manifests

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

Attachment A

Apparent Thickness of LNAPL

Attachment B

LNAPL Disposal Manifests

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NYD001418354		2. Page 1 of 1		3. Emergency Response Phone 317-644-2754 908-354-0210		4. Manifest Tracking Number 023907510 JJK				
		5. Generator's Name and Mailing Address DUPONT STREET DEVELOPERS, LLC 87 10 QUELLEN BOULEVARD ELMHURST, NY 11373 Generator's Phone: 718-396-2888 / 718-654-4088					Generator's Site Address (if different than mailing address) DUPONT STREET DEVELOPERS, LLC (FORMER NUHARI) 49 DUPONT STREET BROOKLYN, NY 11222					
6. Transporter 1 Company Name ACV ENVIRONMENTAL SERVICES, INC							U.S. EPA ID Number NJDU003812047					
7. Transporter 2 Company Name							U.S. EPA ID Number					
8. Designated Facility Name and Site Address CYCLE CHEM, INC. 217 SOUTH FIRST STREET ELIZABETH, NJ 07206 Facility's Phone: 908-355-5800							U.S. EPA ID Number NJDU02200046					
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
	X	1Q, NA3082, Hazardous waste, liquid, n.o.s. (Diethylhexyl - phthalate, Di-N-Octyl Phthalate), 9, III				No.	Type	1100	G	B	U02B	U107
		2.									X	X
		3.										
		4.										
14. Special Handling Instructions and Additional Information D107126 SO 109538 SF-SO# 1) Profile #178785 PHthalates and HCL/OIL												
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.												
Generator's/Offoror's Printed/Typed Name <i>Richard C. [Signature]</i>						Signature <i>[Signature]</i>			Month Day Year			
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____												
17. Transporter Acknowledgment of Receipt of Materials												
Transporter 1 Printed/Typed Name <i>Willy [Signature]</i>						Signature <i>[Signature]</i>			Month Day Year 1 26 22			
Transporter 2 Printed/Typed Name						Signature			Month Day Year			
18. Discrepancy												
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection												
18b. Alternate Facility (or Generator) U.S. EPA ID Number												
Facility's Phone:												
18c. Signature of Alternate Facility (or Generator)									Month Day Year			
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)												
1. 1111			2.			3.			4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a												
Printed/Typed Name						Signature			Month Day Year			

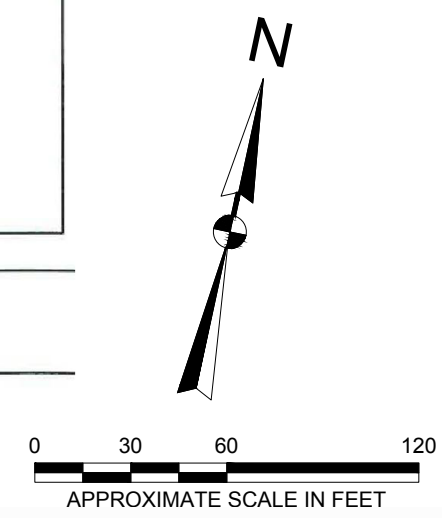
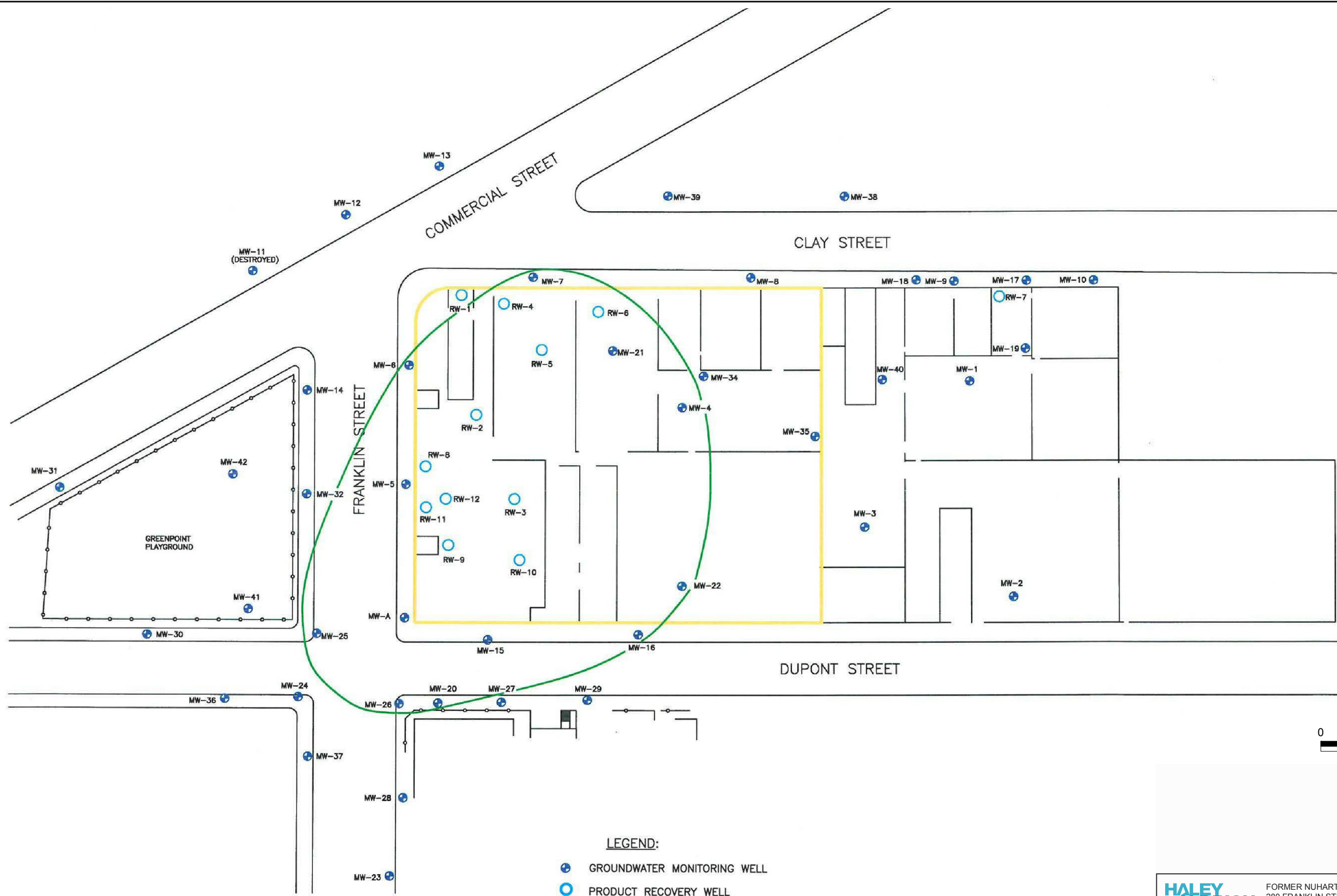
D108263

Please print or type.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number NYD001468354	2. Page 1 of 1	3. Emergency Response Phone 908 354 0210	4. Manifest Tracking Number 023094531 JJK				
5. Generator's Name and Mailing Address DUPONT STREET DEVELOPERS LLC. 87-10 QUEENS BOULEVARD ELMSHURST, N.Y. 11373 718 396 2888				Generator's Site Address (if different than mailing address) DUPONT STREET DEVELOPERS LLC. 49 DUPONT STREET BROOKLYN, N.Y. 11222					
6. Transporter 1 Company Name ACU ENVIRONMENTAL SERVICES INC.					U.S. EPA ID Number NTD003812047				
7. Transporter 2 Company Name					U.S. EPA ID Number				
8. Designated Facility Name and Site Address CYCLE CHEM INC. 217 SOUTH FIRST ST. ELIZABETH, N.J. 07206 908 355 5800					U.S. EPA ID Number NTD002200046				
Facility's Phone:									
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
		1. RONA 3052, HAZARDOUS WASTE LIQUID SOLIDS. 9, III		XXI	TT	10,000	P	B	V028 U107
		2.							
		3.							
		4.							
14. Special Handling Instructions and Additional Information D107126 S0109538 LDR ON FILE - 9B) DIETHYL HEXYL PHTHALATE, D PROFILE 175765 PHTHALATES & HSCLA OIL DI-N-OCTYL PHTHALATE P10448									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator's/Offeror's Printed/Typed Name Richard Guisheng					Signature 			Month Day Year 1 28 22	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____									
17. Transporter Acknowledgment of Receipt of Materials									
Transporter 1 Printed/Typed Name Francisco Amarante					Signature 			Month Day Year 01 28 22	
Transporter 2 Printed/Typed Name					Signature			Month Day Year	
18. Discrepancy									
18a. Discrepancy Indication Space <input checked="" type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection 11-1) 1429 12-1) G									
18b. Alternate Facility (or Generator)					U.S. EPA ID Number				
Facility's Phone:									
18c. Signature of Alternate Facility (or Generator)							Month Day Year		
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)									
1. H01			2.			3.			4.
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a									
Printed/Typed Name John Ben					Signature 			Month Day Year 01 28 22	

Attachment C

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

JANUARY 2022

FIGURE 1