

April 1, 2025

Brooklyn Community Board 1
Dealice Fuller, Chair
435 Graham Avenue
Brooklyn, NY 11211



Andrea Bender
Vice President, External Affairs
New York City School
Construction Authority

Dear Chair Fuller and members of Community Board One:

The School Construction Authority (SCA) has received Community Board One's resolution in unanimous support of SCA's proposal to locate a new elementary school at 257 Franklin Street in Greenpoint, adopted at the Board's February 12, 2025, meeting. This resolution was informed by a joint recommendation from the Community Board's Environmental Protection and Education & Youth Committees.

SCA is greatly appreciative of and sincerely thankful for the Board's support, and for the extensive engagement we have had with the Board and its members in numerous public meetings and conversations, particularly in recent months. SCA is incredibly excited to bring this long-anticipated school to fruition for the children and families of Greenpoint.

Along with the resolution in support, the Board raised two questions, to which our responses are below.

1. **NYSDEC and SCA claim that the proposed plan that's in place to stop the plume from reaching the school or affecting the children is more than what's required.**
 - a. **Specifically, which protective elements of the plan are more than what's required?**

The phthalate non-aqueous phase liquid (NAPL) plume has not reached the 257 Franklin Street property based on groundwater monitoring conducted by the NYS Department of Environmental Conservation (NYSDEC) since at least 2012 and confirmed by SCA's own subsurface investigations in 2008 and 2023. In fact, the NAPL plume does not appear to be moving in the direction of the proposed school site based on measured groundwater flow direction and the viscosity of the NAPL in the cold subsurface. Further, the NAPL under the streets and sidewalks is currently being recovered by the NuHart responsible party and this work will continue until the NYSDEC Remedial Action Objectives are satisfied.



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As such, the hydraulic barrier installed in the sidewalk adjacent to 257 Franklin Street in 2023 appears to be an added safeguard in preventing NAPL migration, which will likely never prove necessary. However, SCA agrees that installing this barrier was critical in addressing the community's reservations in moving forward with the school project.

In addition, development of the school site under protocols of the Mayor's Office of Environmental Remediation (OER) Voluntary Cleanup Program (VCP), which includes regulatory review and approval by NYS DEC, is not required based on the subsurface conditions at 257 Franklin Street. Nevertheless, SCA will take this additional step to allow additional public participation in the school development project.

On top of these measures, SCA will also take additional measures within our site. SCA will construct our new building without a basement to avoid the need for excavation dewatering, thereby avoiding the possibility of drawing any contaminants into our property from off-site. Further, buried utilities serving the new school will enter the property at the southern end of the site along Franklin Street or the western end of the site along Dupont Street to avoid encountering the top of the hydraulic barrier. Finally, our school will include vapor mitigation engineering controls in the form of a gas vapor barrier and sub slab depressurization system (SSDS) preventing potential vapor intrusion due to volatile organic compounds emanating from remedial properties in the vicinity of the school.

Protective Element	Description
Hydraulic Barrier	The hydraulic barrier installed in the sidewalk is intended to intercept any NAPL contaminants not captured by the pneumatic pumping system operating at the NuHart site.
Limited Subsurface Construction	SCA will construct the new building without a basement or cellar to avoid the need for excavation dewatering.
Relocation of buried utilities	Buried utilities serving the new school will enter the property at the southern end of the site along Franklin Street or the western end of the site along Dupont Street to avoid encountering the top of the hydraulic barrier
Installation engineering controls	Our project will include installation of a gas vapor barrier and sub slab depressurization system (SSDS) to prevent potential vapor intrusion.
Voluntary Cleanup Program	Full time environmental oversight will be required during subsurface activities, including the implementation of a Community Air Monitoring Program (CAMP).



- b. Specifically, what other sites can they reference that have dealt with phthalate plumes in this manner in an urban setting? Please provide specific locations.

SCA, NYSDEC, and OER are not aware of any other phthalate NAPL plume projects in New York City or New York State. Phthalates are a very uncommon subsurface contaminant, particularly in the NAPL form. However, the use of hydraulic barriers to prevent the migration of petroleum-based NAPL migration is quite common and this technology has proven effective for decades.

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2. SCA: Will construction of the new school facility involve the installation of piles? If so, how will this affect the site contamination and remedial action's success?

SCA will need to complete a geotechnical investigation to determine if a deep pile foundation is required. Such an investigation would occur during the early design phase. However, given what is known about the area, it seems reasonable that deep piles may be necessary to support the building. If so, they would likely be drilled piles rather than driven piles, which creates less noise and vibration in the vicinity of the drill rig. Regardless of the installation technique, there is nothing about the installation of piles on the 257 Franklin Street property that would affect the NuHart NAPL plume.

As far as contaminants on the SCA site itself, no NuHart contaminants of concern were identified and therefore the installation of piles will have no bearing on the success of the NuHart remediation project. Dewatering will not be required during the pile installation process. As with all ground-intrusive activities, SCA will implement a Community Air Monitoring Plan (CAMP) during the installation of the structural piles and these monitoring results will be shared with OER daily.

I hope this letter has responded to the questions in the February 12 resolution. As always, SCA staff remain more than willing to discuss and address any questions or concerns on this or any other issues. Please feel free to contact me directly at 718-472-8005 or abender@nycsca.org at any time.

Thank you again for all your engagement and support of this project, and for your advocacy on behalf of the Greenpoint community for all these years.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrea Bender", is written over a light blue circular stamp.

Andrea Bender
Vice President, External Affairs
New York City School Construction Authority

