Greenpoint Landing Community Briefing
257 Franklin Street Proposed Elementary School
December 19, 2024
Community Questions and Answers by Topic

I. Environmental

1. **Are there any info/data/studies with respect to any potential toxic creep over the long term with respect to the school site?**

   Regarding the NuHart site, the New York State Department of Environmental Conservation (NYSDEC) has been and will continue to monitor the phthalate plume for the foreseeable future and at least until all remedial objectives have been achieved. As far as the school site is concerned, data from SCA's 2008 investigation as well as our 2023 investigation (both available here) show that the plume has not reached the school site. In addition, the NuHart responsible party successfully installed a hydraulic barrier wall protecting the school site in 2023. As a result, it is extremely unlikely that the plume can ever enter the school site. No borings or monitoring wells installed on the school side of the hydraulic barrier have ever contained non-aqueous phase liquid (NAPL).

2. **What do the investigations show about the conditions of the SCA site? What future investigations will you do?**

   The 2008 and 2023 investigations show that the school site is a typical NYC site regarding environmental conditions including shallow historic fill material and a tank. In addition to the school site investigations performed in 2008 and 2023, all soil requiring excavation will be evaluated again for waste characterization parameters based on the requirements of the selected off-site disposal facility. All testing results will continue to be shared with the Mayor's Office of Environmental Remediation (OER) throughout the project due to the school site's E-designation.

3. **Are the wells near the sidewalk adjacent to the school site contaminated? What is the recovery plan for those?**

   One of the monitoring wells in the sidewalk adjacent to the site contains phthalates in the form of NAPL which floats on top of the groundwater surface approximately 12 feet below the sidewalk. This NAPL does not extend to the proposed school site and, in SCA's professional opinion, never will, due to the hydraulic barrier installed in the sidewalk adjacent to the site that extends 25 feet below the ground surface. Furthermore, groundwater flows in a northwesterly direction (away from the school site) on the NuHart site, the proposed school site, and surrounding properties which are monitored by the NYSDEC. Finally, the NuHart responsible party is in the process of installing a pneumatic NAPL recovery system to address phthalates under the City streets and will be required to maintain that system until the remedial objectives presented in the NYSDEC

NuHart Record of Decision are achieved. Please see: https://extapps.dec.ny.gov/data/DecDocs/224136/

4. **Why did the product make it into the street but not onto the school site? Why won't it keep migrating?**

   Our understanding is that, historically, the NuHart facility was heating the phthalates to lower their viscosity. This allowed the material to be pumped through their industrial process during their years of operation. When the release occurred, the warm, fluid NAPL spread into nearby/adjacent utility corridors in the street and sidewalk at the intersection of Franklin and Dupont Streets. The NAPL quickly cooled in the cold subsurface, the viscosity increased, and the material migration essentially ended. This hypothesis is supported by the many years of groundwater/NAPL monitoring performed by NYSDEC which shows very little change in the NAPL dimension over time, including after Hurricane Sandy. Furthermore, groundwater elevation measurements collected on NuHart, the proposed school site, and other NYSDEC sites in the neighborhood indicate that groundwater flows in a northwesterly direction, away from the proposed school. For additional information, please contact NYSDEC.

5. **What if product is spilled during recovery from the street bed and sidewalk?**

   The NuHart recovery system will pump NAPL recovered from under the sidewalks to a holding tank. In the unlikely event that a spill was to happen, it would most likely not occur on the public streets and sidewalks.

6. **Are the pumping wells used by the NuHart responsible party for product recovery from the street bed and sidewalk safe for the environment?**

   Yes, the SCA understands that the pumping wells are powered with an air compressor (pneumatic), so they do not introduce anything detrimental to the environment. In fact, they will facilitate the environmental cleanup of phthalates under the streets and sidewalks.

7. **Are the toxins on the NuHart site volatile or non-volatile?**

   Phthalates are semi-volatile organic compounds (SVOCs). This means that they do not present a concern for vapor intrusion. For additional information please see: https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/phthalates

   Trichloroethylene (TCE) is a contaminant of concern for the NuHart site and is also a concern for vapor intrusion. However, TCE was only found in soil vapor samples collected north and northwest of the NuHart site, consistent with the measured groundwater flow direction. The proposed school site is located southwest of NuHart and is therefore unaffected by the impacts of the TCEs found at NuHart. Further, the TCE plume was remediated as part of the NuHart cleanup. For additional information please see: https://www.epa.gov/system/files/documents/2024-12/tce-fact-sheet.pdf

8. What about PCBs on the NuHart site?

Polychlorinated biphenyls (PCBs) were not detected in soil or groundwater samples at concentrations above regulatory comparison criteria on the proposed school site.

9. What entity is conducting the phthalate removal on the NuHart site?

The NuHart State Superfund responsible party, Madison Realty Capital, is handling the below grade removal of product under the City streets and sidewalks. NAPL pumping from recovery wells was the selected off-site phthalate remedy because source removal via excavation was not possible given the vast network of buried utilities under Franklin and Dupont Streets.

10. What procedure is used to remove phthalates on the NuHart site and under the streets?

Phthalates on the NuHart site were removed via excavation and dewatering. Residual phthalate impacts identified at the bottom of the excavation were treated in-place via in-situ solidification (ISS). Phthalates under the street and sidewalk will be pumped to a holding tank for off-site disposal using a vacuum truck. A vacuum truck will also be used to remove NAPL from any recovery wells that are not connected to the pneumatic pumping system monthly.

11. What is the process for oversight of the NuHart site?

The NYSDEC and New York State Department of Health (NYSDOH) will oversee the NuHart project in perpetuity.

12. How does the oversight procedure work for the NuHart site and the school site?

Regarding the NuHart site, we recommend contacting the NYSDEC. The SCA is not involved in the NuHart project in any capacity other than as a community stakeholder.

For the proposed school site, the OER is the lead environmental regulatory agency based on the neighborhood rezoning and the site's E-designation. If the school project moves forward, SCA intends to apply to OER's Voluntary Cleanup Program (VCP) to allow for robust public participation in the school development plans. The SCA will develop a Remedial Action Work Plan (RAWP) for the proposed school site, including proposed engineering controls for the new school building. The RAWP will undergo a minimum 30-day public review period and will be reviewed by the OER, NYSDEC, and NYCDOH before approval. Once all comments are addressed, the SCA will receive a Notice to Proceed (NTP) from OER allowing the SCA to obtain all necessary building permits. During construction, the SCA will provide daily reports to OER during all ground-intrusive work.

13. What happens if the NuHart responsible party leaves and determines they will not need to maintain the site going forward?

If the NuHart responsible party were to abandon the property, the NYSDEC would take control of the NuHart site, complete the cleanup using State funding, and could pursue cost recovery through litigation.

14. What is the most effective solution for NAPL recovery given the depth of the phthalate plume below the ground surface at the NuHart site and in the street bed?

Source removal by excavation is the most effective remedial strategy. However, excavation under the sidewalk and street is not possible due to the numerous buried utilities serving the community. This is why the responsible party is using a vacuum truck and pneumatic NAPL recovery system for the area under the streets and sidewalks.

15. How deep is the hydraulic barrier around the school site? Is it deep enough?

The hydraulic barrier protecting the proposed school site starts just below the sidewalk and extends to 25 feet below the ground surface. For reference, groundwater is 12 feet below ground surface and NAPL floats on top of that; the hydraulic barrier wall is twice as deep as groundwater. Based on groundwater measurements collected by DEC since 2012, the groundwater elevation fluctuates very little, even after Hurricane Sandy. As such, the depth of the barrier appears to be more than adequate. Furthermore, the SCA will prohibit dewatering on the proposed school site to avoid drawing the groundwater elevation down relative to the barrier.

16. Will groundwater levels rise and have an impact on the school's safety?

The NYSDEC has been monitoring the groundwater elevations surrounding NuHart since 2012 and has not seen significant variation in measurements including immediately following Hurricane Sandy.

17. What concerns about storm water and groundwater are present at the school?

The proposed school is outside of the flood zone (See NYC and FEMA maps). However, as a precaution the proposed school would be built slab-on-grade, meaning it will not have a basement or a cellar.

18. Will the community be able to access the air monitoring system for the school site during school construction?

Should the school project move forward and into construction, the SCA will implement a Community Air Monitoring Plan (CAMP) and monitor dust and volatile organic compounds (VOCs) during all ground intrusive work on the school site. These results will be reported daily to the OER and shared publicly.

19. How long does it take to detect the need for dust mitigation during construction on an SCA project? How quickly does mitigation happen?

The particulate/dust meter provides instantaneous results to the CAMP technician so that they can spray water to suppress dust and/or stop work as necessary in accordance with the NYSDOH CAMP Guidance Document (refer to Appendix 1A of DER-10: https://extapps.dec.ny.gov/docs/remediation_hudson_pdf/der10.pdf

20. What groundwater cleanup measures would the SCA take?

Groundwater remediation on the school site is not necessary based on our Phase II Environmental Site Investigation findings in 2008 and 2023 SCA notes that the phthalate NAPL plume has not impacted the proposed school site and, in our professional opinion, never will for the following reasons:

a. In 2023, a hydraulic barrier was installed under the sidewalks of Franklin and Dupont Streets to a depth of 25 feet below grade and will be maintained by the NuHart responsible party in perpetuity;
b. Groundwater has been consistently measured to flow in a northwesterly direction (away from the school site) at and near the proposed school site;
c. Groundwater is not used as a source of drinking water in NYC and the SCA will prohibit dewatering during school construction; and
d. The school will be constructed without a basement or cellar.

II. Alternate Sites

1. **Is this the only viable site for the community?**

   This is the only site in the SCA's authority for potential construction of a school. The SCA has evaluated various sites throughout Greenpoint over many years and all were determined to be not feasible for numerous reasons. In addition, sites in Greenpoint present significant challenges from an environmental perspective, among others, due to the industrial history of the neighborhood.

2. **Is this the best location for a school?**

   The SCA believes that the site is suitable and safe for a school because the 2008 and 2023 testing shows the site to be a typical NYC site from an environmental perspective, along with the successful cleanup at the NuHart site, robust engineering controls and other standard building design techniques. Greenpoint is now a highly residential community where many families live, in an area where existing elementary schools are overcrowded, and where those existing schools are a long walk from the rapidly growing residential area.

3. **Is there any reason the community cannot select an existing school?**

   We have received the requests to investigate St. Alphonsus and Saint Francis and we have referred to SCA's Real Estate division.

4. **What happened to the three alternate school sites that were promised in 2011?**

   The SCA evaluated multiple alternative sites for feasibility over the years, and all were determined not to be suitable for a school for a variety of reasons.

5. **What about the trucking yard on West Street between Eagle and Huron?**

   The SCA evaluated multiple alternative sites for feasibility over the years, including that site, and all were determined not to be suitable for a school for a variety of reasons.

6. **Could you develop an alternative location?**

   The SCA has evaluated various sites throughout Greenpoint over many years. All were determined to be not feasible for numerous reasons. In addition, all sites in Greenpoint present significant challenges from environmental perspectives, among others.

7. **Do you decide where the school will be located?**

   Yes. One of the SCA's primary responsibilities is siting new schools citywide in areas of seat need based on available real estate, feasibility of development, and cost effectiveness.

8. **What other solutions are there if the community's parents do not like this plan for their children?**

   As is the case now, parents can pursue enrollment decisions in the best interests of their child and family.

III. School Specific

1. **Why 450 seats? Is a bigger school possible?**

   Based on the size of the property, 450 seats was determined to be the appropriate size. This would be a four- to five-story building depending on future design considerations. We avoid buildings taller than five stories, particularly at the lower grade levels, as emergency evacuations of young children become increasingly difficult beyond five stories.

2. **Is there any prospect of having a middle school?**

   Given the overcrowded conditions in the area elementary schools, the SCA and New York City Public Schools (NYCPS) believe there is a greater need for elementary school seats in northern Greenpoint. The nearest elementary schools are about a mile from the bulk of the residential development in northern Greenpoint.

3. **Could this be an Early Childhood Center serving 3K, Pre-K, and K?**

   The NYCPS Offices of District Planning, Early Childhood Education, and District 14 are best suited to address this question. The need we see from our demographic analyses is in the K-5 grades, as PS 31 and PS 34 are overcrowded, and PS 110 is approaching the limits of its capacity.

4. **Can the area be rezoned to distribute children to the schools that have space?**

   NYCPS Offices of District Planning, Early Childhood Education, and District 14 are best suited to address this question. But the Greenpoint elementary schools are already over or approaching the limits of their capacity. In addition, the distance from the bulk of the new residential development in northern Greenpoint is nearly a mile from these schools.

5. **Has the school zone been set for this site?**

   No. Typically, NYCPS will collaborate with the local Community Education Council and local School District to determine enrollment and other strategies for the school about a year before it opens.

6. **What is the recommended travel distance for middle schools?**

   NYCPS provides hundreds of middle school options throughout the city and provides middle school choice for families to select the option that works best for their children.

7. **Why are you constructing a school next to a flood zone?**

   The site of the proposed school is not within the flood zone. However, the SCA safely builds schools in flood zones with appropriate design and engineering solutions because

we build schools where families live. In Greenpoint, as is the case around the city, many families live in flood zones.

8. **What is the anticipated date of the school's opening?**

   SCA has not yet begun design for the proposed school. As a result, we do not yet have an anticipated opening date. If, in collaboration with the community, the decision is made to move forward with the school, we would then determine an appropriate opening date.

9. **Is there a rough estimate of a completion timeline for the school? Even assuming fast approvals from here on out?**

   In general, once a project moves forward, the SCA's new school development process is typically one year in design and two to three years in construction. However, should this project progress, the additional, voluntary environmental cleanup program requirements we propose to submit could extend these timelines.

10. **Can we rezone the school for kindergarten to make room for students in grades 1 through 5?**

    NYCPS typically determines a school's zone or other enrollment strategies in collaboration with local Community Education Councils about a year before the school opens. We have shared this feedback with NYCPS.

11. **Is the school capacity based on square footage or staffing?**

    Capacity calculations are explained in detail in the Enrollment, Capacity, and Utilization Reports available on the SCA's website. Instructional rooms equal to or greater than 240 square feet are assigned a capacity, and capacity is adjusted based on the programmatic use of the rooms.

12. **Will the school location have new playgrounds for children?**

    Yes.

13. **What additional measures would SCA take during school design and construction because of the product in the street? How will you treat the soil?**

    Although we have not entered design, due to the conditions present in the utility corridors under the intersection of Franklin and Dupont Streets, the SCA would look to restrict the locations of our utility service connections to the southern property line along Franklin Street and the western property line along Dupont Street. This would minimize the risk of disturbing the NAPL and hydraulic barrier under the public streets and sidewalks. Excavated material generated on the school site is not impacted by the NuHart contaminants of concern and will be characterized, transported, and disposed of in accordance with standard SCA construction protocols. All exposed soil (landscaped areas,

if any) would be covered with two feet of environmentally clean fill or would be covered with a paved surface.

14. Are there restrictions on the school's construction as the property is not owned?

No.

15. Would SCA staff be comfortable sending your children to this school?

Yes, the SCA's proposed school site is quite ordinary regarding environmental conditions, including the presence of shallow historic fill and a buried tank, along with the NuHart remediation nearing completion. Furthermore, the proposed school site is not impacted by the NuHart contaminants of concern, is protected by the hydraulic barrier wall installed in 2023, and based on the engineering controls planned for the potential school.

16. Is there a deadline for the new school site?

From a legal perspective there is no "deadline," but the SCA sees overcrowding at the local elementary schools and anticipates additional need for new school seats in the community given the extensive residential development. This, along with the remediation at NuHart, is driving the SCA's interest to move forward on the site currently.

17. When construction of the school starts, will the public be able to comment?

Yes, OER oversight of the project will continue through all phases of the school construction project and will be available to address all environmental concerns, in addition to the SCA team. SCA has a dedicated staff member assigned to all school districts to answer any questions from members of the community. Members of the public will be able to call that person with any questions or concerns whether environmental, general construction, noise, etc.

18. When would the application process commence for potential teachers to apply for these vacant teaching positions at the school?

Should the school project move forward, this question is best directed to NYCPS.

IV. Neighborhood

1. **What effect will the school have on the shelter and vice versa?**

   The SCA looks to build schools where families live, and that includes families in temporary housing. Please refer questions about shelter operations to its operator or to the NYC Department of Homeless Services. Questions about future school operations are best addressed to NYCPS.

2. **Have any tests been conducted on Greenpoint Playground?**

   The SCA has not conducted environmental testing on the playground, as it belongs to NYC Parks and is outside the boundaries of the school property.

3. **Did the SCA evaluate the ponding and flooding around Greenpoint Playground? Why are there drainage issues?**

   The SCA has not conducted any testing on the playground, as it belongs to NYC Parks and is outside the boundaries of the school property.

4. **Would the streets, walkways, and playgrounds surrounding the school be updated?**

   Should the school move forward and into design, the SCA would work closely with the NYC Department of Transportation (DOT) to plan around drop off and pick up access for pedestrians, school buses, and private vehicles. This is standard practice on all the SCA's sites.

5. **Would you be able to raise Greenpoint Playground's height and renovate the facility for the community's kids?**

   The SCA does not have authority of the Greenpoint Playground, an NYC Parks property, and would not be able to renovate Greenpoint Playground.

6. **When do we vote on this as a community?**

   The SCA will collaborate closely with your elected officials to determine the next steps, including if the project goes forward.

7. **Is this the best location for the school if DOT goes through with plans to reroute the B47 bus?**

   The SCA is not in design for the school currently, but we closely coordinate with DOT on how new schools affect transportation planning in neighborhoods.

8. Can the school be part of a mixed-use development?

The SCA always prefers a standalone school, as mixed-use buildings are always more complicated, less efficient, and more expensive. Fortunately, this site provides the opportunity for a standalone school.

V. Other

1. **Will the link to this presentation be accessible later?**

   The link to the December 19, 2024 meeting and all associated documents are available on SCA's website.

2. **Will there be additional meetings?**

   Yes. The SCA appeared at Community Board 1's Full Board Meeting on January 14, 2025, and Community Education Council on January 16, 2025. We are hosting a Virtual Town Hall on January 22, 2025, and will appear at CB1's Environmental Protection Meeting on February 6, 2025. Additionally, the full video of the December 19, 2024, meeting is available on the SCA's website. Should the school move forward, there will also be many public engagement meetings required as part of the regulatory processes.

3. **Would the SCA be amenable to extending the 30-day comment periods stipulated by the Voluntary Cleanup Program to facilitate greater community feedback?**

   Yes.

4. **Is there a comparison that can be done to existing schools to assess the potential toxicity of what is under the existing schools versus the new site?**

   Based on the results of site investigations, the SCA's design standards address any identified subsurface conditions. In the case of 257 Franklin Street, all those recommendations are very typical standard construction recommendations similar to dozens of schools the SCA has built and opened around the city. These recommendations often include registration and removal of a tank identified at the site, proper characterization and off-site disposal of excavated material, import of environmentally clean fill, and vapor intrusion engineering controls for buildings.

   While all these recommendations are routine, the E-designation at 257 Franklin will additionally require oversight from OER throughout the design and construction process. Due to the site's proximity to NuHart and to allay the community's concerns, should the school move forward, the SCA would enter the proposed school into OER's VCP. The VCP will include a robust community participation process usually reserved for sites with more significant environmental conditions.

   Sites with minor environmental conditions such as at 257 Franklin are common throughout NYC. As a result, the SCA has extensive experience with E-designated sites.

VI. Acronym Directory

1. **CAMP** – Community Air Monitoring Plan
2. **FEMA** - Federal Emergency Management Agency
3. **ISS** - In-Situ Solidification
4. **NAPL** - Non-Aqueous Phase Liquid
5. **NTP** – Notice to Proceed
6. **NYCDOH** – New York City Department of Health
7. **NYCDOT** – New York City Department of Transportation
8. **NYCPS** – New York City Public Schools
9. **NYSDEC** - New York State Department of Environmental Conservation
10. **NYSDOH** - New York State Department of Health
11. **OER** - Office of Environmental Remediation
12. **PCB** – Polychlorinated Biphenyls
13. **RAWP** - Remedial Action Work Plan
14. **SCA** – School Construction Authority
15. **SVOC** – Semi Volatile Organic Compounds
16. **TCE** - Trichloroethylene
17. **VCP** - Voluntary Cleanup Program

VII. Key References Linked in this Document:

1. **NYCSCA Enrollment, Capacity, and Utilization Reports**: https://www.nycsca.org/community/capital-plan-reports-data#Enrollment-Capacity-Utilization-69

2. **New York State Department of Environmental Conservation NuHart Plastics Site Document Repository**: https://extapps.dec.ny.gov/data/DecDocs/224136/

3. **NYCSCA Due Diligence Documents for 257 Franklin Street**: https://www.nycsca.org/Community/Environmental-Due-Diligence#257-Franklin-Street-487

4. **NYC Flood Mapper**: https://dcp.maps.arcgis.com/apps/webappviewer/index.html?id=1c37d271fba14163bbb520517153d6d5

5. **FEMA Flood Maps**: https://msc.fema.gov/portal/search?AddressQuery=257%20franklin%20street%2C%20brooklyn%2C%20ny

6. **EPA | Phthalates**: https://www.epa.gov/assessing-and-managing-chemicals-under-tsca/phthalates

7. **EPA | What is TCE?**: https://www.epa.gov/system/files/documents/2024-12/tce-fact-sheet.pdf

8. **SCA Document Repository for 257 Franklin Street**: https://www.nycsca.org/Community/New-School-Sites#PROPOSED-NEW-PUBLIC-SCHOOL-AT-GREENPOINT-LANDING-DISTRICT-14-502

9. **NYS DOH CAMP Guidance Document**: https://extapps.dec.ny.gov/docs/remediation_hudson_pdf/der10.pdf