257 Franklin Street Potential School
Questions Received at Virtual Community Briefing
January 22, 2025

For further reference, please see the videos and QA documents from SCA's other meetings on this topic available here, along with additional resources.

1. **What are the levels of PFAS on the site compared to regulatory criteria? How will SCA remediate PFAS?**

   Perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFOS) were not detected at concentrations above the proposed Unrestricted Use Soil Cleanup Objectives. A summary of the PFAS detected in groundwater at concentrations greater than the New York State Department of Environmental Conservation (NYSDEC) Ambient Water Quality Guidance Values is provided in the table below.

Sample ID Units – ng/L	TRC-GW-03	TRC-GW-DUP-01	NYSDEC Ambient Water Quality Guidance Value
PFOA	**26.4**	**30.6**	6.7
PFOS	**11.6**	**11.3**	2.7

Notes:
ng/L – nanograms per liter **(i.e., part per trillion**)
Light gray shade with bold text value indicates that the result exceeds the NYSDEC Ambient Water Quality Guidance Value.

The concentrations of PFAS in groundwater are not suggestive of an on-site source and are consistent with NYC background conditions. Further, groundwater is not used as a source of drinking water in NYC. As such, groundwater remediation for PFAS is not anticipated. For additional information regarding these emerging contaminants and their ubiquitous presence in the environment, please see:
https://dec.ny.gov/environmental-protection/site-cleanup/pfas

2. **You said that groundwater did not move during Hurricane Sandy or other water events. What about an earthquake or other seismic activity?**

   Typically, SCA would perform geotechnical analysis (including all sources of vibration) as part of our design for a new school, consistent with code requirements. The phthalates in the street bed are relatively viscous, which is why SCA understands that the plume dimensions have remained stable over time. However, seismic activity is generally not a significant concern in the NYC area, and it is unlikely that such activity would affect the plume dimensions.

3. **Will the SCA guarantee that the plume will not move, and the hydraulic barrier wall will not fail?**

   The phthalates in the street bed are relatively viscous, which is why SCA understands that the plume dimensions have remained stable over time. In addition, groundwater flows 90 degrees away from the school site (e.g., northwest, not southwest). The historic lack of movement in the plume is a good indication that significant movement of the plume in the future is extremely unlikely, particularly with the on-going NAPL recovery operations.

   The hydraulic barrier is a very robust grout wall, and at this time the barrier is not necessary as the phthalate plume has not reached the school site. However, it is an engineering control that will be maintained in perpetuity.

   Finally, the NuHart site has been cleaned up, and all NAPL on that site has been remediated. Phthalates under the street and sidewalk will continue to be pumped to a holding tank for off-site disposal using a vacuum truck. The NuHart responsible party will be required to maintain that system until the remedial objectives presented in the NYSDEC NuHart Record of Decision are achieved. For additional information, please visit: https://extapps.dec.ny.gov/data/DecDocs/224136/

   For these reasons, it is SCA's professional opinion that the plume will not reach the school site.

4. **Will the SCA make guarantees in writing to the families whose children may enroll in this school?**

   SCA has every reason to believe, in our professional opinion, that there is no possible exposure pathway for humans to come into contact with what remains of the phthalate plume. Given the engineering controls already in place, along with those planned for the proposed school and the remediation of NuHart, SCA firmly believes that this site is safe for a school and the future students and staff of that school.

5. **You stated that the school will not have a basement. Where will the typical equipment located in a basement, such as a boiler, be located? How will SCA ensure the safety of those areas?**

   For several years now, all of SCA's new school construction projects have included fully electric heating and cooling. This means the building will not need a natural gas or fuel oil fired boiler. SCA has design expertise on how to locate those rooms within the school, controlling access to the custodian and/or principal. In addition, we tend to locate our mechanicals on roofs for a variety of reasons. Roof areas are tightly restricted in all instances; only the custodian and/or principal have access to roofs.

6. **How does the community ensure that, if the project proceeds, it goes through the Mayor's Office of Environmental Remediation's (OER) Voluntary Cleanup Program (VCP)? What does the VCP process look like?**

   The SCA fully commits to applying to the VCP, should we proceed with this project. The main components of the E-designation program overlap with the requirements of the VCP. However, under the VCP, NYSDEC will review and comment on the Remedial Action Plan (RAP) prior to implementation.

   The VCP includes a robust public/community participation component which involves:
   1. On-line report repository which OER maintains.
   2. Issuance of fact sheets to a project contact list developed and maintained by OER [in conjunction with SCA] (1) announcing the draft RAP and (2) at the end of the project when the Notice of Completion is issued.
   3. A minimum 30-day public comment period for the Remedial Action Plan.
   4. Other public meetings will likely be held for this project given significant public interest.

   Following approval of the Phase II/Remedial Investigation Report (RIR) and entry into the VCP, we would then generate and obtain OER, New York City Department of Health and Mental Hygiene (NYC DOHMH), and NYSDEC approval of a Remedial Action Plan, which would include the proposed remedial elements like vapor mitigation engineering controls, and proper characterization and management of site soil and the underground storage tank.

   The cleanup and engineering controls would be documented in a Remedial Closure Report, and OER would review and determine if it meets the stipulations set forth in the Remedial Action Plan. If it does, a Notice of Satisfaction/Completion letter will be issued.

   For more information regarding the VCP, please see:
   https://www.nyc.gov/site/oer/remediation/voluntary-cleanup.page

VI. Acronym Directory

1. **NYC DOHMH** – New York City Department of Health and Mental Hygiene
2. **NYSDEC** – New York State Department of Environmental Conservation
3. **OER** – NYC Mayor's Office of Environmental Remediation
4. **PFOA** - Perfluorooctanoic acid
5. **PFAS** – Per- and polyfluoroalkyl substances
6. **PFOS** - Perfluorooctanesulfonic acid
7. **RAP** - Remedial Action Plan
8. **RIR** - Remedial Investigation Report
9. **SCA** – School Construction Authority
10. **VCP** - Voluntary Cleanup Program

Key References Linked in this Document:

1. **NYS DEC | PFAS**: **https://dec.ny.gov/environmental-protection/site-cleanup/pfas**
2. **New York State Department of Environmental Conservation NuHart Plastics Site Document Repository**: https://extapps.dec.ny.gov/data/DecDocs/224136/
3. **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
4. **NYC OER Voluntary Cleanup Program**: https://www.nyc.gov/site/oer/remediation/voluntary-cleanup.page