

**COMMUNITY AND ENVIRONMENTAL
RESPONSE PLAN**

**FORMER KENT AVENUE GENERATING
STATION**

**500 KENT AVENUE
BROOKLYN, NEW YORK**

Prepared for:

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October 2013

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GLOSSARY OF ACRONYMS AND ABBREVIATIONS

ACM	Asbestos-Containing Material
BMT	Brooklyn-Manhattan Transit Corporation
CAMP	Community Air Monitoring Plan
Con Edison	Consolidated Edison Company of New York, Inc.
CTW	Coal Tar Wrap
DER	Division of Environmental Remediation (New York State Department of Environmental Conservation)
ft	Feet
gpm	gallons per minute
HDPE	High Density Poly Ethylene
Maxymillian	Maxymillian Technologies, Inc.
NYCDEP	New York City Department of Environmental Protection
NYCRR	New York State Codes of Rules and Regulations
NYSDEC	New York State Department of Environmental Conservation
PAHs	Polycyclic Aromatic Hydrocarbons
PCBs	Polychlorinated biphenyls
PM10	Particulate Matter less than 10 micrometers in size
PPE	Personal protective equipment
ppm	parts per million
RAWP	Remedial Action Work Plan
Shaw	Shaw Environmental & Infrastructure Engineering of NY, P.C.
SPDES	State Pollution Discharge Elimination System
SVOC	Semi-Volatile Organic Compound
UST	Underground Storage Tank
VCA	Voluntary Cleanup Agreement
VOC	Volatile Organic Compound

1.0 INTRODUCTION

This Community and Environmental Response Plan (CERP) has been prepared to summarize the controls, monitoring and work practices that will be implemented during the remediation of the Site. The purpose of the CERP is to provide members of the local community, including visitors to the ballfield/park across Kent Avenue, with information on the programs and procedures that will be put in place to protect public health and minimize the disturbance caused by the remedial activity.

This CERP has been developed in accordance with the Voluntary Cleanup Agreement (VCA) between Consolidated Edison Company of New York, Inc. (Con Edison) and the New York State Department of Environmental Conservation (NYSDEC), Title 6 of the New York State Code of Rules and Regulations (NYCRR) Part 375 for remedial action, and the May 2010 NYSDEC - Division of Environmental Remediation (DER) *DER-10, Technical Guidance for Site Investigation and Remediation*.

The Site is located in the Borough of Brooklyn, Kings County on the southeastern shore of the Wallabout Channel of the East River and is generally flat and lies at an elevation of approximately 10 feet (ft) above mean sea level. The total area of the Site is approximately 4 acres. The Site was landfilled sometime between 1844 and 1900 and by 1906 Brooklyn-Manhattan Transit Corporation (BMT) had constructed a boiler house building on the southern portion of the Site for a power plant. The power plant had been expanded over time. During the 1950s, the 1906 boiler house building portion of the power plant was demolished into the basement of the structure. By 1998, Con Edison (current property owner) had ceased operations at the generating plant and adjoining electric substation, and during 2007-2009 demolished the remaining generating station structures.

Between 1999 and 2012, a total of six site assessment/investigations were conducted to assess the environmental conditions at the Site. The investigations concluded that 1.) the Ash Pit in the northwest corner of the Site contained elevated concentrations of polychlorinated biphenyls (PCBs) and 2.) the soils located outside of the final power plant footprint contained elevated concentrations of metals (principally arsenic) and semi-volatile organic compounds (SVOCs), primarily Polycyclic Aromatic Hydrocarbons (PAHs). Also identified during the investigations was the presence of asbestos-containing material (ACM). Between September 2011 and January 2012, the Ash Pit was remediated and backfilled with concrete.

An Alternatives Analysis Report (AAR) was prepared to address the remediation of the areas south (South Excavation Area) and north (North Excavation Area) of the final power plant footprint. The AAR proposes the excavation of materials in the South Excavation Area (anticipated to be within the basement walls of the former boiler house building) down to the basement slab. The AAR also proposes the excavation of material in the North Excavation Area down to the basement slab. The overall extent of ACM present within the two remediation areas

has not been determined. However, it was concluded that sufficient ACM exists at the Site that all material to be excavated shall be handled and disposed of as ACM. Excavated materials will be transported off of the Site to disposal facilities that can accept ACM that are also impacted by metals and SVOCs.

1.1 CERP Organization

This CERP has been organized in general accordance with Section 5.1(f) of NYSDEC *DER-10* as follows:

- Section 1 – Introduction, describes the Site, Site History and purpose of the CERP;
- Section 2 - Public Protection Measures;
- Section 3 – Community Air Monitoring Plan (CAMP);
- Section 4 – Noise and Vibration Mitigation;
- Section 5 – Site Security;
- Section 6 – Erosion and Sediment Control;
- Section 7 – Waste Management;
- Section 8 – Traffic Control and Site Access;
- Section 9 – Off-Site Trucking Routes and Emergency Procedures;

1.2 Con Edison & Regulatory Agency Contact Information

Project-related Questions:

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Health-related Questions:

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Owner-related Questions:

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Con Edison
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1.3 Document Repositories

Williamsburg Library
240 Division Ave. (at Marcy Ave.)
Brooklyn, NY 11211
718-302-3485

Brooklyn Community Board 2
350 Jay Street, 8th Floor
Brooklyn, NY 11201
718-596-5410

1.4 Kent Avenue Remediation Project Website

Information about the project is posted at www.coned.com/MGP (Kent Avenue tab). The Alternatives Analysis Report, maps of excavation areas, and design documents are all posted on the website. Once work begins, air monitoring readings and laboratory results will be posted on the website and the site fence on a next-day basis.

2.0 PUBLIC PROTECTION MEASURES

Con Edison and its Contractor, Maxymillian Technologies (Maxymillian), will implement a number of safety measures to protect the public during remediation work. Signs will be placed at the gates indicating that the site is an active construction site and public access is not permitted. Additionally, as the remediation work involves asbestos-containing material, New York City Department of Environmental Protection (NYCDEP) requires barrier walls to be installed. Maxymillian has subcontracted Delta Environmental, Inc. to provide a NYCDEP/New York State Department of Labor (NYSDOL) certified Asbestos Abatement Supervisor (AAS) to provide supervisory oversight of the asbestos abatement activities and to provide NYCDEP/NYSDOL certified Asbestos Handlers.

2.1 Barrier Walls

Eight (8)-foot high barrier walls will be installed along the fence line within 25 feet of the work areas (see Figures 1 and 2). The barrier walls will consist of 3/8 inch plywood partitions lined with 2 layers of 6-mil reinforced, fire retardant polyethylene (poly) sheeting. Along the concrete retaining wall adjacent to the south boundary of the site, two layers of poly sheeting will be installed onto the wall.

3.0 COMMUNITY AIR MONITORING PLAN

The Community Air Monitoring Plan (CAMP) has been developed to address particulates (dust) and potential subsurface organic vapors (VOCs) that may be released to the air during implementation of remediation activities. The CAMP requires real-time monitoring for dust and organic vapors at the downwind site perimeter of each designated work area for the benefit of nearby downwind properties that contain sensitive receptors (e.g., Division Avenue, Kent Avenue, the ballfield/park east of Kent Avenue, and the high-rise residential building on Kent Avenue north of Clymer Street). The measures included in the CAMP will provide a level of protection for the occupants of the neighborhood schools and residences, as well as the downwind community, from potential airborne releases.

Air monitoring stations for measuring particulate matter less than 10 micrometers in size (PM-10) will be established at four stationary locations (generally, two along Kent Avenue, one along Division Avenue and one along either the western or southern property line). These four locations will be different during the excavation of the North remediation area and the South remediation area (Figures 1 and 2). Depending on wind direction, one location will be the upwind Site perimeter monitoring location and the other three will be downwind Site perimeter monitoring locations, and a roving air monitor using a hand-held instrument for measuring volatile organic compounds (VOCs) downwind of the work zone. The upwind monitoring station will be located in the predominantly upwind direction of the Site and its location will vary depending on daily conditions (e.g., wind direction). A windsock will be used to determine and monitor wind direction throughout the work day. One of the three downwind monitoring stations will be located within the regulated work area and at times will not be accessible for monitoring the instrument readings. The monitoring equipment within the regulated work area will be connected to a telemetry system that will allow the data to be monitored with an on-site computer. Downwind PM-10 measurements will be compared to upwind (background) measurements over a 15-minute averaged period and the air will be monitored for visible airborne dust. Downwind VOC levels will be compared to background levels based on instantaneous readings. See table below for action levels:

Monitor	Exceedance	Action
PM-10	100 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) above background; or Airborne dust is observed leaving the work area	Dust control/suppression (see Dust Control Plan, below)
	150 $\mu\text{g}/\text{m}^3$ above background; or Airborne dust is observed leaving the Site	Stop work and re-evaluate activities

Monitor	Exceedance	Action
VOC	5 parts per million (ppm) above background	Halt work activities; <ul style="list-style-type: none"> continue work if readings readily decrease below 5 ppm over background; if elevated readings persist, the source of vapor must be identified and corrective actions taken (see Odor Control Plan, below).
	25 ppm above background	Stop work and re-evaluate activities

Continuous monitoring will be performed during all ground intrusive activities. Ground intrusive activities include, but are not limited to, soil excavation and handling.

3.1 Dust Control Plan

Below are the dust-generating activities (actual & potential sources) along with Reasonable Available Control Measures & Methods to help reduce these emissions:

Activities	Reasonable Available Control Measure (RACM)	Alternative
Movement of Transport Trucks Entering/ Exiting Site	<ul style="list-style-type: none"> Applying water on haul roads; Restricting vehicle speeds to 10 mph; Hauling materials in properly tarped or watertight containers; 	<ul style="list-style-type: none"> Limit amount of Trucks allowed On-Site at a time Spray tires, if necessary
Weather Issues (High Winds)	<ul style="list-style-type: none"> Covering Stockpiles and material 	<ul style="list-style-type: none"> Cease activities when sustained (15+ minutes) winds > 40 mph
Equipment Moving On-Site	<ul style="list-style-type: none"> Applying water on haul roads; Wetting equipment and work areas; Restricting vehicle speeds to 10 mph; Spraying water on buckets during excavation and dumping; 	<ul style="list-style-type: none"> Limit amount of equipment movement
Excavated Materials	<ul style="list-style-type: none"> Spraying of water on buckets during excavation & dumping; Wetting of equipment and work areas; 	<ul style="list-style-type: none"> Limit the amount of material excavated at a given time
Soil/Debris moved to Stockpile Areas	<ul style="list-style-type: none"> Applying water on haul roads; Wetting of equipment & work areas; Restricting vehicle speeds to 10 mph; Spraying of water on buckets during excavation & dumping; 	<ul style="list-style-type: none"> Limit amount of equipment movement
Stockpiles	<ul style="list-style-type: none"> Covering stockpiles and material after activity ceases; Keeping stockpiles wetted when actively being "worked" or when covered. 	<ul style="list-style-type: none"> Minimize Stockpiles On-Site

3.2 Odor Control Plan

Below are the activities that can cause odor nuisances on-site along with Reasonable Available Control Measures & Methods to help reduce odor:

Activities	Reasonable Available Control Measure (RACM)
Movement of Transport Trucks Entering/ Exiting Site	<ul style="list-style-type: none"> • Hauling materials in properly tarped or watertight containers to prevent odor; • Limit haul trucks to 3 minutes idle time; • Applying foam suppressant.
Equipment Operating On-Site	<ul style="list-style-type: none"> • Turning off equipment that is not in active use; • Limiting the amount of equipment used at one time while on-site; • Applying foam suppressant.
Excavated Materials	<ul style="list-style-type: none"> • Limiting amount of exposed areas or amount of time materials are exposed to the open atmosphere; • Applying foam suppressant.
Soil/Debris moved by equipment to Stockpile Areas	<ul style="list-style-type: none"> • Limiting amount of exposed areas or amount of time materials is exposed to the open atmosphere; • Turning off equipment that is not in active use; • Limiting the amount of equipment used at one time while on-site; • Applying foam suppressant.
Stockpiles	<ul style="list-style-type: none"> • Covering stockpiles and material after activity ceases with Poly Sheeting & securing with sandbags (or equivalent); • Applying foam suppressant.
Remove water prior to treatment or disposal	<ul style="list-style-type: none"> • Set up site drainage & prevent standing water.
Work Zones (Exclusion Zone)	<ul style="list-style-type: none"> • Performing Housekeeping; • Daily cleaning up (Free of trash, garbage, & debris); • Properly disposing of any odorous material; • Applying foam suppressant.

3.3 Asbestos Air Monitoring

In addition to the CAMP, to be performed by Shaw Environmental & Infrastructure Engineering of NY, P.C. (Shaw), third-party asbestos air monitoring will be performed by AirTek in compliance with the NYCDEP variance.

Air monitoring will be established at the entrance to the worker decontamination enclosure systems and at five upwind and five downwind locations to be determined on a daily basis as work is to begin. Approximate positioning of the ten upwind/downwind monitoring locations can be seen in Figures 1 and 2.

4.0 NOISE AND VIBRATION MITIGATION

In accordance with §24-219 of the New York City Noise Code, every construction site where construction activities take place shall have, conspicuously posted, a complete and accurate Construction Noise Mitigation Plan. The Construction Noise Mitigation Plan does not need to be filed with the NYCDEP so long as the plan complies with Chapter 28 of the Rules of the City of New York (RCNY Chapter 28). However, the plan must be readily available for inspection at the construction site. Equipment is anticipated to be used only during the hours of 7:00 a.m. and 6:00 p.m. on weekdays. Should project scheduling requirements necessitate after-hours work, equipment will be used in accordance with the hours specified in the NYCDEP permit.

There will be no vibration monitoring during excavation of the north remediation area. During excavation of the south remediation area, vibrations will be monitored the first day of subsurface remnant concrete demolition during what is expected to be the worst case scenario, a buried interior concrete wall located adjacent to the southern property line. Vibrations will be monitored for the duration of the demolition of the subsurface wall or one working day, whichever is shorter. If vibration results are approved by the engineer, demolition work will continue without vibration monitoring. If not, demolition work will stop and work methods will be reassessed.

5.0 SITE SECURITY

Site security will be maintained around the clock to prevent vandalism and/or destruction of construction equipment and to prevent site access, thus minimizing health and safety concerns for the surrounding neighborhood.

5.1 Manned Security

In addition to securing the site fencing (as noted below), a security presence will be at the site during both working and non-working periods.

5.2 Site Fencing

The existing 10-foot high chain link fence will be secured at the end of each working day. The gates (a second gate will be installed along Division Avenue prior to the start of remediation) will be locked at the end of each working day.

6.0 EROSION AND SEDIMENT CONTROL MEASURES

The Erosion and Sediment Control Plan describes the means and methods to minimize soil and sediment erosion and to control stormwater on the Site.

6.1 Erosion and Sediment Control Plan

Before construction activities begin at the site, sediment barriers will be installed along the natural contours of the west boundary of the site, between the work area and Wallabout Channel, in the general location indicated on Figures 1 and 2. These barriers will consist of silt fence with hay bales or wattle (woven straw surrounded by mesh netting, 1 ft diameter by 6 to 20 ft in length).

Prior to excavation within the North Remediation Area, approximately 80 feet of silt curtain will be installed along the breached sheet pile wall to prevent potential contamination of Wallabout Channel in the vicinity of the North Remediation Area.

Perimeter berms will be created around the work zones, stockpiles and decontamination areas to prevent stormwater from migrating into these areas, and also to prevent any stormwater or decant water from migrating from these areas. Additional details about the perimeter berms and controlling stormwater are discussed later in Section 7.1.

All sediment and erosion controls will be inspected daily and within one work day following each significant rainfall event. Impacted structures will be repaired within one hour after discovering any issues. Sediment removed during inspection and maintenance will be redistributed on-site or transported off-site for disposal depending on potential contact with contaminated materials.

Erosion and sediment controls will remain onsite until the contractor demobilizes from the Site following the completion of the abatement/remediation activities.

7.0 WASTE MANAGEMENT MEASURES

The waste management measures include procedures for managing, treating and disposal of waste materials generated as a result of the Site remediation. All excavated soil and debris will be considered ACM for handling and disposal purposes. A licensed asbestos abatement supervisor will provide supervisory oversight of the asbestos abatement activities to be performed by certified Asbestos Handlers. Only asbestos handlers and supervisors certified by NYCDEP/NYS DOL will be allowed to handle, excavate or remove ACM.

7.1 Excavation and Materials Management Plan

The Excavation and Materials Management Plan (EMMP) includes the following:

- 1) A waste matrix for all waste streams to be managed;
- 2) An approach and procedures for excavation, hauling, and disposal, site grading, and coordination with other on-site activities;
- 3) Incorporating all handling and disposal requirements set forth in NYCDEP Asbestos Control Program (ACP) Variance;
- 4) Testing procedures for determining which excavated materials are non-hazardous industrial waste; petroleum contaminated waste; or hazardous waste;
- 5) Approved waste transporter and disposal facilities;
- 6) Proposed material suppliers for and sources for environmentally clean backfill and demarcation barrier;

Prior to the remedial activities, pre-characterization sampling and analysis were performed to pre-approve excavated soil and debris for disposal at Waste Management's GROWS North and Tullytown Landfills in Pennsylvania.

The Site remediation will start with excavation and backfill of the North remediation area and then move to excavate and backfill the South remediation area. The anticipated activities requiring material handling include:

- A temporary soil storage area will be constructed within the exclusion zone of the North remediation area to allow for continuing excavation until the next waste transport vehicle arrives at the Site for load out. The Soil Storage Area will be underlain by a 10-mil polyethylene liner. Hay bales will be placed, or clean crushed stone and sand will be graded to create a berm along the perimeter of the liner. The perimeter berm will prevent storm water from migrating into the soil storage area, and also to prevent any decant water from migrating from the soil storage area.

- Install 8-foot high barrier walls and demarcate work zones for the North remediation area. Barrier walls will consist of plywood and 2 layers of 6-mil poly sheeting.
- Excavate the North remediation area and transport the material for off-site disposal, using a 25 ton size excavator and a 15 ton size excavator with buckets, hram (pneumatic hammer), and muncher (concrete jaws) attachments. A berm will be established completely around the interior perimeter of the work area to contain and facilitate collection and proper disposal of any runoff water. Soils and debris will be direct loaded into lined waste transporter trucks by excavator for transport to the approved disposal facilities. As an alternate to direct loading, soil and debris may be temporarily stockpiled and covered with 6-mil poly sheeting within the bermed and lined soil storage area. Decant water from the soil storage area and water generated during soil removal will be pumped to wastewater storage tanks for appropriate treatment and disposal. The loaded trucks will be wrapped in accordance with asbestos regulations. Disposal trucks will exit through the decontamination wash pad. During excavation, loading, and stockpile handling of the soils and debris, water will be applied to control fugitive dust.
- Excavate and remove the underground storage tank (UST) within the North Remediation Area. Soil and debris will be excavated, stockpiled and covered with 6 mil poly within the Soil Storage Area. Residual product within the UST will be sampled and subsequently transported and disposed of at an approved off-site facility. Once the residual product is removed from the UST, the tank will be purged, cleaned and disposed of at an approved off-site facility, under the direction of an FDNY certified UST contractor.
- Install the demarcation barrier and backfill the North remediation area. Once the vertical limits of the excavation have been reached, end point samples will be collected and shipped to a New York State Department of Health (NYSDOH) ELAP-certified laboratory for analysis. The demarcation barrier will be placed along the bottom and sidewalls of the excavation prior to placing backfill. Structural fill will be placed in 12 inch lifts and compacted to achieve 92% relative density. The top 4" of disturbed areas will be backfilled with ¾" clean crushed stone.
- The activities and material handling listed above, with the exception of removing the buried UST, will also be completed for the South remediation area.
- If a breach is observed in the Kent Avenue sidewalk vault during the South remediation area excavation, the vault will be sealed in accordance with the specifications and the details in the project plans.
- It is estimated that 60,000 gallons of wastewater will be generated from dewatering, decanting, and decontamination activities during the project. This wastewater will be disposed of at an approved off-site facility, filtered and used to wet excavated soils prior to disposal, or treated/filtered to meet site-specific SPDES requirements and discharge to Wallabout Channel.

- Workers will place used PPE into 6-mil poly bags for placement in lined trucks for disposal with impacted soils and debris. Workers will disassemble the soil storage areas and dispose of poly and other impacted construction materials and place into lined trucks for disposal with impacted soils and debris.

Decontamination procedures will be employed to ensure that no contamination or pollution migrates from the site. The procedures will include:

- Delineating the site into multiple work zones based on the level of contamination and the type of work activities. The project layout will be preplanned to maximize traffic flow between areas;
- Construction of lined and bermed truck/equipment decontamination pads at the exit of the exclusion zones which contains a sump for collection of decontamination liquids;
- Mobilization or construction of a Remote Worker Decontamination facility in accordance with NYCDEP asbestos regulations and site specific variances;
- Mobilization or construction of a Remote Waste Decontamination facility in accordance with NYCDEP asbestos regulations and site specific variances;
- Construction of anti-tracking pads at the site entrances;
- Daily decontamination of mechanical equipment used to assist in the abatement activities, at the bermed and lined heavy equipment decontamination pad;
- Decontamination of mechanical equipment prior to use for backfill operations or prior to demobilization;
- Decontamination of mechanical equipment, as needed, to prevent cross-contamination within work areas;
- Only certified asbestos handlers will decontaminate objects potentially contaminated with asbestos.

7.2 Waste Management Plan

Material management and handling of the anticipated waste streams will be performed as indicated in the table below. As excavations progress, the asbestos abatement supervisor will observe the excavations and segregate soils and debris that do not appear to be consistent with non-hazardous industrial waste for additional testing. Based on the age of the buried debris, Coal Tar Wrap (CTW) pipe has been added as a possible waste stream, in the unlikely event it is encountered.

WASTE STREAM	STORAGE CONTAINER	DISPOSITION
ACM containing non-hazardous soil, concrete, and debris	Stockpile in bermed soil storage area lined with 10 mil poly sheeting underlayment and 6 mil tarped and covered	Horwith Trucks, Inc. to Waste Management GROWS North Landfill in Morrisville, PA and Tullytown Landfill in Tullytown, PA (GROWS/Tully)
Remnant Structures	Stockpile in bermed soil storage area lined with 10 mil poly sheeting underlayment and covered with 6 mil poly. May be mixed with soil & debris for disposal.	Horwith Trucks, Inc. to GROWS /Tully
Remnant Equipment	Stockpile in bermed soil storage area lined with 10 mil poly sheeting underlayment and covered with 6 mil poly	Horwith Trucks, Inc. to GROWS /Tully (or alternate recycling facility)
ACM containing hazardous soil, concrete, and debris including PCB \geq 50 ppm (if encountered)	Stockpile in bermed soil storage area lined with 10 mil poly sheeting underlayment, separated from other waste streams, and covered with 6 mil poly	Horwith Trucks, Inc. to Waste Management, Model City
ACM containing petroleum impacted soils and debris	Stockpile in bermed soil storage area lined with 10 mil poly sheeting underlayment separated from other waste streams, and covered with 6 mil poly	Horwith Trucks, Inc. to GROWS/Tully
Remediation waste (PPE, poly, spent filters)	Double, labeled 6-mil poly asbestos waste bags, add to impacted soil/debris, or placed in sealed roll-off container.	Horwith Trucks, Inc. to GROWS/Tully
Underground Storage Tank	Render inoperable, clean and direct loaded for off-site disposal after decontaminating	Gershow Recycling Corporation Medford, NY
Residual Product from within the Underground Storage Tank	Direct loaded for off-site disposal at approved facility, after sampling results confirm product meets disposal facility requirements.	Clean Water of NY
Decant water/ Decontamination water/ Impacted Construction Water	Temporarily store in frac tanks	Clean Water of NY to Off-site disposal at approved facility, or filter and use to wet ACM containing soils prior to off-site disposal, or on-site filter/treatment to SPDES discharge requirements and direct discharge to Wallabout Channel
Coal Tar Wrap (CTW) Pipe	Stockpile with hazardous soil & debris	Horwith Trucks, Inc. to Waste Management, Model City with other hazardous soil & debris

7.3 Water Management Plan

The following procedures will be performed to assure that wastewater is appropriately handled:

1. Collect decontamination wastewater and impacted construction water using submersible pumps and pump wastewater into settling tank;
2. Dispose of wastewater off-site at approved facility or pump wastewater through the wastewater filter/treatment system, capable of up to 50 gallons per minute (gpm), consisting of 5 micron multi-bag filter skid. If the construction water is turbid, varying levels of filters may be added, ending ultimately with a 5 micron filter;
3. Once wastewater has been filtered, this water may be used to wet asbestos containing soils;
4. If water is to be discharged to the Wallabout Channel, an effluent sample will first be collected from the filter/treatment system. No water will be discharged to Wallabout Channel until the sample results are received and permit compliance is confirmed. All water will be held within a frac tank until compliance is confirmed; and
5. Transport collected sample to laboratory. Analyze sample per the requirements of the SPDES Permit; upon receipt of acceptable sample results, discharge treated water to Wallabout Channel in accordance with the existing SPDES Permit equivalent requirements, or use to wet asbestos containing soils. Upon receipt of unacceptable sample results, dispose of wastewater off-site at an approved facility in accordance with disposal facility requirements, or redesign the temporary onsite treatment system based on the laboratory test results and retreat wastewater and retest.

7.4 Spill Containment and Cleanup Program Plan

Stored substances will be kept in the containers provided by the supplier or manufacturer and securely stored. Safety Data Sheets (SDSs) for these substances will be maintained onsite as materials are brought to the site.

If the spill or release is determined to be within the on-site emergency response capabilities of the personnel, equipment, and materials on-site, the contractor's Site Supervisor will implement the necessary remedial action. If the accident is beyond the capabilities of the operating crew, the Site Supervisor will have all personnel not involved with emergency response activity evacuated from the immediate area. The spill or release area will then be roped or otherwise blocked-off to establish an exclusion zone and contamination reduction zone. The Site Supervisor will then evaluate what further actions are necessary and will review with Con Edison.

The following table identifies potential hazardous products, where they will be stored, and how they will be handled to prevent spill or release:

Material Name	Location Stored	Storage Requirements	Handling Requirements
Impacted Soil, Debris, and Wastewater			
Impacted Soil	Soil Storage Area	Store within lined area including poly or HDPE liner. Enclose with earthen berms. Cover soil stockpiles with poly. Enclose stockpile area with silt fence or hay bales, as necessary.	Restrict access to 40-hr trained and asbestos trained personnel. Handling requires Level C PPE.
Impacted Debris	Soil Storage Area	Store within lined area including poly or HDPE liner. Enclose with earthen berms. Enclose stockpile area with silt fence or hay bales, as necessary.	Restrict access to 40-hr and asbestos trained personnel. Handling requires Level C PPE.
Impacted Waste Water	Sumps and Frac Tanks	Grade Soil Storage Area to promote draining to collection sump. Enclose storage area with liner and berms. Assure liquids migrate to collection sump. Pump to frac tank.	Restrict access to 40-hr and asbestos trained personnel. Handling requires Level D PPE.
Contents of UST			
Contents of 1,500 gallon UST	Existing 1,500 gallon UST	TBD	Restrict to 40-hr trained personnel. Level D PPE.
Maintenance Products			
Heavy equipment grease cartridges	Kelley Storage Box*	Maintain boxes/containers intact and in dry condition. Properly dispose of empty cartridges, do not discard on ground or in work area.	Restrict use to mechanic or heavy equipment operator.
Heavy equipment oils	Kelley Storage Box*	Store in clearly marked drums.	Restrict use to mechanic or heavy equipment operator.
Gasoline (2 gal qty)	Kelley Storage Box*	Store in clearly marked cans.	Restrict use to trained personnel.
Diesel Fuel	Mobile Storage Tank	Store in clearly marked tank	Restrict use to trained personnel.

8.0 TRAFFIC CONTROL AND SITE ACCESS

The objectives of the site-specific Transportation and Traffic Safety Plan for the remedial construction at the Kent Avenue Generating Station site are based on the following work objectives:

- Pre-plan all work, including delivery of materials, or loading and removal of materials, to have the least intrusive impact upon the neighboring community;
- Perform delivery and removal of materials so as not to impede public vehicular traffic, or pedestrian bike or foot traffic;
- Schedule deliveries at times of low traffic volumes when practical;
- Schedule deliveries to occur such that the number of transport vehicles on-site at any specific time is minimized;
- Employ environmental controls to prevent fugitive dust during off-loading of imported fill, or loading of debris or sediment; and
- Perform the majority of on-site activities Monday through Friday, 7:00 am – 3:30pm.

8.1 Transportation and Traffic Safety Plan

The project is divided into two general activities: the North Remediation activities and the South Remediation activities. The Kent Avenue gate will be utilized during the North Remediation activities. A new Division Avenue gate will be installed for use during the South Remediation activities.

All regular truck drivers and delivery personnel will be given a safety briefing regarding the traffic safety plan. Trained traffic control personnel (flaggers) will be used to assist the truckers when entering and exiting the Site. They will stop traffic (bicycles, pedestrians, or vehicles) in a controlled manner to ensure the trucks can enter or exit in a safe manner. Trucks entering/exiting the Site via Division Avenue will be under the direction of the existing traffic light. This light should assist in the control of traffic and allow for safe entrance and egress. Flaggers will also be used on Division Avenue as needed.

Along Kent Avenue, as the truckers exit the site, due to their height in their cabs – they should be able to see along Kent Avenue and not have obstructed views. This, along with a flagger, will ensure a safe entry and exit from the site.

Trucks scheduled to pick up or deliver soil will be spaced out so as not to have multiple vehicles at any one time on the Site or in the surrounding areas. Trucks will stage in a non-congested area and await word from the Site as to when to proceed to the Site. Trucks will not be staged on any local streets. Typically trucks will have radios where they can communicate with each

other. For material loading and off-site disposal, it is estimated that approximately 14 to 18 trucks will enter and exit each workday during this portion of the project. This works out to about 2 trucks an hour. This low frequency will have a minimal impact on the existing traffic flow and congestion to the local area.

8.2 Decontamination of Trucks and Equipment Leaving the Site

Decontamination involves the orderly, controlled removal of contaminants. Standard decontamination sequences are presented in the examples below. Site personnel are expected to minimize contact with contaminants, when conceivable, in order to minimize the need for extensive decontamination. Personnel decontamination will consist of safe work practice, use of disposable PPE, personal hygiene, and personal decontamination before breaks and at the completion of each day.

A Contamination Reduction Zone will be established to perform controlled decontamination of equipment and personnel as they leave the Exclusion Zone. The Contamination Reduction Zone consists of three parts: Temporary Decontamination Pad, Remote Worker Decontamination Facility, and the Remote Waste Decontamination Facility. The Contamination Reduction Zone is shown in Figures 1 and 2.

Temporary Decontamination Pad

A water supply and a temporary decontamination pad will be established at the Site. The decontamination pad will consist of a polyethylene liner, a layer of stone, and earthen berms around the perimeter. A sump system will be installed to pump out and containerize wash water for off-site disposal or for filtration/treatment to SPDES discharge requirements prior to discharge to Wallabout Channel. The decontamination pad will be inspected once per day. All equipment and disposal trucks will be “wet” decontaminated prior to leaving the site. Cross contamination between areas in the Exclusion Zone will be prevented by cleaning heavy equipment, as necessary.

Remote Worker Decontamination Facility

A Remote Worker Decontamination facility will be established at the Site in accordance with NYCDEP asbestos regulations and site specific variances. The remote worker decontamination will include, at a minimum, separate areas for a clean room and a shower room separated by an airlock. Wash water will be collected and containerized for off-site disposal or for filtration/treatment to SPDES discharge requirements prior to discharge to Wallabout Channel.

Remote Waste Decontamination Facility

A Remote Waste Decontamination facility will be established onsite in accordance with NYCDEP asbestos regulations and site specific variances for any bagged waste that is generated. Wash water will be collected and containerized for off-site disposal or for filtration/treatment to SPDES discharge requirements prior to discharge to Wallabout Channel.

9.0 OFF-SITE TRUCKING ROUTES AND EMERGENCY PROCEDURES

Trucks entering and exiting the Site will not use Division Avenue east of Kent Avenue during school hours as there is a school located there. See truck routes below and Figure 3.

LOCAL TRUCK ROUTE TO SITE FROM I-278 WEST:

Take Exit 31 toward Wythe Ave / Kent Ave

Merge onto Williamsburg St. W

Right onto Kent Ave

500 Kent Ave (Project Site is on the left)

LOCAL TRUCK ROUTE TO SITE FROM I-278 EAST:

Exit 30 toward Flushing Ave

Straight onto Classon Ave

Take 2nd left onto Kent Ave

500 Kent Ave (Project Site is on the left)

LOCAL TRUCK ROUTE TO EXIT IMMEDIATE NEIGHBORHOOD:

Left on Kent Avenue (heading north)

Right on Broadway (heading East)

Right on Marcy Avenue (heading South)

Marcy turns into Williamsburg St. W

Williamsburg St. W becomes Williamsburg Place

Merge onto I-278.

9.1 Transporter Contingency Plan

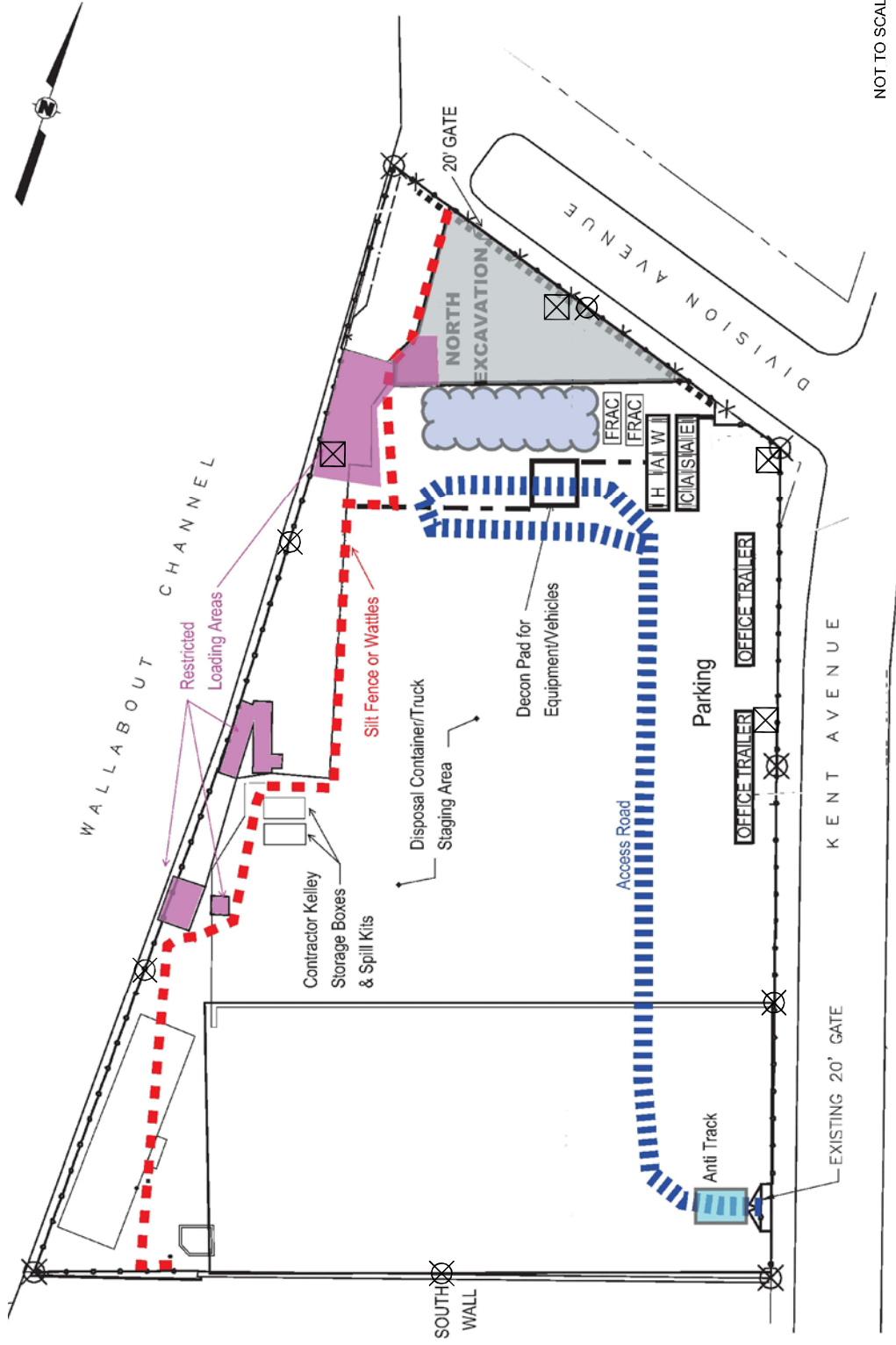
Horwith Trucks, Inc., (Horwith) will transport the soil to the disposal facilities. Horwith requires its drivers transporting contaminated materials to undergo training and pass a safe driver course. All vehicles will have the required permits and will be inspected and maintained prior to use.

In the event of a spill/ discharge or other emergency during delivery, transportation or pickup, the driver will immediately and safely take appropriate action to protect human health and the environment including:

- a. Secure the area to unauthorized access by people or other vehicles.
- b. Keep all sources of ignition (pipes, cigarettes, flares, etc.) away from the scene.
- c. Set up warning signals around the scene to prevent further accidents. Flame producing signals, such as flares, should not be used during incidents involving combustible or flammable materials.
- d. Attempt to contain the spill and stop or reduce the flow of the leak.
- e. Obtain help in the immediate area to assist in securing the site.

The driver will contact (or have a responsible person in the area call) Horwith via the numbers listed previously. The driver or alternate caller will provide Horwith with the information required. The driver is then to continue to monitor the scene and remain in contact with Horwith while an appropriate course of action is determined. The Horwith Emergency Contact, driver, or other authorized individual shall immediately contact Con Edison.

FIGURES



NOT TO SCALE

- LEGEND**
- ⋯ Barrier Wall
 - - - Extent of Regulated Area*
 - ▬ Silt Fence or Wattle
 - ▬ Access Road
 - ⊗ Remote Waste Decon
 - ⊗ Remote Worker Decon
 - ☒ Soil Storage Area**
 - ⊗ Approximate Location of Perimeter Asbestos Air Sampler
 - ⊗ Approximate Location of Perimeter Dust/Vapor Air Sampler

*Extent of Regulated Area may be modified during the project as areas are cleared.
 **Actual Limits of Soil Storage Area may be modified as project progresses.

- ASBESTOS MANAGEMENT / MONITORING:**
- NYCDPE PERMIT REQUIREMENTS:
 - DUST CONTROL (BARRIERS, WET SOIL, COVERED PILES)
 - AIR MONITORING
 - THIRD-PARTY SAMPLING/ANALYSIS AROUND WORK AREAS DURING SOIL REMOVAL
 - MULTIPLE ON-SITE UPWIND AND DOWNWIND MONITORING STATIONS/ SPECIFIC ASBESTOS FIBER TYPE ANALYSIS
 - WORK STOPPAGE AND CORRECTIVE ACTION IF ACTION LEVELS EXCEEDED
 - DATA REPORTS AVAILABLE TO THE PUBLIC WWW.CONED.COM/MGP
 - NYCDPE INSPECTION AND OVERSIGHT

- COMMUNITY AIR MONITORING PROGRAM (CAMP):**
- UPWIND/DOWNWIND SITE PERIMETER MONITORS (VAPORS/DUST)
 - CONTINUOUS MONITORING (RECORDED EVERY 15 MINUTES)
 - WORK STOPPAGE/CORRECTIVE ACTIONS IF EXCEED NYSDOH-SPECIFIED LIMITS ABOVE BACKGROUND (DECAD DOH NOTIFICATIONS)
 - DATA AVAILABLE ON THE WEBSITE WWW.CONED.COM/MGP (KENT AVENUE)

FIGURE 1
SITE LOGISTICS AND AIR MONITORING PLAN
 DURING NORTH REMEDIATION
 FORMER KENT AVENUE GENERATING STATION
 500 KENT AVENUE, BROOKLYN, NEW YORK



Address 500 Kent Ave
Brooklyn, NY 11249

Truck route to site
Truck route from site

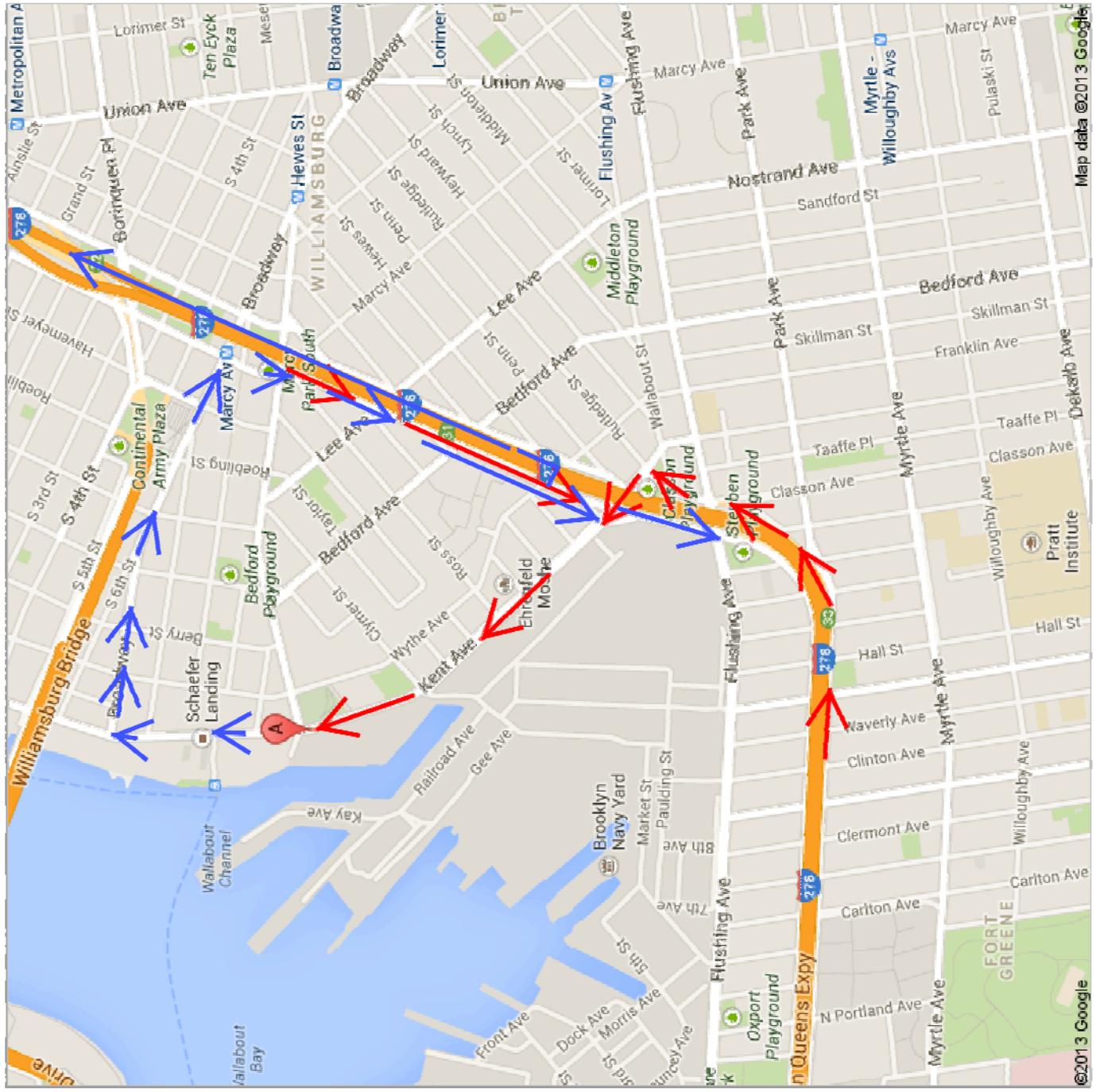


FIGURE 3

LOCAL TRUCK AND EQUIPMENT ROUTE
TO AND FROM PROJECT SITE
FORMER KENT AVENUE GENERATING STATION
500 KENT AVENUE, BROOKLYN, NEW YORK