



# LETTER OF TRANSMITTAL

Submittal No.:012A

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**MT JOB NO.** 13007     **Date:** 08/13/13

**RE:** Former Kent Avenue Generating Station  
Interim Remedial Measure  
500 Kent Avenue  
Brooklyn, New York  
  
**Purchase Order No. 4167052**

**WE ARE SENDING YOU**     **Attached**             **Other: As Below**

COPIES		DESCRIPTION	REVISED
1	<b>Spec:</b>	01330 SUBMITTALS	
	<b>Item:</b>	1.0.1.B.7 Odor Control Plan – <i>Revised</i>	
	<b>Author:</b>	Maxymillian Technologies, Inc.	

**THESE ARE TRANSMITTED as checked below:**

For approval     For your use     As requested     Return comments for distribution

**REMARKS:**

**TRANSMITTED ELECTRONICALLY**

**cc:** D.Rubin, M.Lombardi, T.O'Connell, F.Perez, C.Kraemer,  
S.Shatz, G.Houle, V.Palen, S.Kelley, C.Riccardi

**SIGNED** \_\_\_\_\_

**Sara Kelley, Project Engineer**

If enclosures are not as noted, please notify us at once.

# Odor Control Plan

## Kent Avenue Remediation Project Former Kent Ave Generating Station 500 Kent Ave Brooklyn, New York

Purchase Order No. 4167052

*Prepared For:*



Consolidated Edison Company of New York, Inc.  
4 Irving Place  
New York, New York 10003

*Prepared By*



1801 East Street  
Pittsfield, MA 01201  
MT Project No: 13007

August 2013

**MAXYMILLIAN TECHNOLOGIES, INC.**  
**Reviewed For Submission**

Spec Sect # 01330 Trans # 012A  
Date: 08/13/13 By: SJK

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## 1.0 INTRODUCTION

Consolidated Edison Company of New York, Inc. has contracted Maxymillian Technologies, Inc. (MT) to perform remedial construction activities at the Former Kent Ave Generating Station site located at 500 Kent Ave, Brooklyn, New York. MT has prepared this site-specific Odor Control Plan in accordance with Purchase Order No. 4167052, and specification entitled *Bid Specification for Interim Remedial Measure Former Kent Avenue Generating Station*, dated December 14, 2012.

Based on the bid specifications and materials expected to be encountered, MT does not anticipate odors to be an issue. However, MT has prepared this Odor Control Plan to identify and present Reasonable Available Control Measures (RACM) in the event that odorous materials are encountered. Dust Control methods as outlined in the Dust Control Plan, submitted under separate cover, outline additional methods used to control dust.

### 1.1 Contact Information

MT Contact Responsible for the Preparation of the Odor Control Plan:

Charles Riccardi – Manager of Engineering  
**Office:** 413-499-3050 ext. 294

MT Contact Responsible for the Submittal of the Odor Control Plan:

Sara Kelley – Project Engineer  
**Work:** 413-499-3050 ext. 253  
**Cell:** 413-829-1912

MT Contact Responsible for the Implementation of the Odor Control Plan:

James Smith –Site Supervisor  
**Cell:** 413-447-1229

## **2.0 SITE PLAN**

Total Area of Land Surface to be disturbed (see Site Logistics Plan, under separate cover):

- 2 Anti- Tracking Pads: approximately 20' x 15' each; 600 sq. ft total
- 2 Decontamination Pads: approximately 20' x 15' each; 600 sq. ft. total
- North Excavation Area: 5,250 sq. ft.
- South Excavation Area: 31,250 sq. ft.

Operations & Activities to be performed on the Site:

- Installation of decontamination areas for equipment & personnel;
- Installation of ACM critical barriers;
- Construction of stockpile area;
- Removal of soil, subsurface remnant structures, debris, and equipment from the North & South Excavation Areas;
- Removal of an existing Underground Storage Tank & contents from the North Excavation Area;
- On-site dewatering of the excavated materials;
- Disposal of soil, subsurface remnant structures, debris, and equipment;
- Off-site disposal of waste water to an approved facility, and/or filtration & treatment of waste water to the requirements of the existing Con Edison SPDES Permit equivalent and subsequent discharge of the treated water to the Wallabout Channel;
- Backfilling of the excavations with structural fill;
- Installation of rip rap and structural fill in undermined area in North Excavation, near old equipment room;
- Inspect remaining foundations, walls, and sidewalk vault and repair as directed;

### 3.0 COMPLIANCE

Con Edison’s on-site consultant will perform continuous real-time air monitoring for particulate matter/dust and volatile organic compounds (VOCs), monitor environmental conditions for visible emissions and odors, inspect and monitor MT’s work practices. Con Edison will provide its consultant’s compiled Community Air Monitoring Program (CAMP) data to the DEC and DOH in accordance with New York State reporting requirements.

MT will be monitoring work zone areas and will be utilizing the following instrument to monitor for VOCs. Measurements of total volatile organics will be taken using a Photoionization Detector (PID). In addition to monitoring for VOCs with a PID, MT will monitor for odors using olfactory senses. The VOC measurements will be compared to the action limits listed on the table below.

CONTAMINANT	ACTION LEVEL	ACTIONS REQUIRED
Volatile Organic Compounds (VOCs)	<p>&gt; 5 ppm (15 min TWA) above background</p> <p>&lt;5 ppm, &lt;25 ppm (15 min TWA) above background.</p> <p>&gt; 25 ppm (15 min TWA) above background</p>	<ul style="list-style-type: none"> <li>• Halt work activities and continue monitoring. If VOC levels decrease to &lt;5 ppm above background, work activities may resume.</li> <li>• If VOCs remain above 5 ppm above background, but below 25 ppm above background after work has been halted, the source of vapors must be identified, corrective actions taken to abate emissions and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the Site or half the distance to the nearest potential receptor or residential structure, whichever is less (but in no case less than 20 feet), is below 5 ppm over background for the 15-minute average.</li> <li>• If the VOC readings are above <b>25 ppm</b> at the work area, activities must be shutdown and the engineering controls and site work plan re-evaluated.</li> </ul>

TWA = time weighted average

VOC control measures shall be immediately implemented any time VOC readings persist above 5 part per million (ppm) above background for a 15-minute running average. Should CAMP VOC readings exceed 25 ppm, Con Edison’s Consultant shall notify MT to stop work until the problem is corrected.

Potential Sources of Odor while on-site

- The excavated material may be a source of odor;
- Stockpiles;
- Open Excavations;
- Any removed water may be a source of odor prior to treatment;
- Equipment;
- The Exclusion Zone.

#### 4.0 ODOR CONTROL MEASURES

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

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