7.0 REQUIREMENTS FOR MATERIAL MANAGEMENT ON CON EDISON PROPERTY

The purpose of this section is to provide guidelines for the management of materials in accordance with Con Edison requirements where applicable. Work on Con Edison property will meet their specific requirements in addition to the requirements of the Article VII Certificate Conditions.

7.1 Con Edison

Segment 23 passes thru Con Edison property at the Charles Poletti Substation (Astoria Annex) at the Astoria property (starting from 15th Avenue and 16th Avenue and continuing onto 31st Street to the NYPA GIS Building fence line). This work area will meet all Con Edison requirements as described below.

7.1.1 Soil Materials Disposal Off-site at Approved Disposal Facility

Per Section 5.0, materials will be disposed at NYSDEC and NYSDPS approved off-site disposal locations, as needed. Soils that are generated on Con Edison property will be transported and disposed of at a Con Edison approved disposal facility (see Table 5-1) by a Con Edison approved transport company (see Table 4-1).

7.1.2 <u>Soil Sampling</u>

Soil sampling procedures are described in Section 6.1. In addition to this procedure, the Certificate Holders will coordinate with Con Edison to obtain access to their property for soil sampling of the roll-offs for purposes of characterization and off-site transportation and disposal.

<u>Site Notification</u> - In addition to the procedures outlined above, work on Con Edison property will be performed in accordance with *Non-Hazardous Waste Management General Environmental, Health and Safety Instruction E05.13 for Management of Soils, Groundwater, and Debris from Excavations and Subsurface, Structures at the Astoria Complex (GEHSI E05.13), dated May 8, 2023, and the Con Edison Environmental Health and Safety (EH&S) Remediation Division and New York State Department of Environmental Conservation (NYSDEC) notification requirements. In accordance with the GEHSI E05.13, a Site Work Notification Form will be prepared by the corresponding responsible parties and submitted to Con Edison in coordination with the NYSDEC. Notification by the Contractor to Con Edison*

and NYSDEC will be made within at least 7 days prior to mobilization. Backfill material will be in accordance with the EM&CP; the material meets the requirements of DER 10 and shall be submitted to DEC for approval via Intrusive Work Request Form which includes the particle analysis and any chemical testing data.

<u>Environmental Health and Safety</u> - The Contractor will implement the work on Con Edison property in accordance with the existing Con-Edison-accepted Health and Safety Plan. Intrusive site activities will be conducted in modified Level D PPE to minimize dermal contact with potentially hazardous levels of soil (including Tyvek coveralls, boot covers, and nitrile gloves). In the event that a PPE upgrade will be required, the Contractor will communicate this with CHPE and coordinate this with the appropriate stakeholders to gain concurrence.

Per GEHSI requirements, the Contractor will provide continuous worker breathing zone monitoring during all site intrusive activities that includes monitoring for total volatile organic compounds (VOCs) using one photoionization detector (PID) and total particulates measured in PM-10 using one handheld TSI DustTrak[™] device. In addition to the worker breathing zone, CAMP air monitoring will also be put into effect to monitor for any potential airborne contaminants. Contractor is to generate and submit weekly summary reports to the facilities for record.

<u>Construction</u> – During the excavation for the installation of the ductbank within Con Edison property, the Contractor will utilize either hand digging and/or vacuum truck. The excavated material will be loaded into lined roll-offs and temporarily staged on Con Edison property. roll-offs will be tarped and labelled as pending analyses. Once staged the soils are to be characterized and tagged for sampling in order to correlate the samples with the area from which they were excavated from.

<u>Sampling for Waste Disposal</u> – The soil generated from excavation activities on Con Edison property will be sampled and tested for the following parameters as outlined below:

The Contractor or its subcontractor will collect a maximum of three composite and three grab soil excavated materials, in accordance with the GEHSI requirements for disposal for each 100 to 200 cubic yards of generated soils for each roll off. Each roll off will be treated as a separate stockpile and sampled accordingly. The composite samples will be analyzed for Polychlorinated Biphenyls (PCBs), Toxicity Characteristic Leaching Procedure (TCLP) Metals, and TCLP semi-volatile organic compounds (SVOCs). The grab sample samples will be collected for TCLP volatile organic compounds (VOCs). If NAPL, sheen or MGP odors are detected from

the excavated soil, then the soil sample will undergo manufactured gas plan (MGP) fingerprinting. Soil samples will be analyzed by a New York State Environmental Laboratory Accreditation Program (ELAP) certified laboratory, and the samples will be submitted on the laboratory's expedited turnaround time (TAT). After receiving the laboratory analytical data, the Contractor will submit the data to Con Edison, NYSDEC, and NYSDPS with a comparison to applicable soil clean-up objectives, and with a proposed disposal location for concurrence. Only Con Edison approved disposal facilities will be utilized for this material.

7.1.3 Off-site Disposal of Non-soil Materials

Off-site disposal of non-soil materials is described in Section 8.0 below. In addition to this plan, coordination with Con Edison regarding transportation and disposal of all waste types (i.e., hazardous, non-hazardous, etc.) from their property will be required including providing the necessary document for review and approval (e.g., disposal manifest or Bill of Lading (BOL)).

7.1.4 Groundwater

During Excavation, well-points shall be installed at sufficient spacing to adequately de-water any open excavations. Well-points will pump any groundwater that accumulates into Frak Tanks that are to be staged near the area of excavation. Water is to be tested and characterized prior to disposal at ConEd approved facilities.