Work Plan for PCB Sampling

Con Edison Farrington Street Yard Security Fence Project 31-24 Farrington St. Flushing, N.Y. 11354 EPA ID #: NYP005246667

Parsons has prepared this work plan on behalf of Consolidated Edison Company of New York, Inc. ("Con Edison") to outline the proposed interim polychlorinated biphenyl (PCB) sampling to be conducted at the Former Farrington Street Gas Works Site located in Queens, New York (the "Site"). The purpose of the proposed field work is to obtain analytical laboratory data for the characterization of Site soils located within areas to be disturbed during excavation activities to the extent necessary for interim efforts to make the Site safe and secure from potential external access. The original scope of the Site security fence upgrade project was to upgrade the Site's perimeter fence system to a higher and more secure system that also included perimeter concrete curbing, Site re-grading and automated access gates. The field activities associated with the security upgrade project are currently on hold due to the identification of PCB-impacted Site soils. Prior to the initiation of further excavation activities needed to make the site safe and secure, in-situ sampling for characterization of PCBs in Site soils will be completed.

At this point in time, Con Edison does not intend to compete the original scope of the Site security fence upgrade project until a full Site Characterization field program for PCB impacts is implemented at the Site. In the interim, Con Edison plans to complete specific limited aspects of the upgrade project to the extent necessary make the Site safe and secure from potential external access in the interim. The soil analytical data collected for these limited intrusive activities will be utilized for the development of a work plan associated with full PCB Site Characterization field activities.

1.0 Scope of Work

To date prior to the work stoppage, fence footings and curb installations have been completed on the northern boundary of the Site along 31st Drive, on the eastern boundary of the Site along Farrington Street, and on the southern boundary of the Site along 32nd Avenue east of the 1-story structure, as presented in Figure 1.

Following identification of PCB-impacted Site soils, intrusive field activities associated with Site security fence upgrade activities were halted pending development of future work plans to address PCB-impacted materials at the Site. In the interim, specific limited aspects of the upgrade project to make the Site safe and secure from potential external access will be conducted along the western and southern areas of the Site and in vicinity to the Site entrance located along Farrington Street. Some Site soils will be disturbed during intrusive activities in limited areas during the interim fence upgrade activities. Limited excavations areas are presented on Figure 1, and consist of the following as described further in the sections below:

• Southwestern corner and western 32nd Avenue area, adjacent to Byrd's Alley and 32nd Avenue, to allow for installation of perimeter security fence features;



- Eastern 32nd Avenue area, along 32nd Avenue, to allow for completion of curbing section;
- Entrance gate area in northeastern section of Site, adjacent to Farrington Street, to allow for installation of sliding gate components, and
- Tree stump removal area in northeast corner of Site, at the corner of Farrington Street and 31st Drive, to properly grade northern edge of Site.

Figure 1 presents the conceptual sampling plan to be implemented during these specific limited Site activities that will require excavation of soils. This sampling plan will characterize soils within work areas to determine "as found concentrations" of PCBs prior to disposal, as necessary.

All field sampling will be conducted utilizing in-situ sampling techniques to determine "as found concentrations" of PCBs. The in-situ sampling will be performed in advance of the excavation activities. Under each sampling plan, a field sketch will be maintained indicating the location and depth of all collected samples. The proposed sampling is designed to meet the substantial requirements of PCB Site Characterization requirements specified in 40 CFR §761.61(a)(2) and Subpart N. Soil samples collected during the implementation of this sampling plan will be submitted to a New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP) approved laboratory for analysis of polychlorinated biphenyls (PCBs) via EPA Method 8082A.

2.0 Field Sampling Plans

The proposed sampling plans and locations are as detailed in the following sections. Soil samples will be collected from each proposed sample location and submitted for analysis of PCBs by a NYSDOH ELAP approved laboratory certified for analyses using the most recent Analytical Services Protocol (ASP). Depending upon the depth of the excavation, which will not exceed 24-inches below ground surface (bgs), either one (1) or two (2) soil samples will be collected from each sampling location. In locations where one (1) soil sample is proposed to be collected, the top 6-inches of soil will be sampled. In locations where two (2) soil samples are proposed to be collected, the first soil sample will be collected at the surface of the excavation areas to a depth of 6-inches to 12-inches below ground surface (bgs) in bare soil areas] and the second soil sample will be collected at the bottom 6-inch interval of the planned excavation depth (e.g., for 24-inch deep excavations, the soil sample will be collected from 18- to 24-inches bgs). Additional soil samples will be collected between these two soil sample intervals if visual impacts and odors are observed within these middle depth intervals during the excavation or soil sampling activities.

Based on analytical results for the bottom soil samples collected from within the planned excavations, Con Edison may elect to collect additional soil samples at depths below the planned excavation depths. This additional data will be collected for subsequent Site characterization planning purposes.



2.1 Regrade Areas (Areas A through S)

An approximately 210-feet by 3-feet area within the southwestern portion of the Site will be regraded, with excavation reaching a maximum depth of 1-feet bgs. Regrading this area will form a level base for jersey barricades (or similar) on which the modified interim security fence will be anchored. Intrusive activities in this portion of the Site include tree and stump removal to facilitate placement of the jersey barricades. In-situ soil sampling will be utilized in this area of the Site.

As depicted on Figure 1, this area will be divided into sampling areas approximately 10-feet in length (Areas A through S). Within each sampling area, in-situ soil samples will be collected from the surface soils at depth intervals of 0-inches to 6-inches (or at a 6-inch interval immediately below a gravel subbase or asphalt/concrete cover), and from the bottom 6-inches of each excavation.

2.2 Curb Area (Areas T and U)

An approximately 12-feet by 3-feet area will be excavated to a maximum depth of 24-inches along the southern boundary of the Site for additional necessary curb installation. The total depth of excavation may vary based on the depth of originally advanced excavation, however the total depth of excavation upon completion will be 24-inches bgs or less.

As depicted on Figure 1, this area will be divided into two (2) sections (Areas T and U), and insitu soil samples will be collected in each section from 6-inches to 12-inches bgs or at a 6-inch interval immediately below a gravel subbase or asphalt/concrete cover), and from the bottom 6inches of each excavation.

2.3 Entrance Gate Area (Areas V and W)

An approximately 20-feet by 7-feet area in the northeastern portion of the Site will be regraded to a depth of 6-inches bgs to support necessary installation of a slide gate.

As depicted on Figure 1, this area will be divided two (2) sampling areas (Areas V and W). Within each sampling area, in-situ soil samples will be collected from the surface soils at depth intervals of 6-inches to 12-inches bgs (or at a 6-inch interval immediately below a gravel subbase or asphalt/concrete cover), and from 18-inches to 24-inches bgs.

2.4 Tree Stump Area (Area W)

Fence installation has been completed along the northern and eastern boundaries of the Site prior to the work stoppage, however the previous Site fence remains in place along northern Site boundary along 31st Drive. The previous Site fence will be removed, and as such a tree stump located immediately north of the new security fence will be removed to allow for grading of this area.

Tree stump removal will include an excavation of an approximately 3-feet by 3-feet area. Excavations associated with tree stump removal will be limited to a depth of 6-inches. Prior to tree stump removal, one (1) in-situ soil sample will be collected from the surface soils at depth intervals



of 0-inches to 6-inches bgs (or at a 6-inch interval immediately below a gravel subbase or asphalt/concrete cover).

2.5 Material Management for Off-site Disposal

Soils generated during excavation activities will be stockpiled in a secure part of the Site as designated by Con Edison. The entire generated stockpile(s) will be presumed and managed as PCB soil \geq 50 ppm and will be transported and disposed off-site at a Con Edison approved disposal facility for TSCA chemical waste in accordance with 40 CFR §761.61(a)(5)(i)(B)(2). The generated soil stockpile(s) also will be sampled to determine RCRA waste characteristic requirements for profiling to a Con Edison approved RCRA permitted disposal facility. Composite samples and grab samples will be collected for RCRA Toxicity Characteristic Leaching Procedure (TCLP) and other analyses determined by the Con Edison approved laboratory and the analytical parameters will be based on the requirements of the Con Edison approved laboratory and the analytical

The total number of composite samples and discrete grab samples will be determined based on the estimated volume of soil generated during excavation activities.

2.6 Decontamination

Equipment and tools used during soil sampling will be decontaminated between sampling locations to minimize the potential for cross contamination between the locations, as PCB concentrations will be unknown at the time of sampling. Non-disposable and non-porous equipment such as hand augers will be decontaminated after each use. Decontamination of excavation and material management equipment after excavation activities and prior to equipment removal from the Site will be performed using hand-wiping with appropriate solvent in accordance with decontamination procedures required under 40 CFR 761.79, or by using the double wash/rinse method for decontaminating non-porous surfaces under 40 CFR 761 Subpart S. These decontamination procedures are outlined below. Disposable equipment and porous material such as polyethylene sheeting will be managed in accordance with Section 2.8.

Following characterization, excavation and material management equipment used to excavate soils will not be decontaminated when working between excavation areas as soils generated during excavation will be managed as PCB soil \geq 50 ppm, as specified in Section 2.5. Excavation and material management equipment will be decontaminated as indicated below, following completion of excavation activities and before leaving the Site. Additionally, excavations using like equipment will proceed in order of least- to most-impacted, to the extent practicable, based on PCB laboratory analytical results.

Sampling Equipment:

Prior to and after soil sampling, all non-dedicated sampling equipment (e.g., hand augers, bowls, spoons, etc.) will be decontaminated prior to sample collection. The decontamination procedure for all non-disposable sampling equipment will consist of the following double wash/rinse procedure:



APPENDIX A – WORK PLAN FOR PCB SAMPLING CON EDISON FARRINGTON STREET YARD SECURITY FENCE PROJECT EPA ID #: NYP005246667

- 1. Scrub with potable water and a citrus based solvent (e.g., CitriKleen HD, terpene hydrocarbons, etc.).
- 2. Rinse with potable water.
- 3. Rinse with citrus based solvent.
- 4. Rinse with deionized water.

Between rinses, non-dedicated sampling equipment will be placed on polyethylene sheets or aluminum foil, if necessary. At no time will washed sampling equipment be placed directly on the ground. Soil sampling tools will be wrapped in polyethylene plastic or aluminum foil when transporting between the excavation areas. Decontamination will take place at the sampling location and all liquids will be initially contained in pails, buckets, etc. prior to being containerized on-site in 55-gallon Department of Transportation (DOT) approved drums and labeled appropriately.

Excavation and Material Management Equipment:

Upon completion of the excavations and prior to the equipment or tools leaving the Site, equipment and tools will be wiped down to remove any material accumulated on the equipment and decontamination using the double wash/rinse procedure with citrus based solvent will be performed, to include the following:

- 1. Scrub with undiluted citrus based solvent for one minute.
- 2. Rinse with potable water (1 gallon per square foot).
- 3. Rinse with citrus based solvent.
- 4. Rinse with potable water.

Spent decontamination wash and rinse liquids generated during sampling, excavation, and material management equipment decontamination will be containerized on-site in 55-gallon DOT approved drums and labeled appropriately. Disposal of spent equipment decontamination liquids are discussed in Section 2.8.

2.7 Backfilling Excavations

Excavations will be backfilled with Con Edison approved stone material brought on-site from New York State Department of Transportation (NYSDOT) approved quarries. This stone is being used as a subbase for the concrete structures/features associated with the security fence installation project and as cover material for areas of the Site that are regraded. To minimize the potential for comingling of the different materials, a geotextile fabric will be placed in excavation areas between the stone backfill material and the underlying Site soils.

Previously initiated excavations on the western boundary of the Site, along an approximately 230feet length of Byrd's Alley, will be backfilled with certified clean gravel/stone material prior to completion of the fence upgrade activities. Curbing will not be installed in this area as originally intended. Rather a perimeter berm of the certified clean gravel/stone material will be backfilled along the base of the new fencing in this area of the Site following placement of a geotextile fabric layer.



2.8 Management of Investigation Derived Waste

Soil samples will be collected manually using hand tools. Any excess soil from the sampling process will be returned to the sample location. Soils disturbed during sample collection activities will be within the limited planned excavation areas for making the Site safe and secure and will ultimately be managed with construction related impacted soils as presumed PCBs \geq 50 ppm and in accordance with Section 2.5.

Liquid waste generated during decontamination of equipment will be placed in closed-top 55gallon DOT approved drums and labeled appropriately. The liquid waste will be sampled for analytical parameters based on the requirements of the Con Edison approved disposal facility(ies). The drums will be staged on a drum storage pad consisting of pallets located on plastic (minimum 3 millimeters thick) and bermed with timber or plastic piping. Used plastic sheeting from the drum storage pad and decontamination efforts, personal protective equipment, and disposable sampling equipment not decontaminated will be consolidated in DOT-approved drum(s) and disposed offsite as PCB soil \geq 50 ppm at a Con Edison approved disposal facility for TSCA chemical waste.

The drum storage pad will be in a secure area of the Site as determined by Con Edison and facility representatives prior to proper characterization and disposal. Liquids generated during investigation activities will be managed in accordance with NYSDEC DER-10 Technical Guidance for Site Investigation and Remediation.

2.9 Community Air Monitoring Plan

A Community Air Monitoring Plan (CAMP) will be implemented during all intrusive operations completed at the Site in association with PCB characterization sampling and excavations for Site security fence upgrade activities. Upwind and downwind air monitoring stations will be established, and ambient air will be monitored continuously for particulates, volatile organic compounds (VOCs), and hydrogen cyanide. In addition, time weighted average (TWA) air samples will be collected for PCBs. Action levels for each monitored constituent and laboratory analytical methods associated with analysis of airborne PCB concentrations will be detailed in the Site-specific Health and Safety Plan (HASP).



FIGURE





LEGEND: - REGRADE SAMPLING AREA (AREAS A THROUGH S) - CURB SAMPLING (AREA T & U) - ENTRANCE GATE SAMPLING AREA (AREAS V & W) - TREE STUMP AREA (AREA X)

NOTES:

- 1. LABELS ATTRIBUTED TO GRID CELLS INDICATE THE AREA IN-SITU SAMPLE ANALYTICAL DATA WILL BE ATTRIBUTED TO.
- 2. FENCE POST LOCATIONS SHOWN AS SPECIFIED IN CON EDISON DRAWING 604291-00 AND DO NOT REPRESENT AS-BUILT CONDITIONS AT THE SITE.

