November 25, 2013
Revised December 4, 2013
GEI Project 1330710

Ms. Elizabeth Lukowski
Division of Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233-7014

Geotechnical
Environmental and
Water Resources
Engineering

Re: Monitoring Well Decommissioning
OU2 Nyack Former MGP Site
NYSDEC Site # 3-44-046

Dear Ms. Lukowski:

GEI Consultants, Inc., P.C. (GEI), on behalf of Orange and Rockland Utilities, Inc. (O&R), is submitting this Work Plan for decommissioning monitoring wells located on Operable Unit 2 (OU2) of the Nyack MGP site in Nyack, New York.

The remediation of OU2 of the Nyack MGP site will begin in the late fall of 2013. Three existing monitoring wells will need to be decommissioned because the wells are located in areas where soil excavation and in-situ soil stabilization (ISS) will be performed.

Field Activities

The locations for wells MW10S, MW40, and MW42 are shown on the attached figure. Borelogs for the wells are included in Attachment A. The wells will be decommissioned using methods described in the document entitled "*NYSDEC CP-43: Groundwater Monitoring Well Decommissioning Policy,"* dated November 3, 2009. The NYSDEC document is included in Attachment B. We will be performing this work under the Community Air Monitoring Plan submitted with the Pre-Design Investigation Work Plan, dated March 26, 2012, included as Attachment C.

MW10S

The stick-up well casing and concrete surface seal for this well will be removed. The well riser will be pulled as specified in CP-43. The borehole will then be over-drilled with a rotosonic drill (6-inch diameter sonic casing). The borehole annulus will then be filled with a cement bentonite grout as the rotosonic tools are removed from the borehole. The grout-filled borehole will extend approximately 2 foot into the top of the bedrock unit to over-drill the well sump and seal the borehole (see borelog for MW10S in Attachment A). The ISS will then extend down to the top of bedrock in the area of this well.

MW40

The flush-mount concrete surface seal for the well will be removed. The well riser will be pulled as specified in the guidance document. The borehole will then be over-drilled with a rotosonic drill (6-inch diameter sonic casing). The grouted borehole will extend down into the bedrock to a total depth of 20 feet, to over-drill the well sump and seal the borehole (see borelog for MW40 in Attachment A). The ISS will then extend down to the top of bedrock in the area of this well.

GEI Consultants, Inc., P.C.
1301 Trumansburg Road, Suite N, Ithaca, New York 14850
607.216.8955 fax: 607.274.7577

MW42

The surge from Hurricane Sandy destroyed the concrete surface seal and well pad for this monitoring well. The dislodged concrete surface seal is now located approximately 20 feet west of the original well location. An attempt will be made to locate and uncover the subsurface portion of the well (PVC well riser) at the original well location. A tape measure and GPS unit will be used to identify the location of the well. Shovels or other hand tools will be used to scrape the soil cover at the well location to attempt to find the PVC well riser. If the well riser can be located, it will be pulled with the rotosonic drill rig. The borehole will then be over-drilled and the borehole annulus will then be filled with a cement bentonite grout.

As was recently discussed with the Department, if the subsurface portions of MW42 are not found, and the well is not properly decommissioned, the subsurface features of this well will be left in place until site remediation, where the ISS in this area will address soil down to a depth of approximately 5 feet below the well sump depth. The conditions identified, and the actions taken will be summarized in the project completion report.

Schedule and Reporting

Following approval of this Work Plan by the NYSDEC, the field activities will be scheduled. As required by the NYSDEC, notification will be provided to the Department within 10 working days of the field work.

After completion of the field work, information summarizing the decommissioning activities will be included in the project completion report. The summary information will also be submitted to Rockland County Health Department (RCDOH), as required by the RCDOH permit which will be obtained for this task.

If you have any questions, please do not hesitate to contact me at (607) 216-8958. Please direct the Department's official response to Maribeth McCormick, O&R's MGP program project manager.

Sincerely,

GEI CONSULTANTS, INC., P.C.

James Edwards, C.P.G.
Senior Geologist / Project Manager

JHE:mlr

Attachments: Site Figures
Attachment A – Borelogs
Attachment B – NYSDEC CP-43: Groundwater Monitoring Well Decommissioning Policy
Attachment C – Community Air Monitoring Plan

c: Jeffrey Peifer, P.E. – Orange and Rockland Utilities, Inc.
Maribeth McCormick – Orange and Rockland Utilities, Inc.
Paul Jansen – GEI

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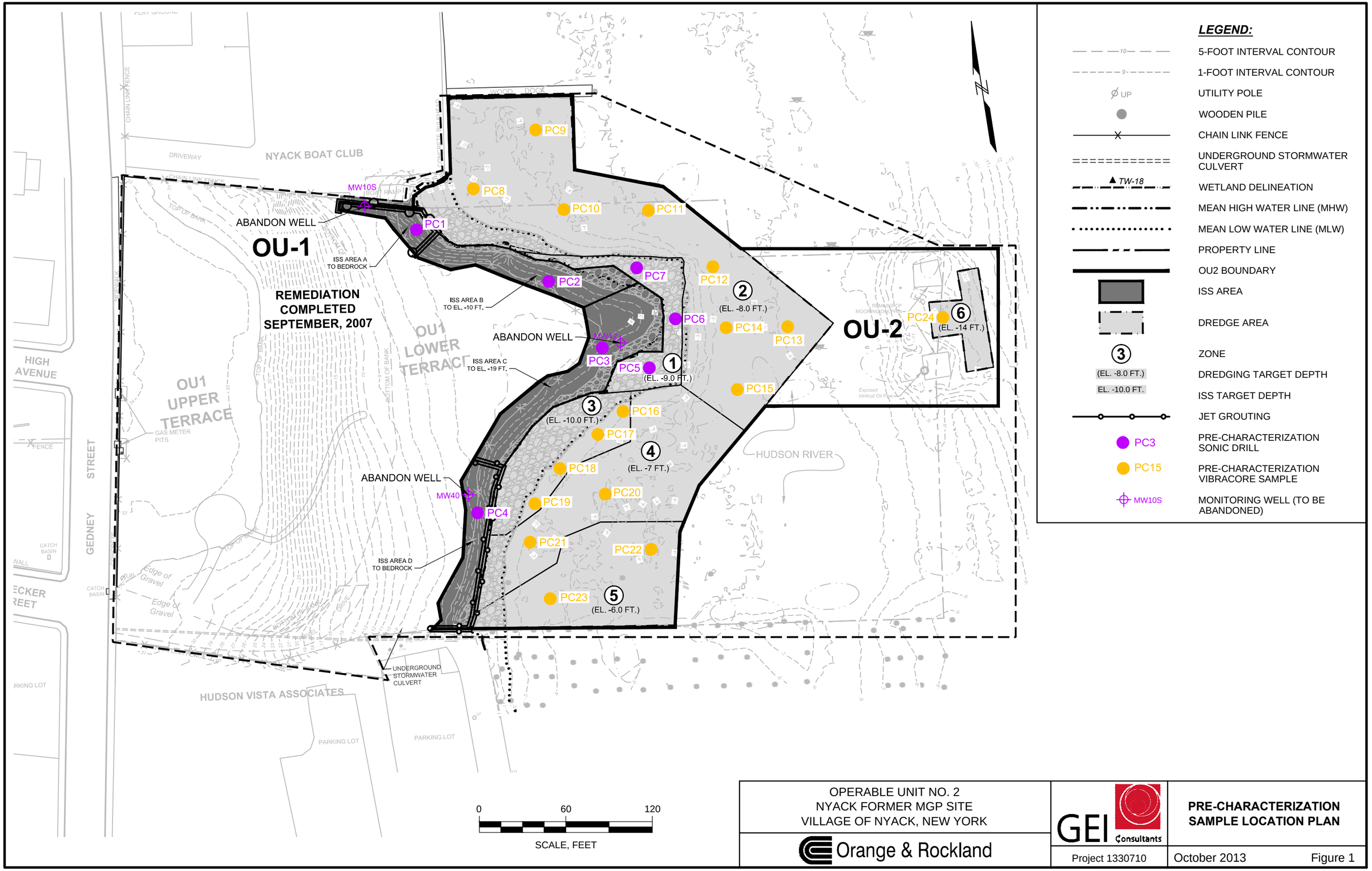
Figures



LEGEND:

- 5-FOOT INTERVAL CONTOUR
- 1-FOOT INTERVAL CONTOUR
- UTILITY POLE
- WOODEN PILE
- CHAIN LINK FENCE
- UNDERGROUND STORMWATER CULVERT
- WETLAND DELINEATION
- MEAN HIGH WATER LINE (MHW)
- MEAN LOW WATER LINE (MLW)
- PROPERTY LINE
- OU2 BOUNDARY
- ISS AREA
- DREDGE AREA
- ZONE
- (EL. -8.0 FT.) DREDGING TARGET DEPTH
- EL. -10.0 FT. ISS TARGET DEPTH
- JET GROUTING
- PC3 PRE-CHARACTERIZATION SONIC DRILL
- PC15 PRE-CHARACTERIZATION VIBRACORE SAMPLE
- MW10S MONITORING WELL (TO BE ABANDONED)

OPERABLE UNIT NO. 2
NYACK FORMER MGP SITE
VILLAGE OF NYACK, NEW YORK

Orange & Rockland

GEI Consultants

PRE-CHARACTERIZATION SAMPLE LOCATION PLAN

Project 1330710 | October 2013 | Figure 1

I:\Project\ORANGE & ROCKLAND\Nyack\Precharacterization\Nyack-Precharacterization.dwg

Attachment A

Borelogs

ENSR | AECOM
1001 West Seneca Street, Suite 204
Ithaca, New York, 14850

Well ID: MW42

Project Name: Nyack OU2 MGP Investigation
Project Number: 05090-022
Date Started/Completed: May 28, 2008
Boring Location: Intertidal zone in the jetty area
Drilling Company: Northstar Drilling Ltd.

Drilling Method: Direct Push/Auger
Sampling Method: Macro-core
PVC/Ground Elevation (ft/msl): 6.17 / 3.91
Total Depth: 26.0 ft bgs
Logged By: Jesse Lloyd

Depth (Feet)	Recovery (Feet)	RQD (%)	Sample ID	Sample Interval	Lithology	USCS	Visual Impacts	Geologic Description	Remarks	Well Construction
0						Fill		Brown fine SAND, some silt; dry.	Stick-up protective well casing Bentonite seal from 0-1 ft bgs Sand pack from 1-12 ft bgs 2", 0.020 slotted PVC screen from 2-12 ft bgs Well sump with bentonite seal from 12-14 ft bgs	
-2	2.3	0.5	MW42 (2-4)					Hydrocarbon-like staining and strong hydrocarbon-like odor from 2.0-3.0 ft bgs. CINDERS and ASHES, little fine sand; wet, hydrocarbon-like odor.		
-4		28.2						CINDERS, trace gravel and fine to medium sand; wet.		
-6	2.0	1.9						Hydrocarbon-like odor from 6.0-8.0 ft bgs.		
-8		3.0						CINDERS, trace gravel and fine to medium to coarse sand; wet.		
-10	1.0	3.5								
-12	1.2	4.1						Black CLAY and CINDERS; slight hydrocarbon-like odor; wet.		
-14		0.0	MW42 (14-16)			ML		Grey SILT, trace shells; moist, firm. Lens of fine sand from 15.2-15.6 ft bgs.		
-16	1.3	0.5								
-18		0.7						Grey SILT; moist, firm.		
-20	1.1	0.3								
-22										
-24	0.4	0.4						Boring terminated at 26.0 ft bgs.		
-26										

Coal Tar or Coal Tar NAPL Saturated Soil

Hydrocarbon Staining, Hydrocarbon Sheen or NAPL Blebs

Comments: Soil samples MW42(2-4) and MW42(14-16) were analyzed for VOCs, SVOCs, RCRA metals, and total cyanide. Soil sample MW42WC(1-14) was analyzed by a suite of analyses for waste characterization.

ENSR | AECOM
1001 West Seneca Street, Suite 204
Ithaca, New York, 14850

Well ID: MW40

Project Name: Nyack OU2 MGP Investigation
Project Number: 05090-022
Date Started/Completed: May 21, 2008
Boring Location: Shoreline/Tar lagoon area
Drilling Company: Northstar Drilling Ltd.

Drilling Method: Direct Push/Auger
Sampling Method: Macro-core
PVC/Ground Elevation (ft/msl): 7.53 / 7.82
Total Depth: 19.0 ft bgs
Logged By: Jesse Lloyd

Depth (Feet)	Recovery (Feet)	PID (ppm)	Sample ID	Sample Interval	Lithology	USCS	Visual Impacts	Geologic Description	Remarks	Well Construction
0	1.0	0.0				Fill		Brown medium to coarse SAND, some gravel, trace silt; moist.	Flush mounted curb box	
-2		0.0							Bentonite seal from 0-6 ft bgs	
-4	1.0	0.4						Brown fine SAND and SILT, coal fragments at 6.5 ft bgs; moist.		
-6		0.2				SM		Brown fine SAND and SILT; moist	Sand pack from 6-18 ft bgs	
-8	1.0	0.1								
-10		0.9						Brown fine SAND and SILT; wet.	2", 0.020 slotted PVC screen from 8-18 ft bgs	
-12		16.8						Dark brown fine SAND; wet, hydrocarbon-like odor. Black hydrocarbon-like staining from 11.7-12.0 ft bgs. Some dark brown non-viscous NAPL and hydrocarbon-like sheen from 12.0-15.0 ft bgs.		
-14	1.3	153								
-16		127						Hydrocarbon-like odor from 15.0-16.0 ft bgs.		
	1.4	461	MW40 (16-17.4					Dark brown fine SAND; some dark brown non-viscous NAPL and hydrocarbon-like sheen from 16.0-17.4 ft bgs. Refusal at 17.5 ft bgs.	Well sump with bentonite seal from 18-19 ft bgs	
-18	NA	NA				Sand-stone		Augered into the bedrock from 17.5-19.0 ft bgs to set the well sump. Boring terminated at 19.0 ft bgs.		

Coal Tar or Coal Tar NAPL Saturated Soil

Hydrocarbon Staining, Hydrocarbon Sheen or NAPL Blebs

Comments: Soil sample MW40(16-17.4) was analyzed for VOCs, SVOCs, RCRA metals, and total cyanide.
Soil sample MW40WC(8-17.4) was analyzed by a suite of analyses for waste characterization.

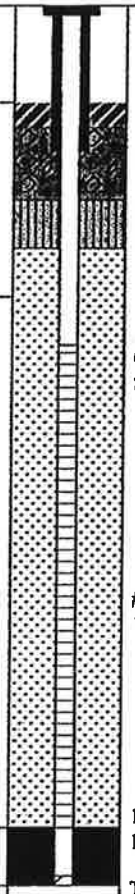
ThermoRetec
1001 West Seneca Street, Suite 204
Ithaca, New York 14850-3342

Well ID: MW10S

Project Name: Nyack MGP Site
Location: Onsite
Project Number: ORAN2-04301
Date Completed: 5-21-01
Drilling Company: Advanced
Drilling Method: Hollow Stem Auger
Sampling Method: Continuous Split Spoon

Boring Location: Onsite
Ground Elevation (ft/MSL): 9.36
PVC Elevation (ft/msl): 11.36
Total Depth (ft): 16.3
Auger/Casing ID (in): 4 1/4 ID
Water Level During Drilling (ft/bgs): 9.8
Logged By: Chris Doroski

Depth (Feet)	Recovery (feet)	Laboratory Sample ID	Blow Counts	PID (ppm)	USCS Symbol	Geologic Description
0	0.5		1-5-15-8	1.6	SM	Silt with fine-medium sand and trace cobbles. Brown-red, damp, firm.
-2	1.0		7-6-9-8	1.8	SM	
-4	1.0		10-12-12-13	2.2	GM	Fine gravel with fine-medium sand and trace silt. Black, saturated, firm.
-6	1.5		11-12-12-12	1.5		Seams of clinker-like material mixed with sand from 5-11.0 ft.
-8	1.5		10-9-10-13	1.6	GM	
-10	1.0		4-7-10-21	2.0		
-12	0.5	MW10S (12-14)	100/.4	14.3	GM	Hydrocarbon-like odor and sheen at 13.0 ft. Visible heavy sheen on drilling tools.
-14	0.3		N/A		ROCK	Driller Reports bedrock at 15.0 ft.
-16	N/A					Boring Complete at 16.0 ft.
-18						
-20						



Locking Protective Stickup
Grouted Annulus
Bentonite Seal 2.0-3.0 ft.
0.020 Slot 2" PVC Screen 5.0-15.0 ft.
1 Sand Pack 3.0-16.0 ft
1 ft DNAPL Sump 15.0-16.0
Threaded End Plug

Remarks:
Laboratory Sample: MW10S (12-14)

Attachment B

NYSDEC CP-43: Groundwater Monitoring Well Decommissioning Policy

CP-43:Groundwater Monitoring Well Decommissioning Policy

New York State Department of Environmental Conservation

DEC POLICY

Issuing Authority: Commissioner Alexander B. Grannis	
Date Issued: November 3, 2009	**Latest Date Revised:**

I. Summary:

Groundwater monitoring wells provide essential access to the subsurface for scientific and engineering investigations (including monitoring wells installed for leak detection purposes). To a degree, every monitoring well is an environmental liability because of the potential to act as a conduit for pollution to reach the groundwater. To limit the environmental risk, a groundwater monitoring well must be properly decommissioned when its effective life has been reached. This document provides procedures to satisfactorily decommission groundwater monitoring wells in New York State. This policy also pertains to other temporary wells such as observation wells, test wells, de-watering wells and other small diameter, non-potable water wells. It does not pertain to water supply wells.

II. Policy:

Environmental monitoring wells should be decommissioned when:

1. they are no longer needed and re-use by another program is not an option; or
2. the well's integrity is suspect or compromised.

The method for decommissioning will be determined based upon well construction and environmental parameters. The method selected must be designed to protect groundwater and implemented according to current best engineering practices while following all applicable federal, state and local regulations. *Groundwater Monitoring Well Decommissioning Procedures* shall be maintained as an addendum to this policy.

This policy is applicable to all New York State Department of Environmental Conservation (DEC) programs that install, utilize and maintain monitoring wells for the study of groundwater, except monitoring wells for landfills regulated under 6 NYCRR Part 360 decommissioned in accordance with those regulations [*see* 6 NYCRR 360-2.11(a)(8)(vi)] and wells installed under the Oil, Gas and Solution Mining Law, Environmental Conservation Law Article 23. There is no specific time frame to dictate when to decommission a well; timing is dependent upon the use and condition of the well

and shall be determined on an individual basis. Best professional judgment must be exercised when using the decommissioning procedures. Outside of DEC use, this policy is mandatory when incorporated into the specifications of a state contract, an Order on Consent or a permit. In all other situations, it shall serve as guidance.

III. Purpose and Background:

This document establishes a monitoring well decommissioning policy and provides technical guidance. Synonyms for well decommissioning include "plugging," "capping" and "abandoning. For consistency, only the term "decommissioning" is used within this document.

Unprotected, neglected and improperly abandoned monitoring wells are a serious environmental liability. They can function as a pollution conduit for surface contaminants to reach the subsurface and pollute our groundwater. They also can cause unwanted mixing of groundwater, which degrades the overall water quality within an aquifer. Improperly constructed, poorly maintained or damaged monitoring wells can yield anomalous poor data that can compromise the findings of an environmental investigation or remediation project. Unneeded or compromised monitoring wells should be properly decommissioned in order to prevent harm to our groundwater.

Since 1980, the DEC has installed, directed or overseen the installation of thousands of monitoring wells throughout New York for various state and federal programs, such as Superfund, solid waste, Resource Conservation and Recovery Act (RCRA), spill response, petroleum bulk storage and chemical bulk storage. This guidance addresses the environmental liability associated with this aging network of wells.

Within its boring zone, a successfully decommissioned well prevents the following:

1. Migration of existing or future contaminants into an aquifer or between aquifers;
2. Migration of existing or future contaminants within the vadose zone;
3. Potential for vertical or horizontal migration of fluids in the well or adjacent to the well; and
4. Any change in the aquifer yield and hydrostatic head, unless due to natural conditions.

Monitoring well construction in New York varies considerably with factors such as age of the well, local geology and either the presence or absence of contamination. The predominant type of monitoring well in New York is the shallow, watertable monitoring well constructed of polyvinyl chloride plastic (PVC). The best method for decommissioning should be selected to suit the conditions and circumstances. Each decommissioning situation is to be evaluated separately using this guidance before a method is chosen and implemented.

IV. Responsibility:

The Division of Environmental Remediation (DER) is responsible for updating this policy and the *Groundwater Monitoring Well Decommissioning Procedures* (addendum) in consultation with the Division of Solid and Hazardous Materials (DSHM) and the Division of Water (DOW). Compliance with the guidance does not relieve any party of the obligation to properly decommission a monitoring well. Oversight responsibility will be carried out by the DEC Regional Engineer.

V. Procedure:

Groundwater Monitoring Well Decommissioning Procedures, the addendum to this policy, provides guidance on proper decommissioning of monitoring wells in New York State.

VI. Related References:

- Groundwater Monitoring Well Decommissioning Procedures, October 1986. Prepared by Malcolm Pirnie, Inc. for the New York State Department of Environmental Conservation, Division of Environmental Remediation.
- Standard Guide for the Decommissioning of Ground Water Wells, Vadose Zone Monitoring Devices, Boreholes, and Other Devices for Environmental Activities, ASTM D 5299-99. American Society for Testing and Materials (ASTM). Philadelphia. 2005.
- 6 NYCRR Part 360 Solid Waste Management Facilities, New York State Department of Environmental Conservation, Division of Solid and Hazardous Materials.
- Specifications for Abandoning Wells and Boreholes in Unconsolidated Materials, New York State Department of Environmental Conservation, Region 1 - Water Unit, undated.
- Handbook of Suggested Practices for the Design and Installation of Groundwater Monitoring Wells, EPA 600/4-89/034, United States Environmental Protection Agency (EPA).

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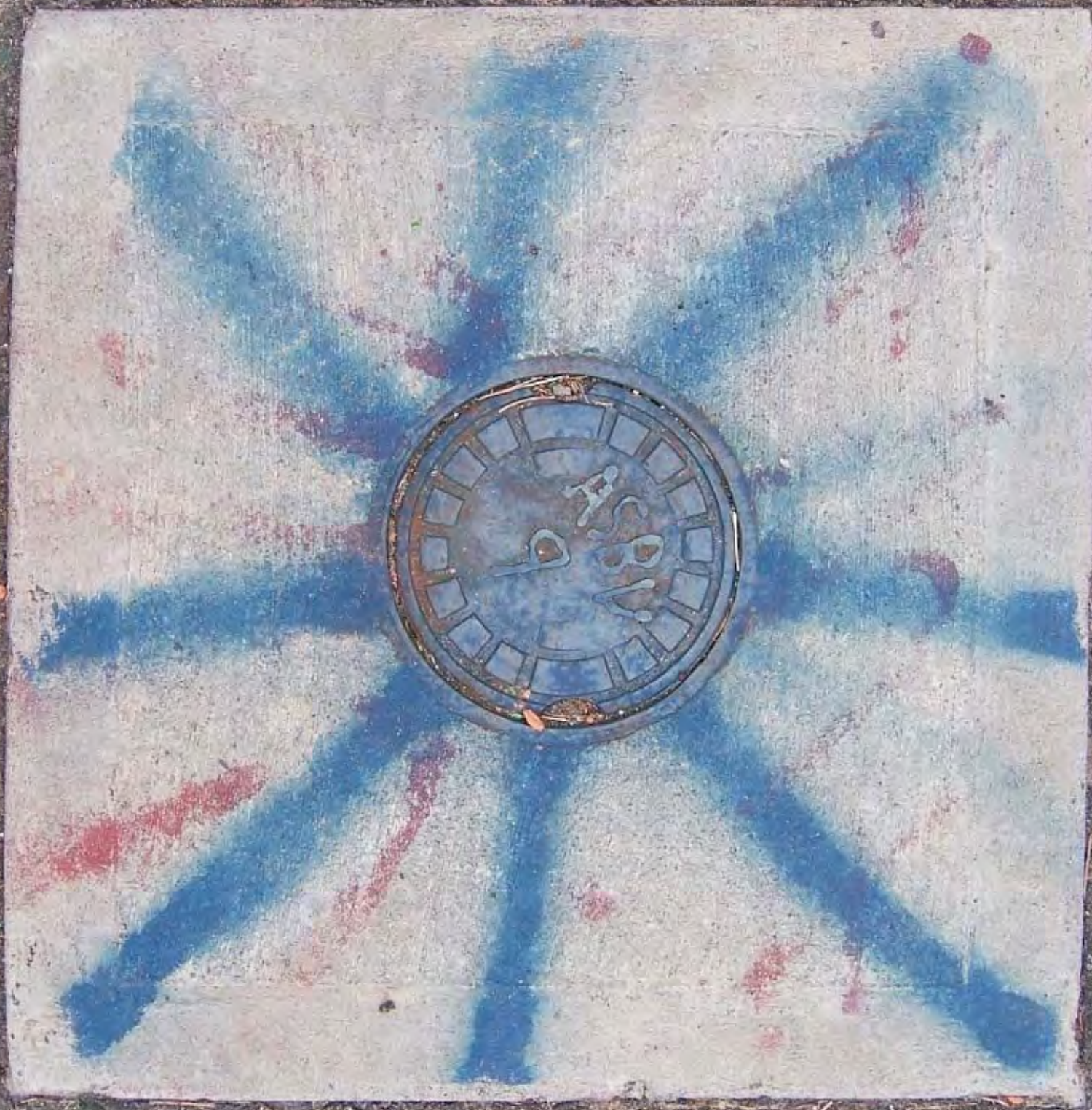
Final - August 2009

GROUNDWATER MONITORING WELL DECOMMISSIONING PROCEDURES



New York State Department of Environmental Conservation
Division of Environmental Remediation

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INTRODUCTION

This document, *Groundwater Monitoring Well Decommissioning Procedures*, is the addendum to CP-43, Groundwater Monitoring Well Decommissioning Policy, which provides acceptable procedures to be used as guidance when decommissioning monitoring wells in New York State. Please note that this document does not address some site-specific special situations that may be encountered in the field. Compliance with the procedures set forth in this document does not relieve any party of the obligation to properly decommission a monitoring well.

Unprotected, neglected and improperly abandoned monitoring wells are a serious environmental liability. They can function as a pollution conduit for surface contaminants to reach the subsurface and pollute our groundwater. They also can cause unwanted mixing of groundwater, which degrades the overall water quality within an aquifer. Improperly constructed, poorly maintained or damaged monitoring wells can yield anomalous poor data that can compromise the findings of an environmental investigation or remediation project. Unneeded or compromised monitoring wells should be properly decommissioned in order to prevent harm to our groundwater.

Previous versions of this guidance have been issued since 1995. Originally developed as a specification for well decommissioning at Love Canal, the procedures were rewritten to make them applicable across the state. From an engineering standpoint, the guidance has changed very little. Most situations do not require a complex procedure.

If you have any questions, please contact Will Welling at (518) 402-9814.

Sincerely,

Gerald J. Rider, Jr., P.E.
Chief, Remedial Section D
Remedial Bureau E
Division of Environmental Remediation

1.0 PREPARATION

If an unneeded monitoring well remains in good usable condition, an alternative to decommissioning might be the reuse by another agency program. DEC encourages reuse in situations where a well will continue to be used and cared for responsibly.

When reuse is not an option, the first step in the well decommissioning process is to review all pertinent well construction information. One must know the well depth and construction details. GPS coordinates and permanent labeling (if available) will be useful in confirming the well to be decommissioned. An inspection must be performed prior to decommissioning in order to verify the construction and condition of each well. Specific details and subsurface conditions form the basis for decisions throughout the decommissioning process.

Well Details

1. Is the well a single stem riser (all one diameter)?
2. Is the well a simple overburden well (no penetration into bedrock)?
3. Does the well riser consist of telescoping diameters of pipe which decrease with depth?
4. Is the well seal compromised (leaking, inadequate or damaged)?
5. If the well is PVC, is it 25 feet or shallower and not grouted into rock?
6. Can the riser be pulled and is removal of the well desired?
7. Is the well a bedrock well?
8. If the monitoring well is a bedrock well, does it have an open hole?
9. Is there a well assembly (riser and screen) installed within the bedrock hole?

Subsurface Conditions

10. Is the soil contaminated?
11. Does the well penetrate a confining layer?
12. If the well penetrates a confining layer, might overdrilling or casing pulling cause contamination to travel up or down through a break in the confining layer?
13. Does the screened interval cross multiple water-bearing zones?

For additional collection and verification of information, the "Monitoring Well Field Inspection Log" (Figure 1) can be used during a field inspection. After the well has been located and the information gathered, one is ready to select the decommissioning procedure in accordance with Section 2.

Special conditions, such as access problems, well extensions through capped and covered non-Part 360 landfills and seasonal weather patterns affecting construction, should be assessed in the planning stage. Decommissioning work requiring the use of heavy vehicular equipment on landfill caps should be scheduled during dry weather (if possible) so as to minimize damage to the cover. If work must be performed during the spring, winter or inclement weather, special measures to reduce ruts should be employed to maintain the integrity of a completed landfill cover system. As an example, placement of plywood under vehicular equipment can eliminate deep ruts that would require repair.

2.0 DECOMMISSIONING METHODS

The primary rationale for well decommissioning is to remove any potential groundwater pathway. A secondary rationale, often important to the property owner or owner of the well, is to physically remove the well. Removed well materials may be recycled and will not interfere with future construction excavation. The previous versions of these decommissioning procedures have stressed that physical removal of the well by pulling is preferable to leaving casing in the ground. Due to the added effort, expense and risk involved with pulling, the decision of whether to pull or not should be a separate consideration aside from selecting the sealing procedure.

One should select a decommissioning procedure that takes into account the geologic and hydrogeologic conditions at the well site; the presence or absence of contamination in the groundwater; and original well construction details. The selection process for well decommissioning procedures is provided by the flow chart, Figure 2. Answers to the questions

in the preceding section are the input for this flow chart. The four primary well decommissioning methods are:

1. Grouting in-place;
2. Perforating the casing followed by grouting in-place;
3. Grouting in-place followed by casing pulling;
4. Over-drilling and grouting with or without a temporary casing.

In a complex situation, one or more decommissioning procedures may be used for different intervals of the same well.

The remainder of Section 2 discusses the well decommissioning methods and the selection process. Refer to Figure 2 for a flow chart diagram of the complete procedure selection process. The DEC Project Manager has the discretion to deviate from the flow chart, (Figure 2), based on site conditions and professional judgment.

2.1 Grouting In-Place

Grouting in-place is the simplest and most frequently used well decommissioning method and grouting itself is the essential component of all the decommissioning methods. The grout seals the borehole and any portion of the monitoring well that may be left in the ground. Because dirt and foreign objects can fall into an open well, whenever possible a well should be sealed first with grout before attempting subsequent decommissioning steps.

For the purpose of these decommissioning procedures, the well seal is defined as the bentonite seal above the sand pack. Aside from obvious channeling by in-flowing surface water around the well, an indication of the well seal integrity may be obtained through review of the boring logs and/or a comparison of groundwater elevations if the well is part of a cluster. Any problems noted on the boring logs pertaining to the well seal, such as bridging of bentonite pellets or running sands, or disparities between field notes (if available) and the well log would indicate the potential for a poor (compromised) well seal.

If the well seal is not compromised and there is no confining layer present, a single-stem, 2-inch PVC, monitoring well can be satisfactorily decommissioned by grouting it in-place. If the seal is compromised, casing perforation may be called for as discussed in Section 2.2.

As discussed in Section 2.4 and its sub-sections, this method is specified for the bedrock portion of a well, and is used for decommissioning small diameter cased wells. Grouting in-place involves filling the casing with grout to a level of five feet below the land surface, cutting the well casing at the five-foot depth, and removing the top portion of the casing and associated well materials from the ground. The casing must be grouted according to the procedures in Section 6. In addition, the upper five feet of the borehole is filled to land surface and restored according to the procedures described in Section 7.

For open-hole bedrock wells, the procedure involves filling the opening with grout to the top of rock according to the procedures in Section 5. A thicker grout may be required to fill any bedrock voids. If excessive grout is being lost down-hole, consider grouting in stages to reduce the pressure caused by the height of the grout column.

The standard mix with the maximum amount of allowable water will be required to penetrate the well screen and sand pack when a well assembly has been installed within a bedrock hole. For an assembly such as this, the grout should be mixed thinly enough to penetrate the slots and sand pack. The grout mixes are discussed in Sections 6.1 and 6.2.

2.2 Casing Perforating/Grouting In-Place

Casing perforation followed by grouting in-place is the preferred method to use if there is poor documentation of the grouting of the well annulus, or the annulus was allowed to be back-filled with cuttings. The grout will squeeze through the perforations to seal any porous zones along the outside of the casing. The procedure involves puncturing, cutting or splitting the well casing and screen followed by grouting the well. A variety of commercial equipment is available for perforating casings and screens in wells with four-inch or larger inside diameters. Due to the diversity of applications, experienced contractors must recommend a specific technique based on site-specific conditions. A minimum of four rows of perforations several inches long around the circumference of the pipe and a minimum of five perforations per linear foot of casing or screen is recommended (American Society for Testing and Materials, Standard D 5299-99, 1999). After the perforating is complete, the borehole must be grouted according to the procedures in Section 6 and the upper five feet of borehole restored according to the procedures in Section 7.

2.3 Casing Pulling

Casing pulling should be used in cases where the materials of the well assembly are to be recycled, or the well assembly must be removed to clear the site for future excavation or re-development. Casing pulling is an acceptable method to use when no contamination is present; contamination is present but the well does not penetrate a confining layer; and when both contamination and a confining layer are present but the contamination cannot cross the confining layer. Additionally, the well construction materials and well depth must be such that pulling will not break the riser. When contamination is likely to cross the confining layer during pulling, a temporary casing can be used. See Section 2.4.

Casing pulling involves removing the well casing by lifting. Grout is to be added during pulling; the grout will fill the space once occupied by the material being withdrawn. An acceptable procedure to remove casing involves puncturing the bottom of the well or using a casing cutter to cut away the screen, grouting, using jacks to free casing from the hole, and lifting the casing out by using a drill rig, backhoe, crane, or other suitable equipment. Additional grout must be added to the casing as it is withdrawn. Grout mixing and placement procedures are provided in Section 6. In wells or well points in which the bottom cannot be punctured, the casing or screened interval will be perforated or cut away prior to being filled with grout. This procedure should be followed for wells installed in collapsible formations or for highly contaminated wells.

At sites in which well casings have been grouted into the top of bedrock, the casing pulling procedure should not be attempted unless the casing can be first cut or freed from the rock.

2.4 Over-Drilling

Over-drilling is the technique used to physically remove an entire monitoring well, its sand pack and the old grout column and fill. In situations where PVC screens and risers are expected to sever and removal of all well materials is required, over-drilling will be required. Over-drilling is called for when a riser can't be pulled and it penetrates a confining layer. Compared to the other procedures, over-drilling is the least common method of well decommissioning.

A "temporary casing" may be necessary when extraordinary conditions are present, such as a high concentration of mobile contaminants in the overburden, depth to water is shallow, there is poor construction documentation or shoddy construction practices. The approach involves installing a large diameter steel casing around the outside of the well followed by drilling / pulling /grouting within this casing. The casing is withdrawn at the end of pulling, grouting and (perhaps) drilling. If the confining layer is less than 5 feet thick, the casing should be installed to the top of the confining layer. Otherwise, it is installed to a depth of 2 feet below the top of the confining layer. After the outer casing has been set, the well can be removed and grouted through pulling if possible or removed and grouted by drilling inside the casing.

Over-drilling is used where casing pulling is determined to be unfeasible, or where installation of a temporary casing is necessary to prevent cross-contamination, such as when a confining layer is present and contamination in the deeper aquifer could migrate to the upper aquifer as the well is pulled. The over-drilling method should:

- Follow the original well bore;
- Create a borehole of the same or greater diameter than the original boring; and
- Remove all of the well construction materials.

In over-drilling the difficulty lies in keeping the augers centered on the old well as the bit is lowered; it will tend to wander off. As a precaution, the well column should be filled with grout before over-drilling. Then without allowing the grout to dry, the driller proceeds with over-drilling the well. Grouting first guarantees that if the drill wanders off the old well and the effort is less than 100% successful, the remaining well portion will at least have been grouted. There are many methods for over-drilling. Please note that the following methods are not suitable for all types of casing, and the advice of an experienced driller should be sought.

- Conventional augering (i.e., a hollow stem auger fitted with a pilot bit). The pilot bit will grind the well construction materials, which will be brought to the well surface by the auger.
- A conventional cable tool rig to advance "temporary" casing having a larger diameter than the original boring. The cable tool kit is advanced within the casing to grind the well construction materials and soils, which are periodically removed with large diameter bailer. This method is not applicable to bedrock wells.

- An over-reaming tool with a pilot bit nearly the same size as the inside diameter of the casing and a reaming bit slightly larger than the original borehole diameter. This method can be used for wells with steel casings.

- A hollow-stem auger with outward facing carbide cutting teeth having a diameter two to four inches larger than the casing.

Prior to over-drilling, the bottom of the well should be perforated or cut away, and the casing filled with grout as with casing removal by pulling.

In all cases above, over-drilling should advance beyond the original bore depth by a distance of half a foot to ensure complete removal of the construction materials. Oversight attention should be focused on the drill cuttings, looking for fragments of well materials. Absence of these indicators is a sign that the drill has wandered off the well. If wandering is suspected, having previously filled the well with grout, the remaining portion which cannot be over-drilled can be considered grouted in-place. When the over-drilling is complete, grout should be tremied within the annular space between the augers and well casings. The grout level in the borehole should be maintained as the drilling equipment and well materials are sequentially removed. As with all the other methods, the upper five feet of borehole should be restored according to the procedures in Section 7.

3.0 SELECTION PROCESS AND IMPLEMENTATION

The decommissioning procedure selection flow chart, Figure 2, is to be used to select decommissioning methods. The selection process first identifies the basic monitoring well type. There are only two types of monitoring wells described in this guidance, overburden wells and bedrock wells. Bedrock wells typically have an overburden portion which in the selection process is to be treated as an overburden well. Techniques are specified for wells based upon their type and the other physical conditions present. Decommissioning techniques called for by the selection process have their practical limits; construction details dictate when a well stem can be pulled without breaking and when it cannot be pulled. The DEC project manager has the discretion to deviate from the flow chart, (Figure 2), based on site conditions, budgetary concerns and professional judgment. The remainder of this section will discuss types of monitoring wells in various settings along with recommended decommissioning techniques.

3.1 Bedrock Wells

Referring to Figure 2 and Section 2.1, if the well extends into bedrock, the rock hole portion of the well is to be grouted in-place to the top of the rock. The grout mix, however, may vary according to the conditions. A thicker grout may be required to fill voids and a thinner grout may be necessary to penetrate well screen and sand pack. Refer to the grout mixture specifications given in Section 6.1 and 6.2.

Prior to grouting, the depth of the well will be measured to determine if any silt or debris has plugged the well. If plugging has occurred, all reasonable attempts to clear it should be made before grouting. The borehole will then be tremie grouted according to Section 6.4 from the bottom of the well to the top of bedrock to ensure a continuous grout column.

After the rock hole is grouted, the overburden portion of the well is decommissioned using appropriate techniques described below. If the bedrock extends to the ground surface, grouting can extend to the ground surface or to slightly below so that the site can be restored as appropriate in accordance with Section 7.

3.2 Uncontaminated Overburden Wells

For overburden wells and the overburden portion of bedrock wells, the first factor in determining the decommissioning method is whether the overburden portion of the well exhibits contamination, as determined through historical groundwater and/or soil sampling results. If the overburden is uncontaminated, the next criteria considers whether the well penetrates a confining layer. In the case that the overburden portion of the well does not penetrate a confining layer, the casing can either be tremie-grouted and pulled or tremie grouted and left in place. As a general rule, PVC wells greater than 25-feet deep should not be pulled unless site-specific conditions or other factors indicate that the well can be pulled without breaking. If the well cannot be pulled, the well should be grouted in-place as accordance with Sections 2.1 and 2.2.

If a non-telescoped overburden well penetrates a confining layer, the casing should be removed by pulling (if possible) in accordance with Section 2.3. If the casing cannot be removed by pulling, the well should be grouted in-place or where complete removal is required, removed by over-drilling. Over-drilling will be based upon the site-specific conditions and requirements. If pulling is attempted and fails (i.e., a portion of the riser breaks) the remaining portion of the well should be removed by using the conventional augering procedure identified in Section 2.4. Note that if the riser is broken during pulling, it is highly unlikely that the driller will be able to target it to over-drill it. This is the reason why all wells should be grouted first. In all cases, after the well construction materials have been removed to the extent possible, the borehole will be grouted in accordance with Section 6 and the upper five feet will be restored in accordance with Section 7.

3.3 Contaminated Overburden Monitoring Wells/Piezometers

Contamination in the overburden plays a role in the selection process. Any contamination present in the overburden must not be allowed to spread as a result of the decommissioning construction. For wells and piezometers suspected or known to be contaminated with light non-aqueous phase liquid (LNAPL) and/or dense non-aqueous phase liquid (DNAPL), often referred to as "product," the decision to decommission the well should be reviewed. Such gross contamination is a special condition and requires design of the decommissioning procedure. If decommissioning is determined to be the proper course of action, measurement of the non-aqueous phase liquid volume will be determined and this liquid will be removed.

If an overburden well (or the overburden portion of a bedrock well) is contaminated with LNAPL, DNAPL and /or dissolved fractions as indicated by historical sampling results, one must evaluate the potential for contamination to cross an overburden confining layer (if one exists) during decommissioning. A rock or soil horizon of very low permeability is known as a confining layer. Contamination in the overburden lying above a confining layer is a significant condition to recognize. To prevent mobile contaminants from crossing a confining layer during pulling or over-drilling, a temporary casing should be installed to isolate the work zone. One should follow the procedure selection flow chart. Some contaminated conditions call for over-

drilling or a specially designed procedure.

A well in contaminated overburden may be grouted in-place as long as the grout fully seals the well and boring zone. If a well in contaminated overburden was constructed allowing formation collapse as annular backfill or if the well has a compromised well seal, one must either physically remove the well or thoroughly perforate the riser and grout it in-place.

If physical removal of the well is required and the overburden contaminants are likely to be dragged upward or downward during decommissioning, a temporary casing should be used to seal off the construction work zone. Casing pulling and overdrilling can be safely accomplished within the temporary casing. Section 2.4 discusses the temporary casing technique.

3.4 Telescoped Riser

If the riser is telescoped in one or more outer casings, the decommissioning approach depends upon the integrity of the well seal. If there is no evidence that the well seal integrity is compromised, the riser should be grouted in-place in accordance with Sections 2.1 or 2.2 and the upper 5 feet of the well surface should be restored in accordance with Section 7. If indications are that the well seal is not competent, it will be necessary to design and implement a special procedure to perforate and grout or remove the well construction materials. The presence and configuration of the outer casing(s) will be specific in the individual wells and will be a key factor in the decommissioning approach. The special procedure must mitigate the potential for cross-contamination during removal of the well construction materials.

4.0 LOCATING AND SETTING-UP ON THE WELL

Prior to mobilizing to decommission a monitoring well, one should notify the property owner and/or other interested parties including the governing regulatory agency. It is advisable that when at the well location, one should review the proposed well decommissioning procedure. Verify well locations and identification by their identifying markers and GPS coordinates. Lastly, verify the depth of each well with respect to depth recorded on the well construction log.

5.0 REMOVING THE PROTECTIVE CASING

Most monitoring wells installed in non-traffic locations are finished with an elevated, protective casing (guard pipe) and a concrete rain pad. Wells at gasoline stations, usually being in high-traffic areas, are typically finished with a flush-mount, curb box and protective 8" dia steel inspection plate rather than a stick-up riser. The curb box is usually easily removed from around the flush-mount well before pulling or over-drilling. In the case of stick-up wells, the riser pipe may be bonded to the guard pipe and rain pad. When the protective casing and concrete pad of a stick-up monitoring well are "yanked out," a PVC riser will typically break off at the bottom of the guard pipe several feet below grade. Once this happens, it may become impossible to center a drill rig upon the well. The riser may become splintered and structurally unstable for pulling. Unless grouted first, the well may fill with dirt. Before pulling a casing or over-drilling a well, a method must be devised for removing these protective surface pieces without jeopardizing the remaining decommissioning effort.

Generally, unless the protective casing is loose and can be safely lifted off by hand, *one*

should fill the monitoring well with grout before removing the outer protective casing. This will ensure that the well is properly sealed regardless of any problems later when removing the protective casing. Remove the protective casing or road box vault initially only if the stick-up or vault will interfere with subsequent down-hole work which must be done before grouting. This down-hole work may include puncturing, perforating or cutting the screen or riser. But as a general procedure don't remove the protective casing or road box until after initial grouting is complete.

The procedure for removing the protective casing of a well depends upon the decommissioning method specified for the monitoring well. The variety of protective casings available preclude developing a specific removal procedure but often one can simply break up the concrete seal surrounding the casing and jack or hoist the protective casing out of the ground. A check should be made during pulling to ensure that the inner well casing is not being hoisted with the protective casing. If this occurs, the well casing should be cut off after the base of the protective casing is lifted above the land surface. At well locations where the riser has been extended, the burial of a previous concrete pad may require the excavation of soil to the top of the concrete pad to remove the well.

Steel well casing should be removed approximately five feet below the land surface so as to be below the frost line and out of the way of any subsequent shallow digging. The upper five feet of casing and the protective casing can be removed in one operation if a casing cutter is used.

Waste handling and disposal must be consistent with the methods used for the other well materials unless an alternate disposal method can be employed (i.e., steam cleaning followed by disposal as non-hazardous waste).

6.0 SELECTING, MIXING, AND PLACING GROUT

This section gives recipes for the "standard grout mixture" and the thicker "special grout mixture." Mixing and placing grout is also discussed in this section. The goal of well decommissioning is to eliminate the capability of water to travel up or down within the volume of the former well and its boring. Success depends upon the correct grout mixture and placement where it is needed. There are two types of grout mixes that may be used to seal monitoring wells: a standard mix and a special mix. Both mixes use Type 1 Portland cement and four percent bentonite by weight. However, the special mix uses a smaller volume of water and is used in situations where excessive loss of the standard grout mix is possible (e.g., highly-fractured bedrock or coarse gravels).

6.1 Standard Grout Mixture

For most boreholes, the following standard mixture will be used:

- One 94-pound bag Type I Portland cement;
- 3.9 pounds powdered bentonite; and
- 7.8 gallons potable water.

Slightly more water may be used in order to penetrate a sand pack when a well screen transects multiple flow zones. This mixture results in a grout with a bentonite content of four percent by weight and will be used in all cases except in boreholes where excessive use of grout is anticipated. In these cases a special thicker mixture will be used.

6.2 Special Mixture

In cases where excessive use of grout is anticipated, such as high permeability formations and highly fractured or cavernous bedrock formations, the following special mixture will be used:

- one 94-pound bag type I Portland cement;
- 3.9 pounds powdered bentonite;
- 1 pound calcium chloride; and
- 6.0-7.8 gallons potable water (depending on desired thickness).

The special mixture results in a grout with a bentonite content of four percent by dry weight. It is thicker than the standard mixture because it contains less water. This grout is expected to set faster than the Standard Grout Mixture due to the added calcium chloride. The least amount of water that can be added for the mixture to be readily pumpable is 6 gallons per 94-pound bag of cement.

6.3 Grout Mixing Procedure

To begin the grout-mixing procedure, calculate the volume of grout required to fill the borehole. If possible, the mixing basin should be large enough to hold all of the grout necessary for the borehole.

Mix grout until a smooth, homogeneous mixture is achieved. Grout can be mixed manually or with a mechanized mixer. Colloidal mixers should not be used as they tend to excessively decrease the thickness of the grout for the above recipes.

6.4 Grout Placement

This guidance requires that grout be placed in the well from the bottom to the top by means of a "tremie." A tremie is a pipe, a hose or a tube extending from the grout supply to the bottom of the well. The tremie delivers the grout all the way down through the water column without its being diluted and mixed with the water that may be present in the well. The tremie pipe or tube is withdrawn as (or after) the well is filled with grout.

Using the tremie, grout is placed in the borehole filling from the bottom to the top. Two-inch and larger wells should use tremie tubing of not less than 1-inch diameter. Smaller diameter wells will call for a smaller tremie pipe. Grout will then be pumped in until the grout appears at the land surface (when grouting open holes in bedrock, the grout level only needs to reach above the bedrock surface). Any groundwater displaced during grout placement, if known to be contaminated, will be contained for proper disposal.

At this time the rate of settling should be observed. If grouting the well in place, the well

casing remains in the hole. But if the decommissioning method has involved down-hole tools such as hollow-stem augers or temporary casing for overdrilling, these will be removed from the hole. As each section is removed, grout will be added to keep the level between 0 and 5 feet below grade. If the grout level drops below the land surface to an excessive degree, an alternate grouting method must be used. One possibility is to grout in stages; i.e., the first batch of grout is allowed to partially cure before a second batch of grout is added.

As previously described in Section 5.0, the outer protective casing "stick-up" should be removed only after a well has been properly filled with grout. This will ensure that the well is properly sealed regardless of any breakage which may occur when removing the stick-up. It is important to reiterate that when either casing pulling or over-drilling are required, due to the uncertainty of successfully pulling a well or over-boring a well, we insist that the driller tremie grout the well first. Then without allowing the grout to dry, the driller proceeds with pulling the casing or over-drilling the well.

Upon completion of grouting, ensure that the final grout level is approximately five feet below land surface. A ferrous metal marker will be embedded in the top of the grout to indicate the location of the former monitoring well. Lastly, a fabric "utility" marking should be placed one foot above the grout so an excavator can see it clearly.

7.0 BACKFILLING AND SITE RESTORATION

The uppermost five feet of the borehole at the land surface should be filled with material physically similar to the natural soils. The surface of the borehole should be restored to the condition of the area surrounding the borehole. For example, concrete or asphalt will be patched with concrete or asphalt of the same type and thickness, grassed areas will be seeded, and topsoil will be used in other areas. All solid waste materials generated during the decommissioning process must be disposed of properly.

8.0 DOCUMENTATION

A form which may be used in the field to record the decommissioning construction is included as Figure 3. Additional documentation may be required by a DEC project manager and samples are included in Appendix A. Programs within the DEC that maintain geographic data on monitoring wells strive to keep that data up to date. Owners of these data sets must be notified when a well is decommissioned. Historical groundwater quality data is linked to monitoring well locations so when a well is decommissioned, existing GIS data must be updated to reflect that fact but the coordinate location in the GIS database should not be eliminated. A metal detector may not be able to detect a deeply buried marker so if this locator is important for future utility runs or foundations, a map should be submitted to the property owner and the town engineer showing the decommissioned well locations. Global Positioning System (GPS) coordinates should be indicated on this map. Lastly, whatever documentation is produced should be provided to the property owner, the DEC, and all other parties involved.

9.0 FIELD OVERSIGHT

Over-drilling requires careful observation to detect whether the drill has wandered off the well. Grout preparation and tremie work should be carefully observed. The successful implementation of a decommissioning work plan depends upon proper direction, observation and oversight. Methods to be employed must be clearly worked through and all parties must understand what they have to do before going into the field. Flexibility is allowed where necessary but the work effort must be thorough and effective to protect our groundwater.

10.0 RELATED REFERENCES

- *Groundwater Monitoring Well Decommissioning Procedures*, October 1986. Prepared by Malcolm Pirnie, Inc., for the New York State Department of Environmental Conservation, Division of Environmental Remediation.

- American Society for Testing and Materials, A.S.T.M. D 5299-99, Standard Guide for the Decommissioning of Ground Water Wells, Vadose Zone Monitoring Devices, Boreholes, and Other Devices for Environmental Activities. A.S.T.M.. Philadelphia. 2005.

- New York State Department of Environmental Conservation, Division of Solid and Hazardous Materials, 6 NYCRR Part 360, Solid Waste Management Facilities.

- New York State Department of Environmental Conservation, Region I - Water Unit, Specifications for Abandoning Wells and Boreholes in Unconsolidated Materials, undated.

- United States Environmental Protection Agency, The Handbook of Suggested Practices for the Design and Installation of Groundwater Monitoring Wells, EPA 600/4-89/034.

FIGURES

APPENDICES

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FIGURE 1

MONITORING WELL FIELD INSPECTION LOG

FIGURE 1

SITE NAME:

SITE ID.: _____
INSPECTOR: _____
DATE/TIME: _____
WEll ID.: _____

MONITORING WELL FIELD INSPECTION LOG
NYSDEC WELL DECOMMISSIONING PROGRAM

	YES	NO
WELL VISIBLE? (If not, provide directions below)		
WELL I.D. VISIBLE?		
WELL LOCATION MATCH SITE MAP? (if not, sketch actual location on back).....		

WELL I.D. AS IT APPEARS ON PROTECTIVE CASING OR WELL: .....

	YES	NO
SURFACE SEAL PRESENT?		
SURFACE SEAL COMPETENT? (If cracked, heaved etc., describe below)		
PROTECTIVE CASING IN GOOD CONDITION? (If damaged, describe below)		

HEADSPACE READING (ppm) AND INSTRUMENT USED..... _____
TYPE OF PROTECTIVE CASING AND HEIGHT OF STICKUP IN FEET (If applicable) _____
PROTECTIVE CASING MATERIAL TYPE: ..... _____
MEASURE PROTECTIVE CASING INSIDE DIAMETER (Inches): ..... _____

	YES	NO
LOCK PRESENT?		
LOCK FUNCTIONAL?		
DID YOU REPLACE THE LOCK?		
IS THERE EVIDENCE THAT THE WELL IS DOUBLE CASED? (If yes,describe below)		
WELL MEASURING POINT VISIBLE?		

MEASURE WELL DEPTH FROM MEASURING POINT (Feet): ..... _____
MEASURE DEPTH TO WATER FROM MEASURING POINT (Feet): ..... _____
MEASURE WELL DIAMETER (Inches): ..... _____
WELL CASING MATERIAL: ..... _____
PHYSICAL CONDITION OF VISIBLE WELL CASING: ..... _____
ATTACH ID MARKER (if well ID is confirmed) and IDENTIFY MARKER TYPE ..... _____
PROXIMITY TO UNDERGROUND OR OVERHEAD UTILITIES..... _____

DESCRIBE ACCESS TO WELL: (Include accessibility to truck mounted rig, natural obstructions, overhead power lines, proximity to permanent structures, etc.); ADD SKETCH OF LOCATION ON BACK, IF NECESSARY.

DESCRIBE WELL SETTING (For example, located in a field, in a playground, on pavement, in a garden, etc.) AND ASSESS THE TYPE OF RESTORATION REQUIRED.

IDENTIFY ANY NEARBY POTENTIAL SOURCES OF CONTAMINATION, IF PRESENT (e.g. Gas station, salt pile, etc.):

REMARKS:

FIGURE 2

DECOMMISSIONING PROCEDURE SELECTION

NYSDEC Monitoring Well Decommissioning Procedure Selection

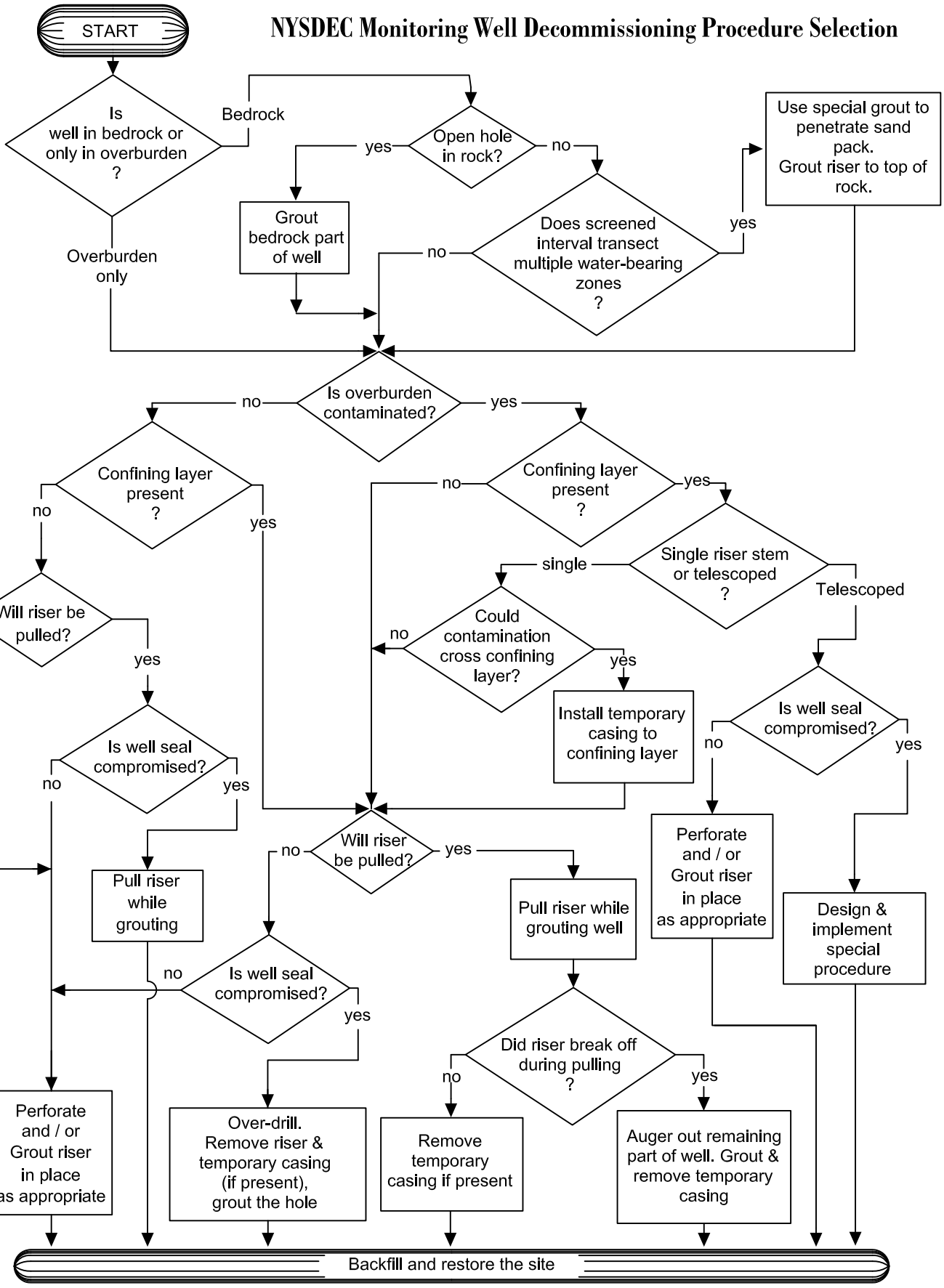


FIGURE 2

FIGURE 3

WELL DECOMMISSIONING RECORD

FIGURE 3

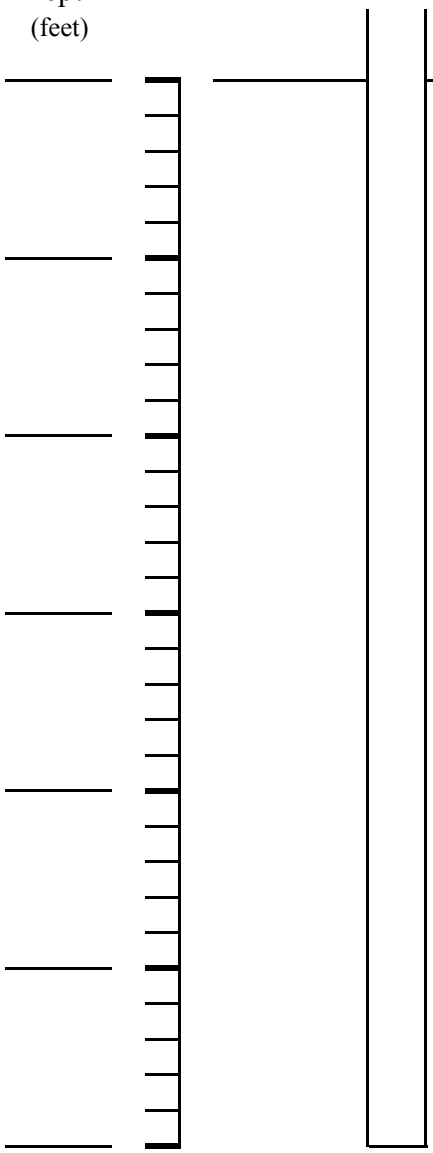
WELL DECOMMISSIONING RECORD

Site Name:	Well I.D.:
Site Location:	Driller:
Drilling Co.:	Inspector:
	Date:

DECOMMISSIONING DATA
(Fill in all that apply)

OVERDRILLING	
Interval Drilled	
Drilling Method(s)	
Borehole Dia. (in.)	
Temporary Casing Installed? (y/n)	
Depth temporary casing installed	
Casing type/dia. (in.)	
Method of installing	
CASING PULLING	
Method employed	
Casing retrieved (feet)	
Casing type/dia. (in)	
CASING PERFORATING	
Equipment used	
Number of perforations/foot	
Size of perforations	
Interval perforated	
GROUTING	
Interval grouted (FBLS)	
# of batches prepared	
For each batch record:	
Quantity of water used (gal.)	
Quantity of cement used (lbs.)	
Cement type	
Quantity of bentonite used (lbs.)	
Quantity of calcium chloride used (lbs.)	
Volume of grout prepared (gal.)	
Volume of grout used (gal.)	

WELL SCHEMATIC*



COMMENTS:

* Sketch in all relevant decommissioning data, including: interval overdrilled, interval grouted, casing left in hole, well stickup, etc.

Drilling Contractor

Department Representative

APPENDIX A - REPORTS

APPENDIX A1 - INSPECTOR'S DAILY REPORT

APPENDIX A2 - PROBLEM IDENTIFICATION REPORT

APPENDIX A3 - CORRECTIVE MEASURES REPORT

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Appendix A1

Inspector's Daily Report

CONTRACTOR:
ADDRESS:

TELEPHONE:
LOCATION _____ FROM _____ TO _____
WEATHER _____ TEMP _____ A.M. _____ P.M. _____ DATE _____

CONTRACTOR'S WORK FORCE AND EQUIPMENT											
DESCRIPTION	*H*	*#*	*DESCRIPTION*	*H*	*#*	*DESCRIPTION*	*H*	*#*	*DESCRIPTION*	*H*	*#*
Field Engineer						Equipment			Front Loader Ton		
Superintendent			Ironworker			Generators			Bulldozer		
						Welding Equip.					
Laborer Foreman			Carpenter								
Laborer									Backhoe		
Operating Engineer			Concrete Finisher								
Carpenter						Paving Equip. & Roller					
						Air compressor					

SEE REVERSE SIDE FOR SKETCH YES ☐ NO ☐ _____

WORK PERFORMED: _____

PAY ITEMS

CONTRACT		STA		DESCRIPTION	QUANTITY	REMARKS
Number	ITEM	FROM	TO			

TEST PERFORMED: _____
PICTURES TAKEN: _____

VISITORS: _____

QA PERSONNEL
SIGNATURE _____

REPORT NUMBER _____
SHEET _____ Of _____

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PROBLEM IDENTIFICATION REPORT

Date _____

Day | Su | M | T | W | Th | F | Sa |

Project _____ Job Number _____

Contractor _____

Subject _____

Sky/Precip.	Clear	Partly Cloudy	Cloudy	Rainy	Snow
TEMP.	<32F	32-40F	40-70F	70-80F	80-90F
WIND	No	Light	Strong		
HUMIDITY	Dry	Mod.	Humid		

PROBLEM DESCRIPTION Reference Daily Report Number 1: _____

PROBLEM LOCATION - REFERENCE TEST RESULTS AND LOCATION (Note: Use sketches on back of form as appropriate):

PROBABLE CAUSES: _____

SUGGESTED CORRECTIVE MEASURES: _____

APPROVALS:

QA ENGINEER: _____

PROJECT MANAGER: _____

Distribution:
1. Project Manager
2. Field Office
3. File
4. Owner

QA Personnel
Signature: _____

MEETINGS HELD AND RESULTS

REMARKS

REFERENCES TO OTHER FORMS

SKETCHES

SAMPLE LOG

SAMPLE NUMBER

APPROXIMATE LOCATION OF STOCKPILE

NUMBER OF STOCKPILE

DATE OF COLLECTION

CLIMATIC CONDITIONS

FIELD OBSERVATION

SHEETS OF

CORRECTIVE MEASURES REPORT

Date _____

Project _____ Job Number _____

Day | Su | M | T | W | Th | F | Sa |

Contractor _____

Subject _____

Sky/Precip.	Clear	Partly Cloudy	Cloudy	Rainy	Snow
TEMP.	<32F	32-40F	40-70F	70-80F	80-90F
WIND	No	Light	Strong		
HUMIDITY	Dry	Mod.	Humid		

CORRECTIVE MEASURES TAKEN (Reference Problem Identification Report No.): _____

RETESTING LOCATION: _____

SUGGESTED METHOD OF MINIMIZING RE-OCCURRENCE: _____

SUGGESTED CORRECTIVE MEASURES: _____

APPROVALS:

QA ENGINEER: _____

PROJECT MANAGER: _____

Distribution:

1. Project Manager
2. Field Office
3. File
4. Owner

QA Personnel
Signature: _____

Attachment C

Community Air Monitoring Plan

GEI Consultants

Geotechnical
Environmental and
Water Resources
Engineering

Appendix E

Community Air Monitoring Plan

Nyack MGP Site
Nyack, New York
NYSDEC Site # 3-44-046

Submitted To:
Orange & Rockland Utilities, Inc.
3 Old Chester Road
Goshen, NY 10924

Submitted By:
GEI Consultants, Inc.
1301 Trumansburg Road, Suite N
Ithaca, NY 14850

March 2012
Project #: 121640-1001

James Edwards
Project Geologist

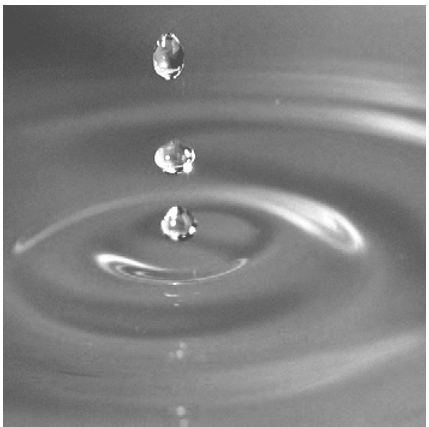


Table of Contents

Abbreviations and Acronyms

CAMP	Community Air Monitoring Plan
COC	Compounds of Concern
GEI	GEI Consultants, Inc.
HASP	Health and Safety Plan
MGP	Manufactured Gas Plant
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
O&R	Orange & Rockland Utilities, Inc.
PAH	Polycyclic Aromatic Hydrocarbons
PDI	Pre-Design Investigation
PID	Photo-ionization Detector
ppm	Parts per Million
SVOC	Semi-Volatile Organic Compounds
VOC	Volatile Organic Compounds
$\mu g/m^3$	Micrograms per cubic meter

1. Introduction

This Community Air Monitoring Plan (CAMP) will be implemented during the Pre-Design Investigation (PDI) of the Orange & Rockland Utilities, Inc. (O&R) Nyack Manufactured Gas Plant (MGP) site, located in Nyack, New York. A CAMP is required by the New York State Department of Environmental Conservation (NYSDEC) and the New York State Department of Health (NYSDOH) at sites where ground-intrusive activities may result in airborne release of compounds of concern (COC). Towards that end, community air monitoring will be performed for total volatile organic vapors (VOCs), and for particulates (dust).

The Nyack MGP site is located between Gedney Street and the Hudson River in Nyack, New York. This CAMP applies to the PDI phase of work for the Nyack MGP site. The PDI field work is scheduled to be performed in the spring of 2012. The PDI field work involves the advancement of subsurface soil borings, and sediment sampling. Community air monitoring will be performed during the drilling of soil borings.

The objectives of this CAMP are to:

- Ensure that the airborne concentrations of COC are minimized to protect the community.
- Provide an early warning system so that potential emissions can be controlled on site at the source.
- Measure and document the concentrations of airborne COC to confirm compliance with the specified limits.

This CAMP is a companion document to GEI's site-specific Health and Safety Plan (HASP). The HASP is a separate document and is directed primarily toward protection of on-site workers within the designated work zones.

2. Air Monitoring Equipment, Methods, and Action Levels

This section provides instructions for performing the CAMP activities. Discussed are the COC to be monitored, the equipment to be used, where sampling is to be performed, and the action limits. For the Nyack MGP site, community air monitoring will be performed for total VOCs and particulates (dust) during the drilling of soil borings.

In addition to the community air monitoring, work/exclusion zone monitoring will be performed during work activities where impacted soil or groundwater may be encountered. The exclusion zone air monitoring requirements, equipment, and action levels are described in the site-specific HASP for this project. Note, however, that the work zone air monitoring and the community air monitoring are conducted as part of the overall site control program. When work zone VOC or particulate readings are found to exceed the downwind CAMP limits, the field staff will check the upwind and downwind air monitoring instruments to assess whether control measures will be required.

2.1 Monitoring Locations

Two community air monitoring locations will be established at the start of each workday – one upwind of the work area, and one downwind of the work area/exclusion zone. The purpose of the upwind station will be to determine the background concentration of VOCs and particulates at the worksite. The downwind monitoring station will be used to assess compliance with the NYSDEC/NYSDOH specified action limits for VOCs and particulates. The upwind VOC and dust measurements will be subtracted from the downwind measurements in order to compare the downwind instrument readings to the CAMP action levels.

The location of the each monitoring station will be noted on the ***Community Air Monitoring Daily Data Sheet*** (Daily Data Sheet) [Attachment A]. The locations of the instruments may be changed during the day to adapt to changing wind directions. Each location will be noted on the Data Sheet, along with the start and stop time at each location. Field personnel will be prepared to move the equipment to multiple locations in the event that there is little wind, if the wind direction changes frequently, or if there is a change to the location of the most sensitive downwind receptor location.

Where the work area is less than 20 feet from the nearest occupied building, the downwind air monitoring station will be positioned at the air intake for the building or at the most sensitive exposure point for the downwind receptors. Background measurements inside the building will be made prior to the start of work. If exceedances of the action levels are

measured at the outside wall of the building, additional measurements will be made inside the building using portable meters.

If necessary, precautions to minimize the release of VOCs and particulates will be taken at the work zone, and engineering or work controls used to protect the downwind receptor. These controls for minimizing releases from the work zone are discussed in Section 3.

2.2 Air Monitoring Equipment

The monitoring instruments will be calibrated at the start of each workday, and again during the day if the performance of an instrument is in question. The time and method of calibration will be noted on the Daily Data Sheet. Both the photo-ionization detectors (PIDs) and particulate meters will be mounted on a tripod in a vented protective case, and programmed to record 15-minute averages. A monitoring technician will check the instrumentation at each of these locations regularly during the work-day to check that they are operating properly.

2.2.1 VOC Monitoring Equipment

VOC monitoring will be performed using PIDs (RAE Systems MiniRAE™ or equivalent) equipped with a 10.2 or 10.6 eV bulb. The instruments will be set to record 15-minute running average concentrations. The PIDs will be equipped with an audible alarm to indicate an exceedance of the action level of 5 ppm total VOCs.

2.2.2 Particulate (Dust) Monitoring Equipment

Particulate monitoring will be performed using meters set to measure 10 micron and finer particulates (PM-10). Particulates will be monitored using an MIE DataRAM DR-2000l, TSI DustTrak™, or equivalent. The equipment used will be set to record 15-minute running average concentrations, for comparison to the action levels.

In addition to the instrument readings, fugitive dust migration will be visually assessed during all work activities, and the observations recorded. Per NYSDEC requirements, visible dust migration will not be allowed. If visible dust is observed to be migrating from the work zone, the work will be stopped and dust control measures implemented.

2.3 Monitoring Action Levels and Responses

The action levels and responses for VOCs and particulates are presented in Table 1.

Table 1. Air Monitoring Response Levels and Actions

VOCs	
Response Level	**Actions**
>1 ppm at the wall of an occupied structure or at an air intake	▪ Check the indoor air concentration and compare with background measurements taken previously
>5 ppm above background for 15-minute average	▪ Temporarily halt work activities ▪ Continue monitoring, especially inside of occupied structures ▪ If VOC levels decrease (per instantaneous readings) below 5 ppm over background, work activities can resume
Persistent levels >5 ppm over background but <25 ppm	▪ Halt work activities ▪ Identify source of vapors ▪ Corrective action to abate emissions ▪ Continue monitoring ▪ Resume work activities if VOC levels 200 feet downwind of the property boundary or half the distance to the nearest potential receptor is <5 ppm for a 15-minute average
>25 ppm at the perimeter of the work area	▪ Shut down work

Particulates	
Response Level	**Actions**
>100 µg/m^3 above background for 15-minute average or visual dust observed leaving the site	▪ Apply dust suppression ▪ Continue monitoring ▪ Continue work if downwind PM-10 particulate levels are <150 µg/m^3 above upwind levels and no visual dust leaving site
>150 µg/m^3 above background for 15-minute average	▪ Stop work ▪ Re-evaluate activities ▪ Continue monitoring ▪ Continue work if downwind PM-10 particulate levels are <150 µg/m^3 above upwind levels and no visual dust leaving site

Sources:

- NYSDOH Community Air Monitoring Plan, December 2009, as published in NYSDEC DER-10, Appendix 1A, 2010.
- Fugitive Dust and Particulate Monitoring, NYSDEC DER-10, Appendix 1B, 2010.
- Special Requirements for Work Within 20 Feet of Potentially Exposed Individuals or Structures, NYSDOH.

All data will be downloaded to a computer on a daily basis and saved for review. The data will be provided to the NYSDEC and/or the NYSDOH upon request at any stage of the project.

If VOC or particulate action levels are observed to be exceeded during the work day, the event, the source, and corrective actions taken will be recorded on the Daily Data Sheet and reported to the on-site NYSDEC representative. If an on-site representative is not present,

exceedances will be noted in the daily report to the NYSDEC project manager within one business day.

Table 2. Emergency Contacts and Telephone Numbers

Fire, Police, Ambulance		911
NYSDEC Contact	Elizabeth Lukowski – Project Manager	(518) 402-9564 (office)
GEI Contacts	James Edwards – Project Geologist Garrett Schmidt – Field Team Leader	(607) 592-6786 (cell) (607) 793-3463 (cell)
O&R Contact	Maribeth McCormick – Project Manager	(845) 783-5534 (office) (914) 557-1361 (cell)

2.4 Odor Monitoring

The field investigation personnel will record observations of odors generated during the RI field activities. When odors attributable to the exposing of impacted media are generated in the work area during intrusive activities, such as soil borings or excavation of test pits, observations will also be made at the downwind limit of the MGP site. The observations will be made to assess the potential for significant odors reaching on-site receptors or being transmitted off site. The downwind odor monitoring will be performed in conjunction with the PID and dust monitoring program described in this CAMP.

Upon detection of odors at the site perimeter, site controls, starting in the work area, will be implemented. The site controls described in Section 3 will be used to assist with odor mitigation. Note that the goal of the Odor Mitigation Plan is to minimize and to prevent, where practicable, the off-site migration of odors. Due to the short distances between any work area at the site and the on-site receptors property line, site controls will be implemented proactively when odors are detected in the breathing zone at any work area.

There are no action levels specified for odors. In the event that odors persist at the downwind receptors or property line after control measures are carried-out, the odor conditions will be discussed with the O&R and NYSDEC project managers.

3. Control Procedures

This section outlines the procedures to be used to control VOCs, odors, and particulates that may be generated during the PDI field activities. The investigation program will be conducted using two principal PDI techniques that may generate odors: test pit excavations and subsurface soil borings. The remainder of this section is intended to provide site managers, representatives of the NYSDEC and NYSDOH, and the public with information summarizing typical odor control options, and to provide some guidance for their implementation. A description of potential sources of odors and methods to be used for odor control are presented in the following sections.

3.1 Potential Sources of Odors and VOCs

Generally, the residuals encountered at former MGP sites are well defined. They are related to residual coal tar-like materials and petroleum, and principally contain VOCs, polycyclic aromatic hydrocarbons (PAHs), and a number of inorganic constituents, including metal-complexed cyanide compounds, and metals. Constituents of MGP tar or petroleum products can produce odor emissions during investigation activities when they are unearthed during backhoe test pits and soil borings. When this occurs, VOCs and light-end semi-volatile organic compounds (SVOCs) can volatilize into the ambient air. Some MGP residuals can cause distinctive odors that are similar to mothballs, roofing tar, or asphalt driveway sealer. It is important to note that the CAMP will provide for continual monitoring of VOCs and particulates during the field work to monitor for any potential release of constituents which may exceed the exposure limits for downwind receptors.

3.2 General Site Controls

Several general excavation or drilling procedure site controls that will be implemented include:

- Every effort will be made to minimize the amount of time that impacted material is exposed to ambient air at the site.
- Drill cuttings from the hollow-stem auger borings will be containerized as soon as possible during completion of each soil boring.
- Meteorological conditions are also a factor in the generation and migration of odors. Some site activities may be limited to times when specific meteorological conditions prevail, such as when winds are blowing away from a specific receptor.

4. Documentation and Reporting

The attached Daily Data Sheet will be filled-out each day to record all of the details of the CAMP work. The form will be used to record the following information:

- Date and weather, with significant changes noted which may affect the positioning of the meters or recording of the data.
- Calibration results for the instruments.
- Locations of the upwind and downwind monitoring stations, and any changes made to the locations during the day to adjust for changing work locations or wind directions.
- Any significant readings made during the day, such as exceedances which occur and their causes.

Additional information will be noted in the project field book(s), as necessary.

The electronic measurements from the PIDs and dust meters will be downloaded each day, reviewed, and archived. Exceedances of the action levels, if any, and the actions to be taken to mitigate the situations, will be discussed immediately with the on-site representatives, or reported within one business day to the NYSDEC project manager (if on-site NYSDEC oversight is not provided). The results of the daily CAMP monitoring will also be discussed in the daily written report to the NYSDEC project manager. Summaries of all air monitoring data will be provided to the NYSDEC or the NYSDOH upon request.

CAMP odor monitoring results will be recorded in the field log book and/or the Daily Data Sheet, and will also be available for review by the state agencies.

ATTACHMENT A

Community Air Monitoring Daily Data Sheet

Community Air Monitoring Daily Data Sheet

Date:

Site:

Project Number:

Weather:

Monitoring Start Time:

End Time:

Monitoring Station Location	Time (24 hour)	CAMP PID (ppm)	CAMP Particulate (mg/m3)	Wind Direction	Work Zone PID (ppm)	Work Zone Particulate (mg/m3)	Activity	Comments

Notes:

INSTRUMENT INFORMATION **Time** **Span and Agent**

PID Model: **Serial Number:** **Calibration:**

PID Model: **Serial Number:** **Calibration:**

Dust meter model: **Serial Number:** **Calibration:**

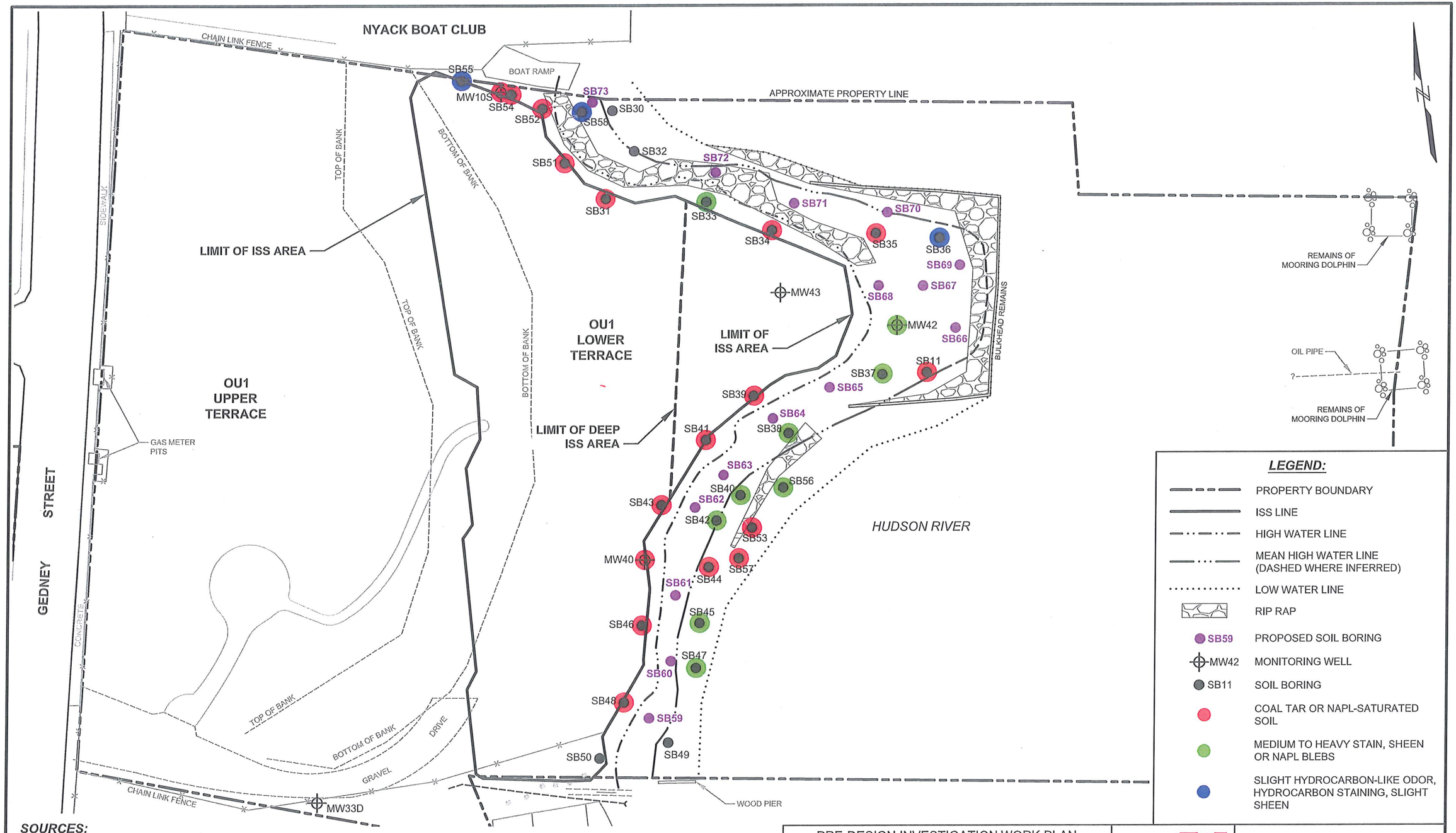
Dust meter model: **Serial Number:** **Calibration:**

Notes for Map on Reverse Side:

Circle Work Area. Show start and end times if there are multiple work areas.

↗ wind direction | **U** Upwind Station | **D** Downwind Station

Monitoring Completed By (print and sign): _____



SOURCES:

1. *FIGURE 4-1: VISIBLE IMPACTS, NYACK FORMER MGP* OF THE OU2 RI REPORT, PREPARED FOR ORANGE AND ROCKLAND UTILITIES, PREPARED BY AECOM, SCALE: 1" = 50', DATE: 04/22/09.
2. *FIGURE 2: PROPOSED SOIL BORING LOCATIONS* OF THE OU2 PRE-DESIGN INVESTIGATION WORK PLAN, PREPARED FOR ORANGE AND ROCKLAND UTILITIES, PREPARED BY ARCADIS, SCALE: 1" = 50', DATE: 2011.

PRE-DESIGN INVESTIGATION WORK PLAN
OPERABLE UNIT 2
NYACK FORMER MGP SITE
NYACK, NEW YORK

ORANGE AND ROCKLAND UTILITIES, INC.
SPRING VALLEY, NEW YORK

GEI Consultants

PREVIOUS AND PROPOSED SOIL BORING LOCATIONS

Project 121640-1001 | March 2012 | Figure 3

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