ENVIRONMENT
& HEALTH

Ms. Greta Kowalski, P.G.
Project Manager
Remedial Action Bureau C
Division of Environmental Remediation
625 Broadway, 12th Floor, Albany, NY 12233

Subject: National Grid Schenectady Broadway – Rotterdam-Weaver St. #36 Duct Bank Reroute

Dear Ms. Kowalski,

On behalf of National Grid, this letter presents the proposed environmental requirements for ground-intrusive investigations for the upcoming Rotterdam-Weaver St. #36 Duct Bank Reroute project. The new duct bank alignment will be installed within the fenced site limits of the former manufactured gas plant (MGP) site and boundary of the New York State Department of Environmental Conservation (NYSDEC) Site No. 4-47-026 (the Site). This letter is specific to the work within the MGP site limits. The approximate location of the work is shown in Figure A.

Subsurface impacts may be present within the limits of the work. Relevant background information is summarized below.

Background Information

National Grid previously performed remediation at the site. Schermerhorn Creek was isolated in a concrete box culvert, a barrier isolation wall was installed, and several excavations of MGP-impacted material were performed. Excavation areas, the limits of the isolation wall, and the location of the concrete box culvert are shown on Figure A.

Planned Work Activities

This project requires coordination between multiple groups within National Grid and outside stakeholders. This notification letter/work plan only describes the work in which Ramboll is involved within the site limits. The first portion of work is anticipated to be completed during the week of April 20th. National Grid requested that Ramboll assist with securing approval from disposal facilities by performing pre-excavation waste characterization sampling at 10 locations along the duct bank alignment. The pre-excavation waste characterization sampling will require: (1) utility location by a third-party utility locator; (2) construction of a temporary decontamination pad; (3) removing the asphalt at the sampling location; (4) air knife the subsurface soils, using a vacuum truck to remove material to 5’ below ground surface (bgs); (5) hand auger to be used to collect a

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sample below 5', up to 8' bgs; (6) collect discrete Volatile Organic Compound (VOC) samples, composite samples, and composite PCB samples from the excavations as shown on Figure A; (7) backfill excavations with material collected in vac truck; (8) finish backfilling with grout and/or gravel and cold patch the asphalt surface.

The proposed locations of the ground-intrusive work are shown on Figure A. Sample locations 3 and 4 are located within previously remediated areas and are assumed to be unimpacted. Other areas within the site limits have not been excavated and may contain historic MGP structures, therefore, may be impacted and will be handled as such. The actual construction of the duct bank within the site limits is anticipated to begin in July.

Proposed Environmental Requirements

The proposed excavations for collecting waste characterization samples are anticipated to be accomplished using vacuum excavation and hand methods. Parratt Wolff will use a walk behind saw to cut the asphalt in an approximately 2' by 2'. The vacuum excavation is anticipated to be approximately 5' bgs, with hand auger sampling extending up to 8' bgs. If boulders, cobbles, and other anthropogenic debris are encountered, Parratt Wolff will use digging bars and/or post-hole diggers to loosen the debris. Excavation support (e.g., trench boxes) is not anticipated to be needed for these excavations. Groundwater is likely to be encountered in the range of 5 to 10 feet below ground surface (bgs). If groundwater is observed in the excavation, vacuum excavation will be stopped immediately to allow for re-use of the excavated material as backfill. If wet soils are removed, spoils will be stored in a lined staging area and allowed to naturally drain prior to use as backfill. Construction water will be collected and stored in watertight drums for off-site treatment and disposal.

1. ***Health & Safety***: A site-specific Job Safety Analysis (JSA) will be developed to fulfill the requirements of 29 CFR 1910 and 29 CFR 1926 for personnel who will be performing the ground intrusive work. Appropriate personal protective equipment (PPE) will be outlined in the JSA. All on-site Contractors working within the site limits will be required to have OSHA 40-hour Hazardous Waste Operations and Emergency Response Standard (HAZWOPER) training. Signage will be posted on the Site fence indicating hazards.

2. ***Community Air Monitoring***: Contractor will be required to implement dust, vapor, and odor control measures, as needed, based on air monitoring, olfactory, and visual indicators during intrusive and spoil handling activities. Upwind and downwind air monitoring will be performed by Ramboll in accordance with NYSDOH Generic Community Air Monitoring Plan. The air monitoring will only be performed during excavation activities within the Site limits. If the ambient air concentrations of total VOCs at the downwind perimeter station exceeds 5 parts per million (ppm) above background (upwind station) concentration for the 15-minute average, work activities will be temporarily stopped while monitoring continues. If the total VOC concentration readily decreases below 5 ppm above background (upwind) concentration, work activities will resume with continued monitoring. If the ambient air concentration of total VOCs at the downwind perimeter of the work area persists at levels in excess of the 5 ppm 15-minute average above background (upwind) concentration, or if instantaneous levels are 25 ppm or greater, work activities will be halted and one or more of the following control measures will be implemented:
    a) Cover the excavated area with polyethylene sheeting.

b) Limit excavation size and the surface area of exposed contaminated soil.

Work activities will resume one instantaneous readings are below 25 ppm and the 15-minute average VOC concentrations remain below 5 ppm above background.

Real time monitoring for PM10 will be performed continuously at the upwind and downwind stations. If the downwind PM10 particulate level is 100 micrograms per cubic meter (µg/m^3) greater than background for the 15-minute period or if airborne dust is observed leaving the work area, dust suppression techniques will be employed. If the PM10 level exceeds 150 µg/m^3 above the upwind level, work must be stopped and dust suppression methods must be applied.

3. ***Excavation & Material Handling***: The asphalt and concrete within the proposed excavation will be removed and stockpiled onsite for offsite recycling. Vacuum-excavated material will be reused to backfill the excavation, unless visible impacts are observed. Any material suspected of being impacted will be staged onsite in a material containment area (poly sheeting and haybales) or containerized in water-tight drums.

   Characterization will consist of collecting samples for laboratory analysis to meet the requirements of the off-site disposal facility selected by National Grid. It's assumed Greenridge landfill and ESMI will be used for off-site disposal. If purifier waste is observed in the excavation, a sample will be collected and analyzed for reactive cyanide and sulfur.

   Vacuum-excavated materials will be used to backfill the excavations and compacted using a vibratory tamper. Impacted materials will be containerized in water-tight drums for offsite disposal once approval is received from the disposal facility. Runoff from precipitation events that enters the excavation area will be pumped into a storage container that will be transported off-site for treatment and disposal. Excavated material with MGP impacts will be staged separately. The locations and limits of MGP impacts will be documented by photographs and through use of GPS or taping from known locations. Excavation of MGP impacted soil beyond the limits required for the gas pipeline inspection will not be performed at this time. If groundwater is encountered during excavation, it will be pumped from the excavation and placed in watertight drums for subsequent characterization sampling and off-site disposal.

4. ***Imported Fill***: The proposed excavations will be backfilled using the excavated materials and compacted using a vibratory tamper. The surface will be restored using cold patch asphalt. If impacted materials are encountered and cannot be used as backfill, fill that meets the NYSDEC's DER-10, Sampling, Analysis, and Assessment of Per- and Polyfluoroalkyl Substances (PFAS, NYSDEC 2023), and Part 375 will be imported to the Site. The laboratory analytical results for the proposed backfill are provided as an attachment to this notification letter. Samples were analyzed in 2024 and previously approved by NYSDEC (approval letter also attached). Common fill (if needed) will be imported from RJ Valente, George Thompson Road, Mechanicville, Mine ID 50049 (Luther Mine Forest) and crushed stone will be imported from Callanan Cropseyville Quarry, MLF# 40031 (Permit ID 4-3822-00005/00001). Weight tickets will be collected for each shipment of imported fill material to document the type, quantity, and source of the imported material, if any. A Request to Reuse Form will be submitted to NYSDEC for approval should materials be considered for reuse during the actual duct bank construction work (anticipated June/July 2026).

5. ***Decontamination***: The Contractor will be required to decontaminate equipment that comes into contact with potentially impacted soil. Parratt Wolff will construct a decontamination pad using lumber and plastic sheeting in a location identified by National Gird. Prior to demobilizing from the Site, the vacuum excavator hopper will be decontaminated using a hot water pressure washer. Personnel working in and around potentially MGP impacted soil will wash boots at a designated boot wash station with Alconox. Any liquid produced from decontamination activities will be collected and containerized for transportation and off-site treatment and disposal.

An on-site representative from Ramboll will observe and document the ground intrusive activities within the Site boundary. This representative will also perform community air monitoring. A letter report will be prepared to summarize the work, analytical lab results, air monitoring results, import weight tickets (if any), and off-site disposal manifests, and submitted to NYSDEC following the completion of work activities.

Parratt Wolff has been subcontracted to begin this work during the week of April 20th, 2026. This work is anticipated to be completed within 4-5 business days. The actual duct bank installation work within the site limits is currently scheduled for July, but other work activities associated with this project are expected to begin at the end of April. Please notify us if you would like to visit the Site during the sampling activities or construction. Please do not hesitate to contact Nicholas Smith or myself if you have any questions or require additional information.

Yours sincerely,

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