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April 3, 2012

Ms. Jane O'Connell
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 2
47-40 21st Street
Long Island City, New York 11101-5407

**Re: Cover System Corrective Measures Work Plan – Revision 1
Mott Haven Campus – X790
730 Concourse Village West
Bronx, New York
SCA LLW# 033485, Job#34857**

Dear Ms. O'Connell:

On behalf of the New York City School Construction Authority (SCA), TRC Engineers, Inc. (TRC) is providing this Corrective Measures Work Plan Revision 1 (Work Plan) to restore the composite cover system engineering control at the Mott Haven Campus located at 730 Concourse Village West, Bronx, New York (hereafter referred to as the "Site").

Background

ATC Associates, Inc. (ATC) performed the annual site inspection on February 23, 2012, in accordance with the November 2008 Site Management Plan (SMP) at the request of the New York City Department of Education (DOE). While inspecting the concrete cap cover system under the platform that supports Public School (P.S.) 151 and former P.S. 156, ATC's inspector observed three (3) shallow excavations. ATC reported that the shallow excavations were "up to 10' x 10' and 6"- 12" deep" and associated with school plumbing system upgrades. These observations were reported in ATC's Annual Site Management Report (SMR), which was provided to the SCA for review and comments before being finalized and submitted to NYSDEC.

On the same day that the SMR was reviewed, the SCA contacted TRC and requested an immediate Site inspection. TRC inspected the Site on Friday, March 16, 2012, and found that the plumbing excavations had not been entirely backfilled and the concrete cap had not been repaired. The concrete cap cover system includes 8" of gravel and 4" of concrete. According to the SCA's Project Officer, this work includes abandoning the subsurface sewer lines and running the lines above grade to eliminate the sewer leaks under the platform. TRC used a photoionization detector (PID) to analyze the exposed soil and all readings registered 0.0 parts per million (ppm). In addition, the exposed soil did not display any evidence of staining or odors. TRC and the SCA directed the Contractor to stop work immediately and cover the excavations with polyethylene sheeting and plywood/lumber. While these measures were being implemented, the SCA notified the NYSDEC of these temporary corrective measures as they were being performed.

On March 19, 2012, the NYSDEC directed the SCA to develop a work plan to improve communications and avoid similar situations from occurring in the future and to restore the site cover system in compliance with the SMP.

On behalf of the SCA, TRC prepared and submitted the Work Plan to the NYSDEC on March 20, 2012 to respond to the NYSDEC directive. The NYSDEC provided comments to the Work Plan in a letter dated March 30, 2012 (refer to *Attachment A*). This revised Work Plan contains responses to bullets 2 through 5 in the NYSDEC comment letter.

Corrective Measures Work Plan

The duration of the remaining school plumbing system upgrade work is expected to be approximately 4 months from start to completion. This work includes exposing up to 11 house traps, video taping the connections, connecting aboveground piping to the traps, and backfilling and restoring the concrete cap. Approximately 70 cubic yards of additional excavated material (i.e., concrete cap, gravel, and soil) is anticipated to be generated during this work. A drawing showing the locations of the house traps is provided as *Attachment B* to this Work Plan.

The Contractor will not perform any work activities that could disturb the Site cover system until authorized by the NYSDEC and SCA. In order for the Contractor to proceed with intrusive work, they will be required to implement SMP-required controls such as a tire wash for trucks leaving the Site and dust suppression. A water hose capable of spraying water directly onto roads, stockpiles, and into each of the excavations will be used for dust suppression. Excavated material will be kept covered with appropriately anchored tarps when not in use. The Contractor will be required to follow the SMP protocols and provide submittals for SCA and TRC review and approval for soil/waste disposal or importing clean fill prior to proceeding. Finally, the Contractor will be required to restore the concrete cap cover system to its original specifications and to the satisfaction of the NYSDEC and SCA upon completion of all subsurface plumbing improvements.

TRC will implement a community air monitoring plan (CAMP) during the remaining intrusive work activities and will provide full time inspection services to verify SMP compliance. After the plumbing improvements are completed, disposal manifests received, and the Site cover system is restored to its original specifications, TRC will issue a Construction Completion Report (CCR) to SCA and DOE. The CCR will summarize the work activities and confirm compliance with the SMP. Upon receipt of TRC's report, DOE will direct ATC to perform a Site inspection in order to issue a Corrective Measures Report (CMR). The CMR will be submitted to the NYSDEC electronically within 30 days of the completion of Site restoration. ATC will also include the CMR/CCR in the next Periodic Review Report.

In order to improve communication between the IEH Division and SCA's Construction Management (CM) Division and New York City Department of Education (DOE) Division of School Facilities (DSF) responsible for Site work, SCA has expanded their current communication network. SCA CM and DOE DSF have been made aware of this site, and all other SCA/DOE sites in a DEC program with SMPs. SCA CM and DOE DSF staff are required to contact IEH for direction prior to proceeding with work on these sites. An SMP addendum will be prepared that will address this expanded communication network.



Sincerely,

TRC Engineers, Inc.



Michael R. Sherwood
Senior Project Manager

Attachment A – NYSDEC Comment Letter dated March 30, 2012
Attachment B – Plumbing System Upgrade Drawings

CC: S. Martinkat (NYSDEC)
A. Lempert (NYCSCA)
L. Guterman (NYCSCA)
S. Kanaparthi (NYCSCA)
B. Orlan (NYCDOE)



ATTACHMENT A
NYSDEC COMMENT LETTER



New York State Department of Environmental Conservation

Division of Environmental Remediation, Region 2 Office

Hunters Point Plaza, 47-40 21 St, Long Island City, New York 11101

Phone: (718) 482-6454 • Fax: 718-482-6358

Website: www.dec.ny.gov



Joe Martens
Commissioner

March 30, 2012

Ross Holden
NYC School Construction Authority
30-30 Thomson Ave
Long Island City, NY 11101

Re: Site Management (SM) Corrective Measures Work Plan (CMWP)
Former Metro North Property
Bronx County, Site No.: C203030

Dear Mr. Holden:

The Department has reviewed your Periodic Review Report and Corrective Measures Work Plan (CMWP), dated March 20, 2012, and has the following comments.

- The IC/EC certification form must be revised. Specifically, item 7 in Box 2 should be checked "No". This affects the remainder of the certification – the instructions then indicate that the signature line in Box 2 should be signed, and the remainder of the form left blank. The certification cannot be made (i.e., checked "Yes") until such time as the CMWP is implemented and the site cover restored.
- The dedicated water truck seems excessive based upon Photo #12 in the Periodic Review Report (PRR) dated March 20, 2012. Please provide a diagram showing the full extent of the proposed sewer trench and recommend appropriate dust suppression (which may in fact be a water truck).
- Please indicate the duration of the construction activities and estimated volume of soil to be removed.
- Please send a copy (electronic only) of TRC's Construction Completion Report to the NYSDEC within 30 days of the completion of the excavation restoration activities, and include it in the next PRR.
- It was the Department's understanding that the list of sites provided by SCA IEH to SCA CM must be consulted prior to any contractor being hired by SCA CM. This requirement should extend to DOE as well. This needs to be clarified in the CMWP and made part of the SMP requirements.

Please respond to these comments within the 10 days of the date of this letter.

If you have any questions, please contact me at (718) 482-4891 or send me an e-mail:

smmartin@gw.dec.state.ny.us

Sincerely,

Sondra Martinkat
Project Manager

cc: J. O'Connell, R. Cozzy – NYSDEC
D. Hettrick - NYSDOH
L. Guterman – SCA
B. Orlan - NYC DOE
G. Gideon – ATC

ATTACHMENT B
PLUMBING SYSTEM UPGRADE DRAWINGS



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Consultants:

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NEW YORK, NY 10001
212.695.4767

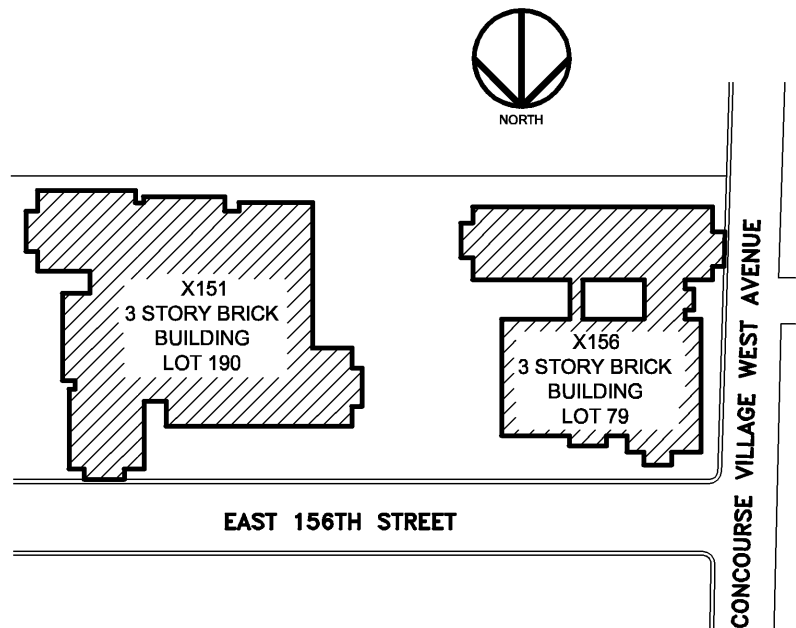
LILKER ASSOCIATES CONSULTING ENGINEERS, PC
1001 AVENUE OF THE AMERICAS
NEW YORK, NY 10018
212.695.1000

NOTE: Drawing may be
printed at reduced scale

1 11/16/2010 ISSUED FOR BID

No. Date Revision

Key Plan:



Block # 2443

Lot # 79 & 190

SCA Design Manager: PRATIMA MALHOTRA

Project Architect/Engineer: B. LILKER

Discipline Lead: E. BETSER

Designer: B. BARKOVITZ

Drawn by: B. BARKOVITZ

Checked by: E. BETSER

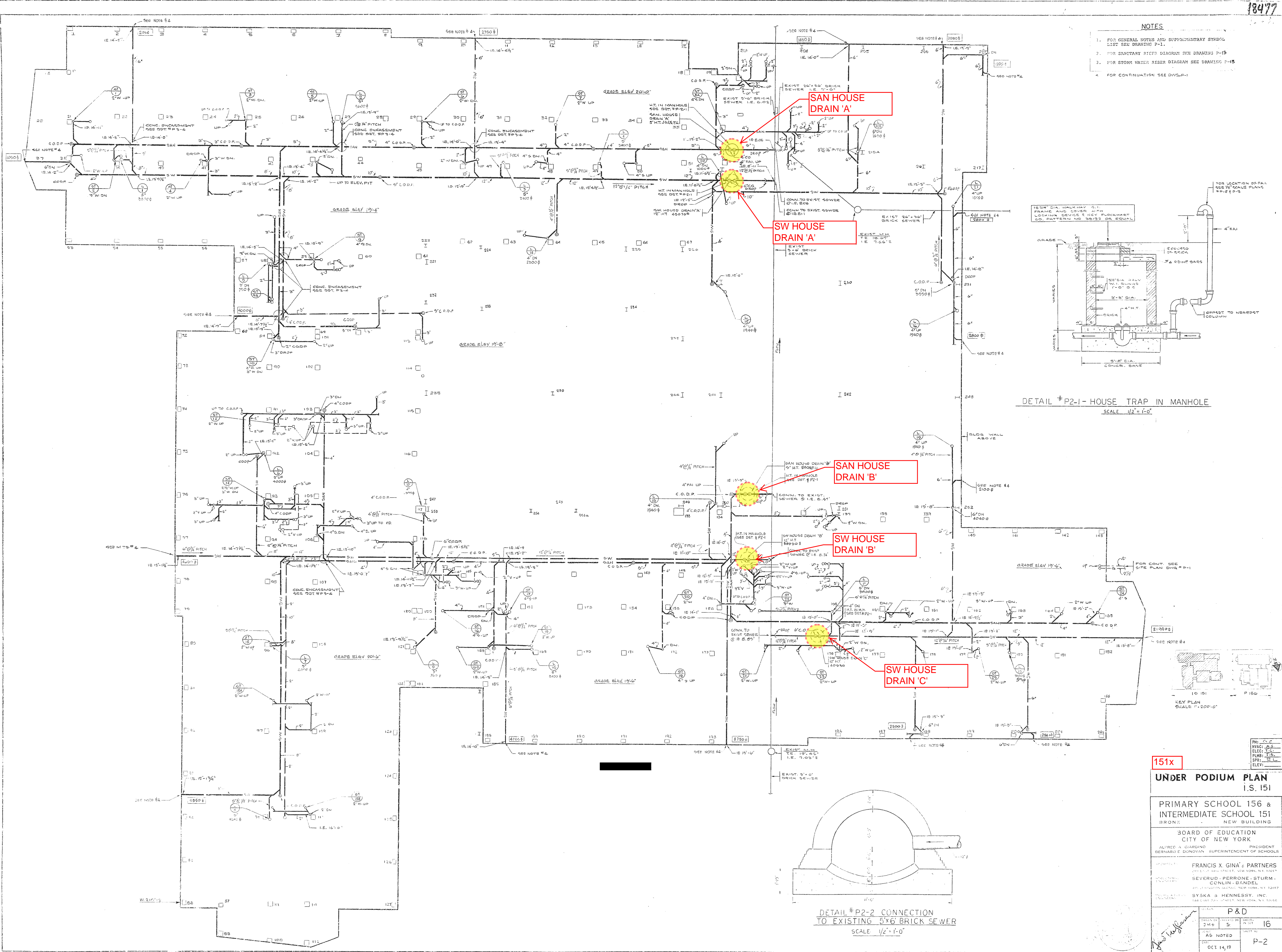
Design No.: D013054 Facility Code: X151 & X156 Date: 11/16/10

Project:
IS 151 AT X151 & PS389 AT X156
CMU WALLS & CONCRETE CEILING
BEAMS & FLOOD ELIMINATION
Address:
250 EAST 156 STREET &
750 CONCOURSE VILLAGE WEST AVENUE
BRONX, NY 10451

Drawing Title:
PLUMBING EXISTING UNDER
X151 PODIUM PLAN
FOR REFERENCE ONLY

Drawing No.:
P502.00

Sheets in Contract Set:
046 of 064



151x

UNDER PODIUM PLAN
I.S. 151

PRIMARY SCHOOL 156 &
INTERMEDIATE SCHOOL 151
BRONX, NY 10451

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P&D
16
AS NOTED
OCT 14, 10
P-2

1 EXISTING PLUMBING UNDER X151 PODIUM PLAN - FOR REFERENCE ONLY
P502 SCALE: 1/16" = 1'-0"

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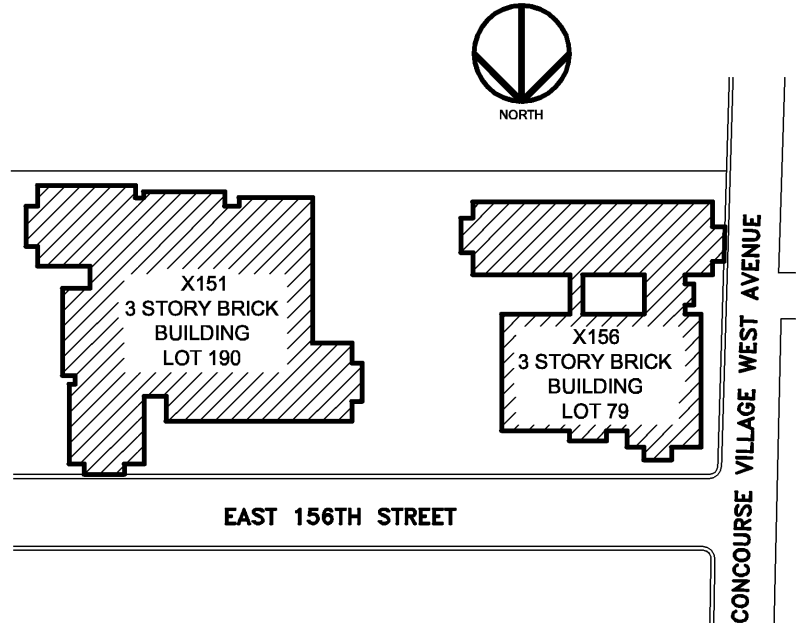
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Discipline Lead:

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Designer:

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Drawn by:

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Checked by:

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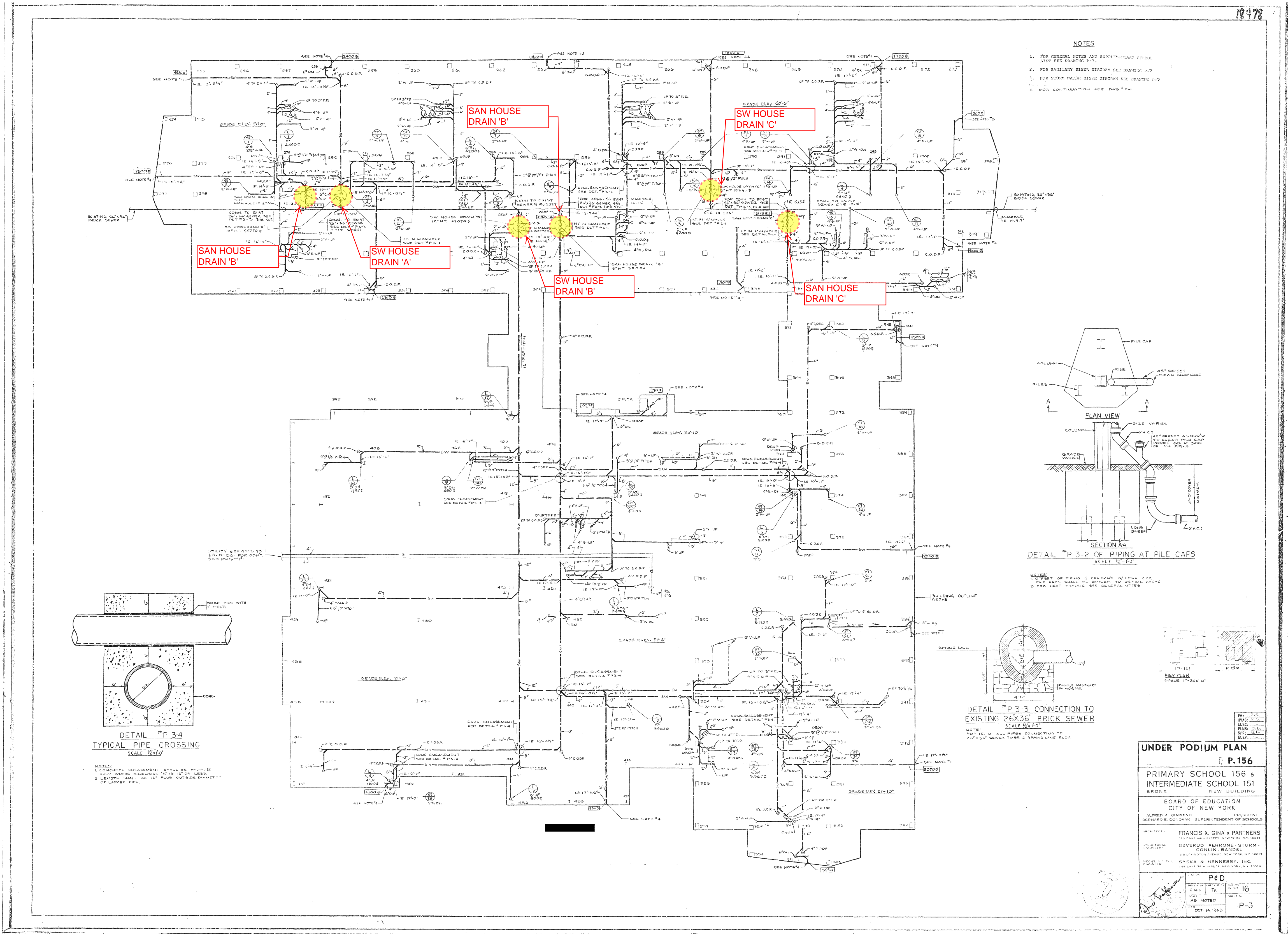
Drawing Title:

PLUMBING EXISTING UNDER
X156 PODIUM PLAN
FOR REFERENCE ONLY

Drawing No.:

P503.00

Sheets in Contract Set:
047 of 064



1 EXISTING PLUMBING UNDER X156 PODIUM PLAN - FOR REFERENCE ONLY
P503 SCALE: 1/16" = 1'-0"