



Consolidated Edison Company of New York
31-01 20th Avenue
Long Island City, NY 11105-2048
www.conEd.com

March 27, 2015

By United Parcel Service

Mr. Gardiner W. Cross
New York Department of Environmental Conservation
Remedial Bureau C, 11th Floor
625 Broadway
Albany, New York 12233-7014

Re: White Plains Former Manufactured Gas Plant Site
White Plains, New York
NYSDEC Site #V00438-3

Dear Mr. Cross:

Enclosed for filing with the Department is the 2014 Periodic Review Report for the above-referenced site.

If you have any questions or require further information, please do not hesitate to call me at (718) 204-4205 or via email at skorobogatovy@coned.com.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Y. Skorobogatov'.

Yelena Skorobogatov
Technical Specialist
MGP Remediation
Environmental, Health and Safety

Enc:

Cc: Anthony Perretta, NYSDOH – 1 copy
Dena Putnick, Esq., NYSDEC – w/o enc.
Edward Moore, NYSDEC, Region 3 – w/o enc.
Kenneth Kaiser, Con Edison – w/o enc.
David S. Brown, Archdiocese of New York – 1 copy
Kimberlea Shaw Rea, Bosworth, Gray & Fuller – 1 copy
Rev. Msgr. Neil Graham, St. John's Church – 1 copy

PERIODIC REVIEW REPORT
WHITE PLAINS FORMER MGP SITE
White Plains, Westchester, New York

Prepared For:



CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

31-01 20th Avenue
Long Island City, NY 11105

Prepared By:

PARSONS

200 Cottontail Lane
Somerset, New Jersey 08873
Phone: (732) 537-3500
Fax: (732) 537-3502

MARCH 2015

TABLE OF CONTENTS

	Page
1.0 INTRODUCTION	1
2.0 SITE ACTIVITIES CONDUCTED IN 2014	2
2.1 Post-Remedial Action Groundwater Sampling.....	2
2.2 Post-Remedial Action NAPL Recovery Well Monitoring	3
3.0 ANNUAL SITE INSPECTION	3
4.0 DECLARATIONS OF CONVENANTS AND RESTRICTIONS	3

LIST OF FIGURES

Figure 1 Site Plan

Figure 2 SMP Notification Areas

LIST OF ATTACHMENTS

ATTACHMENT 1 SITE WIDE INSPECTION FORM

ATTACHMENT 2 SITE INSPECTION PHOTO LOG

1.0 INTRODUCTION

This Periodic Review Report (PRR) has been prepared as part of the remedial program at the Consolidated Edison Company of New York, Inc (Con Edison) White Plains Former Manufactured Gas Plant (MGP) Site located in White Plains, Westchester County, New York (the “Site”) in accordance with the Voluntary Cleanup Agreement (VCA) Index # D3-0002-00-10, Site # V00438-3, which was executed on September 23, 2002 and modified on August 23, 2005. A Site plan is included as [Figure 1](#).

Remedial activities completed at the Site were conducted in accordance with the New York State Department of Conservation (NYSDEC) approved Remedial Action Work Plans (RAWPs) implemented for Operable Units 1 (OU-1) and Operable Unit 2 (OU-2) of the Site. OU-1 consists of the southern section of the Con Edison electric substation and the off-site Saint John the Evangelist Roman Catholic Church property. OU-2 consists of the northern section of the Con Edison distribution substation property and the adjoining 12 Water Street property.

The NYSDEC-approved remedy for OU-1 consists of: (i) continued maintenance and use of the non-aqueous phase liquid (“NAPL”) MGP coal tar cut-off wall installed immediately down-gradient of the former MGP relief holder area in the south-central portion of the Con Edison electric substation property as part of the NYSDEC-approved Interim Remedial Measures (“IRM”); (ii) continued maintenance, operation, and monitoring of the NAPL recovery wells and piezometers installed in that area as part of the IRM; and (iii) installation, maintenance, operation, and periodic monitoring of a network of groundwater monitoring wells on the Saint John the Evangelist Roman Catholic Church property. The NYSDEC-approved remedy for the OU-2 portion of the Site consists of in-situ stabilization/solidification (“ISS”) of MGP source materials, and the installation of a low permeability cap.

As part of the remedial action for the Site, engineering and institutional controls were implemented for the continued protection of human health and the environment. Engineering controls included the composite cover system, the on-site groundwater monitoring well network, the on-site NAPL recovery wells, and the on-site NAPL cut-off wall. Institutional controls included the filing of and compliance with the Declaration of Covenants and Restrictions to place restrictions on the future use of the Site and a Site Management Plan (SMP) was developed to set guidelines for future intrusive activities at the Site. Additional institutional controls include ongoing groundwater and other environmental/public health monitoring.

Since some contamination was left in the subsurface at this Site, a SMP was prepared and approved by the NYSDEC to manage the remaining contamination at the Site in perpetuity or until extinguishment of the Declaration of Covenants and Restrictions for the Site in accordance with the VCA.

In accordance with the SMP, a comprehensive Site-wide inspection of the remedial components installed at the Site will be conducted annually to confirm that the engineering controls continue to perform as designed, that the institutional controls have not been altered, and that the conditions at the Site are fully protective of public health and the environment. The monitoring/NAPL recovery wells, well protective casings and covers, the composite cover system and surrounding surface areas are inspected during each annual inspection event to determine if, and when, maintenance activities are required. The inspections are performed to confirm that

these items are present, functioning properly, and have not been damaged so as to compromise the effectiveness of each feature. Maintenance activities are performed, as appropriate, based on the findings of the annual inspections. Maintenance activities may include, but are not limited to: the repair/replacement of damaged or missing well or vault covers; the repair of damaged concrete or asphalt surfaces immediately surrounding the wells; and the repair of damaged portions of the composite cover system.

The annual certification is a written statement by a New York State-licensed professional engineer indicating that the engineering controls employed at the Site are unchanged from the previous certification or that any changes to the controls employed at the Site were approved by the NYSDEC, and that nothing has occurred that would impair the ability of such controls to protect the public health and the environment or constitute a violation or failure to comply with the SMP.

2.0 SITE ACTIVITIES CONDUCTED IN 2014

As depicted on [Figure 2](#), the following intrusive activities would require notification to the NYSDEC:

- Excavations greater than five feet in depth within the southern section of the Con Edison electric distribution substation property portion of the Site, or
- Intrusive work that encounters the ISS material which is generally 3.5 feet below ground surface (bgs) within the OU-2 area of the Site, or
- Intrusive work that is greater than five feet in depth within the non-ISS areas of the OU-2 area of the Site, or
- Intrusive work that is greater than five feet in depth within the sidewalk along the southern side of Water Street adjacent to the OU-2 area of the Site.

No intrusive activities requiring NYSDEC notification were conducted at the Site in 2014.

2.1 Post-Remedial Action Groundwater Sampling

Post-remedial action groundwater monitoring is performed at the Site on a periodic basis to assess the performance of the remedy. During each sampling event, groundwater samples are collected from the monitoring wells and submitted to a New York State Department of Health Environmental Laboratory Analysis Program (ELAP) approved laboratory for the analysis of volatile organic compounds (VOCs) using USEPA Method 8260 and semi-volatile organic compounds (SVOCs) using USEPA Method 8270.

The most recent post-remedial action groundwater sampling events performed at the Site were conducted on June 2, 2014 through June 5, 2014 and December 15, 2014 through December 18, 2014 in accordance with the SMP. Groundwater samples were collected from monitoring wells MW-6 through MW-20, and MW-101 and were analyzed for VOCs and SVOCs. MW-12C was not sampled in December 2014 due to the presence of NAPL. Letters summarizing the results of these sampling events are submitted to the NYSDEC under separate covers. The next post-remedial action groundwater sampling event is scheduled to take place in May 2015 as per the semi-annual sampling schedule.

2.2 Post-Remedial Action NAPL Recovery Well Monitoring

The on-site network of NAPL recovery wells and piezometers located within the south-central section of the Con Edison electric distribution substation were also monitored on a semi-annual basis in 2014. During each monitoring event, the depth to groundwater and NAPL thickness (if present) were measured in each recovery well and piezometers using an electrical oil/water interface probe attached to a measuring tape accurate to within 0.01 feet.

3.0 ANNUAL SITE INSPECTION

A Site inspection was conducted on March 6, 2015 by Parsons. Inspection activities consisted of visually observing and documenting the condition of the monitoring and NAPL recovery wells, protective casings and covers, and surrounding surface areas. In addition, the on-site composite cover system was inspected. The inspection was performed to confirm that these items are present, functioning properly, and have not been damaged so as to compromise the effectiveness of each feature. The results of the inspection indicated the presence of cracks in the asphalt cover of the parking lot composite cover system which appear to be due to the harsh winter conditions of the past seasons. In addition, concrete flaking was observed in the sidewalk along Water Street in the northeast corner of the Site. These conditions are not currently resulting in exposure pathways through the composite cover system. However, it is recommended that these features be closely monitored during future Site inspections in the event that conditions worsen.

During the Site inspection on March 6, 2015, monitoring well, MW-18 was observed to be missing its well cover but its well plug was intact. As requested by Con Edison, Parsons subsequently installed a replacement cover at MW-18 on March 12, 2015 and this issue has been corrected.

Based on the Site inspection performed on March 6, 2015, the Site continues to be used as an office building with parking lot, an electrical distribution substation, and a church with school. A completed Site-wide Inspection Form is included as [Attachment 1](#). In addition, a Site inspection photo log has been included as [Attachment 2](#).

4.0 DECLARATIONS OF COVENANTS AND RESTRICTIONS

The NYSDEC-approved Declarations of Covenants and Restrictions for the Con Edison electric substation and the 12 Water Street properties were filed with the Westchester County Clerk's office on April 28, 2011. Con Edison notified the NYSDEC of the filing in a letter dated May 10, 2011. This letter was also included in the PRR that was submitted to the NYSDEC on April 11, 2012.

Certification Statement

Based on the annual site inspection of the White Plains Former MGP Site that was conducted on March 6, 2015 and the documentation provided herein, I certify that the engineering and institutional controls implemented at the Site in accordance with the NYSDEC-approved Site Management Plan continue to be protective of human health and the environment.



A handwritten signature in black ink, appearing to read "Daniel Martoccia".

Daniel M. Martoccia, P.E.
NYS License No. 086936

PARSONS

200 Cottontail Lane
Somerset, NJ 08873

FIGURES
























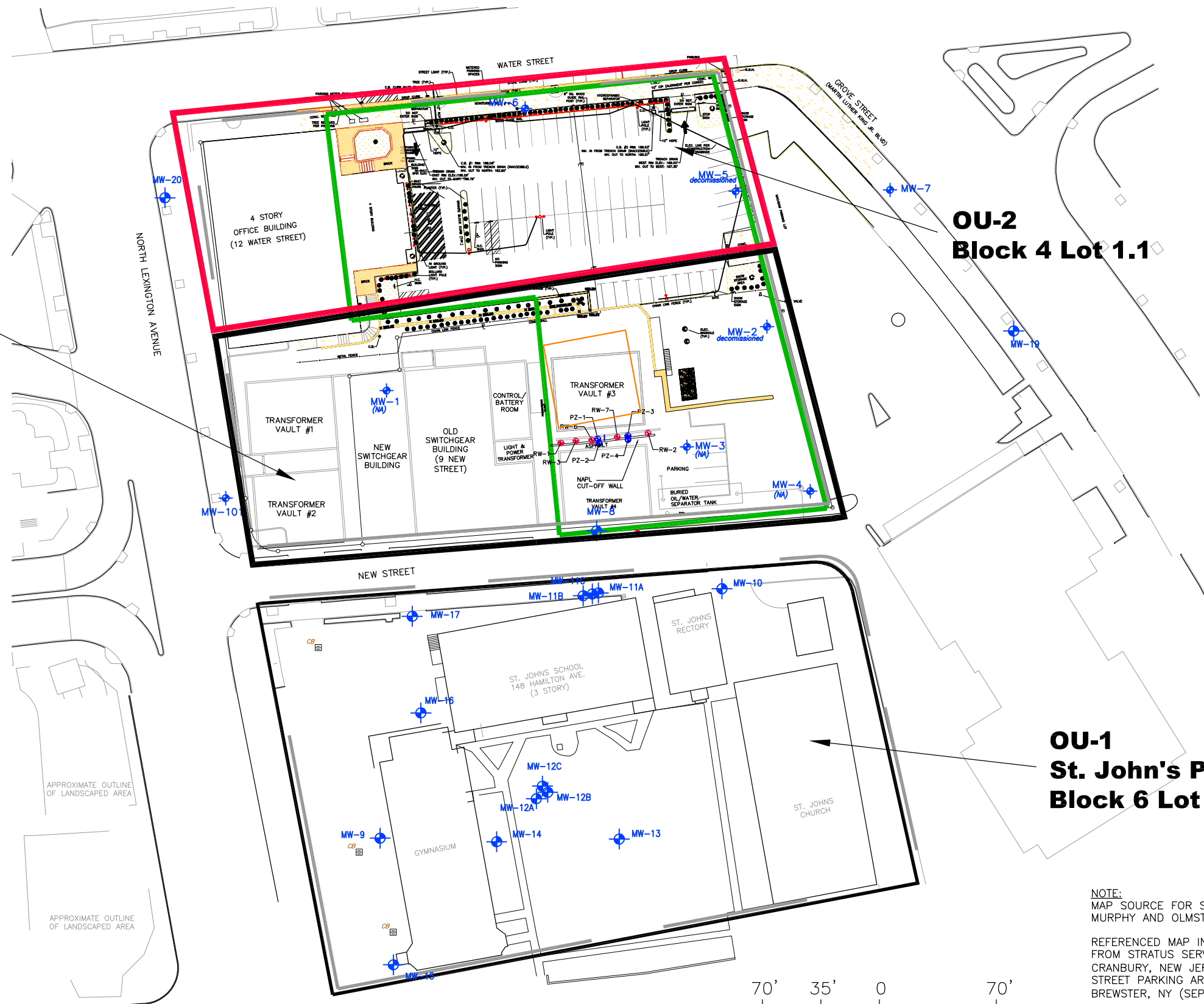
**OU-1
9 New Street
Block 4 Lot 2.1**

**OU-2
Block 4 Lot 1.1**

**OU-1
St. John's Property
Block 6 Lot 2**

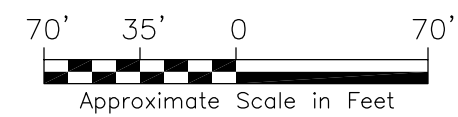
LEGEND:


-  CATCH BASIN
-  RECOVERY WELL
-  PIEZOMETERS
-  MONITORING WELL
-  PARKING METER
-  LIGHT POLE
-  STREET LAMP
-  IN-GROUND LIGHT
-  BOLLARD LIGHT POLE
-  RETAINING WALL
-  PROPERTY LINE
-  CONCRETE
-  BRICK
-  PLANTER AREAS
-  CHAIN LINK FENCE
-  METAL HANDRAIL
-  OPERABLE UNIT 2 (OU-2)
-  OU-1 ELECTRIC DISTRIBUTION SUBSTATION PROPERTY
-  APPROXIMATE BOUNDARY OF FORMER MGP SITE
-  OU-1 ST. JOHN'S CHURCH PROPERTY
-  IRM EXCAVATION AREA

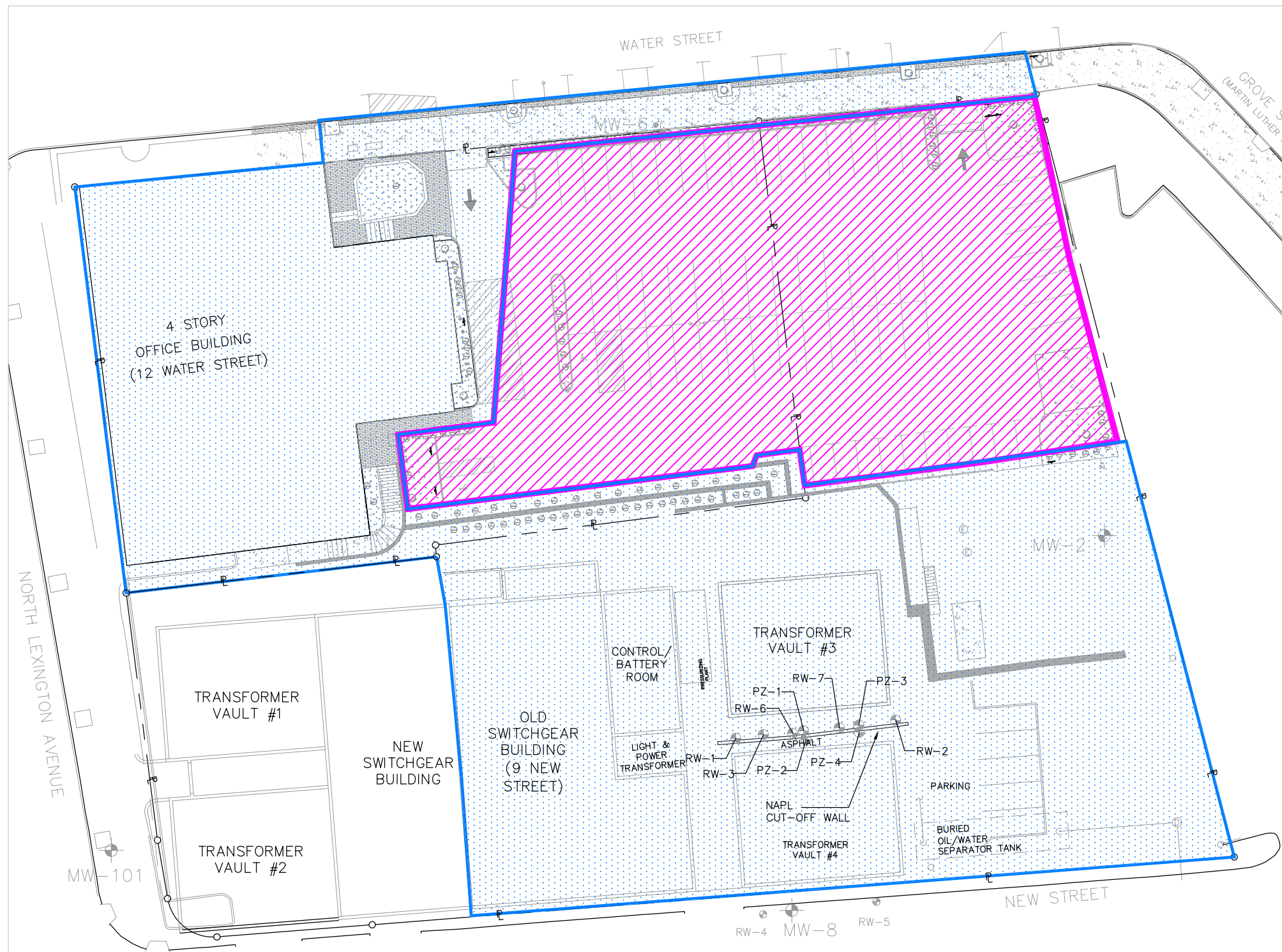


NOTE:
 MAP SOURCE FOR ST. JOHNS BUILDINGS:
 MURPHY AND OLMSTEAD, ARCHITECTS – JUNE 30, 1928.











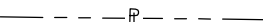



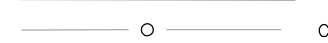
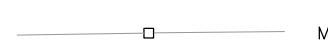


REFERENCED MAP INFORMATION FOR SUBSTATION PROPERTY
 FROM STRATUS SERVICES GROUP, ENGINEERING DIVISION, INC.,
 CRANBURY, NEW JERSEY (MARCH 14, 2000); AND FOR 12 WATER
 STREET PARKING AREA FROM TERRY BERGENDORFF COLLINS,
 BREWSTER, NY (SEPTEMBER 30, 2010)



PARSONS 301 PLAINFIELD ROAD SUITE 350 SYRACUSE, N.Y. 13212 PHONE: (315) 451-9560 FAX: (315) 451-9570		WHITE PLAINS FORMER MGP SITE WHITE PLAINS, NEW YORK	FIGURE NO.
		SITE PLAN	1



LEGEND:


-  RECOVERY WELL
-  PIEZOMETERS
-  MONITORING WELL
-  MONITORING WELL CLUSTER
-  PARKING METER
-  LIGHT POLE
-  STREET LAMP
-  IN-GROUND LIGHT
-  BOLLARD LIGHT POLE
-  RETAINING WALL
-  PROPERTY LINE
-  CONCRETE
-  BRICK
-  PLANTER AREAS
-  CHAIN LINK FENCE
-  METAL HANDRAIL
-  SMP NOTIFICATION AT 3.5 FEET BELOW GRADE
-  SMP NOTIFICATION AT 5 FEET BELOW GRADE

NOTE:

REFERENCED MAP INFORMATION FOR SUBSTATION PROPERTY DERIVED FROM STRATUS SERVICES GROUP, ENGINEERING DIVISION, INC., CRANBURY, NEW JERSEY (MARCH 14, 2000); AND FOR 12 WATER STREET PARKING AREA FROM TERRY BERGENDORFF COLLINS, BREWSTER, NY (SEPTEMBER 30, 2010).



SCALE: 1"=40'

 301 PLAINFIELD ROAD SUITE 350 SYRACUSE, N.Y. 13212 PHONE: (315) 451-9560 FAX: (315) 451-9570	WHITE PLAINS FORMER MGP SITE WHITE PLAINS, NEW YORK	FIGURE NO. 2
	SMP NOTIFICATION AREAS	

ATTACHMENT 1

SITE WIDE INSPECTION FORM

SITE WIDE INSPECTION FORM
WHITE PLAINS FORMER MGP SITE

Inspector: Daniel Martoccia Date: 3/6/2015

Event Type (circle one): Scheduled / Non-Routine

Asphalt Inspection

Please note any observations of breaches in the any asphalt, which may include but are not limited to cracks, holes, indentations, vegetation growing through asphalt, etc.

Observed cracks in the asphalt cover of the parking lot composite cover system which appear to be due to the harsh winter conditions of past seasons. Cracks appear to have gotten worse since last year's inspection.

Concrete Slab/Sidewalks Inspection

Please note any observations of breaches in any concrete/sidewalks, which may include but are not limited to cracks, holes, indentations, vegetation growing through concrete etc.

Observed concrete flaking in the sidewalk located along Water Street in the northeast corner of the Site. Monitoring well, MW-18 was missing its well cover. A well cover was installed at MW-18 on March 12, 2015.

Soil Inspection

Please note any observations of breaches in the soil cover, which may include but are not limited to holes and soil washout.

None observed.

ATTACHMENT 2

SITE INSPECTION PHOTO LOG



Photo 1: East Side of Water Street Parking Lot (facing North)



Photo 2: East Side of Water Street Parking Lot (facing East)



Photo 3: Water Street Parking Lot (facing North)



Photo 4: Water Street Parking Lot (facing West)



Photo 5: Water Street Parking Lot (facing North)



Photo 6: Water Street Parking Lot (facing South)



Photo 7: West Side of Water Street Parking Lot (facing West)



Photo 8: MW-18 Missing Cover on 3/6/15



Photo 9: MW-18 Well Cover Replaced on 3/12/15