



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

July 17, 2018

Mr. William Ottaway  
New York Department of Environmental Conservation  
Division of Environmental Remediation  
625 Broadway  
Albany, New York 12233-1011

**Re: Consolidated Edison Company of New York, Inc.  
White Plains Former Manufactured Gas Plant Site Periodic Review Report  
NYSDEC Site #V00438-3**

Dear Mr. Ottaway:

The enclosed Periodic Review Report has been prepared under Con Edison's Voluntary Cleanup Agreement (VCA) Index # D3-0002-00-10, Site # V00438-3 for the White Plains Former Manufactured Gas Plant (MGP) Site located in White Plains, Westchester County, New York (Site). This report has been prepared in accordance with the Site Management Plan for the Site and provides a summary of a recent annual inspection as it relates to the engineering and institutional controls that have been established at the Site.

Please feel free to contact me at (718) 204-4205 should you have any questions or if you need any assistance during your review of this submittal.

Sincerely,

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

Yelena Skorobogatov  
Project Manager  
EH&S, Remediation  
Consolidated Edison Company of NY,  
Inc.

Attachments:

Periodic Review Report

Cc: Ken Kaiser, Con Edison – w/o enc.  
Dolores Touhy, Esq., NYSDEC – w/o enc.  
Edward Moore, NYSDEC, Region 3 – w/o enc.  
David S. Brown, Archdiocese of New York – 1 hard copy  
Kimberlea Shaw Rea, Westervelt & Rea, LLP – 1 hard copy  
Rev. Msgr. Neil Graham, St. John's Church – 1 hard copy

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**PERIODIC REVIEW REPORT**  
**WHITE PLAINS FORMER MGP SITE**  
**White Plains, Westchester, New York**  
**(NYSDEC SITE NO: V00438-3)**

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**CONSOLIDATED EDISON CO. OF NEW YORK, INC.**

**31-01 20<sup>th</sup> Avenue**

**Long Island City, NY 11105**

*Prepared by:*

**PARSONS**

200 Cottontail Lane

Somerset, New Jersey 08873

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**JULY 2018**

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## 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 on-going 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 WITHIN PAST YEAR**

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 within the past year. Con Edison did however conduct intrusive work in March 2018 related to electric feeder repair in the vicinity of New Street and Lexington Avenue between OU-1 and OU-2. An email notification for this work was sent to the NYSDEC on March 14, 2018.

In addition, trenching associated with telecommunications repair work for the Con Edison electric substation was reportedly conducted within the past year, but the trenching was located between the 12 Water Street office building and the substation's Transformer Vault #1 and thus outside the areas of the Site requiring NYSDEC notification. Based on conversations with Con Edison substation personnel during the June 1, 2018 Site inspection, the width of the trench was approximately 2 feet or less and the depth of the trench varied from less than 5 feet on the Con Edison substation property to an approximate depth of 7 ½ feet within the North Lexington Avenue eastern sidewalk.

## **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 2017 post-remedial action groundwater sampling events performed at the Site were conducted on June 26 through June 29, 2017 and December 11 through December 14, 2017 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. Groundwater samples were not collected in from monitoring well MW-12C due to the presence of dense non-aqueous phase liquid (DNAPL) during gauging. Letters summarizing the results of these sampling events are submitted to the NYSDEC under separate covers.

## **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 within the past year. 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 June 1, 2018 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 also indicated the presence of cracks in the asphalt cover of the Water Street parking lot composite cover system as well as the Con Edison substation parking lot which appear to be due to the 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 cover systems however; it is recommended that these features be closely monitored during future Site inspections in the event that conditions worsen.

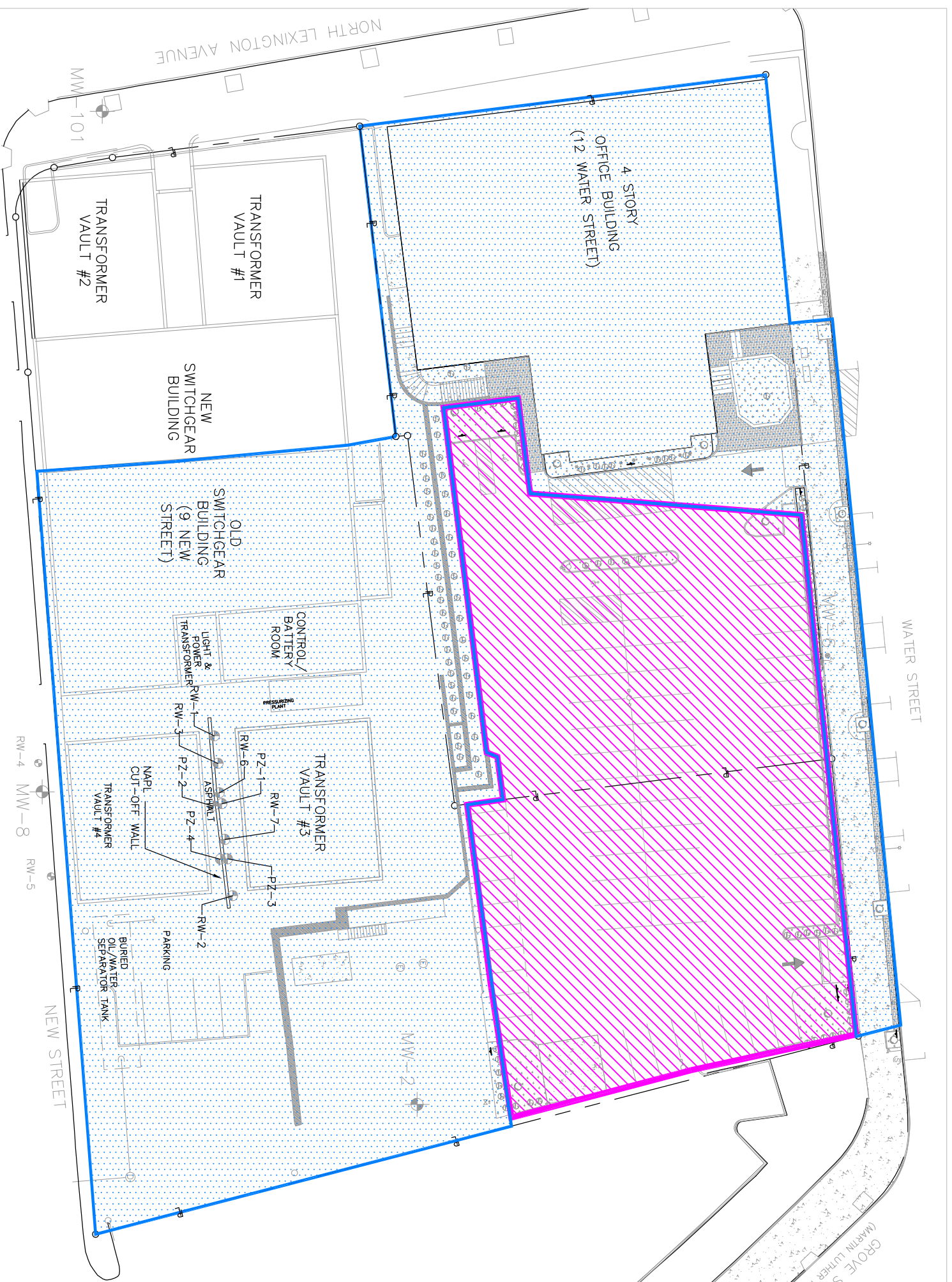
Based on the Site inspection performed on June 1, 2018, the Site continues to be used as an office building with parking lot, an electrical distribution substation, and a church with school. A completed Site-wide Inspection Form is included as [Attachment 1](#), a Site inspection photo log has been included as [Attachment 2](#), the completed Institutional and Engineering Controls Certification (IECC) Form is included as [Attachment 3](#).

#### **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.

## FIGURES



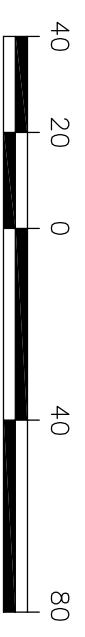


**LEGEND:**

- 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).



**ATTACHMENT 1**

**SITE WIDE INSPECTION FORM**

**SITE WIDE INSPECTION FORM**  
**WHITE PLAINS FORMER MGP SITE**

Inspector: Daniel Martoccia Date: 6/1/2018

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.

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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 do not appear to have gotten worse since last year's inspection.

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**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.

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Observed concrete flaking in the sidewalk located along Water Street in the northeast corner of the Site.

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**Soil Inspection**

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

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None observed except for the new flower/vegetable beds established in the courtyard of the Saint John the Evangelist Roman Catholic Church property.

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**ATTACHMENT 2**

**SITE INSPECTION PHOTO LOG**



**Photo 1: Substation Parking Lot equipment vault (facing East)**



**Photo 2: Sink hole no longer in gravel cover area near Transformer Vault No. 3 (facing East)**



**Photo 3: Substation Parking Lot (facing North)**



**Photo 4: Substation Parking Lot (facing South)**



**Photo 5: Water Street Parking Lot (facing South)**



**Photo 6: Water Street Parking Lot (facing West)**



**Photo 7: Water Street Parking Lot (facing South)**



**Photo 8: Water Street Parking Lot (facing West)**



**Photo 9: Water Street Parking Lot (facing West)**



**Photo 10: Water Street Parking Lot (facing West)**



**Photo 11: Water Street Parking Lot (facing North)**



**Photo 12: Water Street Parking Lot (facing East)**



**Photo 13: Sidewalk immediately north of Water Street Parking Lot (facing West)**



**Photo 14: Newly installed flower/vegetable bed in St John’s Courtyard (facing Northeast)**



**Photo 15: Location of Trenching for Telecommunications Repair Work (facing East)**



**Photo 16: Telecommunications Repair Trenching along North Lexington Avenue (facing South)**

**ATTACHMENT 3**

**INSTITUTIONAL AND ENGINEERING CONTROLS CERTIFICATION  
FORM**



**Enclosure 2**  
**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**  
**Site Management Periodic Review Report Notice**  
**Institutional and Engineering Controls Certification Form**



	Site Details	Box 1
<b>Site No.</b> V00438		
<b>Site Name</b> CE - White Plains MGP		
Site Address: 9 New Street and 12 Water Street      Zip Code: 10601- City/Town: White Plains County: Westchester Site Acreage:		
Reporting Period: June 27, 2017 to June 1, 2018		
		YES    NO
1. Is the information above correct?		<input checked="" type="checkbox"/> <input type="checkbox"/>
If NO, include handwritten above or on a separate sheet.		
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?		<input type="checkbox"/> <input checked="" type="checkbox"/>
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?		<input type="checkbox"/> <input checked="" type="checkbox"/>
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?		<input type="checkbox"/> <input checked="" type="checkbox"/>
<b>If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.</b>		
5. Is the site currently undergoing development?		<input type="checkbox"/> <input checked="" type="checkbox"/>
		<b>Box 2</b>
		YES    NO
6. Is the current site use consistent with the use(s) listed below? Industrial		<input checked="" type="checkbox"/> <input type="checkbox"/>
7. Are all ICs/ECs in place and functioning as designed?		<input checked="" type="checkbox"/> <input type="checkbox"/>
<b>IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.</b>		
<b>A Corrective Measures Work Plan must be submitted along with this form to address these issues.</b>		
_____ Signature of Owner, Remedial Party or Designated Representative		_____ Date

**Description of Institutional Controls**

<u>Parcel</u>	<u>Owner</u>	<u>Institutional Control</u>
<b>125.66-4-1.1</b>	GHP Water Street LLC	Ground Water Use Restriction Soil Management Plan Landuse Restriction

The Controlled Property may be used for: Commercial as described in 6 NYCRR Part 375-1.8(g)(2)(iii) and Industrial as described in 6 NYCRR Part 375-1.8(g)(2)(iv).

The use of groundwater underlying the site is restricted as a source of potable or process water, without necessary water quality treatment as determined by the Department, NYSDOH, or County DOH.

<b>125.66-4-2.1</b>	Con Edison Co of NY Inc.	Ground Water Use Restriction Soil Management Plan Landuse Restriction
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The Controlled Property may be used for: Commercial as described in 6 NYCRR Part 375-1.8(g)(2)(iii) and Industrial as described in 6 NYCRR Part 375-1.8(g)(2)(iv).

The use of groundwater underlying the site is restricted as a source of potable or process water, without necessary water quality treatment as determined by the Department, NYSDOH, or County DOH.

**Description of Engineering Controls**

<u>Parcel</u>	<u>Engineering Control</u>
<b>125.66-4-1.1</b>	Cover System

The site owner will be responsible for the operation and maintenance of the cover system as discussed in the Site Management Plan.

<b>125.66-4-2.1</b>	Cover System
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The site owner will be responsible for the operation and maintenance of the cover system as discussed in the Site Management Plan.

### Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES    NO  
   

2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

(a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

(d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES    NO  
   

**IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

**A Corrective Measures Work Plan must be submitted along with this form to address these issues.**

\_\_\_\_\_  
 Signature of Owner, Remedial Party or Designated Representative

\_\_\_\_\_  
 Date

**IC CERTIFICATIONS  
SITE NO. V00438**

**Box 6**

**SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE**

I certify that all information and statements in Boxes 1,2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Yelena Skorobogatov at Con Edison 31-01 20th Ave.  
Bldg 136, L.I.C., NY 11105,  
print name print business address

am certifying as OWNER (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.

*Y. Skorobogatov*  
Signature of Owner, Remedial Party, or Designated Representative  
Rendering Certification

7/16/18  
Date

IC/EC CERTIFICATIONS


Box 7

Qualified Environmental Professional Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Daniel Martoccia at Parsons, 200 Cottontail Lane, Somerset, NJ 08873  
print name print business address

I am certifying as a Qualified Environmental Professional for the OWNER  
(Owner or Remedial Party)

  
\_\_\_\_\_



7/06/2018

Signature of Qualified Environmental Professional, for the Owner or Remedial Party, Rendering Certification

Stamp (Required for PE)

Date