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

Prepared for:



CONSOLIDATED EDISON CO. OF NEW YORK, INC.

31-01 20th Avenue

Long Island City, NY 11105

Prepared by:

PARSONS

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Bridgewater, New Jersey 08807

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JULY 2024

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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

The following summarizes the required notifications to the NYSDEC and the Site activities conducted over the past year at the Site.

2.1 Required Notification to the NYSDEC

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.

2.2 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 2024 post-remedial action groundwater sampling events performed at the Site were conducted on December 11 through December 15, 2023, and on June 10 through June 14, 2024 in accordance with the SMP. Groundwater samples were collected from monitoring wells MW-6 through MW-20, and MW-101 (with the exception of monitoring wells MW-12C and MW-18) and were analyzed for VOCs and SVOCs. Letters detailing the results of these sampling events are submitted to the NYSDEC under separate covers.

2.3 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 July 11, 2024 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 within OU-2 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 intrusive activities conducted within the Saint John Evangelist Roman Catholic Church portion of OU-1 portion of the Site have been summarized above.

During the site inspection, it was noted that a new cover is needed for MW-19. It was additionally observed during the recent groundwater sampling event that the pvc riser at monitoring well MW-18 was crimped. Based on failed attempts to lower the sampling equipment within monitoring well MW-18, a repair will be necessary for the top portion of riser within this monitoring well.

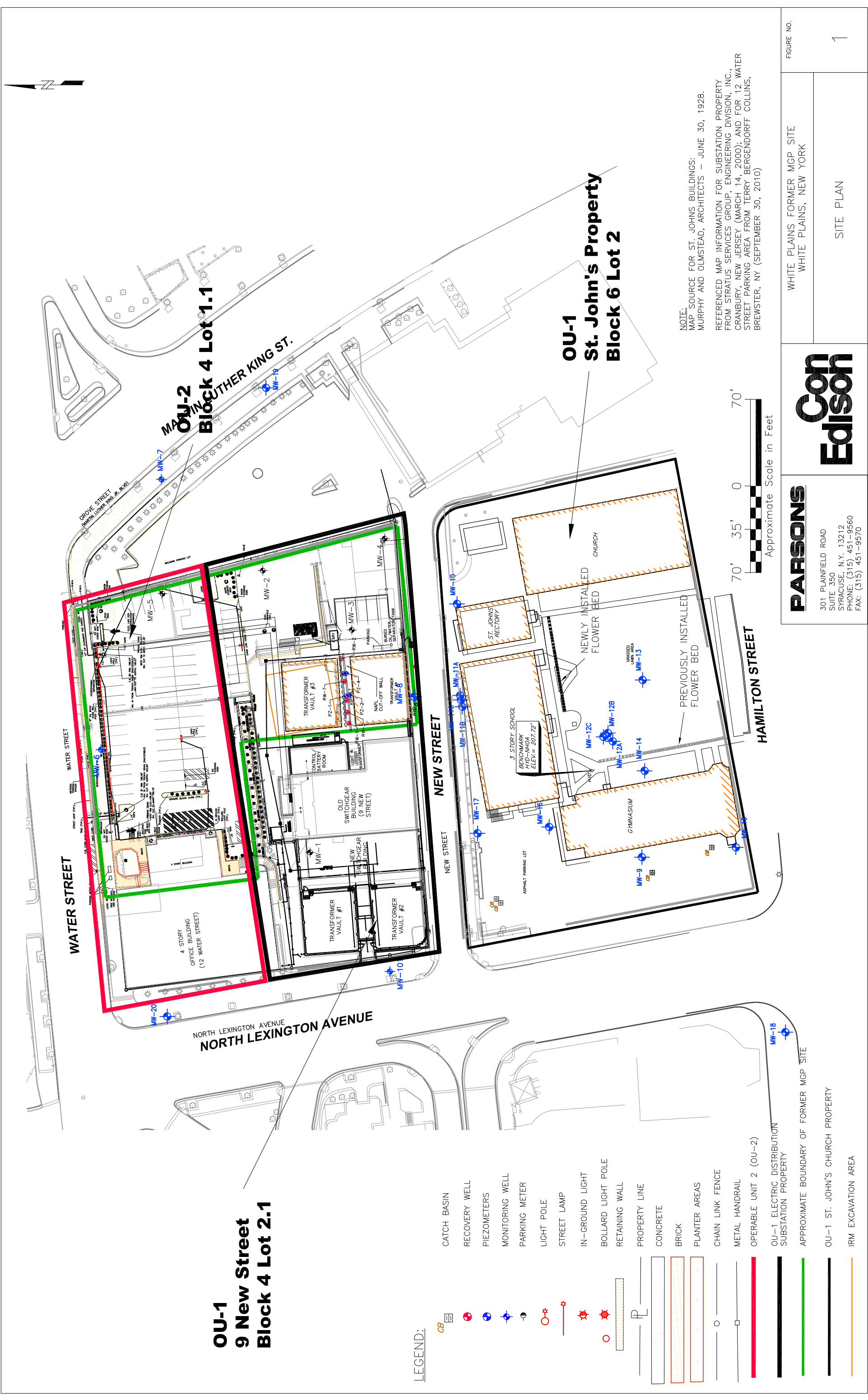
The results of the inspection also indicated the continued presence of cracks in the asphalt cover of the Water Street parking lot composite cover system which appear to be due to the winter conditions of the past seasons. In addition, concrete flaking was again observed in the sidewalk along Water Street 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 July 11, 2024, the Site continues to be used as an office building with parking lot, an electrical distribution substation, and a church. A portion of the Saint John the Evangelist Roman Catholic Church property is also used by the YMCA of Central and Northern Westchester. Additionally, although off-site, a large residential/commercial building was erected in the lot immediately west of N. Lexington Avenue. A completed Site-wide Inspection Form is included as [Attachment 1](#), a Site inspection photo log has been included as [Attachment 2](#), and 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



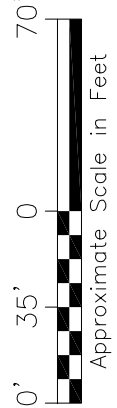
OU-1
9 New Street
Block 4 Lot 2.1

OU-2
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. JOHN'S 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)



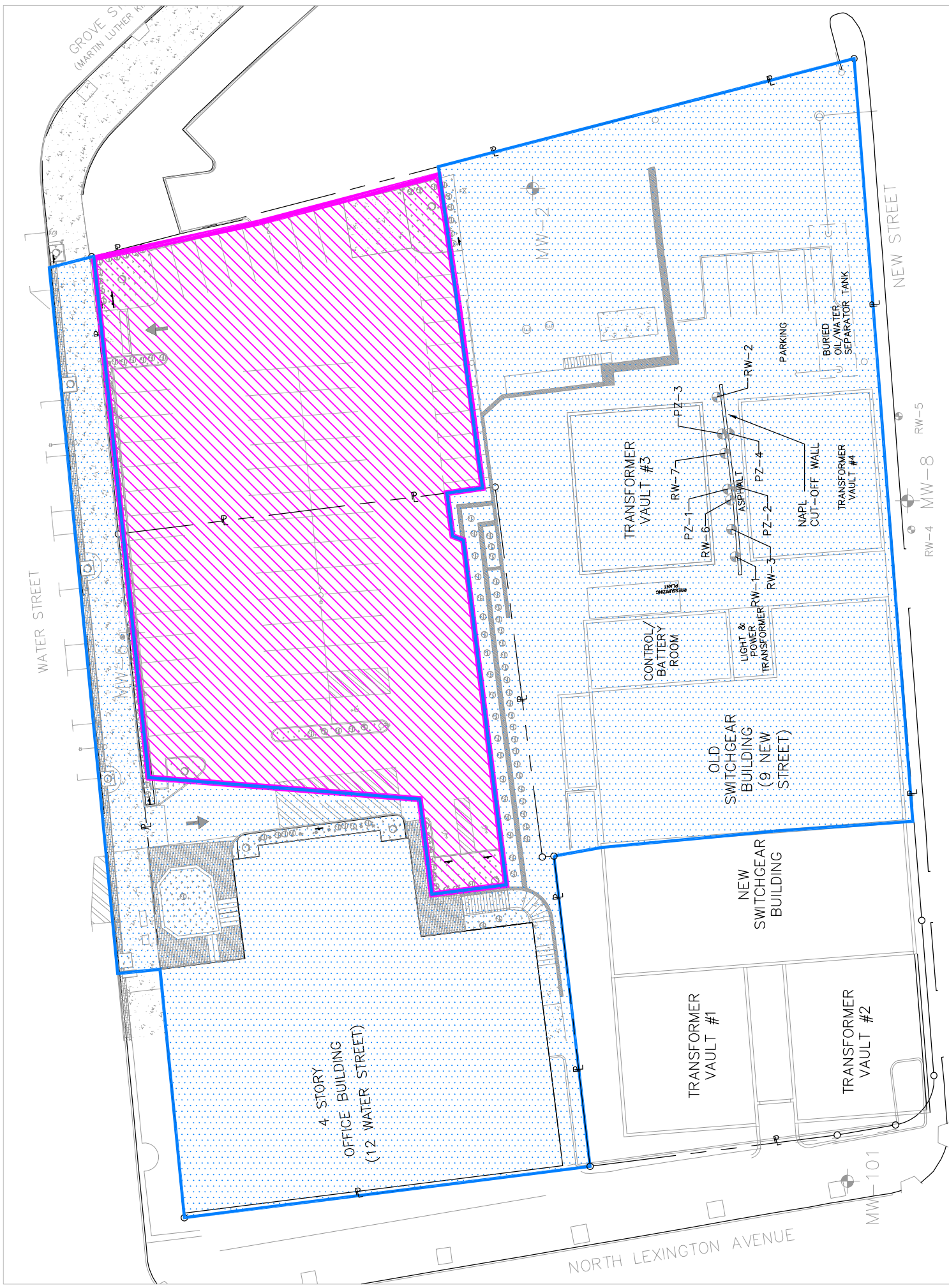
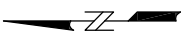
PARSONS
 301 PLAINFIELD ROAD
 SUITE 350
 SYRACUSE, N.Y. 13212
 PHONE: (315) 451-9560
 FAX: (315) 451-9570

Con Edison

WHITE PLAINS FORMER MGP SITE
 WHITE PLAINS, NEW YORK

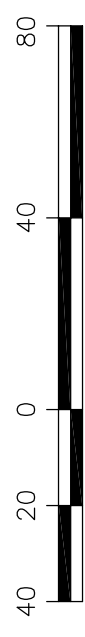
SITE PLAN

FIGURE NO.
 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).

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. 2
SMP NOTIFICATION AREAS	

ATTACHMENT 1
SITE WIDE INSPECTION FORM

SITE WIDE INSPECTION FORM
WHITE PLAINS FORMER MGP SITE

Inspector: Daniel Martoccia Date: 7/11/2023

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.

OU-1: See summary and photos of St. John church hardscaping project completion

OU-2: Observed cracks in the asphalt cover of the parking lot composite cover system in 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.

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.

OU-2: Observed concrete flaking in the sidewalk located along Water Street in the northeast corner of the Site.

Soil Inspection

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

OU-1: See summary and photos of St. John the Evangelist Roman Catholic Church hardscaping project completion

OU-2: None observed.

ATTACHMENT 2
SITE INSPECTION PHOTO LOG



Photo 1: Alley between Transformer Vaults No. 3 and 4 (facing East)



Photo 2: Parking area east of Transformer Vaults No. 3 and 4 (facing South)



Photo 3: Parking area east of Transformer Vaults No. 3 and 4 (facing East)



Photo 4: Driveway east of Transformer Vaults No. 3 and 4 (facing North)



Photo 5: Lower gravel cover area near Transformer Vault No. 3 (facing East)



Photo 6: Upper gravel cover area near Transformer Vault No. 3 (facing East)



Photo 7: Upper gravel cover area near Transformer Vault No. 3 (facing West)



Photo 8: Monitoring Well (MW-7) on western sidewalk of of Dr. Martin Luther King Jr. Blvd



Photo 9: Monitoring Well MW-19 well cover is broken



Photo 10: Water Street parking lot (facing South)



Photo 11: Sidewalk Immediately North of Water Street Parking Lot (facing West)



Photo 12: Water Street Parking Lot (facing West)



Photo 13: Water Street Parking Lot (facing North)



Photo 14: Water Street Parking Lot (facing Southwest)



Photo 15: Water Street Parking Lot entrance (facing North)



Photo 16: Monitoring Well MW-6 on Water Street (facing South)



Photo 17: Surficial paver work completed in the St John's Courtyard (facing East)



Photo 18: Surficial paver work completed in the St John's Courtyard (facing Northeast)



Photo 19: Surficial paver work completed in the St John's Courtyard (facing North)



Photo 20: Western St. Johns driveway/parking lot (facing North)



Photo 22: Building construction in progress across North Lexington Avenue from St. Johns western parking lot; MW-18 is behind construction fencing (facing Northwest)

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
Site No.	V00438		
Site Name 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: July 11, 2023 to July 11 2024			
		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"/>
	If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.		
5.	Is the site currently undergoing development?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Box 2
		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 in place and functioning as designed?	<input checked="" type="checkbox"/> <input type="checkbox"/>
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.		
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

Description of Institutional Controls

<u>Parcel</u>	<u>Owner</u>	<u>Institutional Control</u>
125.66-4-1.1	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.

125.66-4-2.1	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>
125.66-4-1.1	Cover System

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

125.66-4-2.1	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 Engineering Control 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. For each Engineering control listed in Box 4, I certify by checking "YES" below that all of the following statements are true:

(a) The 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 7/22/24
Signature of Owner, Remedial Party, or Designated Representative Date
Rendering Certification

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, 1011 US-22 W Suite 201 Bridgewater NJ 08807
print name print business address

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


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



7/23/24
Date