



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

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February 19, 2008

By Federal Express

Mr. William Ottaway, P.E. New York State Department of Environmental Conservation Remedial Bureau C – 11th Floor 625 Broadway Albany, NY 12233

Re: Con Edison White Plains Former MGP Site White Plains, New York

FEB 2 1 2008

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Dear Mr. Ottaway:

This letter provides information regarding the planned utility isolation work that will be conducted at the Consolidated Edison Company of New York's (Con Edison's) White Plains Substation. As you know, Con Edison has submitted a Remedial Action Work Plan and Draft Remedial Design to address impacted soils present within Operable Unit 2 (OU-2) of the Site utilizing in-situ soil stabilization/solidification (ISS). Prior to commencing the ISS work, it will be necessary to isolate and remove existing gas feeders and electric conduits that are currently present within the proposed ISS area. In accordance with the Operation, Maintenance, and Monitoring (OM&M) Plan (Parsons, 2005) for the Site, Con Edison is providing notification to the New York State Department of Environmental Conservation (NYSDEC) regarding the utility isolation activities at this time.

The isolation work will involve cutting, capping, purging, and abandoning gas mains which currently enter the proposed ISS area from the southern sidewalk of Water Street and from the Hamilton Ave parking area located to the east of OU-2. Valves and manhole vaults associated with the gas mains will also be abandoned as part of the isolation work. Electric lines entering the ISS area will be terminated by cutting and capping the cables at the Site perimeter. The approximate locations of the gas and electric isolation work are shown on the attached figures.

To complete the isolation work, approximately 12 test pits ranging in depths from 4 to 10 feet and 4 to 14 feet in length and width will be excavated to access the utilities. Excavated soil from within the proposed ISS area will be placed back into the test pits following completion of the isolation work. Soil excavated from outside the limits of the proposed ISS area (e.g., Hamilton Ave parking lot or sidewalk) may be reused as backfill material on site provided it contains no visual or olfactory evidence of contamination.

Additionally, the following requirements established in the OM&M Plan will be followed during the intrusive isolation work:

- Excavated soil which can not be reused as backfill material will be sampled and analyzed for waste characterization purposes prior to off-site transportation and treatment/disposal in accordance with the specific requirements of the receiving facility.
- Off-site transportation, treatment, and disposal of excavated soil which can not be reused as backfill material on site will be conducted in accordance with appropriate local, state, and federal regulations.

- Any off-site fill material brought to the site for filling and grading purposes shall be from an acceptable borrow source free of industrial and/or other potential sources of chemical or petroleum contamination.
- Verification (i.e., letter from source facility) indicating that the fill material does not contain detectable levels of target compound list organic chemicals, and has metals concentrations consistent with background or the soil cleanup objectives presented in 6 NYCRR Part 375, will be required and provided before the fill material is off loaded at the Site.
- If the contractor designates a source as "virgin" soil, it shall be further documented in writing to be native soil material from areas not having supported any known prior industrial or commercial development or agricultural use.
- Groundwater encountered during excavation (if any) that requires removal will be containerized and characterized for off-site treatment/disposal in accordance with applicable rules and regulations.
- Excavation activities will be conducted by 40-hour OSHA HAZWOPER-certified personnel that are qualified to perform environmental work.
- Air monitoring will be conducted along the work area perimeters in accordance with the New York State Department of Health (NYSDOH) Community Air Monitoring Plan.
- A site-specific Health and Safety Plan (HASP) will be prepared prior to excavation activities. The HASP will address, among other things, community and work zone air monitoring, odor control, and appropriate training and personal protective equipment for site workers.

The electrical isolation work will involve removal of some transite ducts with asbestos-containing material (ACM). Con Edison is currently preparing an application for an asbestos variance that will be submitted to the New York State Department of Labor (NYSDOL) for approval. A licensed contractor will perform the asbestos work in accordance with the approved variance and applicable rules and regulations.

The current schedule for the isolation activities calls for contractor mobilization by March 3, 2008 and completion of the work by April 30, 2008. If you have any questions, please feel free to call me at (718) 204-4205.

Very truly yours,

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Xelena Skorobogatov Remediation Environment, Health and Safety

Cc: Joseph Crua, NYSDEC

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