



Consolidated Edison Company
of New York, Inc.
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September 5, 2013

VIA EMAIL

Ms. Elizabeth Lukowski
New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau C, 11th Floor
525 Broadway
Albany, NY 12233-7014

Dear Ms. Lukowski:

**Re: NAPL Recovery Pilot Test Work Plan - Final
East 115th Street MGP Site
New York, New York**

In response to the Department's Approval letter of August 21, 2013 (attached), Con Edison provides this Final Work Plan to assess the potential for non-aqueous phase liquid (NAPL) recovery from monitoring wells B403(MW) and B405(MW) at the East 115th Street Manufactured Gas Plan (MGP) Site (Fig. 1). These activities are designed to satisfy the New York State Department of Environmental Conservation's (NYSDEC's) request to monitor the on-site wells for the presence of NAPL and recover it as necessary. Based on the results of the NAPL recovery assessment, a NAPL recovery and monitoring strategy will be developed for the Site. For the initial assessment event, GEI Consultants, Inc., Consolidated Edison of New York, Inc. (Con Edison's) project consultant, will mobilize to the Site to perform the following activities:

- Gauge all site monitoring wells for the presence of NAPL
- Pump NAPL from monitoring wells (B403(MW), B405(MW), and any other wells with significant amount of NAPL (as determined during the initial well gauging) directly into a 5-gallon container
- Monitor both B403(MW), B405(MW), and any other wells (see above) for NAPL recharge in accordance with the following logic:
 - After the NAPL is recovered or pumped from the well, the well will be gauged at a minimum every 15 minutes for a period of up to 3 hours. Based on the NAPL recovery rate one of two gauging scenarios will be followed, as described below.

Scenario A

- If less than 10 percent recharge of the pre-pumping NAPL level is measured during the initial 3-hour period, then the well will be gauged daily for 1 week and then weekly until 85 percent of the original pre-pumping level is achieved or up to 3 months. In other words, if the pump event is performed on Monday and less than 10 percent of the pre-pumping NAPL level is achieved in the first 3 hours, then the well will be gauged on Tuesday, Wednesday, Thursday, Friday, one day the following week, and one day each week, thereafter, until 85 percent of the original pre-pumping NAPL level is achieved or until up to 3 months, whichever is shorter. If 85 percent is not achieved within 3 months, then gauging activity stops. The data collected within these 3 months should be sufficient to estimate future pump event frequency and potential recovery volumes for waste disposal.
- If 85 percent recharge is achieved within 1 month following the initial pumping event, then a

second recovery event will be performed and monitored according to the recharge rate observed after the initial pumping event. After the second pumping event, the well will be monitored for NAPL recharge until either 85 percent of the pre-pumping NAPL level is achieved or the 3 month timeline set by the initial pump event is reached.

Scenario B

- If greater than 10 percent recharge of the pre-pumping NAPL level is measured during the initial 3-hour period, then hourly gauging would continue until the NAPL level recharges to 80 percent of its pre-pumping level or for a maximum of 6 hours. If 80 percent NAPL recharge is not achieved within the first 6 hours, then the well is gauged daily for 1 week, then once per week until 85 percent of the pre-pumping NAPL level is achieved or up to 3 months. If 85 percent is not achieved within 3 months, then gauging activity stops and the data is evaluated for pumping event frequency and estimated disposal volumes.
- If 85 percent recharge is achieved within 1 month following the initial pumping event, then a second recovery event will be performed and monitored according to the recharge rate observed after the initial pumping event. After this second pump event, the well will be monitored for NAPL recharge until either 85 percent of the pre-pumping NAPL level is achieved or the 3 month timeline set by the initial pumping event is reached.
- The general parameters may be modified based on observations made in the field.

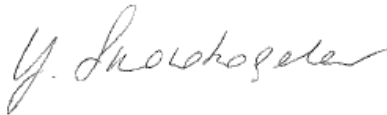
Recovery and monitoring activities are anticipated to be completed within 3 months of the initial pumping event. This should provide sufficient time for NAPL in the subsurface to recharge into the well to 85 percent of its pre-pumping level or to provide enough recharge data to estimate NAPL recharge rates. If 85 percent recharge is achieved within 1 month following the pumping event, then a second event will be performed for further evaluation. During the 3-month period, all site wells will be gauged once a month for the presence of NAPL. After the NAPL recovery assessment test is complete, all site wells will be gauged once per month for the presence of NAPL for an additional 3 months.

A Summary Letter Report with the assessment results and recommendations will be prepared and submitted to the NYSDEC following completion of the above activities.

A schedule for the NAPL recovery pilot project will be developed once access has been obtained for the Site.

If you have any questions or require any further information, please contact me at (718) 204-4205 or via electronic mail at skorobogatovy@coned.com.

Sincerely,



Technical Specialist
MGP Remediation
Environment, Health and Safety

Enclosures

c: Dawn Hettrick, NYSDOH
Dena Putnick, Esq., NYSDEC
Kenneth Kaiser, Con Edison
John Ripp, GEI

New York State Department of Environmental Conservation

Division of Environmental Remediation

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Joe Martens
Commissioner

August 21, 2013

Ylena Skorobogatov
Consolidated Edison Company
31-01 20th Avenue
Long Island City, NY 11105-2048

Re: **NAPL Recovery Pilot Test Work Plan - Approval**
East 115th Street MGP Site, Site # V00540
New York, New York

Dear Ms. Skorobogatov:

The New York State Department of Environmental Conservation (the Department) and the New York State Department of Health (NYSDOH) have reviewed NAPL Recovery Pilot Test Work Plan for the above referenced site, dated July 19, 2013.

The work plan is hereby approved with the following modification:

- Any additional wells that have collected (or begin to collect) NAPL should continue to be monitored and recovered as necessary to avoid over-topping their sumps. Specifically B403(MW) which has recently been observed to have collected 1 foot of NAPL needs to be closely monitored. The monitoring wells (MW series) were installed inconsistent with the work plan and have no designed sump (except the well cap.) The wells therefore, have very little capacity for holding NAPL which could potentially infiltrate the screened zone.

In accordance with the Order on Consent and 6NYCRR 375-1.6(d), please indicate within 15 days whether you accept the Department's modified work plan. Please ensure that all copies of the final work plan include this approval letter.

If you have any questions, please feel free to contact me at (518)402-9564 or email me at ebukows@gw.dec.state.ny.us.

Sincerely,

Elizabeth B. Lukowski
Engineering Geologist
Remedial Action Bureau C
Division of Environmental Remediation



cc:

Dawn Hettrick, NYSDOH
Kenneth Kaiser, Con Edison
John Ripp, GEI
G. Cross
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August 21, 2013

Yates Environmental
Consolidated Edison Company
34-01 10th Avenue
Long Island City, NY 11106-3048

Re: NAFI Recovery Pilot Test Work Plan - Approval
Page 1 of 2
New York, New York

Dear Mr. Stenographer:

The New York State Department of Environmental Conservation (the Department) and the New York State Department of Health (NYSDOH) have reviewed NAFI Recovery Pilot Test Work Plan for the above-referenced site, dated July 19, 2013.

The work plan is hereby approved with the following modifications:

- Any additional wells that have collected (or begin to collect) NAFI should continue to be monitored and reported as necessary to avoid over-pumping their aquifer. Specifically, B-03 (NW) which has recently been drilled to have collected a foot of NAFI needs to be closely monitored. The monitoring wells (NW series) were installed in compliance with the work plan and have no designed pump (except the well cap). The wells therefore have very little capacity for holding NAFI, which could potentially trigger the adjacent zone.

In accordance with the Order on Consent and DECER 07-1-010, please indicate within 15 days whether you accept the Department's modified work plan. Please ensure that all copies of the final work plan include this approved letter.

If you have any questions, please feel free to contact me at (518) 402-3364 or email me at christina@dec.state.ny.us.

Sincerely,

Elizabeth B. Lofowolski
Executive Director
Regional Action Program C
Division of Environmental Remediation

