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

October 30th, 2018

Mr. Douglas MacNeal, P.E.
Division of Environmental Remediation
New York State Department of Environmental Conservation
Hunters Point Plaza
Region 2 Office
47-40 21st Street
Long Island City, NY 11101

RE: Consolidated Edison Company of New York, Inc.
Periodic Review Report October 2017 – October 2018
Kent Avenue Former Generation Station
Brooklyn, NY
NYSDEC Site Number: V00732-2

Dear Mr. MacNeal:

The enclosed Periodic Review Report has been prepared by Roux Environmental Engineering and Geology, D.P.C. (Roux), pursuant to the New York State Department of Environmental Conservation (NYSDEC) approved Site Management Plan for the Con Edison Former Generation Station located at 500 Kent Avenue in Brooklyn, New York, also referred to as Voluntary Cleanup Agreement #D2-0003-02-08, Amendment #2, Site No. V-00732-2, and as amended on July 16th, 2010. This report provides a summary of the sites history and current condition, including a completed Annual Inspection Form and Institutional and Engineering Controls Certification Form during the period of October 2017 - October 2018.

Please feel free to contact me at 718-204-4186 should you have any questions or if you need any assistance during your review of this submittal.

Sincerely,

Kristin Mobyed
Project Manager
EH&S, Remediation
Consolidated Edison Company of NY, Inc.

Attachment: Period Review Report 2018 – 500 Kent Avenue

cc: N. O'Halloran

Table of Contents

Appendices

LIST OF ACRONYMS

Con Edison	Consolidated Edison Company of New York, Inc.
DCR	Declaration of Covenants and Restrictions
ECs	Engineering Controls
ICs	Institutional Controls
MGP	Manufactured Gas Plant
NYS	New York State
NYSDEC	New York State Department of Environmental Conservation
PRR	Periodic Review Report
Shaw	Shaw Environmental & Infrastructure Engineering of New York, P.C.
SMP	Site Management Plan
VCA	Voluntary Cleanup Agreement
VCP	Voluntary Cleanup Program

1. INTRODUCTION

This Periodic Review Report (PRR) was prepared by Roux Environmental Engineering and Geology, D.P.C. (Roux), as required by the Site Management Plan (SMP) which is an element of the remedial program at the Former Kent Avenue Generating Station (hereinafter referred to as the "Site") under the New York State (NYS) Voluntary Cleanup Program (VCP) administered by New York State Department of Environmental Conservation (NYSDEC). The Site was remediated in accordance with Voluntary Cleanup Agreement (VCA) #D2-0003-02- 08, Amendment #2, Site No. V-00732-2, which was executed on July 26, 2002 and last amended on July 16, 2010. The SMP was prepared by Shaw Environmental & Infrastructure Engineering of New York, P.C. (Shaw), on behalf of Consolidated Edison Company of New York, Inc. (Con Edison), in accordance with the requirements in NYSDEC DER-10 Technical Guidance for Site Investigation and Remediation, dated May 3, 2010, and the guidelines provided by NYSDEC. The SMP addresses the means for implementing and monitoring the Institutional Controls (ICs) and Engineering Controls (ECs) that are required by the Declaration of Covenants and Restrictions (DCR) for the Site.

1.1 Site Background

1.1.1 Site Location and Description

The Site is located in Brooklyn, Kings County, New York and is identified as Block 2023 and Lot 10 on the Tax Map of the Borough of Brooklyn/Kings County. The site is an approximately 2.6- acre area bounded by Division Avenue to the north, a former manufactured gas plant site referred to as Former Nassau Gas Works which is owned by National Grid to the south, Kent Avenue to the east, and Wallabout Channel to the west (see Appendix A - **Figure 6** of the SMP). The boundaries of the Site are more fully described in the SMP. The Site is currently a vacant lot with no current operations.

1.1.2 Remaining Contamination

The Site contains residual contamination left after completion of the remedial action. The Site is underlain by historic urban fill and soil impacted by historic industrial operations at depths beyond the remedial excavation limits that have elevated levels of SVOCs and metals that may exceed regulatory cleanup objectives. Engineering Controls have been incorporated into the site remedy to control exposure to remaining contamination during the use of the Site to ensure protection of public health and the environment. A more detailed description of the remaining contamination on-site can be found in Section 1.4.3 of the SMP.

1.1.3 Soil Cover System

Exposure to subsurface soil contamination is mitigated by a cover system that has been constructed on the Site. The cover system, as shown in the SMP on Figure 6 and included as Appendix A, consists of four different configurations:

- A deep cover system with a total thickness of between 4.5 to 11 feet, consisting of compacted structural fill covered with a minimum of 4 inches of 3/4-inch stone. This deep cover system, located within the North and South Excavation Areas, has a demarcation layer (orange plastic fencing) placed directly on top of the concrete slab floor at the base of the remedial program excavation;
- A deep cover with a total thickness of between 8 to 12 feet, consisting of clean fill covered with a minimum of 4 inches of 3/4-inch stone. This deep cover system, located within the Former Generating Station Building Foundation, does not have a demarcation layer on top of the concrete slab floor within the building foundation;

- A soil cap located within the southwest portion of the Site that consists of 20 inches of compacted structural fill covered with a minimum of 4 inches of 3/4-inch stone. This cap has a demarcation layer (orange plastic fencing) at its base, directly covering contaminated soil/fill; and
- A 4-foot-thick cover system consisting of clean fill, covered by structural fill, covered by a minimum of 4 inches of 3/4-inch stone. This clean fill directly covers contaminated soil/fill that was not removed during the remedial program, and there is no demarcation layer separating the clean fill from the contaminated soil/fill.

2. SITE MONITORING

2.1 Media Monitoring Program

With the exception of the historic urban fill underlying the entire Site, all sources of contamination have been removed and very little-known soil/fill contamination remains at the Site above the water table.

There is known groundwater contamination at the Site as a result of the adjacent former manufactured gas plant (MGP) site that was located immediately to the south of the Site. The full impact of the MGP-related contamination on the Site was determined by the 2014 subsurface investigation that was conducted by National Grid. It is anticipated that groundwater monitoring will be required at the Site and once National Grid has completed and reported on its MGP-related subsurface investigation, NYSDEC can identify the requirements of a groundwater monitoring program for the Site (Shaw 2015). No known subsurface investigation has been completed by National Grid at this time.

Previous site investigations did not collect any soil vapor data, but because of historic operations at the Site and the adjacent MGP, the potential for soil vapor intrusion exists. However, since there are no structures remaining on the property, the current site use does not warrant any soil vapor monitoring.

2.2 Inspection Results

As required by the SMP, the annual cover system inspection, as well as the annual site wide inspection, was performed on October 23, 2018. The completed inspection form is provided as Appendix B.

2.2.1 Engineering Controls

The soil cover system appears to be functioning as designed. There appeared to be very minor rutting (less than 2 inches in depth) from vehicular traffic in the vicinity of a stickup monitoring well installed in the southwest corner of the site. Based on the depth and location of the rutting, these do not affect the performance of the cover system.

2.2.2 Institutional Controls

The ICs detailed in the SMP are being followed as required by the DCR for the Site. The Site is limited to restricted residential, commercial or industrial uses only. The site is currently a vacant lot, in compliance with this restriction.

2.2.3 Media Monitoring Results

No sampling events were performed during this monitoring period.

2.2.4 Site Evaluation

The Engineering and Institutional Controls continue to perform as designed and prevent future exposure to residual contamination by controlling disturbances of the subsurface contamination and limiting the use and development of the Site to restricted residential, commercial or industrial uses only. No corrective actions are proposed at this time as the remedy continues to be effective. No preventative measures were recommended in the 2017 PRR. There are no preventive maintenance recommendations based on the 2018 inspection. The next cover system and site wide inspections are scheduled for 2019.

3. REFERENCES

Shaw Environmental & Infrastructure Engineering of New York, P.C, Former Kent Avenue Generating Station Site Management Plan. February 2015.

APPENDICES

A. SMP Figure
B. Inspection Forms
C. Institutional and Engineering Controls Certification Form
D. Photo Log

APPENDIX A

SMP Figure

OFFICE NEW YORK, NY | DRAWING NUMBER FIGURE 6

CONCRETE SLAB FOUNDATION

A

A'

WALLABOUT CHANNEL

PRESUMED LIMIT OF REMNANT BASEMENT SLAB

BURIED BOILER ROOM FOUNDATION WALL

PROPERTY LINE (TYP)

FORMER ASH PIT

FORMER NASSAU GAS WORKS

FORMER GENERATING STATION BUILDING FOUNDATION (BACKFILLED WITH CLEAN FILL)

DIVISION AVENUE

KENT AVENUE

N

SCALE
0 50 100 FEET

LEGEND

- DEEP COVER SYSTEM WITH DEMARCATION BARRIER ABOVE CONCRETE SLAB BOTTOM
- DEEP COVER SYSTEM WITH NO DEMARCATION BARRIER ABOVE CONCRETE SLAB BOTTOM
- SOIL CAP (2 FOOT THICK) SYSTEM
- FOUR FOOT THICK COVER SYSTEM WITH NO DEMARCATION BARRIER
- A — CROSS SECTION MARK (SECTION SHOWN ON FIGURE 7)
- CONCRETE CAP

SOURCE: "PHASE II INVESTIGATION REPORT:KENT AVENUE SITE", LAWLER, MATUSKY, AND SKELLY ENGINEERS, LLP, DATE: FEBRUARY 2000

Shaw Environmental & Infrastructure Engineering of NY, PC

DESIGNED BY: C. KRAEMER	CON EDISON			
DRAWN BY: S. SHATZ	LONG ISLAND CITY, NEW YORK			
CHECKED BY: C. KRAEMER	SITE COVER SYSTEMS			
	FORMER KENT AVENUE GENERATING STATION 500 KENT AVENUE, BROOKLYN, NEW YORK			
APPROVED BY: D. CHEN	DATE: 6/24/14	SCALE: AS SHOWN	DRAWING NO. FIGURE 6	REV NO. -

File: V:\ - CLIENT\Con Edison\146740 Kent Ave\Working\IRM\CADD\IRM\FER & SMP\SMP Figure 6.dwg
Plot Date/Time: Jun 24, 2014 - 9:53am
Plotted By: sara.shatz

APPENDIX B

Inspection Forms

Annual Inspection Form

Former Kent Avenue Generating Station
500 Kent Avenue, Brooklyn, New York

Inspector's Name: Christian Hoelzli	Weather Conditions: Cloudy
Inspection Date: 10/23/18	Air Temperature (ºF): 55
Inspection Time: 9:15	
Comments:	

COVER SYSTEM INSPECTION

1. Walk and inspect the entire perimeter of the Site.

2. Walk and inspect all of the unpaved areas of the Site.

* Are there any signs of significant cracks, settlement or deterioration? No
* Has any of the cover material been removed? No
* Are there signs of vehicular use on the unpaved areas (tire tracks, rutting, etc.)? Minor rutting (less than 2" inches in depth; no rutting in 2 foot cover system area)
* Have any structures been constructed on the unpaved areas? No
* Is the protective casing for the monitoring wells secured? Yes
* Are there any signs of soil washing or erosion (gullies, soil washed out into lower areas)? No
* Are there any signs of intrusive activities (digging, trenching, grading, excavating, etc.)? No
* Comments: None

Repair

Summarize needed/completed repairs to Cover System:

None

Inspector's Signature: Christian Hoelzli

APPENDIX C

Institutional and Engineering Controls Certification Form

Enclosure 1

Certification Instructions

I. Verification of Site Details (Box 1 and Box 2):

Answer the three questions in the Verification of Site Details Section. The Owner and/or Qualified Environmental Professional (QEP) may include handwritten changes and/or other supporting documentation, as necessary.

II. Certification of Institutional Controls/ Engineering Controls (IC/ECs)(Boxes 3, 4, and 5)

1.1.1. Review the listed IC/ECs, confirming that all existing controls are listed, and that all existing controls are still applicable. If there is a control that is no longer applicable the Owner / Remedial Party should petition the Department separately to request approval to remove the control.

2. In Box 5, complete certifications for all Plan components, as applicable, by checking the corresponding checkbox.

3. If you cannot certify "YES" for each Control listed in Box 3 & Box 4, sign and date the form in Box 5. Attach supporting documentation that explains why the **Certification** cannot be rendered, as well as a plan of proposed corrective measures, and an associated schedule for completing the corrective measures. Note that this **Certification** form must be submitted even if an IC or EC cannot be certified; however, the certification process will not be considered complete until corrective action is completed.

If the Department concurs with the explanation, the proposed corrective measures, and the proposed schedule, a letter authorizing the implementation of those corrective measures will be issued by the Department's Project Manager. Once the corrective measures are complete, a new Periodic Review Report (with IC/EC Certification) must be submitted within 45 days to the Department. If the Department has any questions or concerns regarding the PRR and/or completion of the IC/EC Certification, the Project Manager will contact you.

III. IC/EC Certification by Signature (Box 6 and Box 7):

If you certified "YES" for each Control, please complete and sign the IC/EC Certifications page as follows:

- For the Institutional Controls on the use of the property, the certification statement in Box 6 shall be completed and may be made by the property owner or designated representative.

- For the Engineering Controls, the certification statement in Box 7 must be completed by a Professional Engineer or Qualified Environmental Professional, as noted on the 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. **V00732**

Site Name Kent Avenue Station Site

Site Address: 500 Kent Avenue Zip Code: 11211
City/Town: Brooklyn
County: Kings
Site Acreage: 2.6

Reporting Period: October 01, 2017 to October 01, 2018

	YES	NO
1. Is the information above correct?	X	☐
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?	☐	X
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	☐	X
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	☐	X
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?	☐	X

Box 2

	YES	NO
6. Is the current site use consistent with the use(s) listed below? Restricted-Residential, Commercial, and Industrial	X	☐
7. Are all ICs/ECs in place and functioning as designed?	X	☐

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

October 31, 2018
Date

SITE NO. V00732

Box 3

Description of Institutional Controls

Parcel	Owner	Institutional Control
2023-10	Con Ed	Ground Water Use Restriction Soil Management Plan Landuse Restriction Site Management Plan

A deed restriction restricts use of the site to restricted residential use and prohibits the use of groudwater under the site. A site management plan includes requirements for annual certification of the soil cover and a soil management plan if excavation is necessary on the site.

Box 4

Description of Engineering Controls

Parcel	Engineering Control
2023-10	Cover System

A soil cover is in place. Annual certification of the soil cover's placement is necessary.

Box 5

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 compete.

YES	NO
X	☐

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
X	☐

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

October 31, 2018
Date

IC CERTIFICATIONS
SITE NO. V00732

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 Christopher Proce (print name) at Roux Environmental Engineering and Geology, D.P.C. 209 Shafter Street, Islandia, NY 11749 (print business address),

am certifying as Designated Representative of Owner (Owner or Remedial Party)

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

Signature of Owner, Remedial Party, or Designated Representative Rendering Certification — Date: 10/31/18

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.

Ian L. Holst (print name) at Roux Environmental Engineering and Geology, D.P.C. 209 Shafter Street, Islandia, NY 11749 (print business address),

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

STATE OF NEW YORK
IAN L HOLST
098652
LICENSED PROFESSIONAL ENGINEER

Signature of Qualified Environmental Professional, for the Owner or Remedial Party, Rendering Certification	Stamp (Required for PE)	Date
		10/31/18

APPENDIX D

Photo Log

Photograph 1: Condition of stickup monitoring well in South Excavation Area with minor rutting

Photograph 2: Condition of flushmount monitoring well

Photograph 3: Boundary between South Excavation Area and Former Generating Station Building Foundation

Photograph 4: Condition of Remnant Basement Slab

Photograph 5: Condition of South Excavation Area

Photograph 6: Condition of Former Generating Station Building Foundation

Photograph 7: Condition of North Excavation Area