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May 22, 2006

Mr. Bryan Wong
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 2
47-40 21St Street
Long Island City, New York 11101

**RE: Proposed Deep Excavation Plan**
**Former Maspeth Substation**
**57-77 Rust Street, Queens, NY**
**NYSDEC Voluntary Cleanup Program Site No: V-00326**

Dear Mr. Wong:

On Friday, February 24, 2006, Ed Wiederkehr and I met with you, Jane O'Connell, and Dan Walsh (NYSDEC) to discuss options for remediating deeper soil as well as sampling soil on the adjacent residential properties to the north located along 57th Drive.

We also discussed two options for the cleanup criteria that would meet DEC requirements; (1) to achieve ≤1 part per million (ppm) PCBs in all areas; and/or (2) to achieve <10 ppm PCBs greater than two feet below grade (bg). Con Edison (CE) has evaluated these two options and decided that achieving ≤1 ppm PCB would be in the best interest of all concerned parties.

As you aware, it is currently our intent to increase the excavation from the original target depth of 18 feet bg to 30 feet bg in the areas of concern (AOC) to remove deeper PCB contamination as shown on the attached Figure 1. Con Edison proposes to use a combination of two shoring methods for the deeper, limited excavation within the larger excavation footprint. The following is a discussion of Con Edison's proposed scope of work to proceed with the excavation to completion.

**Deeper Excavation**

The first of the two methods will consist of a Slide Rail (SR) series of overlapping trench box systems, which will be installed within the excavation. These systems will be

installed, in general at the center of the site, where the stability of existing shoring/lagging is not a concern. However, in order to maintain stability along the north excavation wall, the second method will consist of overlapping concrete piles to form an enclosed coffer structure approximately 20 feet wide by 56 feet long located in the northeast portion of the excavation. This system was designed to maintain the structural integrity of the row houses while excavating contaminated soils to 30 feet below grade.

Groundwater is approximately 20 feet below grade throughout the site. Groundwater that infiltrates into these proposed systems will be managed as outlined in the Remedial Action Work Plan.

During Con Edison's phone conference held on March 10, 2006, the DEC agreed to the following points:

- The walls of both types of structures will be inaccessible for sidewall end point sampling from within the excavation structure. Furthermore, once installed, these structures cannot be moved laterally. Therefore, sidewall samples were collected to determine the lateral extent of placement prior to their installation. One soil sample from a depth of 30 feet below original grade was collected from each approved sidewall location (shown on the figure) and analyzed. Analyses showed that all the sidewall sample results are <1 ppm PCB. These samples will represent and satisfy the requirements for the post excavation sidewall end point samples.

- All excavations will be advanced to 30 feet below original grade. Bottom end point samples will be collected in these areas in accordance with the frequency set forth in the RAWP, i.e., one sample for every 250 sq. ft. for a total of ten samples. NYSDEC will be notified immediately upon CE's receipt of the analytical data from these locations.

CE discussed the feasibility of the secant wall installation with our contractor's (Coastal Environmental) engineer and was advised that in order to facilitate the installation of the coffer structure, the large support struts spanning the width of the excavation will have to be removed to allow access for the appropriate equipment. However, prior to removal of the struts, the excavation will have to be backfilled to 6 feet bg to prevent the collapse of the existing shoring. Considering this, the planned sequence of implementing these deeper excavations is as follows:

1) Work from the East (58$^{th}$ Street) towards the West (Rust Street).

2) Install the SR trench boxes and excavate soil in the designated areas (SR-1, SR-2). Collect and analyze bottom end point samples.

3) Remove the remaining in-situ soil along and within the west side of the excavation. Collect all necessary bottom endpoint samples in this area as shown on the attached Figure 2.

4) Collect sidewall samples along the proposed perimeter of SR-3 (west side) and analyze. Upon analytical receipt, install trench box, and collect bottom endpoint sample.

5) Submit all soil analytical data to the DEC for approval.

6) Backfill entire excavation (including coffer area footprint) with certified clean material to six feet below original grade, remove cross bracing, and begin to install coffer structure.

7) Excavate within coffer structure from 6 feet to ~16 feet below original grade and stockpile soil for reuse. Excavate soil from 16 feet to 30 feet below grade and dispose as hazardous. Collect bottom endpoint samples for analysis.

It should be noted that 30 feet below grade is the maximum depth possible that can be excavated within these systems. If there are exceedances of the clean up criteria at this depth (i.e., 10 feet below the groundwater table) CE is proposing that this then be addressed as a groundwater issue.

**Hot Spot Removal**

In addition to the proposed excavation to 30 feet bg described above, soil will be excavated to a depth of 22 feet bg in the vicinity of grid point (77,48). At this grid point, soil collected from a test pit indicated a PCB concentration of 2100 ppm. However, we have not yet excavated the soil in this area to 18 feet bg. Soil samples collected at depths of 22, 26, 30, 34 and 38 feet bg with a geoprobe were all <1 ppm PCB. This hot spot, which is outside the proposed coffer structure area, will be excavated to a depth of 22 feet bg, (the next clean sample depth and the limit of excavation with the existing shoring system) without the use of a trench box. Soil samples previously collected to the north (78,56) south (78,40) east (69,45), and west (84,47) were all <1 ppm PCB. Therefore, the excavation will extend laterally to these grid points, as indicated in Figure 3. A post-excavation bottom endpoint sample will then be collected.

**Additional Sampling**

As discussed with the DEC, soil samples were collected along the west side (Rust Street) of the excavation outside of the lagging to confirm that contamination does not extend beyond this limit. The sample depths were 2', 6', 10', 14', and 18' below grade. The results of all these samples were <1 ppm PCB, and locations are shown on the attached Figure 2. As a result of minor exceedances (<10 ppm PCB) in sidewall endpoint samples collected from the east excavation wall (58$^{th}$ St side), CE is planning to collect soil samples from locations beneath the 58$^{th}$ Street sidewalk (outside the site perimeter) as indicated on the attached Figure 2.

Lastly, Con Edison is arranging to meet with the residents along 57th Drive for a property reconnaissance to determine soil sample locations in the backyards. There are at least two addresses (57-50 & 57-44) along 57th Drive where the houses are built to the fence and do not have open, accessible yards. We are likely not going to be able to collect any samples in these areas. I will let you know, in advance, when I have arranged meetings with the residents for this task.

If you have questions or need further clarification, please contact me at 718.267.3868.

Very truly yours,

Barry Cohen

Barry Cohen, Section Manager
Remediation
Environment, Health & Safety

cc. Jane O'Connell, NYSDEC
Edward Wiederkehr, Con Edison
Vincent Desiderio, Con Edison
Jeffrey Rutowski, Con Edison
Jennifer Rommel, Con Edison

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# M&A Linens

**BOTTOM SAMPLES**

Sample points are located using an X - Y - Z grid

- <1 ppm PCB
- 1- 49 ppm PCB
- > 50 ppm PCB
- Proposed sidewall end point sample location
- H-Pile & Lagging

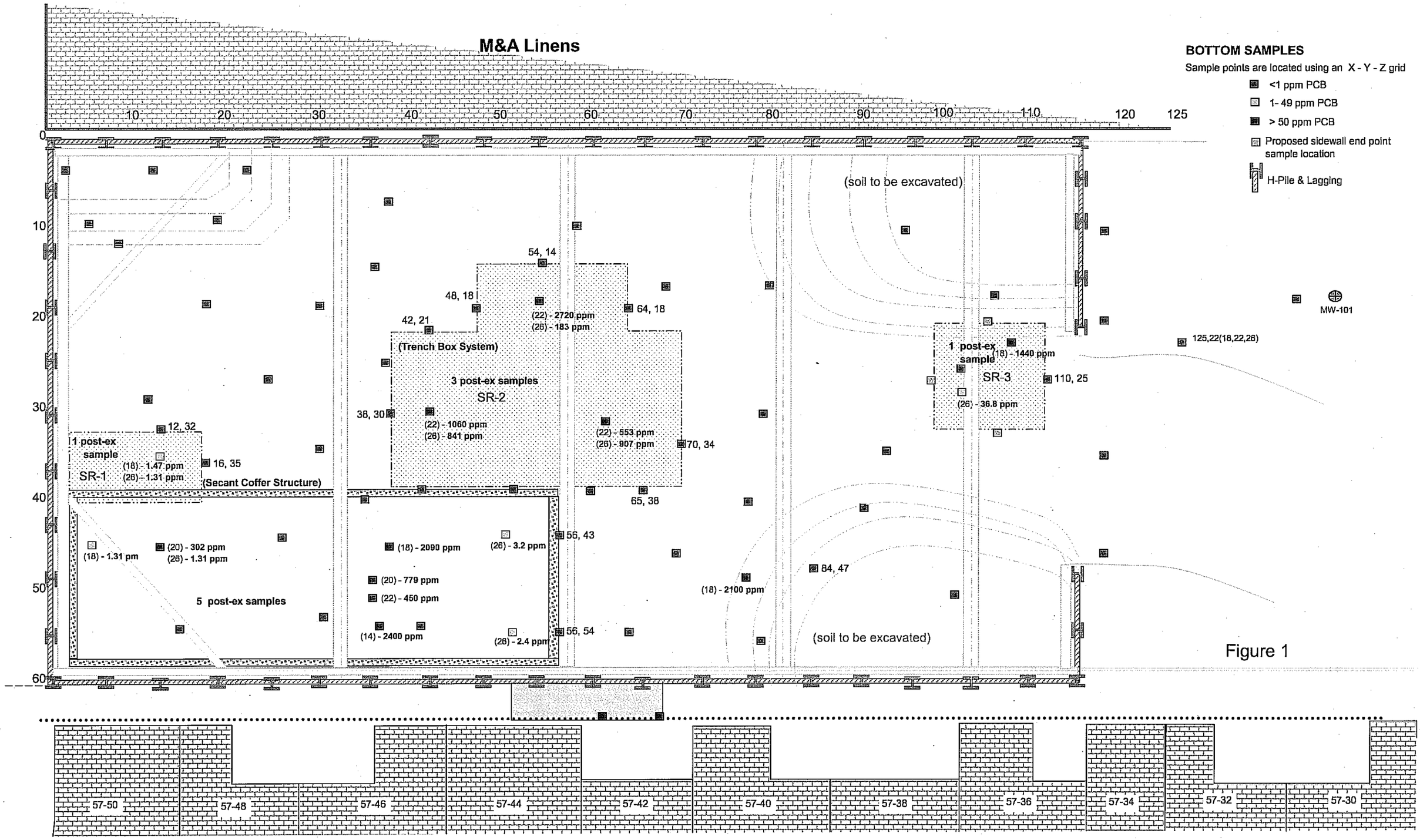


Figure 1

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M&A Linens

58th Street

10 20 30 40 50 60 70 80 90 100 110 120 125

0 10 20 30 40 50 60

(in-situ soil to be excavated)

52,18
(18) - 0.16 ppm
(22) - 2720 ppm
(26) - 183 ppm
(30) - <.0061 ppm
(34) - <.0059 ppm
(38) - <.006 ppm

42,30
(20) - 19 ppm
(22) - 1060 ppm
(26) - 841 ppm
(30) - <.0069
(34) - <.007
(38) - .062

60,32
(20) - 0.54 ppm
(22) - 553 ppm
(26) - 907 ppm
(30) - <.0069
(34) - <.0061
(38) - .072

105, 22
(18) - 1440 ppm
(22) - 0.16
(26) - 0.18

100,28
(18)- 0.14 ppm
(22) - 0.10 ppm
(26) - 36.8 ppm
(28) - 0.012

118, 10 (2, 6, 10, 14, 18)

118, 20 (2, 6, 10, 14, 18)

MW-101

125,22(18,22,26)

118, 35 (2, 6, 10, 14, 18)

118, 45 (2, 6, 10, 14, 18)

12,35
(18) - 1.47 ppm
(20) - 3.3 ppm
(22) - 0.43 ppm
(26) - 0.55
(30) - 0.17
(34) - 0.088
(38) - 0.015

5, 45
(18) - 1.31 ppm
(22) - 0.04
(26) - 0.016
(30) - ND
(34) - 0.24
(38) - 0.044

12,45
(18) - 2.11 ppm
(20) - 302 ppm
(22) - 0.71
(26) - 1.31
(30) - 0.2
(34) - 0.19
(38) - 0.059

37,45
(18) - 2090 ppm
(22) - 0.27
(26) - 0.12

36,48
(20) - 779 ppm

36,51
(22) - 450 ppm

37,55
(14) - 2400 ppm
(18) - 0.13
(22) - 0.67
(26) - 0.057
(30) - 0.049
(34) - 0.076
(38) - 0.052

50,43
(22) - 0.11 ppm
(26) - 3.2 ppm

52,54
(18) - 0.046 ppm
(22) - 0.17 ppm
(26) - 2.4 ppm
(30) - 0.043

77,46
(18) - 2100 ppm
(22) - 0.051
(26) - <.0071
(30) <.0063
(34) 0.011
(38) - 0.1

(in-situ soil to be excavated)

57-50 57-48 57-46 57-44 57-42 57-40 57-38 57-36 57-34 57-32 57-30

Figure 2

**BOTTOM SAMPLES**
Sample points are located using an X - Y - Z grid
- <1 ppm PCB
- 1- 49 ppm PCB
- > 50 ppm PCB
- Proposed end point sample location
- H-Pile & Lagging
- Sample grid: cell = 250 sq. ft.
  Required frequency
  1 sample/cell

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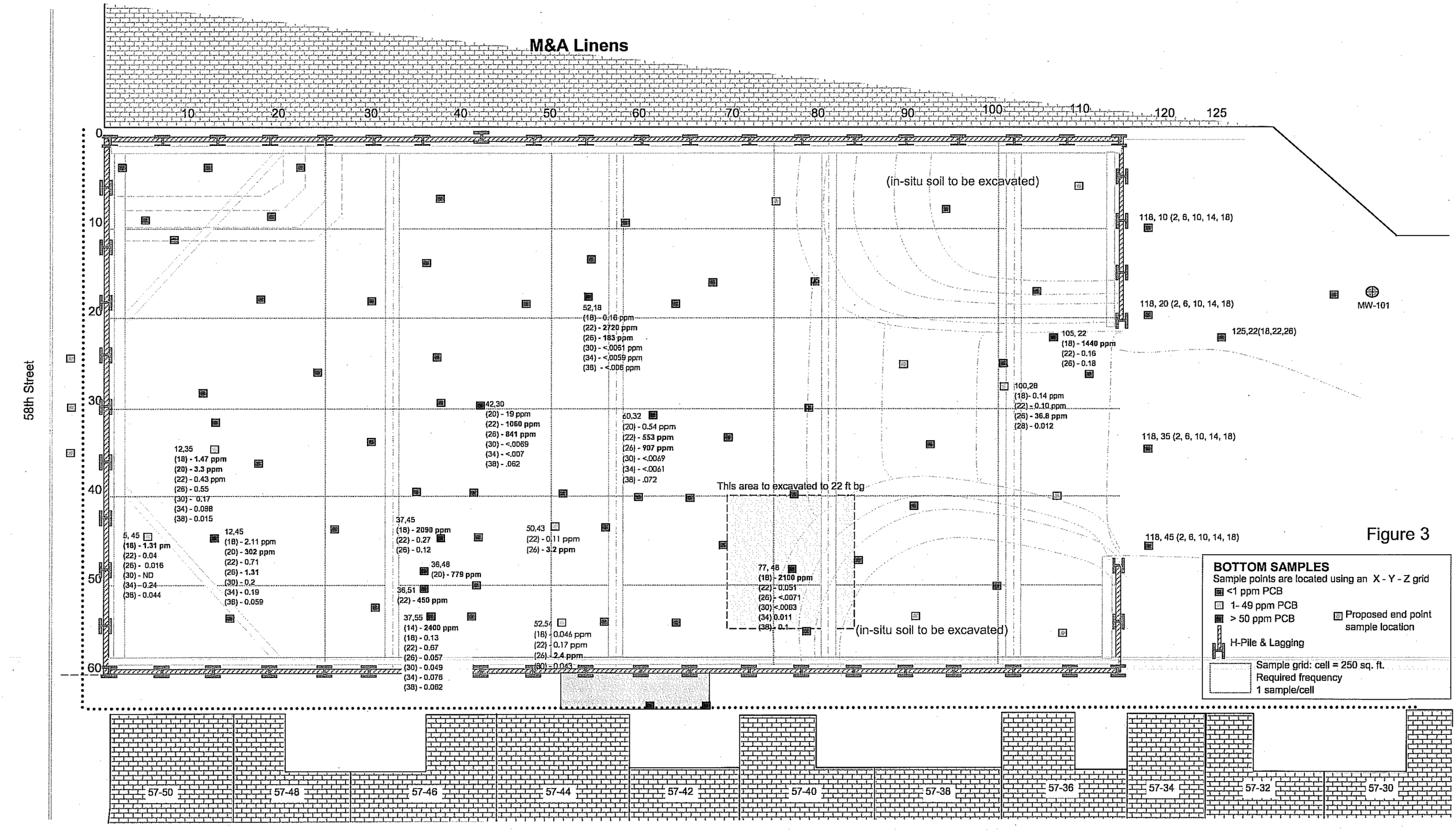


Figure 3

**BOTTOM SAMPLES**
Sample points are located using an X - Y - Z grid
- <1 ppm PCB
- 1- 49 ppm PCB
- > 50 ppm PCB
- Proposed end point sample location
- H-Pile & Lagging

Sample grid: cell = 250 sq. ft.
Required frequency
1 sample/cell