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November 21, 2014

Mr. Ronnie Lee, P.E.
New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau B
625 Broadway
Albany, New York 12233-7017

Subject:

Sediment Work Plan
Krasdale Foods, Inc. Leasehold
Hunts Point Manufactured Gas Plant
Bronx, New York
NYSDEC VCA #V00554

Dear Mr. Lee:

This Sediment Work Plan presents the activities to be conducted adjacent to the Krasdale Foods, Inc. leasehold portion (Krasdale property) of the Hunts Point former Manufactured Gas Plant (MGP) (the site). This work plan has been prepared in accordance with the Voluntary Cleanup Agreement between the New York State Department of Environmental Conservation (NYSDEC) and Consolidated Edison Company of New York, Inc. (Con Edison). This work plan is presented in conjunction with the Interim Remedial Measure (IRM) Work Plan for the storm sewer and outfall (Outfall #1) replacement on the Krasdale property to prevent discharge of MGP-impacted water from the storm sewer to the Bronx River. As part of review of the IRM Work Plan (ARCADIS 2014a), NYSDEC requested in an August 1, 2014 email that additional sediment investigation and potentially sediment removal activities, be conducted adjacent to Outfall #1. The sediment activities described herein will be conducted as part of the investigation of off-site areas associated with the site; however, are being implemented in conjunction with the IRM Work Plan for ease of implementation (increased accessibility of the area during IRM implementation).

Site Location and Background

The Hunts Point former MGP is an approximately 160-acre tract of land located within the Hunts Point peninsula at the confluence of the Bronx and East Rivers. For investigation purposes, portions of the site have been divided into parcels (Parcels A through F). The site also contains the Sultana and Citarella property, located south of Parcel C; the Krasdale Foods property, located between Parcels D and F; and The City of New York Department of Sanitation marine transfer station, located on the southern portion of the former MGP (Figure 1). Various investigations and remediation of these

site areas have been completed and are documented in several reports submitted to the NYSDEC.

Previous investigation activities to evaluate the potential presence and extent of MGP-related impacts in the Bronx and East Rivers adjacent to the site were performed and documented in the Off-Site Remedial Investigation Report (ARCADIS 2014b) which recommended additional remedial investigation activities on Parcel C. Sediment cores taken adjacent to Outfall #1 did not exhibit evidence of MGP-related impacts including purifier waste impacts (i.e., blue discoloration and/or wood chips). The NYSDEC approved the Off-Site Remedial Investigation Report in a May 12, 2014 approval letter. An Off-Site Supplemental Remedial Investigation Work Plan describing additional remedial investigation activities to be implemented on Parcel C was submitted to NYSDEC on July 31, 2014 (Con Edison 2014). As stated above, subsequent to approval of the Off-Site Remedial Investigation Report, NYSDEC requested additional sediment investigation and potentially sediment removal activities be conducted adjacent to Outfall #1 during the planned IRM activities at the Krasdale Foods property.

Sediment Activities

The objective of the sediment activities is to evaluate if impacted materials were conveyed via the storm sewer pipe to the sediments. If impacted materials were transported via the storm sewer pipe, the material would be expected to be deposited at the base of the outfall within the surficial sediments.

The sediment activities described below will be performed during the implementation of the IRM Work Plan (ARCADIS 2014a) due to increased accessibility of the area during the IRM. The shoreline consists of exposed rip-rap riverward of the bulkhead and covering the entire intertidal area. Based on coring completed near shore of this area during the off-site remedial investigation, this rip-rap likely extends into the river below the low water line as refusal was encountered during core collection. As such, because of the presence of the rip rap, to evaluate potential impacts to the sediment beneath the rip-rap/at the base of the outfall, the rip-rap would need to be removed using construction equipment prior to any coring investigation. As such, completion of this investigation work will be performed in conjunction with the IRM as the rip-rap will be removed as part of the IRM.

Sediment activities will be conducted in the project work area, which is defined as the area east of the bulkhead extending from mean high water to the eastern extent of the installed sheeting (Figure 2).

The scope of sediment activities will include:

- Within the project work area, sediment exposed during construction activities, if any, will be evaluated visually for potential impacts before installation of the sheeting. If

visual impacts are observed, then the impacts will be delineated visually prior to installation of the sheeting to the extent feasible given the overall stability of the shoreline, permit requirements and access limitations. It is anticipated that investigation activities could extend north to the Parcel D property line, south an equivalent distance, and vertically to approximately 2 feet below sediment surface (Figure 2). The completion of investigation activities beyond this area would require additional permitting, access, and engineering considerations and as such would be addressed separately as part of potential future investigation activities, if needed.

- Up to two sediment samples will be collected from within the project work area from the surficial sediment (upper two feet), if any, and evaluated for potential visual impacts.
- If visual evidence of heavily impacted material (purifier waste, tar/non-aqueous phase liquid) is observed within the project work area, impacts will be removed to the extent feasible and practicable considering the stability of the sheeting and on-site equipment. If observed, more extensive impacts would be addressed separately as part of potential future remedial activities, if needed.

Investigation Support

Supporting activities will be conducted as part of implementation of the IRM Work Plan (ARCADIS 2014a) and/or in general accordance with procedures outlined in the Site Characterization Work Plan - Krasdale Foods, Inc., Leashold (ARCADIS 2011) and Off-Site Characterization Work Plan (ARCADIS 2012) and their respective supporting appendices.

Reporting

The results of the sediment activities will be summarized in a letter report or in the Off-Site Supplemental Remedial Investigation Report for the additional remedial investigation activities to be implemented on Parcel C (dependent on the timing of implementation). The letter report text will be supported by logs, tables, and figures illustrating findings, as appropriate.

References

ARCADIS. 2011. *Site Characterization Work Plan* – Krasdale Foods Inc., Leasehold. Hunts Point Former Manufactured Gas Plant. Bronx, New York, NY. Prepared for Consolidated Edison Company of New York, Inc.



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ARCADIS. 2012. *Off-Site Characterization Work Plan*. Hunts Point Former Manufactured Gas Plant. Bronx, New York, NY. Prepared for Consolidated Edison Company of New York, Inc.

ARCADIS. 2014a. *Interim Remedial Measure Work Plan* – Krasdale Foods Inc., Leasehold. Hunts Point Former Manufactured Gas Plant. Bronx, New York, NY. Prepared for Consolidated Edison Company of New York, Inc.

ARCADIS. 2014b. *Off-Site Remedial Investigation Report*. Hunts Point Former Manufactured Gas Plant. Bronx, New York, NY. Prepared for Consolidated Edison Company of New York, Inc.

Con Edison. 2014. *Off-Site Supplemental Remedial Investigation Work Plan, Parcel C*. Hunts Point Former Manufactured Gas Plant. Bronx, New York, NY.

Please contact me at (718) 204-4205 or at skorobogatov@coned.com should you have any comments or questions regarding this submittal.

Very truly yours,

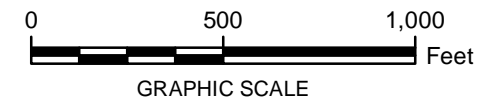
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K. Kasier, Con Edison– 1 electronic copy (via e-mail)
T. Bell, NYC EDC – 1 electronic copy (via e-mail)
M. Hayes, ARCADIS -1 electronic copy (via e-mail)



LEGEND:

- ◆ CURRENT/FORMER OUTFALL LOCATION
- HISTORICAL SITE FEATURE (APPROXIMATE)
- HISTORICAL SURFACE DRAINAGE (APPROXIMATE)
- BRONX RIVER FEDERAL NAVIGATION CHANNEL
- CURRENT/FORMER DREDGED CHANNEL (APPROXIMATE)
- FILLED LAND (1947-1975)
- APPROXIMATE EXTENT OF FORMER MGP
- PARCEL BOUNDARY
- ANHEUSER BUSCH REDEVELOPMENT PARCEL (AB PARCEL)
- GREENWAY REDEVELOPMENT PARCEL
- IROQUOIS PIPELINE VCP PORTION OF ANHEUSER BUSCH PARCEL
- IROQUOIS PIPELINE VCP PORTION OF THE GREENWAY
- NON-VCP PORTION OF ANHEUSER BUSCH PARCEL
- NON-VCP PORTION OF GREENWAY



NOTES:

1. IMAGERY OBTAINED FROM ESRI IMAGE SERVICE.
2. PARCEL BOUNDARIES ADOPTED FROM CADD FILE PREPARED BY LAWLER, MATUSKY, AND SKELLY ENGINEERS, LLP.
3. HISTORIC SITE FEATURES ADOPTED FROM CADD FILE PREPARED BY PARSONS ENGINEERING SCIENCE.

VCP = VOLUNTARY CLEANUP PROGRAM

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
 HUNTS POINT FORMER MANUFACTURED GAS PLANT

SEDIMENT WORK PLAN

SITE PLAN





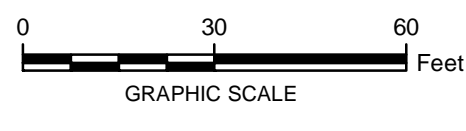
LEGEND:

- ACTUAL SEDIMENT CORE LOCATION
- ◆ CURRENT/FORMER OUTFALL LOCATION
- STEEL SHEET PILING
- - - EXISTING GRADE CONTOUR
- EXTENT OF INVESTIGATION AREA
- PROJECT WORK AREA
- FILLED LAND (1947-1975)
- APPROXIMATE EXTENT OF FORMER MGP
- PARCEL BOUNDARY

NOTES:

1. IMAGERY OBTAINED FROM ESRI IMAGE SERVICE.
2. ALL LOCATIONS ARE APPROXIMATE.
3. PARCEL BOUNDARIES ADOPTED FROM CADD/FILE PREPARED BY LAWLER, MATUSKY, AND SKELLY ENGINEERS, LLP.
4. THE POTENTIAL UNIDENTIFIED UTILITY CROSSINGS AND IROQUOIS PIPELINE ARE APPROXIMATE AND BASED ON A REVIEW OF THE NAVIGATIONAL CHART FOR THE EAST RIVER FROM TALLMAN ISLAND TO QUEENSBORO BRIDGE (CHART NUMBER 12339, EDITION 46, JUNE 2008) AVAILABLE AT THE NOAA OFFICE OF COAST SURVEY ON-LINE CHART VIEWER.
5. HISTORIC SITE FEATURES ADOPTED FROM CADD FILE PREPARED BY PARSONS ENGINEERING SCIENCE.

NYCEP = NEW YORK CITY ENVIRONMENTAL PROTECTION
 CSO = COMBINED SEWER OVERFLOW
 VCP = VOLUNTARY CLEANUP PROGRAM



CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.
 HUNTS POINT FORMER MANUFACTURED GAS PLANT

SEDIMENT WORK PLAN

PROJECT WORK AREA



FIGURE 2