

LETTER OF TRANSMITTAL

Submittal No.:011D

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MT JOB NO. 13007 | **Date**: 10/21/13

RE: Former Kent Avenue Generating Station

Interim Remedial Measure

500 Kent Avenue Brooklyn, New York

Purchase Order No. 4167052

WE ARE SENDING YOU ☐ Attached ☐ Other: As Below								
COPIES		DESCRIPTION REVISION 4						
	Spec:	01414 DUST CONTROL						
1	Item:	1.01 C Dust Control Plan – Revision 4						
		[Revised per DEC Comments]						
	Author:	Maxymillian Technologies, Inc.						
THESE AR	THESE ARE TRANSMITTED as checked below:							
⊠ F	For approval For your use As requested Return <u>comments</u> for distribution							
REMARKS:								
Transmitted Electronically								
oo: D Bubin	cc: D.Rubin, M.Lombardi, T.O'Connell, F.Perez, C.Kraemer,							
	cc: D.Rubin, M.Lombardi, T.O'Connell, F.Perez, C.Kraemer, S.Shatz, G.Houle, V.Palen, S.Kelley, C.Riccardi SIGNED							
If enclosures are	If enclosures are not as noted, please notify us at once. Sara Kelley, Project Engineer							

Dust Control Plan

Kent Avenue Remediation Project Former Kent Ave Generating Station 500 Kent Ave Brooklyn, New York

Purchase Order No. 4167052

Prepared For:



Consolidated Edison Company of New York, Inc. 4 Irving Place New York, New York 10003

Prepared By



1801 East Street Pittsfield, MA 01201 MT Project No: 13007

October 2013

MAXYMILLIAN TECHNOLOGIES, INC. Reviewed For Submission

 Spec Sect #
 01414
 Trans #
 011D

 Date:
 10/21/13
 By:
 SJK

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1. MT Air Monitoring Log

1.0 INTRODUCTION

Consolidated Edison Company of New York, Inc. has contracted Maxymillian Technologies, Inc. (MT) to perform remedial construction activities at the Former Kent Ave Generating Station site located at 500 Kent Ave, Brooklyn, New York. MT has prepared this site-specific Dust Control Plan in accordance with Purchase Order No. 4167052, and specification entitled *Bid Specification for Interim Remedial Measure Former Kent Avenue Generating Station*, dated December 14, 2012.

The requirements of this Plan, as identified as part of Section 01414, are as follows:

- 1) MT shall address responsible person(s) for the preparations, submittal and implementation of the Dust Control Plan and for dust generating operations;
- 2) MT will show a Site Plan (see Site Logistics Plans, under separate cover) that depicts the land surfaces to be disturbed; the operations and activities to be performed on-site; sources of fugitive dust emissions; and the delivery, transport and storage areas on site;
- 3) Description of the Reasonable Available Control Measures (RACM) to be utilized during all period of dust generating operations (at actual and potential sources);
- 4) Description of dust suppressants to be applied including product specs; methods, frequency and intensity of application; application equipment; and certifications related to suppressants safe uses;
- 5) MT will provide a description of specific surface treatments or RACM used to control material track-out where unpaved or access points join paved surfaces;
- 6) MT will provide at least one alternative RACM for each actual and potential fugitive dust control source.

1.1 Contact Information

MT Contact Responsible for the Preparation of the Dust Control Plan:

Charles Riccardi – Manager of Engineering

Office: 413-499-3050 ext. 294

MT Contact Responsible for the Submittal of the Dust Control Plan:

Sara Kelley – Project Engineer **Work:** 413-499-3050 ext. 253

Cell: 413-829-1912

MT Contact Responsible for the Implementation of the Dust Control Plan:

James Smith –Site Supervisor

Cell: 413-447-1229

2.0 SITE PLAN

The project is divided into two general activities: the North Remediation Area activities and the South Remediation Area activities. MT will utilize the Kent Avenue gate during the North Remediation activities and the new Division Avenue gate during the South Remediation activities. Each remediation area will have its own anti-tracking pad, decontamination pad, and impacted soil stockpile areas.

Total Area of Land Surface to be Disturbed (See Site Logistics Plan, under separate cover)

- 2 Anti- Tracking Pads: approximately 15' x 20'; 600 sq. ft. total
- 2 Decontamination Pads: approximately 15' x 20'; 600 sq. ft. total
- North Remediation Area: 5,250 sq. ft.
- South Remediation Area: 31,250 sq. ft.

Operations & Activities to be Performed on the Site

- Installation of decontamination areas for equipment & personnel;
- Installation of ACM critical barriers;
- Construction of stockpile area;
- Removal of an existing Underground Storage Tank & contents from the North Excavation Area;
- Removal of soil, subsurface remnant structures, debris, and equipment from the North & South Excavation Areas:
- On-site dewatering of the excavated materials;
- Disposal of soil, subsurface remnant structures, debris, and equipment;
- Off-site disposal of wastewater to an approved facility, and/or the installation, operation, and maintenance of an on-site packaged water treatment system to be used, as necessary, for treatment of wastewater to the existing SPDES Permit equivalent requirements and release into Wallabout Channel;

- Inspection of remaining foundations, walls, and sidewalk vault and repair as directed;
- Installation of rip rap and structural fill in undermined area in North Excavation, near old equipment room;
- Backfill the excavations with structural fill;
- Grade disturbed areas with 4" of 3/4" clean crushed stone.

2.1 North Remediation Area

The North area is approximately 5,250 square feet in area containing approximately 1,360 cubic yards of material with proposed excavation depths of 6 to 8 feet. Soils and debris will be excavated and direct loaded into lined waste transporter trucks by excavator or 3-4 cubic yard size loader for transport to the approved disposal facilities. As an alternate to direct loading, soil and debris will be stockpiled in a lined soil storage area within the exclusion zone prior to loading into transporter trucks by excavator or 3-4 cubic yard size loader. Laborers will appropriately wrap the transport truck loads in accordance with asbestos regulations. Disposal trucks will exit the exclusion zone via the decontamination wash pad. During excavation, loading, and stockpile handling water will be applied to the soils and debris to prevent dust. A collection sump will be installed within the soil storage area. All decant water will migrate to the sump and be pumped to the on-site water storage area to await off-site disposal or treatment to SPDES discharge requirements prior to discharge into the Wallabout Channel.

2.2 South Remediation Area

The South Remediation area is approximately 31,250 square feet in area containing approximately 8,200 cubic yards of material with proposed excavation depths of 4 to 12 feet. Soils and debris will be excavated and direct loaded into lined waste transporter trucks by excavator or 3-4 cubic yard size loader for transport to the approved disposal facilities. As an alternate to direct loading, soil and debris will be stockpiled in a lined soil storage area within the exclusion zone prior to loading into transporter trucks by excavator or 3-4 cubic yard size loader. Laborers will appropriately wrap the transport truck loads in accordance with asbestos regulations. Disposal trucks will exit the exclusion zone via the decontamination wash pad. During excavation, loading, and stockpile handling water will be applied to the soils and debris to prevent dust. A collection sump will be installed within the soil storage area. All decant water will migrate to the sump and be pumped to the on-site water storage area to await off-site disposal or treatment to SPDES discharge requirements prior to discharge into the Wallabout Channel.

2.3 Impacted Soil Storage Area

Soil excavated and removed from the North & South Remediation Areas will be temporarily stockpiled within the soil storage areas, and segregated by waste stream as necessary. Excavated soil will be placed on 10-mil. poly. MT will place dunnage, hay bales, wattle or grade crushed stone and sand to create a berm along the perimeter of the liner. Construction of the perimeter berm will prevent storm water from migrating into the soil storage area, and also to prevent any

dust, particulate, and decant water from migrating from the soil storage area. After placing the soil within the bermed and lined storage area, MT will collect any additional waste characterization samples necessary and then cover the soil stockpile with 6-mil poly sheeting until the materials are loaded for off-site disposal. Poly sheeting will be secured utilizing sand bags or sand bags with ropes to secure soil piles.

Anticipated Source of Aggregate Material Required for Construction of the Soil Staging Area

MATERIAL	SOURCE
2" Clean Crushed Stone	Tilcon or New York Sand & Stone or approved
	alternate
Sand	Tilcon or New York Sand &Stone or approved
	alternate

3.0 COMPLIANCE

Con Edison's on-site consultant will perform continuous real-time perimeter air monitoring for particulate matter/dust and volatile organic compounds (VOCs), monitor environmental conditions for visible emissions and odors, inspect and monitor MT's work practices. Con Edison's consultant will perform ambient air monitoring for asbestos fibers, including TEM air monitoring at the entrance to the worker decontamination enclosure system and at five (5) upwind/downwind locations to be determined on a daily basis as work is to begin, in accordance with the NYCDEP approved variance for this project.

Con Edison will provide its consultant's compiled CAMP data to the DEC and DOH in accordance with New York State reporting requirements.

MT will also be monitoring work zone areas and will be utilizing the following instrument to monitor for Dust. Total dust will be monitored by a MiniRae with PM-10 in order to determine worker exposure to PAH, metal compounds, and other contaminants. This result will be compared to the calculated exposure limit for site contaminants.

CONTAMINANT	ACTION LEVEL	ACTIONS REQUIRED
Total Dust	< 100 ug/m ³ ave. over 15 min.	No action required.
	Dust visible in work zones	Implement dust suppression methods.
	$\geq 100 \text{ ug/m}^3$ ave. over 15 min.	Continue dust suppression methods. Check downwind levels.
	≥ 150 ug/m ³ ave. over 15 min	• Stop Work, until issue is resolved.
	Visible dust leaving the site.	• Stop Work, until issue is resolved.

Dust control measures shall be immediately implemented at any time particulate readings exceed 100 ug/m³. At any time if particulate readings exceed 150 ug/m³ (15 minute averages), Con Edison's consultant shall notify MT to stop work until the problem is corrected.

MT's Site Safety and Health Officer (SSHO) shall maintain daily written air monitoring logs (Attachment 1) and results recorded shall be made available for review on the request of Con Edison. Results will be recorded in writing. High priority areas of monitoring include open working areas, stockpiles, and the Exclusion Zone (EZ).

In accordance with the approved NYCDEP variance for this project, the Asbestos Abatement Supervisor (AAS) shall conduct a daily visual inspection to ensure that the perimeter sidewalk and adjacent street gutters are free of suspect asbestos debris. If suspect asbestos debris is detected beyond the immediate work area, all work shall cease. The source of suspect asbestos debris shall be properly controlled and the suspect asbestos debris resulting from the fugitive emissions shall be wet cleaned until all evidence thereof is removed.

4.0 REASONABLE AVAILABLE CONTROL MEASURES & ALTERNATIVES

MT will take the necessary precautions to avoid allowing any dust generation that violates NYSDEC regulations or compromises compliance with the Community Air Monitoring Plan (CAMP).

Visible dust may be present in the work area as long as work area dust levels do not exceed work area action levels based on breathing zone monitoring. Visible dust that leaves the regulated asbestos abatement work areas (i.e., fugitive dust) is not acceptable and must be controlled.

Below are the activities (actual & potential sources) of dust on-site along with Reasonable Available Control Measures & Methods to help reduce these emissions:

Activities	Reasonable Available Control Measure (RACM)	Alternative
Movement of Transport Trucks Entering/ Exiting Site	 Applying water on haul roads; Restricting vehicle speeds to 10 mph; Hauling materials in properly tarped or watertight containers; 	 Limit amount of Trucks allowed On- Site at a time Spray tires, if necessary
Weather Issues (High Winds)	Covering Stockpiles and material	Cease activities in extreme conditions
Equipment Moving On- Site	 Applying water on haul roads; Wetting equipment and work areas; Restricting vehicle speeds to 10 mph; Spraying water on buckets during excavation and dumping; 	Limit amount of equipment movement
Excavated Materials	 Spraying water on buckets during excavation & dumping; Wetting equipment and work areas; 	Limit the amount of material excavated at a given time
Soil/Debris moved to Stockpile Areas	 Applying water on haul roads; Wetting equipment & work areas; Restricting vehicle speeds to 10 mph; Spraying water on buckets during excavation & dumping; 	Limit amount of equipment movement
Stockpiles	 Covering stockpiles and material after activity ceases; Keeping stockpiles wetted whether actively being "worked" or when under its covering. 	Minimize Stockpiles On-Site

water will not be applied in excess so as to create standing water or run-off conditions

4.1 Anti – Tracking Pad and Decontamination

At the entrance/exit of the site MT will construct an anti-tracking pad with poly liner, sump, and a layer of crushed stone. A wheel wash station will also be set up with water to spray tires, as necessary. All wash water will be collected and containerized for off-site disposal or treatment to SPDES discharge requirements prior to discharge into the Wallabout Channel.

MT and Delta Environmental, Inc. will also establish a Contamination Reduction Zone to perform controlled decontamination of equipment and personnel as they leave the regulated asbestos abatement work area. MT will provide a water supply for cleaning equipment, and a temporary decontamination pad.

The decontamination pad will consist of multiple layers of 10 mil. poly, up to 40 mil., or a single 40 mil. liner, a layer of stone, and earthen berms around the perimeter. MT will setup a sump system to pump out and containerize wash water for off-site disposal. The decontamination pad will be inspected once per day. All equipment will be decontaminated prior to leaving the site. MT and Delta Environmental, Inc. will prevent cross contamination between areas in the Exclusion Zone by cleaning heavy equipment, as necessary.

MT will utilize these methods to control fugitive dust generation from all operations performed by MT on-site. These areas will include:

- 1) Construction Areas;
- 2) Vehicle & Equipment Parking Areas;
- 3) Material Storage Areas;
- 4) Office / Trailer Areas;
- 5) Haul and Access Roadways;
- 6) Anti-tracking / Decontamination Areas.

Attachment 1

MT Air Monitoring Log



PITTSFIELD, MA 01201 413 499-3050 Fax 413 443-0511

BROOKLYN, NY Con Edison Site; 500 Kent Ave. **MAXYMILLIAN TECHNOLOGIES PROJECT No. 13007** 2013

Air Monitoring Log

Date: Ludlum Multi-Meter S/N: VOC - OVM S/N: O ₂ - Scott Alert S/N:						her: emp:		
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			,					

	Type of Air					Wind		
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