LETTER OF TRANSMITTAL

Submittal No.: 010B

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MT JOB NO.: 13007   Date: 09/09/13

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

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<th>REVISION 02</th>
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<tr>
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<td>Spec: 01570 ENVIRONMENTAL CONTROLS</td>
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<td>Item: 1.02 A Erosion and Sediment Control Plan – Revision 02</td>
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Author: Maxymillian Technologies, Inc.

THESE ARE TRANSMITTED as checked below:

☒ For approval ☒ For your use ☐ As requested ☐ Return comments for distribution

REMARKS:

Transmitted Electronically


If enclosures are not as noted, please notify us at once.

SIGNED ____________________________

Sara Kelley, Project Engineer

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Erosion and Sediment 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

MAXYMILLIAN TECHNOLOGIES, INC.
Reviewed For Submission
Spec Sect # 01570 Trans # 010B
Date: 09/09/13 By: SJK

September 2013
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ATTACHMENT 1 – Site Logistics Plans
1.0 INTRODUCTION

Consolidated Edison Company of New York, Inc. has contracted Maxymillian Technologies, Inc. (MT) to perform remedial activities at the Former Kent Avenue Generating Station site located at 500 Kent Ave, Brooklyn, New York. MT has prepared this site-specific Erosion and Sediment 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.

1.1 Statement of Work

MT has prepared the following site-specific Erosion and Sediment Control Plan for remedial activities at the Kent Avenue Generating Station site based on the following work principles:

- Safety: Perform all work with a “Safety First” attitude;
- Perform all work such that sediment is maintained within the appropriate work zones, and prevents migration of sediment from the work limits;
- Use best management practices to minimize erosion within active work areas, and limit areas of disturbance;
- Project Management/Supervision: Provide a highly experienced project team, familiar and knowledgeable of all erosion and sediment control requirements for the project.

1.2 Site-Specific Approach

MT’s approach for erosion and sediment control at the Kent Avenue Generating Station Site is based on the following work objectives:

- Store all impacted soil and debris within the lined and bermed Soil Storage Area, or within roll-offs;
- Employ best management procedures and operations that will minimize dust and prevent migration of sediments from the work areas;
- Install erosion control devices such as silt fence or wattle to prevent any sediment or particulate from migrating from the site, and/or entering Wallabout Channel;
- Construct soil storage areas in manner to prevent storm water from migrating to or from the storage area;
- Collect all decant, impacted storm water, and decon water for off-site disposal at a Con Edison approved disposal facility or treated/filtered to the requirements of
the existing Con Edison SPDES Permit Equivalent and discharged to the Wallabout Channel;

- Transport and dispose of off-site, all impacted soil and debris at approved facilities;
- Perform all work in accordance with permit conditions and approved variances;
- Perform all work within acceptable local, state, and federal requirements for items such as dust, and storm water management;

1.3 Coordination

MT’s Erosion and Sediment Control Plan represents careful consideration of the anticipated logistical issues associated with this unique site. MT will comply with all requirements of Con Edison. MT will perform work mindful of the community, and conscientious about erosion and sediment control.

1.4 Team Assignment

Mr. Jim Smith will serve as on-site Site Supervisor (SS) for the Kent Avenue Remediation Project. Mr. Smith will assure that all requirements of the Erosion and Sediment Control Plan are performed and maintained for the duration of the project. Mr. Smith’s emergency contact phone number is (413) 447-1229.

Mr. Doug Mason will serve as the on-site Contractor Quality Control Engineer (CQCE). The CQCE will perform routine inspections of the installed erosion and sediment controls, and direct maintenance/replacement as necessary.

Mary Albani, MS, CET with Triangle H&S Solutions will serve as the on-site Site Safety and Health Officer (SSHO). Although the SSHOs primary responsibility will be the health and safety of all personnel on-site, the SSHO will also be mindful of the requirements of the Erosion and Sediment Control Plan, and will point out any noticeable deficiencies to the Site Supervisor.

Mr. Glenn Houle will serve as the off-site Construction Manager (CM), and will be on-site at any time necessary to assure the success of the project. On days that Mr. Houle is on-site, he will inspect the installed erosion and sediment controls for compliance, and direct any necessary maintenance or improvements to the Site Supervisor.
2.0 DESCRIPTION OF WORK

MT has prepared this site-specific Erosion and Sediment Control Plan for the remedial activities at the Kent Avenue Generating Station site. MT’s Erosion and Sediment Control Plan will identify the following:

- Storm water controls in accordance with Specification Section 01570 Environmental Controls, and the Contract Drawings;
- Soil and sediment migration controls to contain potentially contaminated materials within site remediation areas;
- Erosion controls to prevent soil loss from disturbed areas, work areas, haul roads, stockpiles and any other areas where erosion develops as a result of construction activities;
- Decontamination procedures to prevent cross contamination and potential off-site migration;
- Dust controls to minimize fugitive emissions and airborne particulates will be submitted as part of a separate plan.

2.1 Requirements

All erosion and sediment controls will be designed, installed, and maintained in accordance with:

1. This Erosion and Sediment Control Plan;
2. Specification Sections 01570 Environmental Controls.

MT will install erosion and sediment controls prior to the start of remediation activities. MT will not remove temporary controls until after the construction period, or following the Engineer’s approval. A copy of the Erosion and Sediment Control Plan will be kept on-site until the work area is stabilized and permanent controls are established. In addition, all erosion and sediment controls shall be designed, installed, and maintained in accordance with the following erosion control principles:

- Stripping of vegetation, grading, or other soil disturbance - Based on the existing site features, stripping of vegetation should not be required for this project. Construction of the Soil Storage Areas is performed by importing clean sand and stone and placing upon the existing site surface. The imported sand layer is then graded to promote drainage of decant or storm water which will collect above the impermeable liner. Stripping, grading, or soil disturbance shall be done in a
manner that will minimize soil erosion. This can be accomplished by wetting dry areas during stripping to prevent windblown migration of dust.

- Natural vegetation – The site features consist primarily of a gravel/crushed stone base, with some additional areas of concrete slabs, and some very limited areas of natural vegetation. Whenever feasible, natural vegetation will be retained and protected.

- Drainage – Proposed excavations and placement of Soil Storage Areas could affect existing drainage as a result of the modification to the existing surface conditions. MT will construct berms (as required by the variance) around the interior perimeter of the work areas to contain and facilitate collection and proper disposal of any runoff water. MT will construct the Soil Storage Areas such that storm water will not migrate to/from the Soil Storage Area. Soil storage areas will be constructed such that storm water is diverted around them to their existing paths of flow. Storm water which collects within impacted soil storage areas will be collected for off-site disposal at a Con Edison approved disposal facility or treated/filtered to the requirements of the existing Con Edison SPDES Permit Equivalent and discharged to the Wallabout Channel.

- Erosion control devices shall be installed as early as possible in the construction sequence.

- Stockpiled materials shall be protected by covering areas, as appropriate for prevailing conditions.

2.2 Site Features

The overall surface area of the remediation project and the construction support areas are a combined total of ~ 4 acres. The surface cover is primarily pervious and there are no known streams, man-made drainage ditches or other storm water conveyances on the site. MT will use the existing drainage patterns where feasible; install erosion controls to divert storm water around excavations, stockpiles, and loading areas, and minimize the removal of existing vegetation.

Potential drainage patterns which could result in sediment migration from the site include discharges via surface runoff to storm drains located on the north side of the site along Division Avenue or runoff into the Wallabout Channel. To prevent this, MT will construct a sediment barrier by installing silt fence or wattle between the site and the Wallabout Channel, and siltation controls at the catch basins along Division Avenue.

Storm water that comes in contact with impacted soil, or debris will be collected for off-site disposal at a Con Edison approved disposal facility or treated/filtered to the requirements of the existing Con Edison SPDES Permit Equivalent and discharged to the Wallabout Channel. Runoff from impacted soil or debris stockpiles that are covered with plastic sheeting or other approved cover will not be collected assuming positive drainage occurs from the bottom of the
covered stockpiles. Any runoff from the decon washing of construction equipment or trucks will not be directed to any on-site drainage system or resource area. Decontamination wash water will be collected within the decon pad for off-site disposal at a Con Edison approved disposal facility or treated/filtered to the requirements of the existing Con Edison SPDES Permit Equivalent and discharged to the Wallabout Channel.

2.3 Dust Control

MT will take the necessary precautions to avoid allowing any dust generation that violates NYSDEC regulations and NYSDEC action levels or compromises compliance with the Community Air Monitoring Plan (CAMP). MT will take the following actions to control dust emissions from the sources listed in the table below:

<table>
<thead>
<tr>
<th>SOURCES OF DUST EMISSIONS</th>
<th>REASONABLY AVAILABLE CONTROL MEASURES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Soil &amp; Debris Stockpile</td>
<td>• Lined and covered with plastic sheeting</td>
</tr>
<tr>
<td></td>
<td>• Protected from high winds with sandbags</td>
</tr>
<tr>
<td></td>
<td>• Sprayed with water to prevent migration</td>
</tr>
<tr>
<td>Soil &amp; Debris Excavating</td>
<td>• Sprayed with water to prevent migration</td>
</tr>
<tr>
<td>Soil &amp; Debris Loading</td>
<td>• Sprayed with water to prevent migration</td>
</tr>
<tr>
<td>Unpaved Roadways</td>
<td>• Reduced vehicle speeds</td>
</tr>
<tr>
<td></td>
<td>• Restricted work operations during periods of high wind</td>
</tr>
<tr>
<td></td>
<td>• Sprayed with water to prevent migration</td>
</tr>
<tr>
<td>Paved Roadways</td>
<td>• Scheduled sweeping and cleaning</td>
</tr>
<tr>
<td></td>
<td>• Required use of anti-tracking and decontamination pad</td>
</tr>
<tr>
<td>Disturbed Areas</td>
<td>• Sprayed with water to prevent migration</td>
</tr>
</tbody>
</table>

2.4 Inspection and Maintenance

MT will inspect sediment and erosion controls daily and within one work day following each significant rainfall. MT will repair these structures within one hour after discovering any issues:

- Silt fences or straw wattle will be cleaned to maintain original design capacity;
- Temporary erosion controls that have lost structural integrity will be repaired or replaced;
- Waste materials from erosion controls will be disposed off-site as non-hazardous waste;
- Channels that form as a result of erosion will be backfilled with clean soil.

Sediment removed during inspection and maintenance will be redistributed on-site or transported off-site for disposal depending on potential contact with contaminated materials.
3.0 EROSION CONTROL MEASURES

3.1 Sediment and Erosion Controls

Before construction activities begin at the site, MT will install sediment barriers along the natural contours of the west boundary of the site, between the work area and the Wallabout Channel, in the general location indicated on the attached Site Logistics Plans. These barriers will consist of silt fence/hay bales or wattle.

Prior to excavation within the North Remediation Area, MT will install approximately 80 feet of silt curtain along the breached sheet pile wall to prevent contamination of Wallabout Channel in the vicinity of the North Remediation Area.

3.2 Stockpile Controls

MT may temporarily stockpile excavated soil and debris within the Soil Storage Area. Excavated soil will be placed on 10-mil. poly. MT will place donnage or hay bales or wattle, or grade existing site materials 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 storm water, dust, particulate, or decant water from migrating from the Soil Storage Area. After placing the soil within the bermed and lined storage area, MT will cover the soil stockpile with 6-mil poly sheeting until the material is loaded off-site for disposal. Poly sheeting will be secured utilizing sand bags or sand bags with ropes to secure soil piles. A collection sump will be installed such that all decant water will migrate to the sump and be pumped to the on-site wastewater storage tank for off-site disposal at an approved disposal facility or for filtration/treatment to SPDES discharge requirements prior to discharge to the Wallabout Channel.

MT will segregate waste streams within the soil storage area to prevent cross-contamination of non-hazardous materials with hazardous materials. MT will demarcate the soil storage area.
4.0 DECONTAMINATION

Decontamination involves the orderly, controlled removal of contaminants. Standard decontamination sequences are presented in the examples below. All site personnel should minimize contact with contaminants, when conceivable, in order to minimize the need for extensive decontamination. Personnel decontamination will consist of safe work practice, use of disposable PPE, personal hygiene, and personal decontamination before breaks and at the completion of each day.

MT will establish a Contamination Reduction Zone to perform controlled decontamination of equipment and personnel as they leave the Exclusion Zone. The Contamination Reduction Zone consists of three parts: Temporary Decon Pad, Remote Worker Decon Facility, and the Remote Waste Decon Facility.

Temporary Decon Pad
MT will provide a water supply and a temporary decontamination pad. The decontamination pad will consist of a polyethylene liner, a layer of stone, and earthen berms around the perimeter. MT will set up a sump system to pump out and containerize wash water for off-site disposal or for filtration/treatment to SPDES discharge requirements prior to discharge to the Wallabout Channel. The decontamination pad will be inspected once per day. All equipment and disposal trucks will be decontaminated prior to leaving the site. MT will prevent cross contamination between areas in the Exclusion Zone by cleaning heavy equipment, as necessary.

Remote Worker Decon Facility
MT will mobilize or construct a Remote Worker Decon facility in accordance with NYCDEP asbestos regulations and site specific variances. The remote worker decon will include, at a minimum, separate areas for a clean room and a shower room separated by an airlock. MT will collect and containerize wash water for off-site disposal or for filtration/treatment to SPDES discharge requirements prior to discharge to the Wallabout Channel.

Remote Waste Decon Facility
MT will mobilize or construct a Remote Waste Decon facility in accordance with NYCDEP asbestos regulations and site specific variances for any bagged waste that is generated. MT will collect and containerize wash water for off-site disposal or for filtration/treatment to SPDES discharge requirements prior to discharge to the Wallabout Channel.
5.0 RESTORATION

The project site will be inspected daily and all construction debris, litter, cups, paper, plastic, etc. will be picked up and disposed of properly. MT will restore all work areas to pre-existing conditions prior to demobilization. All erosion controls will be removed and disposed off-site. The Sediment Storage Area, construction entrance (anti-tracking pad), and decon pad will be disassembled and disposed off-site. Any altered site contours will be graded to the Final Plan grading contours. A final cleanup effort during the demobilization phase of this project will restore the site to its original condition.
ATTACHMENT 1
Site Logistics Plans