Re: 7 World Trade Center (Trade Center Substation) Investigation Plan

Dear Mr. Price:

NYSDEC has reviewed the Subsurface Investigation Work Plan for the referenced site submitted by Con Edison on November 16, 2001. The Plan’s Introduction (page 1) identified the release of 100,000-gallons of transformer oil but only mentions an unquantified amount of cable dielectric fluid. Based on information provided by Con Edison, the following releases occurred:

1. 100,105 gallons of transformer oil
2. 5,300 gallons of cable dielectric fluid from the WTC substation reservoir
3. 2,000 gallons of cable dielectric fluid from the Farragut substation reservoir
4. 15,300 gallons of cable dielectric fluid from the five feeders running between Farragut and WTC substations
5. 3,672 gallons of capacitor oil

As documented by Con Ed’s Chem Lab, transformer oil has been identified in the Verizon building located at 140 West Street and has impacted Verizon’s cable vault. The same oil was also confirmed by Con Ed's Chem Lab to be present in Verizon’s manholes and trenches located on Washington Street, Barclay Street and Vesey Street.

In addition to Con Ed’s oil, there was a maximum loss of 12,000 gallons of diesel from two underground storage tanks registered at 7WTC. To date, EPA and DEC have recovered approximately 20,000 gallons from the other two intact 11,600 gallon underground fuel oil storage tanks at 7WTC.

The Work Plan submitted to address the 126,377 gallons of various dielectric oils released from the Con Ed’s World Trade Center Substation is conditionally approved by the department, pending inclusion of the following comments:

1. The Work Plan as written is dependent on EPA’s assistance. There is a brief window of opportunity to utilize EPA’s contractors to assist in Con Ed’s product recovery efforts. However, NYSDEC cannot guarantee EPA’s assistance. The plan will be implemented
by Con Edison. Any assistance which EPA can provide will be at EPA’s discretion. This applies to any references in the work plan to EPA’s assistance (i.e., well development, product recovery, waste disposal, etc.).

2. If NYC DDC is unable or unavailable to provide a crew and equipment to break up the concrete for the drilling locations within the footprint of 7 WTC, Con Edison’s contractor (ADT) has the capability to bore through the concrete slab.

3. With respect to drill cuttings generated during this investigation, Con Edison should use the World Trade Center substation’s EPA ID number for any potentially hazardous wastes generated within the footprint of 7 WTC. Any potentially hazardous wastes generated outside the footprint should be manifested under the temporary EPA ID number which was assigned to Con Edison in the wake of September 11.

4. Field screening using a PID in addition to visual and olfactory observations will be conducted on all soil samples.

5. At least one soil sample from each boring/well location will be analyzed for the following parameters:
   - TPH via EPA modified method 8100
   - Oil ID via an appropriate method (NYSDOH 312 series)
   Soil samples should be collected from either the zone of highest observed contamination or from the interval at or immediately above the water table interface.

6. Oil samples will be collected from any wells which exhibit recoverable product. These samples will be analyzed for oil ID via NYSDEH method 310.

In accordance with the schedule outlined in the Work Plan, NYSDEC expects that Con Edison will begin implementation within 5 business days of receipt of this conditional approval letter. It is DEC’s understanding that Verizon has not committed to trench areas along the west side of 7 WTC (Washington St.), and along the northwest corner of 7 WTC (on Barclay St near Washington St.). If trenches are not open for inspection and incorporation into the investigation within 12 business days of this letter, two borings/monitoring wells will be substituted and installed along Washington Street and one boring/well will be installed along the west end of Barclay Street near Washington St.

Following installation, the wells should be surveyed and gauged by Con Edison’s contractors. A report must be generated by Con Edison for submittal to NYSDEC which includes the following items: lab analytical data; boring logs and well construction diagrams; field notes; a scaled site map which includes all trenches and boring locations, surrounding buildings, structures and subsurface utilities which illustrates plume contours and results of the examination of subsurface structures. The report must also include conclusions and recommendations for remediation. Based on the results of this initial investigation, additional delineation may be required by the Department.

If you have any questions or comments, please call Jennifer Rommel (646) 739-2831 or Jane O’Connell (718) 482-4973.

Sincerely,

Jennifer M. Rommel
Engineering Geologist 2

Jane H. O’Connell
Engineering Geologist 2

Cc: T. Kunkel, DEC