

# Fourth Annual Report Interim Remedial Measure for NAPL Recovery

August 2017 Through July 2018 Former Equity Works MGP Site, Brooklyn, New York

NYSDEC Site No.: 224050

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#### **Executive Summary**

National Grid's consultant, AECOM, has prepared this Interim Remedial Measure (IRM) Annual Report to document the fourth year of operation of the non-aqueous phase liquid (NAPL) recovery system within the footprint of the former Equity Manufactured Gas Plant (MGP) site (the Site) located at 254 Maspeth Avenue in Brooklyn, New York during the period of August 2017 through July 2018. The IRM is being conducted pursuant to a Multi-site Order on Consent and Administrative Settlement, Index # A2-0552-0606, between The Brooklyn Union Gas Company (BUG) d/b/a National Grid NY, and the New York State Department of Environmental Conservation (NYSDEC). Details regarding the construction of the NAPL recovery IRM remedy are included in the IRM for NAPL Recovery Construction Completion Report (CCR), submitted to the NYSDEC in May 2015 (AECOM, 2015).

The Site is located in a historically industrialized area and operated as a MGP from approximately 1893 to 1929. BUG acquired the MGP in approximately 1903 and transferred ownership of the Site in 1951. The Site currently consists of three adjoining properties – 222 Maspeth Avenue, 252 Maspeth Avenue, and 254 Maspeth Avenue. The 222 Maspeth Avenue property is used by Cooper Tank as a solid waste recycling facility, with the 252 and 254 parcels used to support Cooper Tank's recycling operations.

The IRM activities included the following:

- installation of 5 recovery wells at appropriate locations within the central areas of the Site to reduce the quantity of NAPL, and at 18 selected perimeter locations to control the potential for off-site migration.
- on-going measurement and recovery of NAPL that collects in the recovery wells.

Data collected to date indicate that NAPL collection rates at 12 of the 23 recovery well locations (2 on-site and 10 perimeter locations) warrant the continued operation of pumps to support automated recovery. The well pumps are controlled with timers that are adjusted, as required, with a goal of containing the NAPL within the sump of each well, but at a level above the inlet to the pump to minimize the collection of groundwater. The remaining 11 wells are managed using manual recovery techniques on a quarterly basis.

Since system startup through July 25, 2018, the system has operated with an average on-line factor of 97% without incidents or unplanned releases from the system. Approximately 19,316 gallons of mixed fluids have been collected from the recovery system and managed as an alternative fuel initially at the Tradebe Facility in Cohoes, New York until March of 2017 and more recently at Veolia Technical Solutions Facility in Middlesex, New Jersey. An estimate of the organic/water ratios over the monitoring period indicates that the mixed fluids collected typically contain 60 to 75% organic, resulting in over 11,500 gallons of NAPL being removed from the site to date.

#### 1. Introduction

National Grid's consultant, AECOM, is submitting this 4th Annual Report outlining the Interim Remedial Measure (IRM) for NAPL Recovery progress during its fourth year of operation. The NAPL recovery system is located within the footprint of the former Equity Works Manufactured Gas Plant (MGP) site (the Site). The Site consists of three adjoining properties – 222 Maspeth Avenue, 252 Maspeth Avenue, and 254 Maspeth Avenue located in Brooklyn, New York. The location of the Site and the orientation of the individual properties are illustrated in Figures 1-1 and 1-2, respectively.

The IRM is being implemented pursuant to a Multi-site Order on Consent and Administrative Settlement, Index # A2-0552-0606, between The Brooklyn Union Gas Company (BUG) d/b/a National Grid NY, and the New York State Department of Environmental Conservation (NYSDEC), in accordance with applicable guidelines of the NYSDEC and the New York State Department of Health (NYSDOH).

This document is organized in the following manner: a summary of activities associated with the initial installation and operation of the recovery wells is presented in Section 2; the results from the fourth year's monitoring activities are documented in Section 3 and proposed revisions to the system's operation and monitoring program are discussed in Section 4.

#### 2. Recovery Well Installation and Operation

National Grid conducted the IRM to collect recoverable NAPL while site-wide investigation and remedial alternative and design activities are completed. The design of the NAPL recovery system included the installation of 23 recovery wells at locations that were determined to have the potential to collect mobile NAPL and be compatible with Cooper Tank's construction and long-term operational activities. Consistent with the NYSDEC approved work-plan (AECOM, 2013), recovery wells were installed in the following areas of the Site:

- On-Site-5 recovery wells (RW-1 through 5) were installed at locations within the 252 Maspeth Avenue property.
- Site Perimeter –18 recovery wells (RW-6 through 23) were installed along the perimeter of the Site on the 222, 252 and 254 Maspeth Avenue properties.

Recovery well locations are shown on Figure 2-1. The perimeter locations are spaced at approximately 18 ft on center, with the exception of the area along the driveway of 254 Maspeth Avenue where the presence of a subsurface structure has required spacing of approximately 30 feet between the three recovery wells (RW-6, -7 and -8). All locations were equipped with the infrastructure, i.e., conduits for electrical service and tubing, for the subsequent automation of NAPL recovery activities.

#### 2.1 Recovery Well Designs

Recovery wells were designed to accommodate the uncertainty of long-term NAPL recovery rates. All well risers were constructed of 6-inch diameter schedule 40 polyvinyl chloride (PVC). Recovery well screens were constructed of 6-inch diameter 0.020-inch slot wire wrap stainless steel. Five (5) and ten (10) foot lengths of screen were used, as required, to address soil intervals where NAPL (i.e., saturated thickness greater than 1-inch) have been observed. Centralizers were installed at the top and bottom of each screen. The screen size was selected based on the grain-size information obtained during the Pre-Design Investigation (PDI). Each well was equipped with a 5-foot long, 6-inch diameter, stainless steel sump to collect NAPL. The annular space above the filter pack was filled with a bentonite seal (minimum of 3 to 4 feet thick). Note that additional bentonite seals were used at locations where multiple screen intervals were installed. The annular space above the bentonite seal was filled with a grout mixture from the bentonite seal to approximately one to two feet below the top of casing (TOC). Each recovery well was completed in a 4-foot by 4-foot traffic rated well vault. Illustrations of an in-place recovery well and completed well location are provided in Figure 2-2.

#### 2.2 Initial Monitoring and NAPL Recovery

The NAPL recovery system is intended to operate in a manner that contains the NAPL levels at the locations within the well sumps (5 ft. in length). As part of the installation of the system, initial monitoring activities were conducted to provide a preliminary estimate of potential collection rates. The results were used to determine which locations would require automation for the cost-effective recovery of NAPL. The monitoring activities provided the ability to group the locations into three categories based on the observed recharge rates. They were grouped as follows: Primary Recovery Wells (produce approximately 1 gallon per day (gpd) of NAPL recovered; Secondary Recovery Wells (approximately 0.1 to 0.5 gpd of NAPL recovered) and Gauging Wells (< 0.1 gpd of NAPL recovered). The distribution of wells within these categories is provided on Table 2-1.

#### 2.2.1 Primary Recovery Wells

The majority of NAPL (approximately 85 percent of total) was collected from the eight primary locations. The manual management of NAPL at these locations would require that recovery activities be conducted on a weekly basis to ensure that the storage capacity of the well sumps (approximately 7.5 gallons) not be exceeded. This frequency of manual monitoring/collection was not thought to be cost-effective or

practical given site access issues and the level of activity on the Cooper Tank facility. As a result, the wells at these eight locations were automated by setting NAPL recovery pumps in the wells.

#### 2.2.2 Secondary Recovery Wells

Approximately fifteen percent of the NAPL was collected from five secondary wells. The manual management of NAPL at these locations would require that recovery activities be conducted on a monthly basis to ensure that the storage capacity of the well sumps is not exceeded. Long-term manual monitoring/recovery at this frequency was not thought to be cost effective, and these locations were also automated by setting NAPL recovery pumps in the wells.

#### 2.2.3 Gauging Wells

NAPL levels at the 10 remaining wells were consistently observed to be within the wells sumps at each location. It was believed that NAPL at these locations could be effectively managed on a quarterly basis using manual recovery techniques. Note that one of the secondary wells (RW-11) was converted to a gauging well during the first year of operation, bringing the total to 11 wells.

#### 2.3 System Operation

Discussions of the recovery/collection methods for the automated and gauging wells are provided below.

#### 2.3.1 Automated Wells

The Primary and Secondary recovery well locations (Figure 2-3) are equipped with fixed speed pumps manufactured by Pump Works and/or Linear Pumps. Note that the equipment designed by Linear Pumps has been determined to be better suited to site conditions and will be used to replace the Pump Works equipment over time. The well pumps are controlled with timers that are adjusted, as required, with a goal of containing the NAPL within the sump of each well, but at a level above the inlet to the pump to minimize the collection of groundwater.

Collected NAPL is accumulated in a 500 gallon capacity double-walled polyethylene tank located above ground in the system's control trailer on the 254 parcel (Figure 2-4). The accumulation tank is equipped with a high liquid level detector to prevent over-filling, as well as secondary containment. The system is equipped with additional alarms and communication equipment to ensure its safe operation.

The contents of the tank are periodically gauged by field staff using the following method:

- The tank is accessed through the topmost access port;
- An interface probe is lowered to the bottom of the tank;
- The probe is left in place for a period of 5 minutes to allow the separate layers of NAPL and water to resolve:
- The probe is slowly raised until the water level is encountered;

The thicknesses of the NAPL and water levels are used to estimate the relative organic/water composition of the mixed fluids.

#### 2.3.2 Gauging Wells

The Gauging Wells are monitored during quarterly inspection activities and accumulated NAPL is recovered using an air lift system that consists of an air compressor and sample line (1 inch outside diameter black iron pipe) that runs from the bottom of the well sump to a closed 55 gallon drum and is operated in the following manner:

- A small stream of compressed air is introduced into the bottom of the sample line through a "T' connection.
- The upward movement of the air "bubble" creates a vacuum that draws NAPL upward from the sump and into the drum.
- The consistency of the stream is observed until the fluid being removed appears to be clear (i.e., NAPL is no longer being removed). At that point, the air flow is discontinued and the volume of collected NAPL is measured and recorded.

The collected NAPL is stored in sealed drums and collected with the NAPL from the accumulation tank at regular intervals by a certified waste hauler.

#### 3. System Performance

The following discussion provides summaries of NAPL recovery and waste management observations during the fourth year of system operation (August 2017 to July 2018), as well as a discussion of the associated maintenance and response activities.

#### 3.1 NAPL Recovery

Monitoring and recovery activities were conducted on an approximate quarterly basis through the year. The results from the monitoring of the automated and gauging wells are discussed below.

#### 3.1.1 Automated Wells

The results from the gauging activities during the system's operation are summarized in Table 3-1. Adjustments to the pumping rates were generally appropriate to contain NAPL within the sumps of the wells. However, experience during the first four years of operation demonstrate that although general trends of the flow of NAPL to a well can be established, there are short-term variabilities in flow and/or minor mechanical issues (e.g. pump screen clogging, tripped fuses) that can challenge the ability to continually maintain a matching pumping rate. Pump duration adjustments are made on an on-going basis when data indicate NAPL thickness is near or above the sump level in the recovery wells.

Approximately 3,311 gallons of mixed fluids were collected from the system during the fourth year of operation (August 1, 2017 through July 31, 2018). An illustration of the cumulative volume of mixed fluids collected over time is provided in Figure 3-1. From startup through July 2018, approximately 18,855 gallons of mixed fluids have been removed by the system based on readings from the level sensor in the recovery tank. Note that the estimates of total recovered volume presented in Table 3-1 (based on in truck volumes listed on the manifests) can vary slightly from the "tank" level sensor estimate due to the variability over time between the level sensor readings and the "in truck" volumes recorded by the waste hauling company. In the past, observation of the relative proportions of organic/water have been highly variable; however, the use of the standardized protocol presented in the Year 2 Report has provided more consistent results. During Year 4 operations, the observed NAPL to water ratio of collected mixed fluids was approximately 50 to 60% NAPL. A conservative estimate of the organic/water ratios since system startup indicates that the collected material likely contained over 10,300 gallons of NAPL.

#### 3.1.2 Gauging Wells

The 2015-2018 data from the gauging wells is presented in Table 3-2. As indicated, manual recovery on a quarterly basis is appropriate to maintain DNAPL levels within the sumps. During Year 4 operations, approximately 86 gallons of mixed fluids were recovered from the 11 gauging wells.

Figure 3-2 presents a graphical illustration of the trend in DNAPL thickness in the "gauging" recovery wells during the first four years of operation. As illustrated, thicknesses have generally decreased over time with typical variation. This suggests that the collection system is having a potentially significant effect on reducing the quantity of recoverable DNAPL in the areas where the gauging wells are located.

#### 3.2 Waste Management

The collected NAPL was managed as an alternative fuel at the Tradebe Facility in Cohoes, New York until March of 2017 and more recently at Veolia Technical Solutions Facility in Middlesex, New Jersey. A summary of the waste shipments and associated quantities from both the automated and gauging wells is presented in Table 3-3.

The initial shipments of mixed fluids during Years 1 and 2 were managed as a non-hazardous waste in accordance with NYSDEC Guidance DER-4, "Management of Coal Tar Waste and Coal Tar Contaminated Soils and Sediment". From time to time the results from the analysis of the mixed fluids in

the tank indicated a flash point that we greater than 140° F. Although the results were believed to be the result of inconsistencies in sampling and analysis, shipments after February 5, 2016 during Year 2 operations were conservatively managed as a D001 Ignitable Waste using the RCRA ID number for the Site: NYR 000 225 615. Documentation of the shipments for Year 4 operations are provided in Appendix A.

#### 3.3 System Maintenance

There were no significant maintenance issues with the system during the monitoring period. The following maintenance activities were accomplished during the fourth year of operation:

- Periodic cleaning of the system trailer to remove wood dust generated by Cooper Tank recycling operations.
- Quarterly cleaning of recovery well pump intake screens as needed and replacement of vault lid hardware (latches, hinges, etc.) that get damaged by site operations.
- Replacement of the surface vault lid at RW-3 on 252 Maspeth Avenue. The ground surface was also paved at the 252 Maspeth Avenue parcel to support current bus parking operations.

During the current reporting period, the system was on-line 354 days out of a total of 365 days of operation. This reflects an on-line factor of 97%, which is consistent and slightly higher than prior years of operation. The 11 days off-line included several days when the tank was at capacity and the system was shut down to accommodate the schedule for tank pump-outs.

Following the replacement of the surface vault lid at RW-3 and outlined above during Year 4 operations, routine access to this recovery well has been restored.

#### 3.4 Incidents/Unplanned Releases

There were no incidents or unplanned releases during the reporting period.

#### **Recommendations for Future Operation** 4.

National Grid continues to conduct additional evaluations of recharge rates and the composition of mixed fluids to determine if it will be practical to refine the operation of the system, e.g. transition automated wells to gauging wells, over time.

Starting in June 2014, and continued during various quarterly gauging events, a pilot program was initiated to evaluate the recharge rates for select wells. During the evaluation, NAPL was removed from the well and NAPL thicknesses were monitored periodically over the next 24 hours, with results reported in gallons/day. The results for three wells located along the southern edge of the 252 Maspeth Avenue parcel (RW-18, -19 and -20) and one well along the eastern edge of the 254 Maspeth Avenue parcel (RW-10) are summarized in Figure 4-1. As illustrated, NAPL recharge rates for prior years indicate a decreasing trend, with expected variability.

During Year 3 operations (AECOM, 2017), National Grid conducted a recharge evaluation to evaluate the possibility that the decreasing recharge rates (above) could be associated with "fouling" of the well screens. The results from the evaluation were presented in the Year 3 Annual Report and demonstrated that significant NAPL recharge was noted in all wells, confirming that recovery well screen fouling is not currently an issue.

Data collected in 2018 indicated a continued decrease in NAPL thickness in RW-10, -18 and -19 compared to baseline (2014) levels. The evaluation will be continued at these wells and possibly additional wells during Year 5 operations.

The results of the above actions will be reviewed as part of the next annual report to determine if there is a trend in the rate of NAPL collection and if any modifications to the operation of the system are required.

Prepared for: National Grid

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**Tables** 

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Table 2-1
Categories of Recovery Wells
Former Equity Works MGP Site, Brooklyn, New York

#### Primary Recovery Wells (collection rate < 1 gpd)

	•	
Well	Loca	tion
RW-2	252 Parcel	on-site
RW-3	252 Parcel	on-site
RW-10	254 Parcel	perimeter
RW-12	254 Parcel	perimeter
RW-13	254 Parcel	perimeter
RW-18	254 Parcel	perimeter
RW-19	254 Parcel	perimeter
RW-20	254 Parcel	perimeter

#### Secondary Recovery Wells (collection rates 0.1 to 0.5 gpd)

Well	Loca	tion
RW-8	254 Parcel	perimeter
RW-9	254 Parcel	perimeter
RW-11	254 Parcel	perimeter
RW-21	254 Parcel	perimeter
RW-22	222 Parcel	perimeter

#### Gauging Wells (collection rate < 0.1 gpd)

Well	Loca	tion
RW-1	252 Parcel	on-site
RW-4	252 Parcel	on-site
RW-5	252 Parcel	on-site
RW-6	254 Parcel	perimeter
RW-7	254 Parcel	perimeter
RW-11	254 Parcel	perimeter
RW-14	254 Parcel	perimeter
RW-15	254 Parcel	perimeter
RW-16	254 Parcel	perimeter
RW-17	254 Parcel	perimeter
RW-23	222 Parcel	perimeter

Note:

Based on data from initial gauging events - May 2013 through February 2014

Table 3-1
NAPL Monitoring and Recovery - Automated Wells
Former Equity Works MGP Site, Brooklyn, New York

	Location			Depth of Well (ft.)														
	Parcel Well II		Design Measured		NAPL Thickness (ft.)	7/29/2015	10/15/2015	1/15/2016	4/28/2016	7/28/2016	10/17/2016	1/19/2017	4/6/2017	7/26/2017	10/26/2017	1/19/2018	4/5/2018	7/25/2018
On-Site	252	RW- 2	51.00	49.70	12	0.06	5.43	8.98	0.55	3.42	0.20	3.33	0.01	6.05	3.62	8.82	1.38	1.52
On-Site	232	RW- 3	51.00	50.40	14	0.63	4.72	11.74	1.25	3.06	0.50	9.20	6.02	12.04	11.02	13.42	1.11	13.95
		RW- 8	48.00	46.72	3	0.06	0.15	1.89	0.98	0.10	2.41	3.63	2.05	0.01	0.01	0.01	0.00	2.71
		RW- 9	50.00	48.87	6	0.06	1.73	7.32	13.50	7.78	0.10	4.92	6.30	12.30	0.01	0.01	0.00	0.00
	254	RW- 10	46.00	45.30	11	0.06	6.25	11.44	3.03	0.20	0.05	6.32	6.60	0.95	0.01	0.01	0.00	0.02
		RW- 11	46.00	45.73	8													0.91
		RW- 12	46.00	45.48	13	4.01	2.65	10.45	10.60	2.25	10.11	1.20	0.01	2.85	2.65	0.75	4.30	5.60
Perimeter		RW- 13	46.00	45.53	12	0.06	0.35	10.51	6.01	0.1	8.08	5.53	6.2	0.01	0.01	0.01	6.95	10.81
		RW- 18	50.00	47.50	10	8.80	0.10	trace	0.10	0.10	0.05	0.01	0.01	0.01	0.01	0.01	0.01	3.65
	252	RW- 19	52.00	50.18	12	0.06	0.1	7.71	0.15	2.72	0.05	5.56	0.01	6.2	0.01	0.01	0.01	0.0
	232	RW- 20	52.00	50.75	11	9.01	1.8	2.0	1.4	2.2	1.9	2.0	0.0	2.1	2.0	1.2	0.0	1.31
		RW- 21	50.00	49.80	5	0.06	0.1	trace	8.65	0.1	5.97	0.01	0	0	0.01	2.12	1.82	3.70
	222	RW- 22	46.00	42.95	8	1.88	8.34	0.57	0	0.1	0.1	0.01	1.51	0.01		0.01	0.01	0.02
	•	Recov	ered Gallor	ns (cumulativ	e from system startup)	4215	5539	7156	9277	11477	12531	14071	15277	16263	16750	17730	18792	19316
			Av	11.1	12.1	13.1	14.3	15.5	15.3	15.4	15.4	14.8	14.0	13.9	13.9	13.2		

#### Notes:

#### **Bold** Primary Recovery Wells

--- Not available. At RW-11, pump transferred to RW-22 during 10/3/14 event RW-11 converted to a Gauging Well

Recovered Gallons (cumulative) is total amount pumped (based on disposal manifests) and does not include correction factor for NAPL to water ratio Gallons per Day does not include correction factor for NAPL to water ratio

Table 3-2
NAPL Monitoring and Recovery - Gauging Wells
Former Equity Works MGP Site, Brooklyn, New York

	Location Depth of Well (ft.) Typical Pre-Recovery NAPL Thickness (feet)								Mixed Fluids Quantity Recovered (gal.)																						
	Parcel	Well ID	Design	Measured	NAPL Thickness (ft.)	7/29/2015	10/15/2015	1/15/2016	4/28/2016	7/28/2016	10/17/2016	1/19/2017	4/6/2017	7/26/2017	10/26/2017	1/19/2018	4/5/2018	7/25/2018	7/29/2015	10/15/2015	1/15/2016	4/28/2016	7/28/2016	10/17/2016	1/19/2017	4/6/2017	7/26/2017	10/26/2017	1/19/2018	4/5/2018	7/25/2018
		RW- 1	45.00	43.35	3	1.75	1.71	2.11	0.70	1.50	0.98	1.55	0.01	1.66	1.02	0.95	1.00	1.52	4.0	4.0	8.0	3.0	5.0	5.0	5.0	0.0	5.0	3.0	3.0	2.0	4.0
On-Site	252	RW- 4	51.00	49.91	trace	5.22	1.00	trace	trace	trace	0.05	0.01	0.01	0.06	0.00	0.01	0.01	0.02	10.0		0.0	0.0	0.0	0.0	0.0	0.0	4.0	0.0	0.0	0.0	0.0
		RW- 5	47.00	44.45	2	0.65	0.53	trace	0.80	1.23	0.05	0.01	0.01	0.00	0.01	0.01	0.01	0.02	2.0	3.0	0.0	3.0	5.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		RW- 6	47.00	45.72	3	2.40	2.11	3.25	2.57	2.91	2.67	3.75	2.55	2.95	3.23	2.85	2.00	2.33	5.0	4.0	6.0	7.0	7.0	7.0	7.0	7.0	7.0	5.0	5.0	6.0	4.5
		RW- 7	48.00	46.05	1	0.06	1.10	0.20	0.25				1.46	0.75	0.01	0.54	1.30	0.60	0.0	3.0	0.0	4.0				0.0	3.0	0.0	2.0	3.0	2.0
		RW- 11	46.00	45.73	4	1.75	1.93	2.23	0.80	2.25	1.33	2.20	1.22	2.85	1.30	0.80	0.80	0.91	4.0	6.0	5.0	2.0	6.0	3.5	5.0	3.5	4.0	3.0	3.0	3.0	4.0
Perimete	254	RW- 14	45.00	45.13	trace	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Cilinote		RW- 15	45.00	43.72	trace	0.00	0.0	0.0		trace	0.0	0.0	0.0	0.0	0.0	0.01	0.0	0.0	0.0	0.0	0.0		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
		RW- 16	50.00	49.72	1	0.06	1.13	trace				0.56	0.0	0.0	0.0	1.7	1.81	0.02	0.0	4.0	0.0				0.0	0.0	0.0	0.0	0.0	5.0	0.0
		RW- 17	48.00	49.60	6	4.34	4.01	4.42	4.40	4.42	3.55	3.72	3.20	4.67	4.03	3.14	2.90	4.65	8.0	8.0	8.0	12.0	10.0	6.0	12.0	7.0	9.0	7.0	7.0	6.0	8.0
	222	RW- 23	44.00	41.69	2	0.87	0.94	trace					0.01	0.01					0.0	0.0	0.0					0.0	0.0		0.0	0.0	
																		Total	33.0	32.0	27.0	31.0	33.0	21.5	29.0	17.5	32.0	18.0	20.0	25.0	22.5
																Cumulativ	e from Syste	em Startun	160.0	192 0	219.0	250.0	283.0	304.5	333.5	351.0	383.0	401.0	421.0	446.0	468.5

Notes

RW-11 converted to a Gauging Well during 10/3/14 event

No manual gauging and removal during June 2015 due to time/access limitation

--- = Unable to access due to ongoing Cooper Tank site operations or equipment blocking recovery well that could not be moved

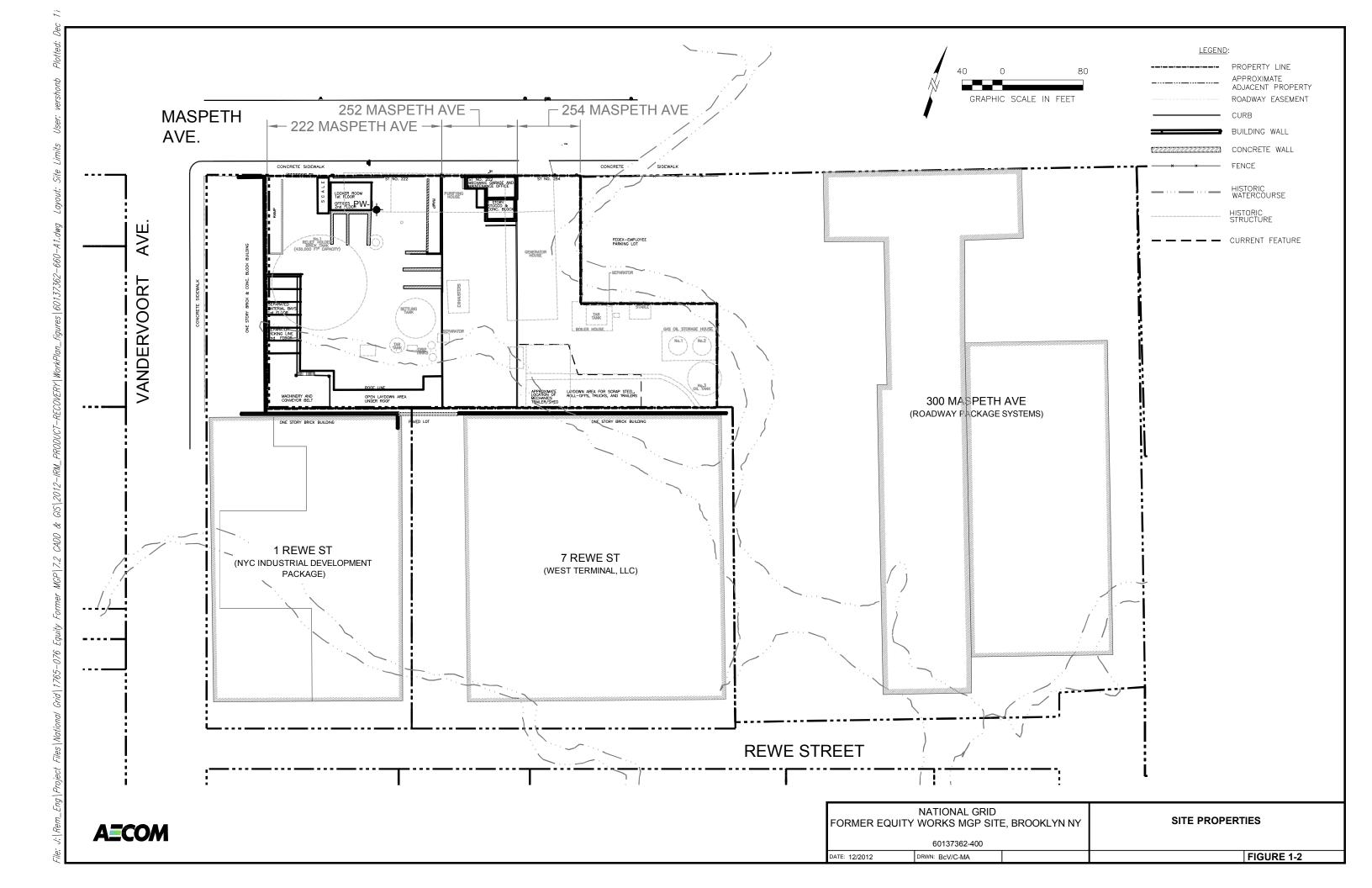
Table 3-3
Summary of Waste Management
Former Equity Works MGP Site, Brooklyn, New York

Date	Quantity Shipped (gallons)
6/8/2015	466
6/24/2015	490
7/9/2015	550
7/24/2015	437
8/17/2015	493
9/10/2015	335
9/29/2015	496
10/22/2015	617
11/18/2015	550
12/22/2015	450
2/5/2016	581
2/19/2016	545
3/11/2016	462
4/5/2016	533
5/2/2016	540
5/31/2016	625
6/27/2016	495
7/25/2016	540
9/1/2016	540
10/6/2016	514
11/10/2016	550
12/14/2016	500
1/12/2017	490
3/10/2017	553
4/6/2017	653
5/22/2017	520
7/28/2017	466
9/29/2017	487
11/17/2017	495
12/22/2017	485
2/15/2018	571
4/6/2018	491
6/29/2018	524

Note: Shipments prior to June 2015 not included on table.

**Figures** 

Project number: 601637362





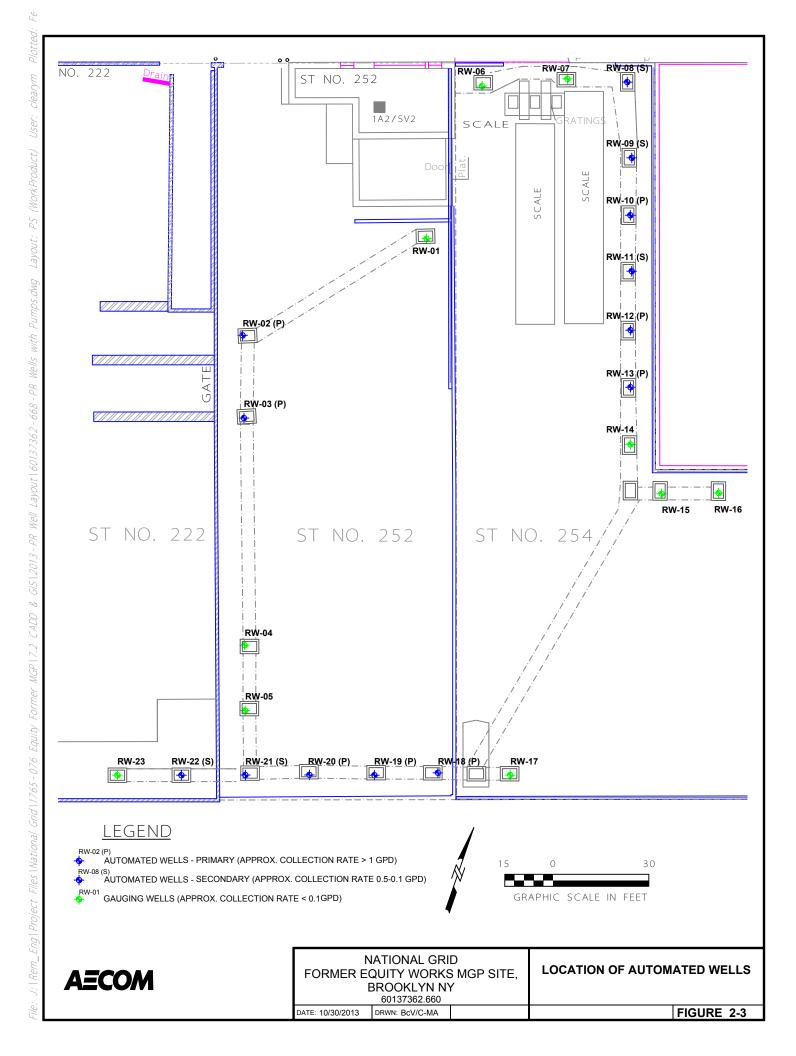


**AECOM** 

NATIONAL GRID FORMER EQUITY WORKS MGP SITE, BROOKLYN, NY 60137362.660

COMPLETED WELL LOCATION

Figure 2-2





**AECOM** 

NATIONAL GRID FORMER EQUITY WORKS MGP SITE, BROOKLYN, NY 60137362.660

**CONTROL TRAILER** 

Figure 2-4

Figure 3-1
Cumulative Volume of Mixed Fluids Collected
IRM for NAPL Recovery
Former Equity Works MGP Site

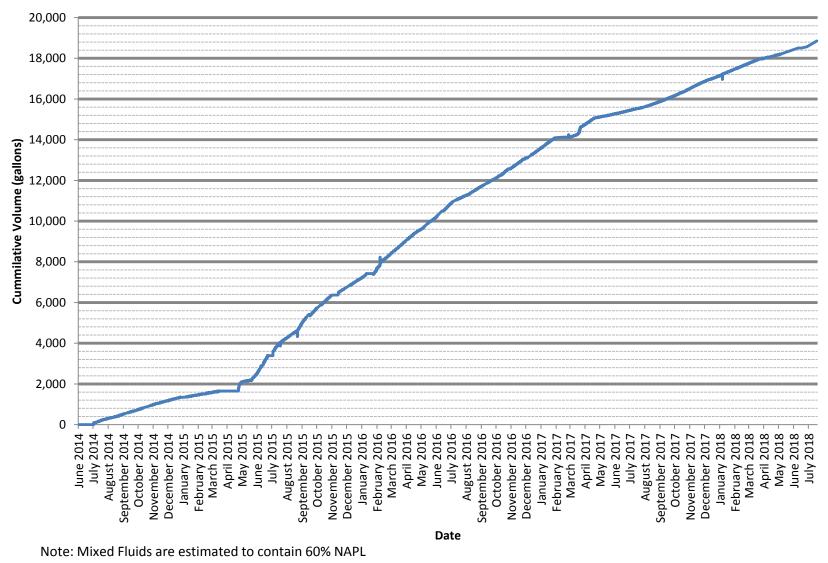


Figure 3-2
NAPL Thickness Versus Time - Gauging Wells
Former Equity Works MGP Site, Brooklyn, New York

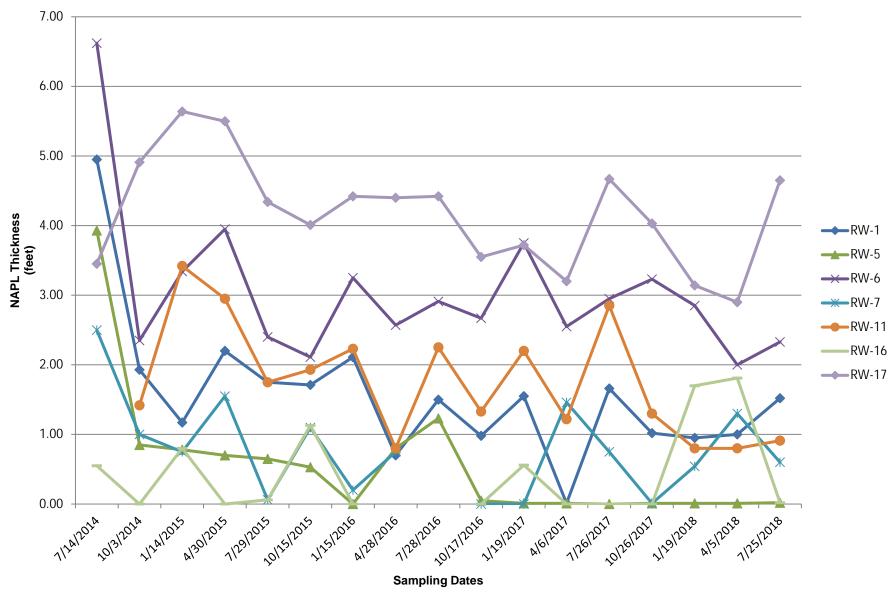
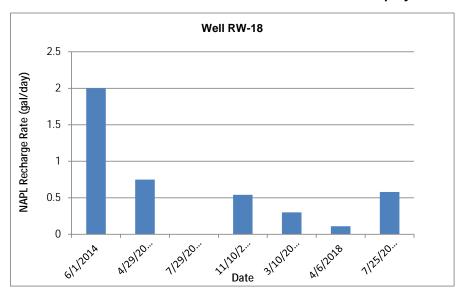
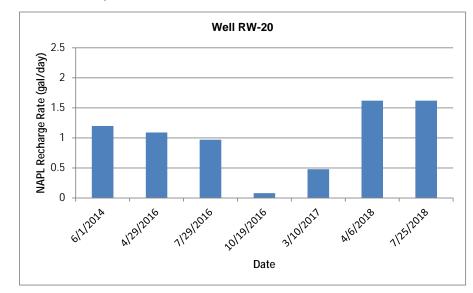
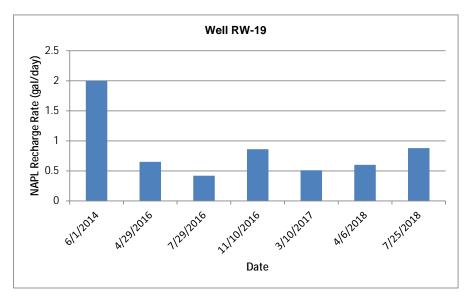
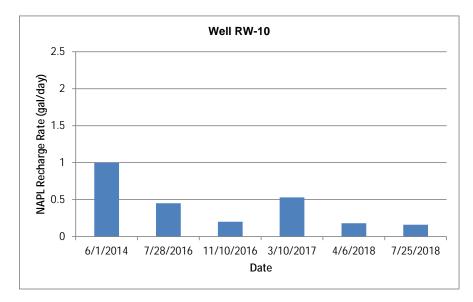


Figure 4-1
NAPL Recharge Rates Versus Time - Automated Wells
Former Equity Works MGP Site, Brooklyn, New York









# **Appendix A Waste Disposal Documentation**

Project number: 601637362



Page 1 of 1

- 9 · · · ·										
CUSTOMER INVOICE										
INVOICE DATE	INVOICE NUMBER									
5/29/2018	812837900									
2%10 Net 30										

For Billing Inquiries

Call KEITH REED at 1 (973) 347-7111

Customer No. 487403

BILL TO: NATIONAL GRID

175 E. OLD COUNTRY ROAD

SITE B

HICKSVILLE, NY 11801 JOSEPH ODIERNA Generator No. 640920

JOB SITE: EQUITY WORKS MGP SITE

254 MASPETH AVE BROOKLYN, NY 11211 BRIAN BERMINGHAM

MANIFEST NUMBERS: A 001302937VES

CUSTO	MER P.O. NUMBER	SERVICE DATE F	RANGE				TERR.
3200301	635	04/06/2018					N05
	DESCRIPTIO	N		UOM	QTY	UNIT PRICE	EXTENSION
101578	COAL TAR CONTAMINATED	WATER	MAR	GAL	491.00	\$3.25	\$1,595.75
Trans.	ENVIRON. TRANSPORT GRO	OUP INC.	MAR	TANKTR	1.00	\$1,350.00	\$1,350.00
Misc.	TANK CLEANING			EACH	1.00	\$495.00	\$495.00
Misc.	TOLLS			EACH	1.00	\$275.00	\$275.00
Misc.	STATE REGULATORY FEES			EACH	1.00	\$20.00	\$20.00
						TOTAL	\$3,735.75

Veolia ES Technical Solutions LLC is permitted for and has capacity to accept waste listed above in container quantities.

ALL PAST DUE AMOUNTS WILL BEAR INTEREST AT 1.5% PER MONTH OR THE MAXIMUM RATE ALLOWED BY LAW, WHICHEVER IS LESS.



### **Activity Report**

JOB NO: 3024534000 BILL DOC NO HN80320704 WO NO: 3024534000 EPA ID: NYR000225615

GENERATOR NO 640920

BILL TO: NATIONAL GRID 175 E OLD COUNTRY RD HICKSVILLE, NY 118014257 (516) 545-2255 JOB SITE: EQUITY WORKS MGP SITE 254 MASPETH AVE BROOKLYN, NY 11211 (516) 545-2586

CONTACT: JOSEPH ODIERNA

CONTACT: WILLIAM RYAN, PROJECT MANAGER

MANIFEST NUMBER(S): 001302937VES -

CUSTOMER P.O. NUMBER PROJECT NUMBER SHIP DATE TERR. 04/06/2018 N05 # CONT. CONT./CODE DESCRIPTION UOM PG/LN WASTE AREA Manifest #001302937∀ES VACTRU-TT WP 101578 / Approval MARBULK5 COAL TAR CONTAMINATED WATER EACH 04/06/2018 Misc. - STATE REGULATORY FEES 4419 (EACH) Total Hours: 0 # of Containers: 1 Comments: Signature: 

Veolia Environmental Solutions is permitted for and has capacity to accept waste listed above in container quantities.

1 of 1

Print Name:

#### Veolia Environmental Services

125 Factory Lane Middlesex, NJ 08846 (732) 469-5100

# Weig cket

Date Scheduled:

04/06/2018 16:00:00

**Customer Name:** 

**EQUITY WORKS MGP SITE** 

Transporter:

ENVIRONMENTAL TRANSPORT GROUP, INC.

Trailer #:

TW195

Weigh Ticket #:

205299

Order Number:

228424

OrderType:

WR

Weighing Tractor: YT6

**General Notes** 

Туре	Weight	U of M	Date		Captu <b>re</b> Type	Specific Weighing Notes
Gross	37,640	Lb-	4/10/18	2:14 pm	Manual	missed capture
Tare	32,900	Lb	4/10/18	2:15 pm	Manual	missed capture

Net:

4,740.00 Lb

#### **VEOLIA**

#### PACKING SUMMARY

Generator Number: 640920

EQUITY WORKS MGP SITE

254 MASPETH AVE BROOKLYN, NY 11211

Aith: WILLIAM RYAN, PROJECT MANAGER

EPA ID: NYR000225615

Manifest Number:

001302937VES

Field System (D:

HN

Work Order Number: Date Shipped:

3024534000

04/08/2018

Container#: HN-3024534000-001

Waste Area:

Manifest Page/Line:

01 / 1

WP: 101578

DisposalCode: MARBULK5

PHY State: L.

Date Accumulated: 04/06/2018

Gen Drum ID:

Shipping Name:

UN 1993, WASTE FLAMMABLE LIQUIDS, n.o.s., (BENZENE, PETROLEUM DISTILLATES), 3, II, RO (D001, D018)

No. of Commons: 01

1

Outer Container: VACTRU-TT

Inner Container:

Primary Waste Codes:

8,810G,100G

PCB Serial 批

OOS Date: 77

Total Cmns Wt: 5000

System: H061

Cubic Ft.: 625.00

Individual Common Weights:

1@5660 (GALLONS)

Units Container Size

TANKTR

Net Weight

SIC: 1389

Chemical Name

Source: G49

EPA/State Codes D001, D018, B

BENZENE [21000B] NAPHTHALENE [57000B] TOLUENE [12000B] COAL TAR CONTAMINATED WATER [95%] MAY CONTAIN SOME COAL TAR SOLIDS [5%]

Form: V#806

5 20 gal

## Veolia Environmental Services Routing Summary

Trip Ticket # 179174

Printed by: MARY GASKILL

Created by: MGASKILL

Print Date: 3/20/2018

Print Time: 7:51:52AM

Page 1 of 1

Leg # 1

Departs: From:

7:00AM: 4/6/2018

640920 - EQUITY WORKS MGP SITE

254 MASPETH AVE **BROOKLYN, NY 11211**  Arrives:

4:00PM 4/6/2018

001-800 - VEOLIA - MIDDLESEX

125 FACTORY LANE MIDDLESEX, NJ 08846

SR #: 372312

Manifest

001302937VES

Trailer #:

Contact: WILLIAM TYAN, REDJECT MANAGER

Phone: 510 545 556 BRENDAN Maye

Pickup Comments:

ETGI On Site Between 7 & 7:30 am, delivers to Veolia, Middlesex at 4 pm on April 6th.

Delivery Comments:

Confirmed Delivery Into Middlesex at 4 pm with Karen Fischer.

Transporter:

Tractor #

Driver(s):

ENVIRON. TRANSPORT GROUP INC. **GOLDMINE ROAD** 

FLANDERS, NJ 07836

Phone:

973.347 8200

Purchase Order #:

**Equipment Type:** 

Tanker Straight Vac

Additional Instructions:

# 

	T	UNIFORM HAZARDOUS	1. Generator ID Number	i) (Abomittori)	To B and the late				For	<u>эл Арргоv</u> е	d. OMB No	. 2050-00
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	Ľ	5. Generator's Name and Mailin QUITY WORKS MC	יייים פויים פויים	ERNA	Genera	itor's Site Addres	s (ifdifferent	wan mailing addre	ss)	<u> </u>	<u> </u>	LO
	ш	75 E. OLD COUNTS HCKSVILLE NY 1	RV ROAD		BRO	maspeth Oklyn, n	AVE  Y   121:	1				
	Ŀ	Generator's Phone:	- <b></b>	. 516 545-2	_							
$\  \ $		3. Transporter 1 Company Nam NVIRON, TRANSPO	18 ORT GRAUD IMA		<u> </u>			U.S. EPA ID I	Number	<del></del>		
		7. Transporter 2 Company Nam						NID		0 6 9	2 0	6 l
	1	•	·					U.S. EPATON	Yumber			
Ш	ľ	B. Designated Facility Name and	d Site Address FOLIA ES	TECHNICAL SOLU	TIONS			U.S. EPA IDN	vumber			
	ı		125 FACTOR MIDDLESEX	LY LAINE.								
	١,	acility's Phone: 732 469		4.0000				מנון	0 0	3 4 5	4 5 4	
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	14	4. Special Handling Instructions TAR CONTAMIN	s and Additional Information IATED WATER	ER Service Contra	icted by VESTS	+ 1) LIN	zi Wip	101578 - M.	ARBUL	K5 COA	.L	
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ANS	Tr	anspotter 2 Printed/Typed Nam			Signature	7 9	- '		<del></del>	Mont	h Day	1/8 Year
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) FA		cility's Phone;		. 3 <sub>1</sub>				1				
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¥	_/	Jane	Solcell			2				Month 109		/8ar /8
:PA	Fó	rm 8700-22 (Rev. 3-05) Pre	evious editions are obsolete.		DESIGN	ATED FAC	ILITY TO	DESTINAT	LION 6.			( 0
										· *** = \4F	riculul	ncu:

VEOLIA ES LAB CODING: "S" Codes

Piece Count:

Page:	1	of	1
9		01	

**BULK SHIPMENT - Single Generator** Received: 4/6/2018

Order Number:

WS 228424

Bill To:

**VEOLIA ES TECHNICAL SOLUTIONS, LLC (NJD080631369)** 

PO:

Broker:

Trailer Number:

NJ TW195

Carrier:

**VEOLIA ES TECHNICAL SOLUTIONS, LLC (NJD080631369)** 

Weigh Ticket:

205299

**ENVIRONMENTAL TRANSPORT GROUP, INC. (NJD000692061) DELIVERY TYPE: Customer delivery to Facility** 

All Bulk manifests need to reflect the actual received quantity by weight noted in Section 18 of the manifest.

**EQUITY WORKS MGP SITE** 

NYR000225615 (32409)

MANIFEST: 001302937VES RESPIRATOR REQUIRED

100-32409-1

101578

WIP: 101578

One TT - 520.00 Gallons

520.00 Gallons

1.0000

S162 7122 Actual BC:MARFS (Profile:MARBULK5) 4740(net lbs) / 8.333 / 1.1590 SG = 491 Gls

Subtotals, for Manifest:

520.00

1.0000

TOTAL, All Generators

1.0000

Printed: 4/11/2018

-		
4/11/2018		<b>Gais</b> 520 / B
4/1	Ship To	520 gal
	S MGP SITE	\$162
	Generator EQUITY WORKS MGP SITE	<b>Dest.</b> T-221
QC Report	SCHNICAL	Source Tank TW195
ŏ	Broker VEOLIA ES TECHNICAL	Still Run
	<u>SampleNbr</u> 18096-00040	Fuel Lot#
	1	LR#
	Code Nbr S162-7122	Ord# - 228424
Decre construction of the	<u>Date</u> 4/6/2018	# 4 0

1.159  black  0  \$2.01  7  9462  91211.80  9.065  0.07			
		CHARACTERISTICS	
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<u>DISCLAIMER</u> - THIS IS A VEOLIA ES TECHNICAL SOLUTIONS, L.L.C. INTERNAL DOCUMENT ONLY. THESE ARE PRELIMINARY LAB RESULTS AND MAY NOT HAV BEEN REVIEWED OR CONFIRMED.

į.



Page 1 of 1

CUSTOME	R INVOICE
INVOICE DATE	INVOICE NUMBER
7/27/2018	817915734
2%10	Net 30

For Billing Inquiries

Call KEITH REED at 1 (973) 347-7111

Customer No. 487403

BILL TO: NATIONAL GRID

175 E. OLD COUNTRY ROAD

SITE B

HICKSVILLE, NY 11801 JOSEPH ODIERNA Generator No. 640920

JOB SITE: EQUITY WORKS MGP SITE

254 MASPETH AVE BROOKLYN, NY 11211 BRIAN BERMINGHAM

MANIFEST NUMBERS: A 001363771VES

CUSTO	MER P.O. NUMBER	SERVICE DATE F	RANGE				TERR.
3200301	635	06/29/2018					N05
	DESCRIPTIO	N		UOM	QTY	UNIT PRICE	<b>EXTENSION</b>
101578	COAL TAR CONTAMINATED	WATER	MAR	GAL	524.00	\$3.25	\$1,703.00
Trans.	ENVIRON. TRANSPORT GR	OUP INC.	MAR	TANKTR	1.00	\$1,350.00	\$1,350.00
Misc.	TANK CLEANING			EACH	1.00	\$495.00	\$495.00
Misc.	TOLLS			EACH	1.00	\$275.00	\$275.00
Misc.	STATE REGULATORY FEES			EACH	1.00	\$20.00	\$20.00
				•	•	TOTAL	\$3,843.00

Veolia ES Technical Solutions LLC is permitted for and has capacity to accept waste listed above in container quantities.

ALL PAST DUE AMOUNTS WILL BEAR INTEREST AT 1.5% PER MONTH OR THE MAXIMUM RATE ALLOWED BY LAW, WHICHEVER IS LESS.



230185

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved: OMB No. 2050 003 UNIFORM HAZARDOUS 1. Generator ID Number . Manifest Tracking Numbe 2. Page 1 of 3. Emergency Response Phone 363 *(*877) 818-0087 NYR000225615 **WASTE MANIFEST** Generator's Site Address (if different than mailing address) 5. Generator's Name and Mailing Address JOE ODIERNA 254 MASPETH AVE EQUITY WORKS MGP SITE 173 E. OLD COUNTRY ROAD HICKSVILLE, NY 11801 BROOKLYN, NY 11211 Generator's Phone: U.S. EPA ID Number 6. Transporter 1 Company Name N J D 0 0 0 6 9 2 0 6 1 ENVIRON. TRANSPORT GROUP INC. U.S. EPA ID Number 7. Transporter 2 Company Name U.S. EPA ID Number 8. Designated Facility Name and Site Address YEOLIA ES TECHNICAL SOLUTIONS 125 FACTORY LANE MIDDLESEX, NJ 08846 IN J D 0 0 2 4 5 4 5 4 4 Facility's Phone: 732 469-5100 10. Containers 12. Unit 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 11. Total 13. Waste Codes Quantity WL/Vol. Туре and Packing Group (if any)) No: НМ UN1993, WASTE FLAMMABLE LIQUIDS, n.o.s., (BENZENE PETROLEUM DISTILLATES), 3, II, RQ (D001,D018) D001 В X 275 TT G 1 D018 pedal Handling Instructions and Additional Information ER Service Contracted by VESTS -[- 1] WIP 101578 - COAL TAR CONTAMINATED WATER / APPROVAL: MARBULKS / ACTUAL GALLONS RECT: 5246 14. Special Handling Instructions and Additional Information 10AC 15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPAAcknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. agent for Nation Generator's/Offeror's Printed/Typed Name me gan I Port of entry/exit: \_\_ Export from U.S Date leaving U.S. Transporter signature (for exports only): 17. Transporter Acknowledgment of Receigt of Materials Transporter 1 Printed/Typed Name 18. Discrepancy Full Rejection \_ Partial Rejection ..... Residue 18a. Discrepancy Indication Space Manifest Reference Number: U.S. EPA ID Number 18b. Alternate Facility (or Generator) Facility's Phone: Month Day Year 18c. Signature of Alternate Facility (or Generator) 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 4. 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name ww DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED) EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

# Weigh Ticket

Date Scheduled:

06/29/2018 16:00:00

**Customer Name:** 

**EQUITY WORKS MGP SITE** 

Transporter:

FREEHOLD CARTAGE INC.

Trailer #:

195

Weigh Ticket #:

205704

Order Number: OrderType:

230185

Weighing Tractor: YT7

WR

#### General Notes

Туре	Weight	U of M	Date		Capture Type	Specific Weighing Notes
Gross	37,560	Lb	6/29/18	4:40 pm	Electronic	
Tare	32,820	Lb	6/29/18	5:15 pm	Electronic	

Net:

4,740.00 Lb

**VEOLIA ES LAB CODING: "S" Codes** 

**BULK SHIPMENT - Single Generator** 

Page: 1 of 1 Received: 6/29/2018

Order Number:

WS 230185

Piece Count:

Bill To:

**VEOLIA ES TECHNICAL SOLUTIONS, LLC (NJD080631369)** 

PO:

1

Broker:

VEOLIA ES TECHNICAL SOLUTIONS, LLC (NJD080631369)

Trailer Number:

NJ 195

Carrier:

FREEHOLD CARTAGE INC. (NJD054126164)

Weigh Ticket:

205704

**DELIVERY TYPE: Customer delivery to Facility** 

All Bulk manifests need to reflect the actual received quantity by weight noted in Section 18 of the manifest.

**EQUITY WORKS MGP SITE** 

NYR000225615 (32409)

MANIFEST: 001363771VES RESPIRATOR REQUIRED

100-32409-1

101578

WIP: 101578

One TT - 275.00 Gallons

275.00 Gallons

1.0000

S162 7122 Actual BC:MARFS (Profile:MARBULK5) 4740(net lbs) / 8.333 / 1.0850 SG = 524 Gls

Subtotals, for Manifest:

275.00

1.0000

TOTAL, All Generators

1.0000

Printed: 7/3/2018

7/3/2018				Gals	275 / B
71/	Ship To				275 gal
		GP SITE			54015
Location	Generator	EQUITY WORKS M		Dest.	GATX 2323
QC Report		TECHNICAL	, LLC	Source Tank	195
•	Broker	VEOLIA ES TECHNICAL	SOLUTIONS	Still Run	
	SampleNbr	18180-00058		rue! Lot#	
	- Ipr	7	70	FP#	
	Code Nbr	S162-71Z	Ord#		230185
	Date	6/29/2018	0P#		

ASIS S162-7122 1.085 black 43.5 8.13	122	122	122
\$ * In m m	\$0 ** \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	1.085 black 43.5 8.13 0 0 0	1.085 black 43.5 8.13 8813 0 0 0 0 1.085
* 10 m m	* w m	χ 10 m m	* 10 m m
	10 m m	10 m m	
m 89	m M	m 20 4	
	8	8	8

DISCLAIMER - THIS IS A VEOLIA ES TECHNICAL SOLUTIONS, L.L.C. INTERNAL DOCUMENT ONLY. THESE ARE PRELIMINARY LAB RESULTS AND MAY NOT HAV BEEN REVIEWED OR CONFIRMED.