

---

# EXPLANATION OF SIGNIFICANT DIFFERENCE

## NYSEG BRIDGE STREET

Former Manufactured Gas Plant



---

Plattsburgh (C) / Clinton County / Registry No. 5-10-016 / March 2007

Prepared by the New York State Department of Environmental Conservation  
Division of Environmental Remediation

### 1.0 INTRODUCTION

The purpose of this Explanation of Significant Difference (ESD) is to document a change in the selected remedy for the NYSEG Bridge Street former Manufactured Gas Plant (MGP). The Bridge Street site is located at 140 Bridge Street in the City of Plattsburgh, in Clinton County. The site is located on approximately 0.24 acres near the outlet of the Saranac River.

On March 2004, the New York State Department of Environmental Conservation (NYSDEC) signed a Record of Decision (ROD) which selected a remedy for the site. The 2004 ROD selected no further action for the site. This selection was based on successful implementation of an Interim Remedial Measure in 2001 that removed contaminated soil down to bedrock, which occurs between 4 and 10 feet beneath the site. The ROD also required development of a site management plan, execution of an environmental easement, and annual certification that the engineering and institutional controls remain in place and effectively protect public health and the environment. One of the ROD requirements for the environmental easement was to restrict the use of the site to commercial or industrial use.

The subject of this ESD is the commercial/industrial land use restriction that was specified in the 2004 ROD. New York State Electric and Gas (NYSEG) has requested that the NYSDEC allow restricted-residential use of the site.

This Explanation of Significant Difference will become part of the Administrative Record for this Site. The information here is a summary of what can be found in greater detail in documents that have been placed in the following repositories:

Plattsburgh Public Library  
19 Oak Street  
Plattsburgh, NY 12901  
Attn: Reference Librarian  
(518) 563-0921

NYSDEC Region 5 Office  
1115 State Route 86  
PO Box 296  
Ray Brook, NY 12977  
Attn: Russ Huyck  
(518) 897-1242

NYSDEC  
625 Broadway, 11<sup>th</sup> Floor  
Albany, NY 12233-7014  
Attn: George Heitzman  
(518) 402-9662

### 2.0 SITE DESCRIPTION AND ORIGINAL REMEDY

#### 2.1 Site History, Contamination, and Selected Remedy

The NYSEG Bridge Street site is a former manufactured gas plant (MGP), where gas for lighting and heating homes and businesses was produced. The Bridge Street MGP operated from 1860 to 1896. In

1896 the plant was abandoned and the operations were moved to the Saranac Street Site. The Bridge Street Plant was relatively small and consisted of one main building with a gas holder and a coal shed. The plant was destroyed by fire and rebuilt on at least two occasions in 1865 and 1871.

The production of manufactured gas created many by-products, some of which remained on the site. A dense, oily liquid known as tar would condense out of the gas at various stages during its production, purification, and distribution. Although much of the tar produced by plants was typically reused or sold, recovery of the tar was incomplete. Significant amounts of tar leaked or was discharged from storage and processing facilities over the life of the plant, contaminating subsurface soils and groundwater on the site.

From the end of gas manufacturing operations at the site in 1896 until 1918, the property and building remained vacant and were used as a warehouse. Historical information indicates that the building was used as an automobile dealership and service center from 1918 to approximately 1949. The original building was modified sometime between 1896 and 1927 to extend over the former gas holder. This modified building was then converted into an apartment building in the early 1970's. NYSEG purchased the property in 2000.

The NYSDEC and NYSEG entered into a Consent Order on March 30, 1994. The Order requires NYSEG to implement a full remedial program for thirty three former MGP sites across New York State. In 2001, NYSEG performed an Interim Remedial Measure that included the razing of the site building and the adjacent firehouse. The entire site was then excavated down to bedrock, with off-site disposal of removed materials. The entire site was then backfilled with clean sand and seeded.

The remedy selected for the site in 2004 included the following elements:

- Development of a site management plan to assure the existing backfill over the bedrock is maintained and to restrict the excavation of bedrock.
- Annual certification that the institutional controls are unchanged. Completion of additional, operation, maintenance and monitoring requirements.
- Execution of an institutional control, in the form of an environmental easement, to limit the use and development of the parcel to commercial and industrial uses.
- Since the remedy resulted in MGP waste remaining in bedrock at the site, a long term bedrock groundwater monitoring program was instituted.

### **3.0 CURRENT STATUS**

NYSEG has performed two years of environmental monitoring at the site, in accordance with an approved Operation, Maintenance, & Monitoring Plan. The Department has developed a draft Environmental Easement for the site that will be executed by NYSEG once the change in permissible land use is made.

### **4.0 DESCRIPTION OF SIGNIFICANT DIFFERENCES**

The following describes the significant differences to the remedy, compared to the remedy selected in the March 2004 ROD:

The environmental easement for the site will be issued to permit restricted-residential use of the site. Restricted-residential use is one for which there is common ownership or a single owner/managing entity of the site, and which prohibits single family housing and vegetable gardens. Restricted-residential use also includes active recreational uses, such as playgrounds, for which a reasonable potential for soil contact exists. Land uses which require a less protective remedy (i.e. commercial and industrial), would also be permitted.

Regulations which became effective after the 2004 ROD was issued specify that two feet of clean soil is necessary at the surface of a site to be protective for restricted-residential land use. Because the clean soil backfill at the Bridge Street site ranges from 4 to 10 feet thick, the remedy that was performed is protective of public health and the environment for the requested land use. Therefore the NYSDEC has incorporated the requested change into the ROD. Although the property is zoned as R-2 Residential, which is consistent with this decision, this is not a determination by the NYSDEC of the specific land use of the site.

In addition, the ROD's requirement for annual certification will be revised to require periodic certification. This is a minor modification to the selected remedy, and is consistent with other RODs currently issued by the NYSDEC, and with recently-enacted State regulations.

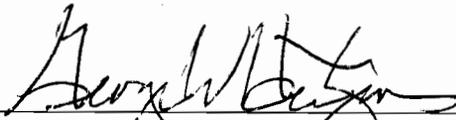
## **5.0 SCHEDULE AND MORE INFORMATION**

An environmental easement reflecting this change will be granted to the NYSDEC. In addition to the land use restrictions described above, the environmental easement will prohibit the use of groundwater from beneath the site without necessary treatment, and will require the evaluation of soil vapor intrusion into any structures that are developed on the site. Environmental monitoring will continue at the site, along with periodic certifications that the engineering and institutional controls are unchanged and effectively protect public health and the environment.

Interested persons are invited to contact the Department's Project Manager for this site to obtain more information or have questions answered. The project manager for this site is George Heitzman, who can be contacted in writing at 625 Broadway, Albany, New York, 12233-7014; by telephone at (518) 402-9662; or by email at [gwheitzm@gw.dec.state.ny.us](mailto:gwheitzm@gw.dec.state.ny.us) .

2/20/07

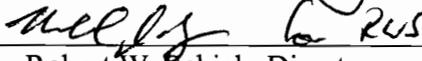
Date



George W. Heitzman, Project Manager/Section Chief  
Section D, Remedial Bureau C

2/20/07

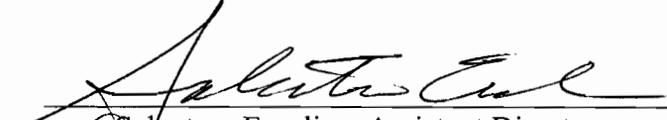
Date



Robert W. Schick, Director  
Remedial Bureau C

2/28/07

Date



Salvatore Ervelina, Assistant Director  
Division of Environmental Remediation

MAR - 1 2007

Date



Dale A. Desnoyers, Director  
Division of Environmental Remediation