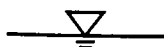


JAW - MARC 2001



**de maximis, inc.**

2975 Bee Ridge Road  
Suite C  
Sarasota, FL 34239  
(941) 926-7929  
Fax (941) 926-0829

April 10, 2001

Patricia Simmons  
Central New York Remedial Section  
New York Remediation Branch  
Emergency and Remedial Response Division  
U.S. Environmental Protection Agency, Region II  
20<sup>th</sup> Floor, 290 Broadway  
New York, New York 10007

**Subject: Quarterly Progress Report  
Operations and Maintenance and Long Term-Monitoring Activities  
PAS Site, Oswego, NY**

Dear Ms. Simmons:

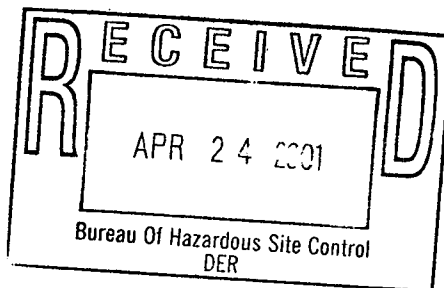
The April 2001 Quarterly Progress Report is submitted under Consent Decree 98-CV0112NPMGJD for operation, maintenance, and long-term monitoring activities at the PAS Site in Oswego, New York (Consent Decree) is attached. This attached Progress Report, which covers the period January 2001 through March 2001, conforms with requirements of Paragraph 30 of the Consent Decree, which was entered on August 10, 1998.

If you have any questions, please call me at <sup>045</sup>(941) 926-7929.

Sincerely,  
de maximis, inc.

Mark Valentine

- cc: Performing Settling Defendants
- J. Singerman, U.S. EPA Region II
- C. Whitfield, NYSDEC, Division of Hazardous Waste Remediation
- C. Branagh, NYSDEC, Region 7 Office
- R. Heerkens, NYDOH, Office of Public Health



OK Cyn  
HIS  
Missed first  
pump out in  
March 2001.  
O&M now doing  
O&M - watch  
that they follow  
schedule.  
Esp. Fish  
sampling.  
Johnny  
5/3/01



**QUARTERLY PROGRESS REPORT**  
*Operation, Maintenance and Long-term Monitoring Activities*

**PROJECT NAME:**      *Pollution Abatement Services Site  
Oswego, New York*

**PERIOD COVERED:**    JANUARY – MARCH 2001

**ACTIONS TAKEN DURING PREVIOUS QUARTER (JAN – MAR 2001):**

- On July 19, 2000, the Performing Settling Defendants proposed that O'Brien & Gere Operations, Inc. (now known as O'Brien & Gere Inc. of North America) (OBG) replace BBL Environmental Services as the primary remedial contractor for operation, maintenance and long-term monitoring (OMM) activities conducted at the site. USEPA formally approved the proposed contractor change in their letter dated July 26, 2000.
- Removal activities were conducted at the PAS Oswego Site in accordance with the Operation, Maintenance and Long-term Monitoring Activities Plan (BBL, 1998) (Work Plan). A total of 31,284 gallons of leachate was removed during the period January through March of 2001. Specific quantities of leachate removed during each month, along with removal dates and manifest numbers, are described in this progress report under the section entitled "Documentation of Removal Activities". Subsequent to each of these events, leachate and ground water was disposed of at the BFI/CECOS Niagara Falls, New York, disposal facility. Buffalo Fuels Corporation was the transportation subcontractor for both BBLES and OBG leachate removal activities.
- OBG performed ground-water elevation monitoring on January 8 and 22, February 5 and 19 and March 5 and 19, 2001.
- Quarterly groundwater elevation monitoring was performed on February 5, 2001. Quarterly groundwater elevation results for the M-series and LR-series monitoring wells indicated upward vertical gradients calculated for the leachate collection well LCW-4 area were greater than 1.5 feet per foot. Therefore, leachate removal activities were conducted at LCW locations (excluding LCW-4) during the January to March 2001 period, in accordance with the November 15, 1999 leachate removal protocol.
- OBG performed site maintenance activities on January 8 and 22, February 5 and March 5, 2001, which included inspection of spill control materials, perimeter fencing, and monitoring wells, as well as cleanup of the storage shed and clearing of any debris accumulated in the concrete surface drainage trenches. These maintenance activities were performed in accordance with the approved Work Plan.
- The PSDs conducted a visit to the Oswego area to update information regarding ownership of selected properties located downgradient of the containment system and performed other activities toward obtaining institutional controls in accordance with the Consent Decree, including review of the EPA draft Environmental Protection Easement and Restrictive Covenant.

**ACTION ITEMS FOR FOLLOWING QUARTER (APR - JUN 2001):**

- OMM activities will be performed in April, May, and June 2001, in accordance with the approved Work Plan. The OMM activities include pumping 15,000 gallons of leachate during the first week of the month, or whatever volume can be efficiently removed during a one-day pumping event, up to 15,000 gallons. The ground-water slurry wall wells and leachate wells will be monitored during the beginning of the third week of the month. If leachate elevations measured during the third week indicate that an additional



- 10,000 gallons of removable leachate has accumulated in the collection trenches, then a contingency removal event will be promptly scheduled to remove the 10,000 gallons of additional leachate.
- OBG will conduct quarterly ground-water elevation monitoring on May 7, 2001.
- OBG will also conduct semi-annual monitoring on May 7, 2001, including collection of groundwater quality samples from Long-term Monitoring (LTM) wells LR-6, LR-8, M-21, M-25 and M-26.
- OBG will continue to perform routine maintenance activities, including inspection of spill control materials and perimeter fence. These maintenance activities will be performed in accordance with the approved Work Plan.
- PSDs will continue to perform activities toward obtaining institutional controls in accordance with the Consent Decree, including submittal of comments to EPA on the draft Environmental Protection Easement and Restrictive Covenant.

- The schedule for leachate removal events and tasks is provided below.

LEACHATE REMOVAL EVENTS AND TASK SCHEDULE (2 <sup>nd</sup> Quarter 2001)							
	April 2001 Removal Events		May 2001 Removal Events		June 2001 Removal Events		Task
	First Event	Contingency Event	First Event	Contingency Event	First Event	Contingency Event	
Pre-Pumping Monitoring	Apr 2	Apr 16	May 7	May 21	Jun 4	Jun 18	LCW- and SWW- Series Wells for April, May and June. LCW-, SWW-, M-, and LR- Series Wells for May (first event only).
Removal	Apr 4	Apr 18	May 9	May 23	Jun 6	Jun 20	Remove leachate from LCW- 1, -2, -3 and -4 wells (pending results of May 7 readings).

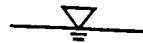
LEACHATE REMOVAL EVENTS AND TASK SCHEDULE (3 <sup>rd</sup> Quarter 2001)							
	July 2001 Removal Events		August 2001 Removal Events		September 2001 Removal Events		Task
	First Event	Contingency Event	First Event	Contingency Event	First Event	Contingency Event	
Pre-Pumping Monitoring	Jul 9	Jul 23	Aug 6	Aug 20	Sep 10	Sep 24	LCW- and SWW- Series Wells for July, Aug. and Sept. LCW, SWW-, M-, and LR- Series Wells for Aug. (first event only).
Removal	Jul 11	Jul 25	Aug 8	Aug 22	Sep 12	Sep 26	Remove leachate from LCW- 1, -2, -3, and -4 wells (pending results of Aug. 6

**ANTICIPATED DELAYS/PROBLEMS:**

- OBG inadvertently did not remove leachate during the first week of March, but did remove leachate during the March contingency removal event.

**RESULTS OF FIELD ACTIVITIES:**

- Ground-water elevation data collected on January 8 and 22, February 5 and 19 and March 5 and 19, 2001 are attached (See Attachment 1).
- The routine leachate disposal and site inspection checklists are attached (See Attachment 2).



**DOCUMENTATION OF REMOVAL ACTIVITIES DURING PREVIOUS QUARTER:**

- Hazardous Waste Manifests and Gallons Removed (See Attachment 3)
- Waste Treatment/Disposal Certifications (See Attachment 4)

**JANUARY 2001**

**January 10, 2001**

Manifest #	Amount (gal)	Date Removed
NYG2448306	5,272	1/10/01
NYG2448315	5,234	1/10/01

**January 10, 2001 Total = 10,506 gallons**  
**January 2001 Total = 10,506 gallons**

**FEBRUARY 2001**

**February 7, 2001**

Manifest #	Amount (gal)	Date Removed
NYG2448351	5,207	2/07/01
NYG2448369	5,087	2/07/01

**February 7, 2001 Total = 10,294 gallons**  
**February 2001 Total = 10,294 gallons**

**MARCH 2001**

**March 21, 2001**

Manifest #	Amount (gal)	Date Removed
NYG2448324	5,243	3/21/01
NYG2448333	5,241	3/21/01

**March 21, 2001 Total = 10,484 gallons**  
**March 2001 Total = 10,484 gallons**

• **CUMULATIVE REMOVAL QUANTITIES**

Cumulative gallons removed during quarter under OMM Plan - January thru March 2001 31,284 gal

**HISTORICAL SUMMARY OF LEACHATE REMOVAL ACTIVITIES**

<i>Order/Decree</i>	<i>Disposal Facility/Period</i>	<i>Quantities</i>
<b>1991 IGR Order (2/92 - 10/94)</b>	<b>DuPont:</b> 1992 (2/98 - 12/98) 1993 1994 (1/94-10/94) <u>Subtotal</u>	221,808 337,619 <u>254,898</u> 814,325
<b>1994 IGR Order (10/94 - 10/98)</b>	<b>DuPont:</b> 1994 (From 10/94) 1995 1996 (To 5/96) <u>Subtotal (To 5/96)</u>  <b>BFI/CECOS:</b> 1996 1997 <u>1998 (1/98-10/98)</u> <u>Subtotal</u>  <b>94 IGR Order Total</b>	50,683 279,164 <u>119,901</u> 449,748  163,446 269,371 <u>207,541</u> 640,358  1,090,106
<b>Final IGR Total</b>		<b>1,904,431</b>
<b>OMM Consent Decree (Beginning 11/98)</b>	<b>BFI/CECOS:</b> 1998 (1/1/98-12/98) 1999 2000 (thru Dec 2000) 2001 (thru Mar 2001) <u>OMM Subtotal:</u>	18,423 177,710 196,613 <u>31,284</u> <u>424,030</u>
<b>GRAND TOTAL</b>		<b>2,328,461</b>

• LEACHATE DISPOSAL DOCUMENTATION

January 10, 2001

BFI/CECOS Work Order Number	Manifest #	Date Disposed
283930	NYG2448306	1/10/01
283931	NYG2448315	1/10/01

February 7, 2001

BFI/CECOS Work Order Number	Manifest #	Date Disposed
283977	NYG2448351	2/07/01
283978	NYG2448369	2/07/01

March 21, 2001

BFI/CECOS Work Order Number	Manifest #	Date Disposed
284045	NYG2448324	3/21/01
284046	NYG2448333	3/21/01

Note: "Gallons removed" is based upon BFI/CECOS's measurement of the "loaded" and "tare" weights as measured at the Niagara Falls, New York facility and shown on the weight tickets included in Attachment 4, and a density of 8.346 pounds per gallon.

File on eDOCs  Yes \_\_\_\_\_ No \_\_\_\_\_  
Site Name PAS  
Site No. 738001  
County Oswego  
Town Oswego  
Foitable  Yes \_\_\_\_\_ No \_\_\_\_\_  
File Name 2001-04-10. Q2 - 01 Report  
Scanned & eDOC \_\_\_\_\_