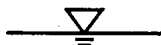


JULY - SEPT 2001



de maximis, inc.

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

October 9, 2001

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

**Subject: Quarterly Progress Report - 3Q01
Operations and Maintenance and Long Term-Monitoring Activities
PAS Site, Oswego, NY**

Dear Ms. Simmons:

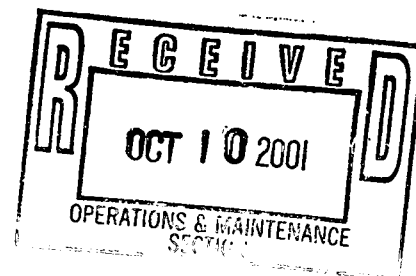
The October 2001 Quarterly Progress Report is submitted under Consent Decree 98-CV0112NPMGJD for operation, maintenance, and long-term monitoring activities at the PAS Site in Oswego, New York (Consent Decree) is attached. This attached Progress Report, which covers the period July through September 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 (941) 926-7929.

Sincerely,
de maximis, inc.

Mark Valentine

cc: Performing Settling Defendants
L. McDavid, USEPA
G. Rider, NYSDEC, Division of Hazardous Waste Remediation
R. Parker, NYSDEC, Region 7 Office
D. Geraghty, NYDOH, Office of Public Health



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

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

PERIOD COVERED: JULY – SEPTEMBER 2001

ACTIONS TAKEN DURING PREVIOUS QUARTER (JULY – SEPTEMBER 2001):

- Removal activities were conducted at the PAS Oswego Site in accordance with the Operation, Maintenance and Long-term Monitoring Activities Plan (Work Plan). A total of 30,311 gallons of leachate was removed during the period July through September 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.
- Ground-water elevation monitoring was performed on July 9 and 23, August 6 and 20 and September 10 and 17, 2001.
- On August 6, 2001, quarterly ground-water elevation monitoring was performed. Quarterly ground-water 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 (including LCW-4) during the August through September 2001 period, in accordance with the November 15, 1999 leachate removal protocol.
- Site maintenance activities were conducted on July 9 and 23, August 6 and 20, September 10 and 17, 2001, which included mowing the vegetated cap, inspection of spill control materials, 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.

ACTION ITEMS FOR FOLLOWING QUARTER (OCT – DEC 2001):

- OMM activities will be performed in October, November, and December 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.
- Quarterly ground-water elevation monitoring will be conducted on November 5, 2001.

Routine maintenance activities will continue, 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 upon receipt of USEPA's response to the revised draft Environmental Protection Easement and Restrictive Covenant.

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

LEACHATE REMOVAL EVENTS AND TASK SCHEDULE (4th Quarter 2001)							
	October 2001 Removal Events		November 2001 Removal Events		December 2001 Removal Events		Task
	First Event	Contingency Event	First Event	Contingency Event	First Event	Contingency Event	
Pre-Pumping Monitoring	Oct 1	Oct 15	Nov 5	Nov 19	Dec 3	Dec 5	LCW- and SWW- Series Wells for Oct, Nov. and Dec. LCW-, SWW-, M-, and LR- Series Wells for Nov. (first event only).
Removal	Oct 3	Oct 17	Nov 7	Nov 21	Dec 17	Dec 19	Remove leachate from LCW-1, -2, -3 and -4 wells (pending results of Nov 5 readings)

LEACHATE REMOVAL EVENTS AND TASK SCHEDULE (1st Quarter 2002)							
	January 2002 Removal Events		February 2002 Removal Events		March 2002 Removal Events		Task
	First Event	Contingency Event	First Event	Contingency Event	First Event	Contingency Event	
Pre-Pumping Monitoring	Jan 1	Jan 21	Feb 4	Feb 18	Mar 4	Mar 18	LCW- and SWW- Series Wells for Jan, Feb. and Mar. LCW, SWW-, M-, and LR- Series Wells for Feb. (first event only).
Removal	Jan 9	Jan 23	Feb 6	Feb 20	Mar 6	Mar 20	Remove leachate from LCW-1, -2, -3, and -4 wells (pending results of Feb. 4 readings).

ANTICIPATED DELAYS/PROBLEMS:

- None

RESULTS OF FIELD ACTIVITIES:

- Ground-water elevation data collected on July 9 and 23, August 6 and 20 and September 10 and 17, 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)

JULY 2001

July 11, 2001

Manifest #	Amount (gal)	Date Removed
NYG2448459	5,205	7/11/01
NYG2448405	5,265	7/11/01

July 11, 2001 Total = 10,470 gallons

AUGUST 2001

August 8, 2001

Manifest #	Amount (gal)	Date Removed
NYG2448477	5,004	8/8/01
NYG2448432	4,364	8/8/01

August 8, 2001 Total =9,368 gallons

SEPTEMBER 2001

September 12, 2001

Manifest #	Amount (gal)	Date Removed
NYG2534544	5,233	9/12/01
NYG2534535	5,240	9/12/01

September 12, 2001 Total = 10,473 gallons

• **CUMULATIVE REMOVAL QUANTITIES**

Cumulative gallons removed during quarter
- July through September 2001

30,311 gal

HISTORICAL SUMMARY OF LEACHATE REMOVAL ACTIVITIES

<i>Order/Decree</i>	<i>Disposal Facility/Period</i>	<i>Quantities</i>
1991 IGR Order (2/92 - 10/94)	<i>Dupont:</i> <i>1992 (2/98 -12/98)</i> <i>1993</i> <i><u>1994 (1/94-10/94)</u></i> <i>Subtotal</i>	221,808 337,619 <u>254,898</u> 814,325
1994 IGR Order (10/94 - 10/98)	<i>DuPont:</i> <i>1994 (From 10/94)</i> <i>1995</i> <i>1996 (To 5/96)</i> <i>Subtotal (To 5/96)</i> <i>BFI/CECOS:</i> <i>1996</i> <i>1997</i> <i><u>1998 (1/98-10/98)</u></i> <i>Subtotal</i> <i>94 IGR Order Total</i>	50,683 279,164 <u>119,901</u> 449,748 163,446 269,371 <u>207,541</u> 640,358 1,090,106
Final IGR Total		1,904,431
OMM Consent Decree (Beginning 11/98)	<i>BFI/CECOS:</i> <i>1998 (11/98-12/98)</i> <i>1999</i> <i>2000 (thru Dec 2000)</i> <i>2001 (thru Sept 2001)</i> <i>OMM Subtotal</i>	18,423 177,710 196,613 <u>101,417</u> 494,163
GRAND TOTAL		2,398,594

• LEACHATE DISPOSAL DOCUMENTATION

July 11, 2001

BFI/CECOS Work Order Number	Manifest #	Date Disposed
284253	NYG2448459	7/11/01
284254	NYG2448468	7/11/01

August 9, 2001

BFI/CECOS Work Order Number	Manifest #	Date Disposed
284292	NYG2448477	8/8/01
284293	NYG2448486	8/8/01

September 12, 2001

BFI/CECOS Work Order Number	Manifest #	Date Disposed
284346	NYG2534544	9/12/01
284347	NYG2534535	9/12/01

Note: "Gallons removed" is based upon BFI/CECOS 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.

011 _____ 00Y _____ 20010912

File on eDOCs Yes _____ No _____
Site Name RAS
Site No. 738001
County Conejo
Town Oswego
Foitable Yes _____ No _____
File Name 2001-10-09, Q3-01 - Report
Scanned & eDOC _____