

Handwritten: JRM/amy 4/7/03



**de maximis, inc.**

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April 1, 2003

Ms. Patricia Pierre c/o Mr. Joel Singerman  
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 - 1Q03  
Operations and Maintenance and Long Term-Monitoring Activities  
PAS Site, Oswego, NY**

Dear Ms. Pierre:

The April 2003 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 through March 2003, 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 *updated 4/2/03*
- 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:**    JANUARY - MARCH 2003

**ACTIONS TAKEN DURING PREVIOUS QUARTER (JAN - MAR 2003):**

- 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 30,377 gallons of leachate was removed during the period January through March of 2003. 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 OBG leachate removal activities.
- Routine ground-water elevation monitoring was performed on January 6 and 20, February 3, and 17, March 3 and 17, 2003.
- On February 3, 2003, quarterly ground-water elevation monitoring was also 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 less than 1.5 feet per foot. Therefore leachate removal activities were conducted at LCW locations (including LCW-4) during the period January through March 2003, in accordance with the November 15, 1999 leachate removal protocol.
- Site maintenance activities were conducted on January 20, February 17, and March 17, 2003, 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.
- PSDs received USEPA's comments on the revised draft version of the Environmental Protection Easement and Restrictive Covenant document that the PSDs submitted to USEPA in September 2002. In subsequent discussions with USEPA, the PSDs indicated that they have reviewed USEPA's comments and find these comments to be acceptable.

**ACTION ITEMS FOR FOLLOWING QUARTER (APR - JUN 2003):**

- OMM activities will be performed in April, May, and June 2003, 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, including the semi-annual ground water and leachate quality sampling, will be conducted on May 5, 2003.
- Routine maintenance activities will be conducted, including inspection of spill control materials and perimeter fence. Snow removal will be performed on an as needed basis throughout the following quarter. These maintenance activities will be performed in accordance with the approved Work Plan.
- The PSDs will proceed with conducting a title search for the four identified properties down-gradient from the PAS Site, as depicted on the figure entitled "Properties Downgradient of the PAS Site" (dated July 10, 2002), which was transmitted electronically to USEPA on July 17, 2002. In addition, as discussed with USEPA, the PSDs intend to review the results of the title search with USEPA and begin contacting the identified property owners once these title search activities have been completed.

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

<b>LEACHATE REMOVAL EVENTS AND TASK SCHEDULE (2<sup>nd</sup> Quarter 2003)</b>							
	<b>January 2003 Removal Events</b>		<b>February 2003 Removal Events</b>		<b>March 2003 Removal Events</b>		<b>Task</b>
	<b>First Event</b>	<b>Contingency Event</b>	<b>First Event</b>	<b>Contingency Event</b>	<b>First Event</b>	<b>Contingency Event</b>	
Pre-Pumping Monitoring	Apr 7	Apr 21	May 5	May 19	Jun 2	Jun 16	LCW- and SWW- Series Wells for Apr, May, Jun LCW-, SWW-, M-, and LR- Series Wells for May. (first event only).
Removal	Apr 9	Apr 23	May 7	May 21	Jun 4	Jun 18	Remove leachate from LCW-1, -2, -3, and -4 wells. (LCW-4 dependent on levels measured on May 5)

<b>LEACHATE REMOVAL EVENTS AND TASK SCHEDULE (3<sup>rd</sup> Quarter 2003)</b>							
	<b>April 2003 Removal Events</b>		<b>May 2003 Removal Events</b>		<b>June 2003 Removal Events</b>		<b>Task</b>
	<b>First Event</b>	<b>Contingency Event</b>	<b>First Event</b>	<b>Contingency Event</b>	<b>First Event</b>	<b>Contingency Event</b>	
Pre-Pumping Monitoring	Jul 7	Jul 21	Aug 4	Aug 18	Sep 8	Sep 22	LCW- and SWW- Series Wells for Jul, Aug, Sep. LCW-, SWW-, M-, and LR- Series Wells for Aug. (first event only).
Removal	Jul 9	Jul 23	Aug 6	Aug 20	Sep 10	Sep 24	Remove leachate from LCW-1, -2, -3, and -4 wells. (LCW-4 dependent on levels measured on Aug 6)

**ANTICIPATED DELAYS/PROBLEMS:**

- None

**RESULTS OF FIELD ACTIVITIES:**

- Ground-water elevation data collected on January 6 and 20, February 3 and 17, and March 3 and 17, 2003 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 (See Attachment 3)
- Waste Treatment/Disposal Certifications (See Attachment 4)

***JANUARY 2003***

**January 8, 2003**

Manifest #	Amount (gal)	Date Removed
NYG2534886	5,284	1/8/03
NYG2534877	5,253	1/8/03

*January 8, 2003 Total = 10,537 gallons*  
*January 2003 Total = 10,537 gallons*

***FEBRUARY 2003***

**February 5, 2003**

Manifest #	Amount (gal)	Date Removed
NYG2534904	4,608	2/5/03
NYG2534895	5,296	2/5/03

*February 5, 2003 Total = 9,904 gallons*  
*February 2003 Total = 9,904 gallons*

***MARCH 2003***

**March 5, 2003**

Manifest #	Amount (gal)	Date Removed
NYG2534913	5,034	3/5/03
NYG2534922	4,862	3/5/03

*March 5, 2003 Total = 9,896 gallons*  
*March 2003 Total = 9,896 gallons*

• **CUMULATIVE REMOVAL QUANTITIES**

Cumulative gallons removed during quarter  
under OMM Plan - *January through March 2003*

**30,377**

**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>	
	1992 (2/98 -12/98)	221,808
	1993	337,619
	<u>1994 (1/94-10/94)</u>	<u>254,898</u>
	<i>Subtotal</i>	814,325
1994 IGR Order (10/94 - 10/98)	<i>DuPont:</i>	
	1994 (From 10/94)	50,683
	1995	279,164
	1996 (To 5/96)	<u>119,901</u>
	<i>Subtotal (To 5/96)</i>	449,748
	<i>BFI/CECOS:</i>	
	1996	163,446
	1997	269,371
	<u>1998 (1/98-10/98)</u>	<u>207,541</u>
	<i>Subtotal</i>	640,358
	<i>94 IGR Order Total</i>	1,090,106
<b>Final IGR Total</b>		<b>1,904,431</b>
OMM Consent Decree (Beginning 11/98)	<i>BFI/CECOS:</i>	
	1998 (11/98-12/98)	18,423
	1999	177,710
	2000	196,613
	2001	130,212
	2002	118,592
	<u>2003</u>	<u>30,337</u>
<i>OMM Subtotal</i>	671,887	
<b>GRAND TOTAL</b>		<b>2,576,318</b>

• **LEACHATE DISPOSAL DOCUMENTATION**

**January 8, 2003**

<b>BFI/CECOS Work Order Number</b>	<b>Manifest #</b>	<b>Date Disposed</b>
285582	NYG2534877	1/8/03
285583	NYG2534886	1/8/03

**February 5, 2003**

<b>BFI/CECOS Work Order Number</b>	<b>Manifest #</b>	<b>Date Disposed</b>
285621	NYG2534904	2/5/03
285622	NYG2534895	2/5/03

**March 5, 2003**

<b>BFI/CECOS Work Order Number</b>	<b>Manifest #</b>	<b>Date Disposed</b>
285675	NYG2534913	3/5/03
285676	NYG2534922	3/5/03

**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.

File on eDOCs  Yes \_\_\_\_\_ No  
Site Name PAS  
Site No. 738001  
County Oswego  
Town Oswego  
Foilable  Yes \_\_\_\_\_ No  
File Name 2003-04-01 - Q1-03 Report  
eDOC \_\_\_\_\_