

ANNUAL PROGRESS REPORT – Future

Operation, Maintenance and Long-term Monitoring Activities

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

PERIOD COVERED: JULY 2011 – JUNE 2012

ACTIONS PLANNED FOR THE YEAR

- Removal activities will be performed during the period July 2011 through June 2012 at the PAS Oswego Site (Site) in accordance with the Operation, Maintenance and Long-term Monitoring (OMM) Activities Plan (BBL, 1998). The OMM activities will include pumping approximately 15,000 to 20,000 gallons per month from July 2011 through December 2011 and approximately 10,000 gallons per month for the period January 2012 through June 2012 or whatever volume can be efficiently removed during a one-day pumping event up to 10,000 gallons.
- Leachate removed from the leachate collection system will continue to be discharged to the City of Oswego Eastside Wastewater Treatment Facility as the primary leachate treatment and disposal option identified in EPA's September 2010 Explanation of Significant Differences issued for the PAS Site. A City of Oswego Eastside Wastewater Treatment Facility official will be notified of each date that leachate is planned to be discharged into the City of Oswego sanitary sewer system. The City of Auburn New York Wastewater Treatment Facility will continue to be retained as the contingent leachate treatment and disposal option in the unlikely event that the primary treatment and disposal option becomes unavailable.
- The amount of leachate discharged during each removal event, along with flow totalizer, pH and temperature readings, will be recorded. The level of leachate remaining in the leachate collection tank after each leachate removal event will also be recorded.
- Quarterly leachate discharge monitoring reports will be prepared describing the quantity of leachate discharged to the Eastside Wastewater Treatment Facility during each leachate removal event. Such reports will be submitted to the City as required by the PAS Site Wastewater Discharge Permit issued in July 2010. Sampling of the PAS leachate discharge will continue to be conducted on a semi-annual basis as required by the permit.
- Quarterly ground-water elevation monitoring is scheduled to be conducted on August 4 and November 9, 2011 and February 8 and May 9, 2012. The following wells were added to quarterly ground-water elevation monitoring events beginning in November 2007: OS-1, OS-3, OI-1, OD-3, LD-3, LD-4, LD-5, LD-6, LD-8, and LS-6. These wells were added to elevation monitoring to evaluate their potential for abandonment.

- The grass on the slurry wall cap will be mowed and vegetation will be removed from the two concrete drainage troughs as necessary.
- Site inspection and maintenance activities will be conducted monthly in combination with each leachate removal event. Additional site inspection and maintenance visits will also be conducted on a quarterly basis. Inspection and maintenance activities at this site include the following:
 - Visually inspect the slurry wall vegetated cap for signs of burrowing vermin or surface anomalies.
 - Visually inspect the leachate collection system equipment to verify proper operation of the leachate collection pumps, the leachate discharge pump, flow meter, heat trace power panel, lighting and main power panel.
 - The french drainage system and concrete troughs will be inspected.
 - The perimeter security fence will be inspected to ensure the integrity and the security of the site is maintained. Repairs to a section of fencing located along the northeast perimeter of the site is anticipated.
- A request to abandon several aging monitoring wells, particularly the LD-series wells, originally was discussed with EPA in 2006. A request to abandon these wells was further discussed in a meeting with EPA in 2009 and most recently requested in the July 2010 Annual Progress Report. Approval is requested to abandon the LD-series monitoring wells in the fall of 2011. Figure 3 shows the locations of the LD-series wells proposed for abandonment. Table 2 provides the construction details for these wells.
- Semi-annual sampling of long-term groundwater monitoring wells LR-6, LR-8 and M-21 and leachate collection wells LCW-2 and LCW-4 is scheduled to be conducted on November 7-8, 2011 and May 7-8, 2012.
- PAS Site Operation, Maintenance and Long-term Monitoring Plan will be updated and submitted to EPA.
- The Institutional Control Implementation Plan (ICIP) includes requirements for the period following the execution and recording of the Easement, which were documented in the approved Remedial Action Completion Report for the PAS Oswego Superfund Site (de maximis, July 2006). It states that following implementation of institutional controls on the Industrial Precision Products Property, the Site will be inspected on an annual basis to determine whether any intrusive activities have occurred. In addition, building and property records will be reviewed to ascertain whether or not any filings have been made for such activities. The ICIP provides for an annual report summarizing the findings of the inspection and record review to be prepared, along with a certification confirming that operation and maintenance activities will continue, and that that the annual report would be included in the annual OM&M progress report to be submitted to EPA each year.

- The schedule for leachate removal events is provided below.

REMOVAL EVENT SCHEDULE 3RD QUARTER 2011						
	July 2011 Removal		August 2011 Removal		September 2011 Removal	
	Event Date		Event Date		Event Date	
Removal	<i>Jul 6</i>		<i>Aug 4</i>		<i>Sep 6</i>	

REMOVAL EVENT SCHEDULE 4TH QUARTER 2011						
	October 2011 Removal		November 2011 Removal		December 2011 Removal	
	Event Date		Event Date		Event Date	
Removal	<i>Oct 5</i>		<i>Nov 9</i>		<i>Dec 7</i>	

REMOVAL EVENT SCHEDULE 1ST QUARTER 2012						
	January 2012 Removal		February 2012 Removal		March 2012 Removal	
	Event Date		Event Date		Event Date	
Removal	<i>Jan 4</i>		<i>Feb 8</i>		<i>Mar 7</i>	

REMOVAL EVENT SCHEDULE 2ND QUARTER 2012						
	April 2012 Removal		May 2012 Removal		June 2012 Removal	
	Event Date		Event Date		Event Date	
Removal	<i>Apr 11</i>		<i>May 9</i>		<i>Jun 6</i>	

NOTE: Each monthly removal event includes water level elevation monitoring at all LCW- and SWW- Series wells. In addition, quarterly water level elevation monitoring will be conducted at the M-, LR-, LD-, OS-, OD-, and OI- Series monitoring wells during the removal events in February, May, August and November. Semi-annual sampling will be conducted at long-term monitoring wells LR-6, LR-8 and M-21 and leachate collection wells LCW-2 and LCW-4 on November 7-8, 2011 and May 7-8, 2012.