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Ms. Patricia Simmons-Pierre  
Project Manager  
Central New York Remediation Section  
USEPA Region 2  
290 Broadway, 20<sup>th</sup> Floor  
New York, NY 10007-1866

Subject:

Pollution Abatement Services Superfund Site – Fourth Operable Unit  
Oswego, New York  
2011 Annual Progress Report

Dear Ms. Simmons-Pierre:

On behalf of National Grid, please find enclosed the Annual Progress Report, which describes the activities performed during 2011 in connection with the fourth operable unit (OU4) at the Pollution Abatement Services (PAS) Superfund Site located in Oswego, New York. The report has been prepared in accordance with the requirements outlined in Section X of the Consent Decree for OU4 between the USEPA and the Settling Defendants (National Grid and General Motors) lodged by the Court on December 15, 1998. Please note that the Settling Defendants originally included General Motors, though they have since underwent reorganization due to bankruptcy proceedings and are no longer involved with this project.

As stated in the Annual Progress Report, monitoring was not conducted in 2011, but will continue in 2012, and subsequently in two year intervals, until changed with USEPA concurrence. The monitoring will include sampling and analysis of sediments, sediment traps, and fish tissue.

Please feel free to call me at (518) 452-7826 (ext. 21) if you have any questions regarding the enclosed.

Sincerely,

ARCADIS

David K. Rigg  
Principal Scientist

Date:

February 15, 2012

Contact:

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Our ref:

B0036444.0012

**ARCADIS**

Ms. Patricia  
Simmons-Pierre  
February 15, 2012

Enclosure

Copies:

Carol Berns, New York/Caribbean Superfund Branch, Office of Regional Counsel,  
United States Environmental Protection Agency, Region 2  
Chief, Environmental Enforcement Section, Environment and Natural Resources  
Division, United States Department of Justice, Re: DOJ # 90-11-2-2A  
Payson Long, Division of Hazardous Waste Remediation, New York State  
Department of Environmental Conservation  
Julia Kenney, New York State Department of Health  
Allen M. Hecht, Esq., National Grid  
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**Pollution Abatement Services Superfund Site  
Oswego, New York  
Fourth Operable Unit**

**Annual Progress Report  
Period Covered: January 1, 2011 - December 31, 2011**

This is the twelfth Annual Progress Report for the fourth operable unit (OU4) at the Pollution Abatement Services (PAS) Superfund Site (the Site) located in Oswego, New York. This progress report has been prepared in accordance with the requirements set forth in Section X of the OU4 Consent Decree lodged by the Court on December 15, 1998 between the United States Environmental Protection Agency (USEPA), and National Grid and General Motors Corporation (the Settling Defendants). The activities conducted pursuant to the requirements of the OU4 Consent Decree for the year 2011 are summarized below.

In accordance with the requirements set forth in the OU4 Consent Decree and the September 1997 Record of Decision (ROD) for OU4 (USEPA, 1997), the August 1999 *PCB Long-Term Monitoring Plan* (Plan) was developed by Blasland, Bouck & Lee, Inc. (BBL) (BBL, 1999). BBL (currently ARCADIS) is the USEPA-approved Supervising Contractor identified in the OU4 Consent Decree. The Plan provides a detailed description of the requirements, methods, and procedures for monitoring the polychlorinated biphenyl (PCB) levels in the sediments and biota (fish) in the creeks and wetlands adjacent to the Site. The Plan was approved by the USEPA in a July 22, 1999 letter (USEPA, 1999).

**I. Actions Taken Toward Compliance with the Consent Decree**

On January 7, 2009, USEPA provided comments to the ARCADIS (2008) *Annual PCB Long-Term Monitoring Report*. The comments recommended that rather than reducing the sampling frequency to once every three years (as was proposed in the Annual Report), that the monitoring be conducted once every two years for the next two rounds (i.e., sampling in 2010 and 2012). As such, sampling was not conducted in 2011.

**II. Analytical Results and Data Generated**

No analytical results/data were generated during this reporting period.

**III. Plans and Reports and other Deliverables Completed or Submitted**

No plans, reports, or other deliverables were completed or submitted during this reporting period.

**IV. Planned Activities for 2012**

The activities planned for 2012 will include the continued monitoring of PCBs in sediments, sediment traps, and fish tissue.

**V. Delays Encountered or Anticipated**

No delays were encountered during 2011, and no delays are anticipated during 2012.

**VI. Modifications to Plans or Schedules**

No modifications to the annual monitoring requirements were made in 2011. Monitoring will take place in 2012 as requested by USEPA.

## **VII. Actions Taken in Support of the Community Relations Plan**

In accordance with the requirements of the OU4 Consent Decree, the Settling Defendants will, upon notice by the USEPA, participate in the Community Relations Plan developed by the USEPA. To date, USEPA has not requested any participation by the Settling Defendants. Accordingly, no actions have been taken by the Settling Defendants in support of USEPA's Community Relations Plan.