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Ms. Patricia Simmons-Pierre  
Project Manager  
Central New York Remediation Section  
USEPA Region 2  
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New York, NY 10007-1866

ENVIRONMENT

Subject:  
Pollution Abatement Services Superfund Site – Fourth Operable Unit  
Oswego, New York  
Annual Progress Report - 2013

Dear Ms. Simmons-Pierre:

Date:  
March 7, 2014

On behalf of National Grid, please find enclosed the Annual Progress Report which describes the activities performed during 2013 in connection with the fourth operable unit (OU4) at the Pollution Abatement Services (PAS) Superfund Site located in Oswego, New York.

Contact:  
David K. Rigg

Phone:  
518.250.7379

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 National Grid and GM. As you may know, GM filed for bankruptcy in 2009.

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Our ref:  
B0036444.0012

As stated in the Annual Progress Report, monitoring was not conducted in 2013, and will subsequently continue in two year intervals (next sampling in 2014), until changed with USEPA concurrence. The monitoring includes sampling and analysis of sediments, sediment traps, and fish tissue.

Please feel free to call me at (518) 250-7379 if you have any questions regarding the enclosed.

Sincerely,

ARCADIS of New York, Inc.



David K. Rigg  
Principal Scientist

Imagine the result

Enclosure

Copies:

Carol Berns, New York/Caribbean Superfund Branch, Office of Regional Counsel,  
United States Environmental Protection Agency, Region 2

Payson Long, Division of Hazardous Waste Remediation, New York State  
Department of Environmental Conservation

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**Pollution Abatement Services Superfund Site  
Oswego, New York  
Fourth Operable Unit**

**Annual Progress Report  
Period Covered: January 1, 2013 - December 31, 2013**

This document represents the 2013 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 2013 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 fish in White Creek and Wine Creek. The Plan was approved by the USEPA in a July 22, 1999 letter (USEPA, 1999). The monitoring activities identified in the Plan include sampling of surficial sediments (0 to 3 inch), subsurface sediments (3 to 6 inch and 6 to 12 inch), suspended sediment (trap), and biota (fish). In the third Annual Progress Report (BBL, 2000), BBL proposed that subsurface sediment samples not be collected in the future, and that future long-term monitoring events include the continued collection of surficial sediment, sediment trap, and fish samples in accordance with the Plan. USEPA approved this modification to the Plan on May 30, 2001, as documented in BBL's May 31, 2001 letter to the USEPA (BBL, 2001).

ARCADIS recommended additional modification to the monitoring program (specifically recommending a focus on the collection of fish tissue only) in the ARCADIS *2013 PCB Long-Term Monitoring: 5-Year Review*. On January 27, 2014 USEPA provided comments to the ARCADIS recommendations, and required continued biannual monitoring of fish, and monitoring of a single location for surficial sediment (location SS-301) and sediment trap (location ST-401) beginning in 2014.

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

During this 2013 reporting period, and in accordance with the USEPA-approved Plan, as modified in 2001 and 2009, no PCB monitoring activities were completed in 2013. While no monitoring was conducted, ARCADIS did submit the 2012 Annual Monitoring Report and provided an update of ecological risk evaluation using the 2012 monitoring data. Furthermore, a site visit including ARCADIS Staff, as well as representatives from USEPA, NYSDEC, National Grid, and de maximis occurred on November 14, 2013.

## **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**

The following deliverables were completed by ARCADIS and submitted to USEPA in 2013:

- Annual Progress Report for 2012 (April 16, 2013);
- PCB Long-Term Monitoring: 5-Year Review (July 22, 2013); and
- PCB Long-Term Monitoring Program Report (Risk Evaluation Addendum) (November 20, 2013).

## **IV. Planned Activities for 2014**

The frequency of biota, sediment and sediment trap monitoring will continue at two year intervals for the next three rounds (i.e., sampling in 2014, 2016, 2018) until the next Five-Year Review scheduled for 2018. Recent modifications to the monitoring program are outlined in section VI.

## **V. Delays Encountered or Anticipated**

No delays were encountered during 2013, and no delays are anticipated during 2014.

## **VI. Modifications to Plans or Schedules**

As described in a USEPA response letter (dated January 27, 2014), the biannual monitoring will be modified to include a single location for surficial sediment (location SS-301) and sediment trap (location ST-401) sampling. Fish monitoring will continue unchanged at all five stations.

## **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.