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Subject:
Pollution Abatement Services Superfund Site – Fourth Operable Unit
Oswego, New York
Annual Progress Report - 2019

ENVIRONMENT

Date:
October 25, 2019

Dear Ms. Simmons-Pierre:

Contact:
Jason C. Vogel

On behalf of National Grid, please find enclosed the Annual Progress Report which describes the activities performed during 2019 in connection with the fourth operable unit (OU4) at the Pollution Abatement Services (PAS) Superfund Site located in Oswego, New York.

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315.671.9134

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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 indicated previously, GM filed for bankruptcy in 2009.

Our ref:
B0036444.2018

As stated in the Annual Progress Report, monitoring was not conducted in 2019, and will subsequently continue in two-year intervals (next sampling in 2020), until changed with USEPA concurrence. The monitoring includes sampling and analysis of sediments, sediment traps, and fish tissue.

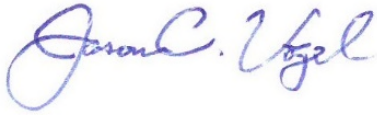
Please feel free to call me at 315.671.9134 if you have any questions regarding the enclosed.

Ms. Patricia Simmons-Pierre

October 25, 2019

Sincerely,

Arcadis of New York, Inc.



Jason C. Vogel
Senior Ecologist

Copies:

Marla Wieder, New York Caribbean Superfund Branch/ Regional Criminal Enforcement Counsel, Office of Regional Counsel, United States Environmental Protection Agency, Region 2 (via e-mail)

Payson Long, Division of Hazardous Waste Remediation, New York State Department of Environmental Conservation (via e-mail)

Julia Kenney, New York State Department of Health (via e-mail and U.S. mail)

John Parkinson, Esq., National Grid (via e-mail)

Steve Beam, National Grid (via e-mail)

Richard R. Capozza, Esq., Hiscock and Barclay, LLP (via e-mail)

John C. Brussel, P.E., Arcadis (via e-mail)

Enclosures:

Attachments

Annual Progress Report - Period Covered: January 1, 2019 - December 31, 2019

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

**Annual Progress Report
Period Covered: January 1, 2019 - December 31, 2019**

This document represents the 2019 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 2019 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 2019 reporting period, and in accordance with the USEPA-approved Plan, as modified in 2001, 2009, and 2014, no PCB monitoring activities were completed. While no monitoring was conducted in 2019, Arcadis did submit the 2018 Annual Monitoring Report and provided an update of ecological risk evaluation using the 2018 monitoring data.

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 Annual Progress Report for 2018 was submitted on April 4, 2019.

IV. Planned Activities for 2020

Biota monitoring will continue at two-year intervals (with the next round performed in 2020) until the next Five-Year Review scheduled for 2023.

V. Delays Encountered or Anticipated

No delays were encountered during 2019, and no delays are anticipated during 2020.

VI. Modifications to Plans or Schedules

As part of the 2018 Monitoring Report, Arcadis recommended discontinuing sediment and sediment trap sampling and continuing with the biota monitoring only for the next two rounds of sampling beginning in 2020. The most recent data indicate that both sediment and sediment trap PCB concentrations are below the general sediment cleanup value of 1 milligram per kilogram. Additionally, sediment (and mobile material from sediment traps) are less important media for PCB exposure compared to fish. No changes were recommended for the biota monitoring.

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.