

Ms. Patricia Simmons-Pierre
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Date: October 15, 2021
Our Ref: 30038471 #10
Subject: Pollution Abatement Services Superfund Site
Fourth Operable Unit
Oswego, New York
2021 Annual Progress Report

Dear Ms. Simmons-Pierre,

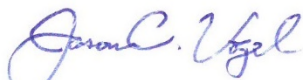
On behalf of National Grid, please find enclosed the Annual Progress Report describing the activities performed during 2021 in connection with the fourth operable unit (OU4) at the Pollution Abatement Services (PAS) Superfund Site located in Oswego, New York.

The report has been prepared in accordance with the requirements outlined in Section X of the Consent Decree for OU4 between the United States Environmental Protection Agency (USEPA) and the Settling Defendants (National Grid and General Motors [GM]) lodged by the Court on December 15, 1998. Although the Settling Defendants originally included National Grid and GM, please recall that GM filed for bankruptcy in 2009.

As indicated in the Annual Progress Report, monitoring was not conducted in 2021. Monitoring is being performed in two-year intervals (next sampling in 2022) to support the pending sixth Five-Year Data Review Report by USEPA in 2023. The monitoring includes sampling and analysis of fish tissue only in accordance with USEPA comments on the 2018 Annual PCB Long-Term Monitoring Report (Arcadis, 2019) provided on April 30, 2020.

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

Sincerely,
Arcadis of New York, Inc.



Jason C. Vogel
Senior Scientist

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Direct Line: 315.671.9134

Ms. Simmons-Pierre
USEPA Region 2
October 15, 2021

CC: 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)
Angela Martin, 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., Barclay Damon, LLP (via e-mail)
John C. Brussel, P.E., Arcadis (via e-mail)

Enclosures: Annual Progress Report - Period Covered: January 1, 2021 - December 31, 2021

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

**Annual Progress Report
Period Covered: January 1, 2021 - December 31, 2021**

This document represents the 2021 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 2021 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). Since the Plan was developed, several adjustments were made to the scope of work, with USEPA approval, as described below:

- The third Annual Progress Report (BBL, 2000) proposed that subsurface sediment samples are not collected. 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).
- On January 7, 2009, USEPA provided comments to the Arcadis (2008) *Annual PCB Long-Term Monitoring Report* recommending 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).
- On January 27, 2014, USEPA provided comments to the 2013 *PCB Long-Term Monitoring: 5-Year Review* (Arcadis, 2013) in which Arcadis recommended discontinuing surficial sediment and sediment trap sampling, since sediment PCB concentrations for most locations were below the site cleanup value of 1 milligram per kilogram (mg/kg). USEPA agreed with discontinuing the sediment samples from all locations except for Location 3 and all sediment trap locations except for Location 4, since these locations had PCB levels above 1 mg/kg in recent sampling events.

- Based on the fifth Five-Year Data Review Report prepared by USEPA (2019), it was recommended that the monitoring continue to be conducted once every two years for the next two rounds (i.e., sampling in 2020 and 2022).
- On April 30, 2020, USEPA provided comments on the *2018 Annual PCB Long-Term Monitoring Report* (Arcadis, 2019) in which Arcadis recommended discontinuing the remaining surficial sediment and sediment trap sampling since the sediment PCB concentrations had declined to levels below the site cleanup value of 1 mg/kg. USEPA agreed with discontinuing the surficial sediment and sediment trap sampling. As a result, starting with the 2020 monitoring activities, only fish samples were collected as part of the biennial monitoring.

I. Actions Taken Toward Compliance with the Consent Decree

During this 2021 reporting period, and in accordance with the USEPA-approved Plan no PCB monitoring activities were completed. While no monitoring was conducted in 2021, Arcadis did submit the 2020 Annual Monitoring Report and provided an update of ecological risk evaluation using the 2020 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 2020 was submitted on May 3, 2021.

IV. Planned Activities for 2022

The frequency of biota monitoring will continue at two-year intervals for the next round (i.e., sampling in 2022) until the next Five-Year Review scheduled for 2023.

V. Delays Encountered or Anticipated

No delays were encountered during 2021, and no delays are anticipated during 2022.

VI. Modifications to Plans or Schedules

No modifications to the annual monitoring requirements were made in 2021. Monitoring will take place in 2022 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 USEPA, participate in the Community Relations Plan developed by 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.