

December 12, 2019

Mr. David Szymanski
Division of Solid and Hazardous Waste
NYSDEC, Region 9
270 Michigan Avenue
Buffalo, NY 14203-2999

Re: National Grid Dewey/Kensington Service Center (Site #915144)
PRR

Dear David:

Enclosed for your review is the Periodic Review Report (PRR) for the National Grid Dewey/Kensington Service Center Site (Site No. 915144).

The PRR includes the following from the period November 1, 2018 – November 1, 2019:

- Attachment 1 – PRR
- Attachment 2 – PRR Certification Form

If you have any questions, please feel free to contact me at 315.428.5652.

Sincerely,



for SPS

Steven P. Stucker, C.P.G.
Lead Environmental Engineer

ecc: Kelly Lewandowski - NYSDEC
Lisa Montesano – NG
Devin Shay- Groundwater & Environmental Services, Inc.

Periodic Review Report – National Grid Dewey/Kensington Service Center (Site #915144)

Reporting Period – November 01, 2018 to November 01, 2019

I. Introduction

A. Brief Site Summary –

The National Grid Dewey/Kensington Service Center Site (#915144) is located in Buffalo, New York. National Grid owns the property and services its customers from the active facility. Service trucks, equipment, and materials are stored and maintained on-site. A mechanic's shop, several administrative buildings, an above ground fuel island, and an employee parking lot are currently located on-site and are part of the service center.

Prior to 1992, the service center also served as a hazardous waste management facility permitted by the New York State Department of Environmental Conservation (NYSDEC) (Part 373 Permit No. 9-1402-00397/00001-0). National Grid stored spent electrical transformers containing polychlorinated biphenyl- (PCB-) laden oil, various solid wastes, and bulk waste oils on-site. Some liquid wastes were stored within underground storage tanks (USTs). The hazardous waste management facility was closed in December 1992, in accordance with a NYSDEC-approved closure plan.

During excavation activities in the mid 1990s, it was discovered that soil and groundwater were contaminated near a UST identified as Solid Waste Management Unit (SWMU) #7. Multiple USTs were subsequently removed, and an investigation including the advancement of soil borings and the installation of groundwater monitoring wells was completed. A remedial action was completed in 2002 and a long-term groundwater monitoring program was implemented.

On October 3, 2011, National Grid received official notification that the site was deleted from the New York State Registry of Inactive Hazardous Waste Disposal Sites (letter from Ms. Kelly Lewandowski, NYSDEC Chief Site Control Section, to Mr. Chuck Willard, NG SIR Director).

B. **Remedial Program Effectiveness** – During the reporting period (November 01, 2018, to November 01, 2019), the long-term remedial objectives were met for the site.

C. **Remedial Program Compliance** - The major elements within the Institutional Control/Engineering Control(s) (IC/EC) Plan are in compliance.

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- D. **Remedial Program Recommendations** - It is recommended that no changes be made to the IC/EC Plan. It is recommended that the Project Review Report (PRR) submittal frequency (annual) remain the same. The next PRR submittal deadline would be December 1, 2020.

II. Site Overview

A. Site Location and Boundaries –

The Dewey/Kensington Service Center is an active National Grid facility, encompasses approximately 23 acres, and is generally located within the center of Buffalo, New York in a predominantly residential area. To the west are Delaware Park, Canisius College, and Forest Lawn Cemetery; to the east are Fillmore Junior High School and the Erie County Medical Center; immediately to the west are the St. Mary School and Sisters of Charity Hospital; and to the south is a four lane expressway.

The site is bordered to south by Kensington Avenue and to the north by Dewey Avenue. The New York Central Railroad tracks boarder the site to the east. The expressway runs along the western side of the site.

B. Regulatory History and Remedy Features –

In September 1992, excavation activities at the facility, in the vicinity of Building #13, revealed petroleum-impacted gravel and a broken vent line connected to an underground waste oil tank. The former waste oil tank was removed and four groundwater monitoring wells (ESI-1, ESI-2, ESI-3, and ESI-4) were installed in the vicinity of the former tank to supplement an existing monitoring well (MW-1) and to facilitate periodic groundwater monitoring in this area.

In February 1994, National Grid agreed to conduct a focused Resource Conservation and Recovery Act (RCRA) Facility Assessment- (RFA-) type soil and groundwater investigation, and a Focused Risk Assessment/ Corrective Measures Study (FRA/CMS) to address the concerns identified by the RFA.

During Fall 1994, National Grid conducted soil and groundwater investigation activities in accordance with the NYSDEC-approved *Soil and Groundwater Investigation Work Plan* (1994). These investigations showed the presence of several volatile organic compounds (VOCs) and polychlorinated biphenyls (PCBs) in groundwater at concentrations above NYSDEC Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1 – *Ambient Water Quality Standards and Guidance Values* (NYSDEC, 1998, amended 2000). Based on these results, NYSDEC requested

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implementation of the quarterly groundwater monitoring program proposed in the *SWMU #7 Soil/Groundwater Investigation Report (1994)*.

The *SWMU #7 Focused Risk Assessment and Corrective Measures Study Report (FRA/CMS Report) (1995, revised 1996)* concluded that the limited action alternative (i.e., implementing a groundwater monitoring program) would adequately meet the corrective measure objective of mitigating the offsite migration of impacted groundwater. Following the initial submittal of the FRA/CMS Report, a *Groundwater Sampling and Analysis Plan (SAP) (1996)* was submitted to NYSDEC in May 1996. The May 1996 SAP was then revised based upon NYSDEC comments, and the revised SAP for the groundwater monitoring program was presented in the revised FRA/CMS Report dated June 1996.

In November 1997, National Grid entered into a Consent Order with NYSDEC to guide future site monitoring and to establish a framework for implementing additional site investigation or remediation. As mandated in the Consent Order, semiannual (spring and fall) groundwater monitoring events are conducted at SWMU #7 monitoring wells. The list of wells sampled during each groundwater monitoring event has been modified through time in response to NYSDEC requirements and the results of investigation/evaluation activities, as agreed to by NYSDEC.

The Consent Order specifies that a contingency plan must be implemented to evaluate additional remedial activities if analytical results from monitoring wells located at the property boundary indicate an exceedance of NYSDEC groundwater quality standards presented in TOGS 1.1.1 for two consecutive monitoring events. The monitoring wells designated as property boundary wells have changed, as new monitoring wells have been installed as part of the contingency plan implementation. For example, monitoring wells MW-7 and MW-9 were designated as property boundary wells in the Consent Order. In 1999, the property boundary wells included monitoring wells MW-6, MW-7, MW-11, MW-12, and MW-14. The current property boundary well arrangement includes monitoring wells MW-6, MW-11, MW-12, MW-20, MW-21, and MW-24 (installed spring 2002).

III. Evaluate Remedy Performance, Effectiveness, and Protectiveness

- A. **Evaluation of Remedy Performance** - The wells are part of the remedy performance. However, there is no current requirement for a site inspection of the existing facility buildings, fences, or fuel tanks. Based on the well inspections and analytical data, the remedy performance has been effective in protecting facility workers and the public.

IV. IC/EC Plan Compliance Report

A. IC/EC Requirements and Compliance

1. IC/EC Controls

The ICs/ECs included:

- Semi-annual groundwater monitoring well inspections of the following wells: MW-1, MW-2, MW-5, MW-6, MW-7, MW-9, MW-10, MW-11, MW-12, MW-13, MW-15, MW-16, MW-17, MW-19, MW-20, MW-21, MW-24, MW-25, and ESI-1.
- Annual groundwater monitoring well sampling and analysis of the following wells: MW-1, MW-6, MW-9, MW-11, MW-12, MW-20, MW-21, MW-24.

2. IC/EC Goals - Each goal is being met and/or working effectively.

3. IC/EC Corrective Measures – No deficiencies were noted during the semi annual inspections.

4. IC/EC Conclusions/Recommendations – The program is in compliance and there are no recommendations at this time. During the April 2019 monitoring event, NYSDEC AWQS for PCBs were exceeded in the samples collected at wells MW-1 and MW-9. All monitoring wells downgradient of MW-1 and MW-9 that were sampled (MW-6, MW-11, MW-12, MW-20, MW-21, and MW-24) exhibited concentrations below laboratory detection limits for PCBs.

B. IC/EC Certification – Refer to PRR Form - Attachment 1 for the certification.

V. Monitoring Plan Compliance Report – The Annual Monitoring Report was submitted to the NYSDEC on December 9, 2019.

VI. Operation & Maintenance (O&M) Plan Compliance Report - Not Applicable

VII. Overall PRR Conclusions and Recommendations

A. Compliance with Site Management Plan (SMP)

1. Requirements - All IC/EC Plan requirements were met during this reporting period.

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2. **Exposure Pathways** – There are no new completed exposure pathways resulting in unacceptable risk.

3. **Proposed Plans and Schedule to Meet Compliance** – No plan proposed.

B. Performance and Effectiveness of the Remedy – The remedy as described by the Record of Decision and executed by National Grid has been effective in meeting the program goals.

C. Future PRR Submittals – The frequency of PRR Submittals should remain annual. Therefore, the next PRR submittal deadline will be December 1, 2020.

VIII. Additional Guidance - Not Needed



Enclosure 2
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form



	Site Details	Box 1
Site No. 915144		
Site Name Niagara Mohawk Dewey Ave. Service Sta.		
Site Address: 144 Kensington Avenue	Zip Code: 14214	
City/Town: Buffalo		
County: Erie		
Site Acreage:		
Reporting Period: November 01, 2018 to November 01, 2019		
		YES NO
1. Is the information above correct?		<input checked="" type="checkbox"/> <input type="checkbox"/>
If NO, include handwritten above or on a separate sheet.		
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?		<input type="checkbox"/> <input checked="" type="checkbox"/>
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?		<input type="checkbox"/> <input checked="" type="checkbox"/>
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?		<input type="checkbox"/> <input checked="" type="checkbox"/>
If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.		
5. Is the site currently undergoing development?		<input type="checkbox"/> <input checked="" type="checkbox"/>
		Box 2
		YES NO
6. Is the current site use consistent with the use(s) listed below? Commercial and Industrial		<input checked="" type="checkbox"/> <input type="checkbox"/>
7. Are all ICs/ECs in place and functioning as designed?		<input checked="" type="checkbox"/> <input type="checkbox"/>
IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.		
A Corrective Measures Work Plan must be submitted along with this form to address these issues.		
_____ Signature of Owner, Remedial Party or Designated Representative		_____ Date

SITE NO. 915144

Box 3

Description of Institutional Controls

Parcel

Owner

Institutional Control

89.16-1-2

National Grid

**Monitoring Plan
O&M Plan**

89.16-1-6

National Grid

**Monitoring Plan
O&M Plan**

Box 4

Description of Engineering Controls

None Required

Not Applicable/No EC's

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

(a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

(d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

**IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and
DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. 915144

Box 6

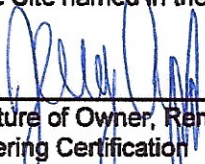
SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1, 2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Gerald Cresap, PE at 5 Technology Place, Suite 4, East Syracuse, NY
print name print business address

am certifying as Agent for National Grid (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.


Signature of Owner, Remedial Party, or Designated Representative
Rendering Certification

12/6/2019
Date

