

November 25, 2024

Mr. Tracey Garland
New York State Department of Environmental Conservation
Division of Environmental Remediation, BURC
625 Broadway
Albany, New York 12233-7014

Re: National Grid Fort Plain Former MGP Site

NYSDEC Site No. 4-29-007 Fort Plain, New York 2024 Periodic Review Report, revision 1

Dear Mr. Garland:

Enclosed for your review is the 2024 Periodic Review Report (PRR) for the National Grid Fort Plain Former MGP Site in Fort Plain, NY. The PRR pertains to the period from September 13, 2023 through September 13, 2024 and includes a brief report and Institutional Controls/Engineering Controls (IC/EC) Certification Form. This report represents the first revision from the original submission, completed on October 9, 2024. Revisions are based on your comments in an email dated November 7, 2024.

Please feel free to contact me at 315.428.5652.

Sincerely,

for SPS

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

ecc: Devin Shay - Groundwater & Environmental Services, Inc.



I. Introduction

A. Brief Site Summary –

The Fort Plain Former MGP site (the site) is located on an approximately 0.5-acre parcel in the Village of Fort Plain, NY, identified as Block 2, Lot 38 on the Village Tax Map Section number 046.54. Gas production from both coal and oil was conducted at the site from 1868 to 1935. A water gas plant and associated "gasometer" were present at the southern end of the property in 1891. A gas holder was present at the north end of the property, along with a coal storage shed, generators, electrical transformers, and a repair shop. The site was previously owned by a predecessor company to Niagara Mohawk Power Corporation. Currently, the site is secured by a chain link fence and a portion of the property is used by National Grid as an electrical substation.

A Remedial Investigation (RI) was initiated in 1998 by Niagara Mohawk, and summarized in the RI Report submitted in May 2004. A Remedial Design Report for the site was approved by the NYSDEC in January 2010, and all approved remediation work was completed by August 2011. As planned, some subsurface residual MGP impacts were left in place and an Environmental Easement was placed on the property. Engineering and Institutional Controls (EC/IC) were implemented as part of the Environmental Easement.

- B. **Remedial Program Effectiveness** During the reporting period (September 13, 2023, to September 13, 2024), 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.
- D. Remedial Program Recommendations It is recommended that no changes be made to the IC/EC Plan. It is recommended that an annual Periodic Review Report (PRR) be submitted. The next PRR submittal deadline would be October 13, 2025.

II. Site Overview

A. Site Location and Boundaries -

The site is a rectangle of approximately 0.5 acre in the Village of Fort Plain, NY, identified as Block 2, Lot 38 on the Village Tax Map Section number 046.54. The site is bordered on the east by Hancock Street (State Route 5S), on the south by a private residence, on the west by a steep wooded bank leading up to Clinton Ave, and on the north by a paved parking lot.

B. Regulatory History and Remedy Features –

On November 7, 2003, National Grid entered into Order on Consent #A4-0473-0000 with the Department to remediate the site. The following documents were submitted as part of the investigation and remediation of the site:



- Preliminary Site Assessment / Interim Remedial Measures Study February 1998
- Phase II Preliminary Site Assessment / Interim Remedial Measures Study March 2000
- Phase III Preliminary Site Assessment / Interim Remedial Measures Study February 2002
- Remedial Investigation Report May 2004
- Additional Investigation Study Report October 2005
- Soil Vapor Evaluation Report May 2006
- Final (100%) Remedial Design Report January 2010.

The following remedial actions were implemented as part of the approved RD:

- Excavation of approximately 1,270 cubic yards of MGP-impacted soil and debris.
- Installation of well EW-1 and extraction of non-aqueous phase liquid (NAPL), if present.
- Addition of amendments and nutrients to the backfill materials used at the northern gas holder excavation to enhance degradation of dissolved benzene, toluene, ethylbenzene, and xylene (BTEX).
- Installation of a cover system at the southern gas holder area.
- Completion of a clean soil and stone cover across the property.
- Execution of an Environmental Easement on the property to restrict land use.
- Implementation of a Site Management Plan (SMP) including EC/IC, periodic monitoring, and periodic reporting.

III. Evaluate Remedy Performance, Effectiveness, and Protectiveness

A. **Evaluation of Remedy Performance** – Quarterly inspections are conducted on the Site features including the groundwater monitoring wells, asphalt pavement (Route 5S Diner parking lot), security fencing/gates, gas holder retaining wall, concrete block retaining wall, former gas holder cap, and storm water drainage system. Semi-annual groundwater sampling is conducted at wells MW-2, MW-3, MW-7, MW-8, MW-9, MW-10, and MW-12. Annual groundwater sampling is conducted at EW-1 during the second half of the year. NAPL collection is conducted at EW-1 if necessary, however NAPL has not been detected in the monitoring well since gauging started occurring in 2012. Well MW-11 was missing for many years, however the well was located in 2022, and properly decommissioned on February 8, 2024, following approval from the NYSDEC. 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:

- Fencing / Access Control: Quarterly site inspection of the perimeter fence and gates are conducted.
- Soil Cover System: Quarterly site inspection of the cover system atop the former southern gas holder.
- Groundwater Monitoring: Semi-Annual low flow groundwater sampling of the following monitoring wells: MW-2, MW-3, MW-7, MW-8, MW-9, MW-10, and MW-12. Annual low flow groundwater sampling of the following monitoring wells: EW-1. The condition of these wells is also inspected quarterly.
- Compliance with the property restrictions outlined in the Environmental Easement.
- 2. IC/EC Goals Each goal is being met and/or working effectively.
- 3. **IC/EC Corrective Measures –** No deficiencies were noted during the quarterly inspections.
- 4. **IC/EC Conclusions/Recommendations –** The EC program is in compliance and there are no recommendations for the program at this time.
- B. IC/EC Certification Refer to PRR Form- Attachment 1 for the certification.
- V. Monitoring Plan Compliance Report The Semi-Annual Monitoring Reports will be submitted in January and June.
- 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.
 - 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 October 13, 2025.
- **VIII. Additional Guidance –** Monitoring well MW-11 was decommissioned on February 8, 2024, with approval from the NYSDEC.



Attachment 1 – IC/EC Certification



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



Sit	Site Details te No. 429007				Box 1	
Sit	e Name NM	- Fort Plain MGP				
Cit Co	e Address: 14 y/Town: Fort unty:Montgor e Acreage: 0	Plain mery	Zip Code: 13339-			
Re	porting Period	d: September 13, 2	2023 to September 13, 202	4		
					YES	NO
1.	Is the inform	ation above correc	t?		\mathbf{X}	
	If NO, includ	e handwritten abov	ve or on a separate sheet.			
2.			erty been sold, subdivided s Reporting Period?	, merged, or undergone a		X
3.		een any change of R 375-1.11(d))?	use at the site during this F	Reporting Period		X
4.	Have any fee		X			
			tions 2 thru 4, include do previously submitted wi			
5.	Is the site cu	ırrently undergoing	development?			X
					Box 2	
					YES	NO
6.		t site use consister and Industrial	nt with the use(s) listed bel	ow?	X	
7.	Are all ICs in	place and function	ning as designed?	X		
			HER QUESTION 6 OR 7 IS E THE REST OF THIS FOR		and	
A	Corrective Me	asures Work Plan	must be submitted along v	with this form to address	these iss	ues.
Sig	nature of Own	er, Remedial Party	or Designated Representativ	ve Date		

SITE NO. 429007 Box 3

Description of Institutional Controls

Parcel Owner Institutional Control

046.54-2-38 Niagara Mohawk Power Corp (National Grid

IC/EC Plan

Soil Management Plan

Monitoring Plan

Site Management Plan

Ground Water Use Restriction

Landuse Restriction

- 6. Imposition of an institutional control in the form of an environmental easement that will require (a) limiting the use and development of the property to commercial use, which will also permit industrial use; (b) compliance with the approved site management plan; (c) restricting the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by NYSDOH; and (d) the property owner to complete and submit to the Department a periodic certification of institutional and engineering controls.
- 7. Development of a site management plan which will include the following institutional and engineering controls: (a) management of the final cover system to restrict excavation below the soil cover's demarcation layer, pavement, or buildings. Excavated soil will be tested, properly handled to protect the health and safety of workers and the nearby community, and will be properly managed in a manner acceptable to the Department; (b) continued evaluation of the potential for vapor intrusion for any buildings developed on the site, including provision for mitigation of any impacts identified; (c) monitoring of groundwater; (d) identification of any use restrictions on the site; (e) fencing to control site access as a typical security measure; (f) provisions for the continued proper operation and maintenance of the components of the remedy.

Box 4

Description of Engineering Controls

Parcel <u>Engineering Control</u>

046.54-2-38

Fencing/Access Control

Cover System

Box	5
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	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 Engineering Control 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 compete.	
	YES NO	
	f X	
2.	For each Engineering control listed in Box 4, I certify by checking "YES" below that all of the following statements are true:	
	(a) The 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	
	old X	
	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. 429007

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 <u>Gerald Cresap, PE</u> print name	at <u>6780 Northern Blvd. Suite 10</u> print busine	00, East Syracuse, NY, ess address
am certifying asagent for Natio	onal Grid	(Owner or Remedial Party)
for the Site named in the Site Details Signature of Owner, Remedial Party Rendering Certification	HE OF NEW LO	10-9-2029 Date
	087401 (E)	

EC CERTIFICATIONS

Box 7

Qualified Environmental Professional Signature

I certify that all information in Boxes 4 and 5 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.

١_	Gerald Cresap, PE	_at _	6780 Northern Blvd. Suite 100, East Syracuse, NY						
	print name		print business address						
an	n certifying as a Qualified Environment	al Pr	ofessional for the agent for National Grid						
(Owner or Remedial Party)									
	OF NEW								

Signature of Qualified Environmental Profession the Owner or Remedial Party, Rendering Certification

ation (Required for PE)

Date

2024 Periodic Review Report National Grid Fort Plain Former MGP Site 14 Hancock Street, Fort Plain, NY 13339



Attachment 2 – Quarterly Inspection Checklists

Date:	10/19/2023			
Technician:	KL			

Time:	8:30		
Weather:	Cloudy 49		

Site Controls							
Fence Condition	GOOD FAIR		DAMAGED	COMMENTS:SW Corner has small damage from tree			
Main Gate Condition	GOOD	FAIR		DAMAGED	COMMENTS:		
Padlock-NG/GES	OPERATIONAL		NON-C	PERATIONAL	COMMENTS:		

General Site Conditions									
Condition of Monitoring Wells	GOOD	FAIR	POOR	COMMENTS:					
Condition of Pavement (Rt. 5S Diner)	GOOD	FAIR	POOR	COMMENTS:					
Evidence of Intrusive Activities	NONE	MINOR	SIGNIFICANT	COMMENTS:					
Evidence of Settlement	NONE	MINOR	SIGNIFICANT	COMMENTS:					

NOTE: Asphalt pavement on surrrounding properties is not part of the Site Remedy.

Former MGP Property Cover system									
Vegetative Growth	NONE	MINOR	SIGNIFICANT	COMMENTS:					
Borrowing or Depressions	NONE	MINOR	SIGNIFICANT	COMMENTS:					
Evidence of Settlement	NONE	MINOR	SIGNIFICANT	COMMENTS:					
Evidence of Sedimentation	NONE	MINOR	SIGNIFICANT	COMMENTS:					
Missing Stone	NONE	MINOR	SIGNIFICANT	COMMENTS:					
Standing Water	NONE	MINOR	SIGNIFICANT	COMMENTS:					
Damage or Failure	NONE	MINOR	SIGNIFICANT	COMMENTS:					

Drainage Swale								
Vegetative Growth	NONE	MINOR	SIGNIFICANT	COMMENTS:				
Evidence of Sedimentation	NONE	MINOR	SIGNIFICANT	COMMENTS:				
Missing Stone	NONE	MINOR	SIGNIFICANT	COMMENTS:				
Standing Water	NONE	MINOR	SIGNIFICANT	COMMENTS:				
Damage or Failure	NONE	MINOR	SIGNIFICANT	COMMENTS:				

Drainage Basin									
Condition of Basin	GOOD	FAIR	POOR	COMMENTS:					
Evidence of Sedimentation	NONE	MINOR	SIGNIFICANT	COMMENTS:					
Depth to Water	1.87 feet below ground surface			COMMENTS:					

Concrete Block Retaining Wall (north of the former MGP property)				
Condition of Wall GOOD FAIR POOR COMMENTS:				

NOTE: Concrete block retaining wall is not part of the Site Remedy.

Southern Gas Holder Retaining Wall				
Condition of Wall	GOOD	FAIR	POOR	COMMENTS:small possible collapse still secure

Hillside (west of the former MGP property)				
Condition of Hill	GOOD	FAIR	POOR	COMMENTS:
Any Obvious Movement	NONE	MINOR	SIGNIFICANT	COMMENTS:

Site Monitoring Wells			
Well ID	Locatio	n Secure	
EW-1	YES	NO	
MW-2	YES	NO	
MW-3	YES	NO	
MW-6	Destroyed		
MW-7	YES	NO	
MW-8	YES	NO	
MW-9	YES	NO	
MW-10	YES	NO	
MW-11	YES	NO	
MW-12	YES	NO	

General Comments:

NYSDEC Brad Demo on-site

Date:	1/11/2024	
Technician:	Kevin Leo	

Time: 12:30
Weather: Cloudy 37

Site Controls			
Fence Condition	Good	COMMENTS:	
Main Gate Condition	Good	COMMENTS:	
Padlock-NG/GES	Operational	COMMENTS:	

General Site Conditions		
Condition of Monitoring Wells	Good	COMMENTS:
Condition of Pavement (Rt. 5S Diner)	Good	COMMENTS:
Evidence of Intrusive Activities	None	COMMENTS:
Evidence of Settlement	None	COMMENTS:

NOTE: Asphalt pavement on surrrounding properties is not part of the Site Remedy.

Former MGP Property Cover system			
Vegetative Growth	None	COMMENTS:	
Borrowing or Depressions	None	COMMENTS:	
Evidence of Settlement	None	COMMENTS:	
Evidence of Sedimentation	None	COMMENTS:	
Missing Stone	None	COMMENTS:	
Standing Water	None	COMMENTS:	
Damage or Failure	None	COMMENTS:	

Drainage Swale		
Vegetative Growth	None	COMMENTS:
Evidence of Sedimentation	None	COMMENTS:
Missing Stone	None	COMMENTS:
Standing Water	None	COMMENTS:
Damage or Failure	None	COMMENTS:

Drainage Basin			
Condition of Basin	Good	COMMENTS:	
Evidence of Sedimentation	None	COMMENTS:	
Depth to Water	5 feet below ground surface	COMMENTS:	

Concrete Block Retaining Wall (north of the former MGP property)		
Condition of Wall	Good	COMMENTS:

NOTE: Concrete block retaining wall is not part of the Site Remedy.

Southern Gas Holder Retaining Wall			
Condition of Wall	Good	COMMENTS:	

Hillside (west of the former MGP property)		
Condition of Hill	Good	COMMENTS:
Any Obvious Movement	None	COMMENTS:

Site Monitoring Wells	
Well ID	Location Secure
EW-1	Yes
MW-2	Yes
MW-3	Yes
MW-6	Destroyed
MW-7	Yes
MW-8	Yes
MW-9	Yes
MW-10	Yes
MW-11	Yes
MW-12	Yes

General Comments:

Date:	4/11/2024
Technician:	Kevin I eo

Time: 08:45
Weather: rain 50

Site Controls		
Fence Condition	Good	COMMENTS:
Main Gate Condition	Good	COMMENTS:
Padlock-NG/GES	Operational	COMMENTS:

General Site Conditions		
Condition of Monitoring Wells	Good	COMMENTS:
Condition of Pavement (Rt. 5S Diner)	Good	COMMENTS:
Evidence of Intrusive Activities	None	COMMENTS:
Evidence of Settlement	None	COMMENTS:

NOTE: Asphalt pavement on surrrounding properties is not part of the Site Remedy.

Former MGP Property Cover system			
Vegetative Growth	None	COMMENTS:	
Borrowing or Depressions	None	COMMENTS:	
Evidence of Settlement	None	COMMENTS:	
Evidence of Sedimentation	None	COMMENTS:	
Missing Stone	None	COMMENTS:	
Standing Water	None	COMMENTS:	
Damage or Failure	None	COMMENTS:	•

Drainage Swale		
Vegetative Growth	None	COMMENTS:
Evidence of Sedimentation	None	COMMENTS:
Missing Stone	None	COMMENTS:
Standing Water	None	COMMENTS:
Damage or Failure	None	COMMENTS:

Drainage Basin		
Condition of Basin	Good	COMMENTS:
Evidence of Sedimentation	None	COMMENTS:
Depth to Water	1.43 feet below ground surface	COMMENTS:

Concrete Block Retaining Wall (north of the former MGP property)		
Condition of Wall	Good	COMMENTS:

NOTE: Concrete block retaining wall is not part of the Site Remedy.

	Southern Gas Holder Retaining Wa	all
Condition of Wall	Good	COMMENTS:

Hillside (west of the former MGP property)		
Condition of Hill	Good	COMMENTS:
Any Obvious Movement	None	COMMENTS:

Site Monitoring Wells	
Well ID	Location Secure
EW-1	Yes
MW-2	Yes
MW-3	Yes
MW-6	Destroyed
MW-7	Yes
MW-8	Yes
MW-9	Yes
MW-10	Yes
MW-12	Yes

General Comments:

MW-11 decommissioned 2/8/2024

Date:	7/10/2024	
Technician:	Kevin Leo	

Time: 10:15 Weather: PC 84

	Site Controls	
Fence Condition	Good	COMMENTS:
Main Gate Condition Good COMMENTS:		COMMENTS:
Padlock-NG/GES	Operational	COMMENTS:

General Site Conditions		
Condition of Monitoring Wells	Good	COMMENTS:
Condition of Pavement (Rt. 5S Diner)	Good	COMMENTS:
Evidence of Intrusive Activities	None	COMMENTS:
Evidence of Settlement	None	COMMENTS:

NOTE: Asphalt pavement on surrrounding properties is not part of the Site Remedy.

Former MGP Property Cover system			
Vegetative Growth	None	COMMENTS:	
Borrowing or Depressions	None	COMMENTS:	
Evidence of Settlement	None	COMMENTS:	
Evidence of Sedimentation	None	COMMENTS:	
Missing Stone	None	COMMENTS:	
Standing Water	None	COMMENTS:	_
Damage or Failure	None	COMMENTS:	

Drainage Swale		
Vegetative Growth	None	COMMENTS:
Evidence of Sedimentation	None	COMMENTS:
Missing Stone	None	COMMENTS:
Standing Water	None	COMMENTS:
Damage or Failure	None	COMMENTS:

Drainage Basin		
Condition of Basin	Good	COMMENTS:
Evidence of Sedimentation	None	COMMENTS:
Depth to Water	2.05 feet below ground surface COMMENTS:	

Concrete Block Retaining Wall (north of the former MGP property)		
Condition of Wall Good COMMENTS:		

NOTE: Concrete block retaining wall is not part of the Site Remedy.

	Southern Gas Holder Retaining Wa	all
Condition of Wall	Good	COMMENTS:

Hillside (west of the former MGP property)			
Condition of Hill	Good	COMMENTS:	
Any Obvious Movement None COMMENTS:			

Site Monitoring Wells	
Well ID	Location Secure
EW-1	Yes
MW-2	Yes
MW-3	Yes
MW-6	Destroyed
MW-7	Yes
MW-8	Yes
MW-9	Yes
MW-10	Yes
MW-12	Yes

General Comments:

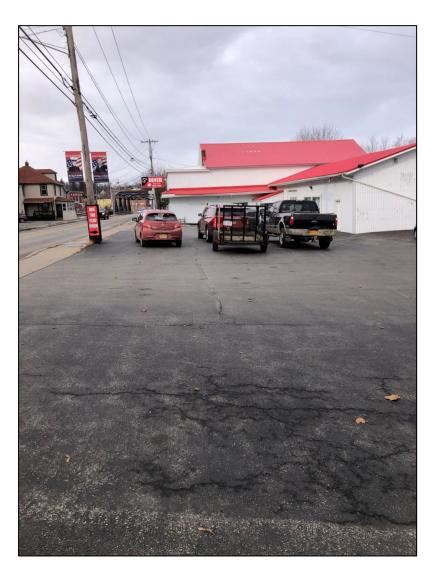






Site Conditions – October 19, 2023





Site Conditions – January 11, 2024





Site Conditions – January 11, 2024







Site Conditions – April 11, 2024







Site Conditions – July 10, 2024