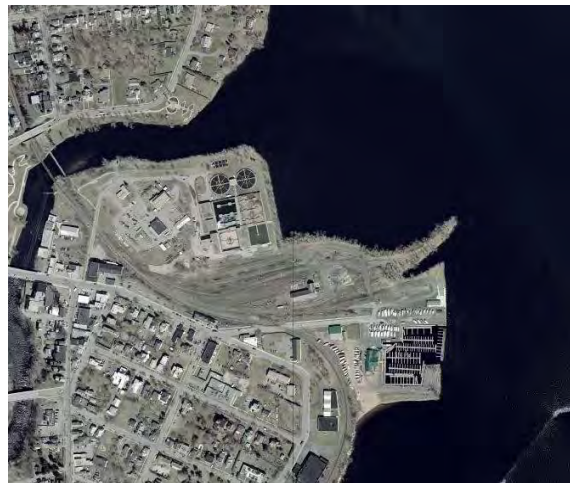

2021 PERIODIC REVIEW REPORT

Bridge Street Former Manufactured Gas Plant Plattsburgh, New York

Prepared for:



NEW YORK STATE ELECTRIC AND GAS CORPORATION



Prepared by:



301 Plainfield Road, Suite 350, Syracuse, New York 13212

SEPTEMBER 2021

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1.0 INTRODUCTION

This Periodic Review Report (PRR) has been prepared as part of the remedial program for the New York State Electric & Gas Corporation (NYSEG) Bridge Street Former Manufactured Gas Plant site located in the City of Plattsburgh, Clinton County, New York (the “Site”) in accordance with an Order on Consent Index # DO-0002-9309, Site # 5-10-016 which was executed on March 30, 1994.

2.0 EXECUTIVE SUMMARY

A former manufactured gas plant (MGP) consisting of one main building with a gas holder and a coal shed operated at the site from 1860 until 1896. Site operations were relocated to an alternate site (Saranac Street) after 1896, and all MGP activities at the Site were discontinued.

The New York State Department of Environmental Conservation (NYSDEC) and NYSEG entered into an Order of Consent (D0-0002-9309) on March 30, 1994 (the Order). Under this Order, NYSEG agreed to investigate and remediate 33 former MGP sites in New York State. The remedial investigation (RI) of the Plattsburgh-Bridge Street former MGP site was completed under the Order. The Remedial Investigation Report (RIR), dated January 15, 2004 presented the findings of the RI. In 2001, during the RI, NYSEG conducted an interim remedial measure (IRM) to locate the former gas holder, remove it, and remove impacted soil at and near the site. The NYSDEC approved the RIR on January 20, 2004 and prepared a Proposed Remedial Action Plan (PRAP) for public review and comment. Following the public comment period, the NYSDEC issued its Record of Decision (ROD) in March 2004 that outlined the remedial plan for the site. As specified in the ROD, NYSEG prepared an Operation, Maintenance, & Monitoring Plan (OM&M Plan), which the NYSDEC approved on August 17, 2004.

NYSEG submitted recommendations regarding the OM&M Plan to the NYSDEC after reviewing the historical data for the site in a letter report entitled *Review of Groundwater Monitoring Results and Trend Analysis*, dated August 12, 2010. In a letter from the NYSDEC dated February 7, 2011, the NYSDEC indicated that MW-10B can be removed from the monitoring network and that the analysis of cyanides and phenols will no longer be required.

In a letter from the NYSDEC dated July 24, 2019, the NYSDEC indicated that, upon review of the 2018 OM&M Report, the frequency of groundwater monitoring events would be revised to occur every 36 months, and Site inspections would be performed annually.

Annual Site inspections were performed between 2019 and 2021 at the Site. Per annual inspection results, institutional controls (ICs) and engineering controls (ECs) appear to be functioning as intended resulting in a continued effective and protective remedy. It is recommended that the Site continue to be inspected annually.

A periodic groundwater monitoring event was performed in 2021. The results of the monitoring event were provided to the NYSDEC in the 2021 OM&M Summary Report in August 2021. It is recommended that the frequency of groundwater monitoring events remain at events performed once per 36-month period.

3.0 SITE OVERVIEW

The Plattsburgh Bridge Street Former MGP Site (the site) is situated on an approximately 0.5 acre lot at 140 Bridge Street in the City of Plattsburgh, New York ([Figure 1](#)). The property is bounded by Bridge Street on the north, an apartment building on the east, residences to the west, and a warehouse facility to the southwest. There are no day-to-day activities performed at the Site. Regular landscape maintenance is completed during the summer months. A one-story utility shed was located at the Site until July 2021 when it was removed.

4.0 ANNUAL INSPECTIONS

Annual Site inspections have been completed since the submittal of the 2018 OMM Summary Report. Site inspections were completed on November 5, 2019, August 20, 2020, and July 7, 2021. Inspection activities consisted of visually observing and documenting the condition of the monitoring wells, including protective casings and covers, and surrounding surface areas. The inspection was performed to confirm that these items are present, functioning properly, and have not been damaged so as to compromise the effectiveness of each feature.

No disturbances to the vegetated surface or concrete sidewalk were observed during each site inspection. Additionally, no signs of restricted land use violations were noted. The site continues to be an empty lot with a regularly mown lawn.

The monitoring wells were inspected for damage during each site inspection. The 2019 inspection found many bolts missing from the well covers for the groundwater monitoring wells. All missing bolts were subsequently replaced. The 2021 inspection found that MW-7BS was missing its well casing plug. All groundwater monitoring wells were found to be in good working condition.

The site contained a small shed used to contain tools and other support equipment associated with groundwater sampling efforts. The 2019, 2020, and 2021 site inspections all note that the shed was in poor condition. The shed was removed from the site and disposed of after the 2021 groundwater sampling event and Site inspection.

The Institutional and Engineering Controls appear to be functioning as intended resulting in a continued effective and protective remedy. Photographs of Site conditions were taken on an annual basis during each Site inspection and are presented in [Appendix A](#) of this PRR. Site inspections forms were completed on an annual basis during each Site inspection and are presented in [Appendix B](#) of this PRR.

The Site restrictions and ECs appear to be in place and functioning as intended. No changes to the OM&M Plan are proposed. [Appendix D](#) includes the appropriate verification and certification forms.

5.0 GROUNDWATER MONITORING PLAN COMPLIANCE

Groundwater monitoring and sampling is performed at the Site on a periodic basis to assess the performance of the remedy. During each sampling event, groundwater samples are collected from the monitoring wells and submitted to a New York State Department of Health Environmental Laboratory Analysis Program (ELAP) approved laboratory for analysis of benzene, toluene, ethylbenzene, and xylenes (BTEX) and polycyclic aromatic hydrocarbons (PAHs).

On July 8th and 9th 2021, groundwater samples were collected from eight (8) groundwater monitoring wells (MW-1B, MW-2B, MW-3B, MW-6B, MW-7BD, MW-7BS, MW-9B, and MW-11B). Monitoring well locations are presented on [Figure 2](#). Field duplicate groundwater samples were collected from MW-7BS for quality control purposes. The 2021 OM&M Summary Report, dated August 2021, summarizes the results of this groundwater sampling events, and was submitted to the NYSDEC.

NAPL was not detected in monitoring wells MW-1B, MW-3B, MW-7BD or MW-7BS, however sheens and/or odors were observed at these locations. NAPL was detected in monitoring wells MW-2B, MW-6B, MW-9B, and MW-11B. Observations within bedrock wells are generally consistent when compared to previous sampling events, with the exception of MW-9B. MW-9B had historically shown little indication of NAPL presence, with the exception of monitoring events in 2006 and 2017. Odors, sheens, and DNAPL blebs were observed in MW-9B during the 2021 monitoring event.

The highest concentrations of BTEX compounds were detected at MW-7BD and were comparable to the concentrations detected during the previous sampling events. In addition, the total BTEX concentrations for MW-1B, MW-2B, MW-3B, MW-6B, MW-7BS, MW-9B, and MW-11B were comparable to concentrations detected during previous monitoring events.

The highest concentrations of total PAHs were detected at MW-2B (10,805 µg/L). However, concentrations of total PAHs detected in MW-2B in July 2021 were generally within the range concentrations detected during previous sampling events. These elevated concentrations are observed following an overall decline from 2008 to 2017. Total PAH concentrations at MW-1B, MW-3B, MW-6B, MW-7BD, MW-7BS, MW-9B, and MW-11B were generally comparable to previous sampling events.

Based on the comparability of groundwater monitoring results from this period to previous monitoring events, it is not recommended that the frequency of occurrence of groundwater monitoring events be changed from the current 36-month interval.

6.0 CONCLUSIONS AND RECOMMENDATIONS

The ICs and ECs established for the Site appear be performing as intended, and the remedial objectives continue to be achieved. No corrective measures are necessary. It is recommended that Site inspections continue on an annual basis, groundwater monitoring continue with a frequency of 36 months, and PRRs be submitted every 3-years.

FIGURES



Plattsburgh, NY

New York Quadrangle

LATITUDE: N 44.696175°
LONGITUDE: W 73.445734°



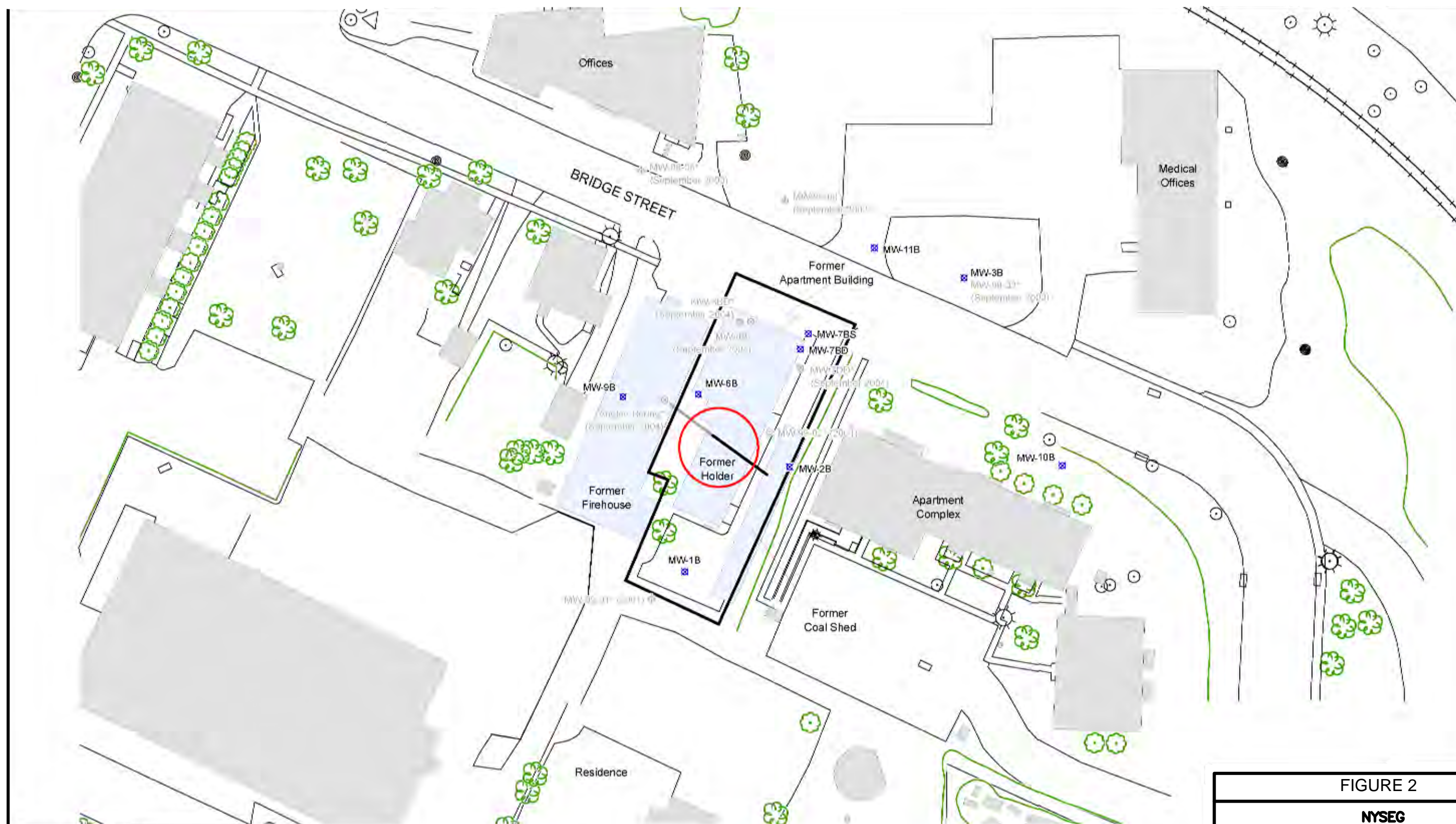
FIGURE 1

NYSEG- New York State Electric and Gas
Bridge Street Former MGP Site
Plattsburgh, NY

SITE LOCATION MAP

PARSONS

301 PLAINFIELD ROAD * SUITE 350 * SYRACUSE, NY 13212 * 315-451-9560



LEGEND

- Overburden Monitoring Well
- Bedrock Monitoring Well
- Property Boundary (approx.)
- Former Gas Holder
- Former Structures (approx.)
- Buildings
- * - Well Decommissioned

NOTE:

BASE MAP FROM URS CORPORATION,
FIGURE 2 JOB NUMBER 11177107.10000
DATED JULY 2014.

GRAPHIC SCALE

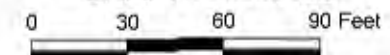


FIGURE 2

NYSEG
NEW YORK STATE ELECTRIC AND GAS
BRIDGE STREET FORMER MGP
PLATTSBURGH, NY

MONITORING WELL LOCATIONS

PARSONS

301 PLAINFIELD ROAD, SUITE 350, SYRACUSE, NY 13212 * 315-451-9560

APPENDIX A

SITE INSPECTION PHOTO LOG

2019 SITE INSPECTION PHOTO LOG



Photo 1: Site View (Facing East)



Photo 2: On-Site Monitoring Well Example (MW-7BD)



Photo 3: On-Site Storage Shed



Photo 4: Shed Features in Need of Repair



Photo 5: Well Inaccessible at time of inspection (MW-9B)

2020 SITE INSPECTION PHOTO LOG



Photo 1: Site View (Facing South)



Photo 2: On-Site Groundwater Monitoring Well MW-7BD



Photo 3: On-Site Groundwater Monitoring Well MW-9B



Photo 4: On-Site Groundwater Monitoring Well MW-11B



Photo 5: On-Site Groundwater Monitoring Well MW-3B



Photo 6: On-Site Groundwater Monitoring Well MW-7BS



Photo 7: On-Site Groundwater Monitoring Well MW-5B



Photo 8: On-Site Groundwater Monitoring Well MW-1B



Photo 9: On-Site Groundwater Monitoring Well MW-2B



Photo 10: On-Site Storage Shed



Photo 3: Site View (Facing North)

2021 SITE INSPECTION PHOTO LOG



Photo 1: Site View (Facing East)



Photo 2: On-Site Monitoring Well Example



Photo 3: Shed Prior to Removal



Photo 4: Former Shed Footprint Following Removal

APPENDIX B

SITE INSPECTION FORMS

Insitutional and Engineering Controls Inspetion Form

I. SITE INFORMATION

DATE OF INSPECTION: 11/5/2019

Site No. 510016

INSPECTOR: Henry Frenztel

Site Name Plattsburgh Bridge Street MGP

Site Address 146 Bridge Street

Zip Code 12901

City/Town Plattsburgh

County Clinton, New York

II. SITE CONDITIONS

Physical Characteristics of Site: Grass-covered open lot with single-story utility shed located in southeastern portion of parcel. Shed door partially damaged. Parcel is generally flat, with slight slope towards Bridge Street to the north.

Current Site Operations: Parcel is large open grass lot with no current Site operations. Eight (8) groundwater monitoring wells exist at the Site, and are used periodically for groundwater sampling activities.

III. SITE INSPECTION CHECKLIST

YES

NO

1. Has some or all of the Site property been solid, subdivided, merged, or undergone a tax map amendment since the initial/last certification?

X

If YES, is documentation or evidence that documentation has been previously submitted included in this certification?

2. Have any amendments and/or additional filings been recorded that may modify or supercede Deed Restrictions?

X

If YES, is documentation or evidence that documentation has been previously submitted included in this certification?

3. Have any federal, state, and/or local permits (e.g., building permit) been issued for or at the property since the initial/last certification?

X

If YES, is documentation or evidence that documentation has been previously submitted included in this certification?

4. Has there been an actual or pending zoning or land-use change for the Restricted Area on which the Deed Restriction is filed?

X

If YES, is documentation or evidence that documentation has been previously submitted included in this certification?

5. Have periodic inspections of the Site identigied any excavation or other distrubance activies that habe taken place within the insitutional control areas or other areas subject to the Site Management Plan?

X

6. Do groundwater monitoring wells MW-1B, MW-2B, MW-3B, MW-6B, BW-7BS, MW-7BD, MW-9B, and MW-11B appear to be in good working condition?

X

If NO, refer to following page for comments.

7. Does the cover system appear to be in good working condition?

X

If NO, describe:

Mointoring Well	Comment
MW-1B	Missing 1 bolt. Lock and J-plug present.
MW-2B	Missing 1 bolt. Lock and J-plug present.
MW-3B	Missing 2 bolts. Lock and J-plug present.
MW-6B	All bolts present. Lock and J-plug present.
MW-7BS	Missing 2 bolts. Lock and J-plug present.
MW-7BD	Missing 2 bolts. Lock and J-plug present.
MW-9B	All bolts present. Car parked on top of well at time of inspection, preventing access.
MW-11B	Missing 1 bolt. Lock and J-plug present.

Additional Comments: Following inspection, all missing bolts were replaced. Repairs to shed to be made in future.

CONTROL CERTIFICATION STATEMENT

For each Institutional or Engineering control listed above, I certify by checking "Yes" that all of the following statements are true:

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

Insitutional and Engineering Controls Inspetion Form

I. SITE INFORMATION

DATE OF INSPECTION: 8/20/2020

Site No. 510016

INSPECTOR: Stephen Liberatore

Site Name Plattsburgh Bridge Street MGP

Site Address 146 Bridge Street

Zip Code 12901

City/Town Plattsburgh

County Clinton, New York

II. SITE CONDITIONS

Physical Characteristics of Site: Grass-covered open lot with single-story utility shed located in southeastern portion of parcel. Shed door partially damaged. Parcel is generally flat, with slight slope towards Bridge Street to the north.

Current Site Operations: Parcel is large open grass lot with no current Site operations. Eight (8) groundwater monitoring wells exist at the Site, and are used periodically for groundwater sampling activities.

III. SITE INSPECTION CHECKLIST

YES

NO

1. Has some or all of the Site property been solid, subdivided, merged, or undergone a tax map amendment since the initial/last certification?

X

If YES, is documentation or evidence that documentation has been previously submitted included in this certification?

2. Have any amendments and/or additional filings been recorded that may modify or supercede Deed Restrictions?

X

If YES, is documentation or evidence that documentation has been previously submitted included in this certification?

3. Have any federal, state, and/or local permits (e.g., building permit) been issued for or at the property since the initial/last certification?

X

If YES, is documentation or evidence that documentation has been previously submitted included in this certification?

4. Has there been an actual or pending zoning or land-use change for the Restricted Area on which the Deed Restriction is filed?

X

If YES, is documentation or evidence that documentation has been previously submitted included in this certification?

5. Have periodic inspections of the Site identigied any excavation or other distrubance activies that habe taken place within the insitutional control areas or other areas subject to the Site Management Plan?

X

6. Do groundwater monitoring wells MW-1B, MW-2B, MW-3B, MW-6B, BW-7BS, MW-7BD, MW-9B, and MW-11B appear to be in good working condition?

X

If NO, refer to following page for comments.

7. Does the cover system appear to be in good working condition?

X

If NO, describe:

Mointoring Well	Comment
MW-1B	Well in good condition.
MW-2B	Well in good condition.
MW-3B	Well in good condition.
MW-6B	Well in good condition.
MW-7BS	Well in good condition.
MW-7BD	Well in good condition.
MW-9B	Well in good condition.
MW-11B	Well in good condition.

Additional Comments: Repairs to shed to be made in future.

CONTROL CERTIFICATION STATEMENT

For each Institutional or Engineering control listed above, I certify by checking "Yes" that all of the following statements are true:

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

Insitutional and Engineering Controls Inspetion Form

I. SITE INFORMATION

DATE OF INSPECTION: 7/7/2021

Site No. 510016

INSPECTOR: Henry Frentzel

Site Name Plattsburgh Bridge Street MGP

Site Address 146 Bridge Street

Zip Code 12901

City/Town Plattsburgh

County Clinton, New York

II. SITE CONDITIONS

Physical Characteristics of Site: Grass-covered open lot with single-story utility shed located in southeastern portion of parcel present at the time of inspection. Parcel is generally flat, with slight slope towards Bridge Street to the north. Following inspection, shed was removed from the property and disposed of.

Current Site Operations: Parcel is large open grass lot with no current Site operations. Eight (8) groundwater monitoring wells exist at the Site, and are used periodically for groundwater sampling activities.

III. SITE INSPECTION CHECKLIST

YES

NO

1. Has some or all of the Site property been solid, subdivided, merged, or undergone a tax map amendment since the initial/last certification?

X

If YES, is documentation or evidence that documentation has been previously submitted included in this certification?

2. Have any amendments and/or additional filings been recorded that may modify or supercede Deed Restrictions?

X

If YES, is documentation or evidence that documentation has been previously submitted included in this certification?

3. Have any federal, state, and/or local permits (e.g., building permit) been issued for or at the property since the initial/last certification?

X

If YES, is documentation or evidence that documentation has been previously submitted included in this certification?

4. Has there been an actual or pending zoning or land-use change for the Restricted Area on which the Deed Restriction is filed?

X

If YES, is documentation or evidence that documentation has been previously submitted included in this certification?

5. Have periodic inspections of the Site identigied any excavation or other distrubance activies that habe taken place within the insitutional control areas or other areas subject to the Site Management Plan?

X

6. Do groundwater monitoring wells MW-1B, MW-2B, MW-3B, MW-6B, BW-7BS, MW-7BD, MW-9B, and MW-11B appear to be in good working condition?

X

If NO, refer to following page for comments.

7. Does the cover system appear to be in good working condition?

X

If NO, describe:

Mointoring Well	Comment
MW-1B	Well in good condition.
MW-2B	Well in good condition.
MW-3B	Well in good condition.
MW-6B	Well in good condition.
MW-7BS	J-plug requires replacement, otherwise well in good condition.
MW-7BD	Well in good condition.
MW-9B	Well in good condition.
MW-11B	Well in good condition.

Additional Comments: Shed in poor condition at the time of inspection. Shed removed from property and disposed of following inspection.

CONTROL CERTIFICATION STATEMENT

For each Institutional or Engineering control listed above, I certify by checking "Yes" that all of the following statements are true:

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

APPENDIX C

VERIFICATION AND CERTIFICATION FORMS



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. **510016**

Site Name NYSEG - Plattsburg Bridge St. MGP

Site Address: 146 Bridge Street Zip Code: 12901-
City/Town: Plattsburgh
County: Clinton
Site Acreage: 0.240

Reporting Period: ~~November 16, 2004 to August 30, 2021~~

July 23, 2018

YES NO

1. Is the information above correct? ☒ ☐

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? ☐ ☒

3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))? ☐ ☒

4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period? ☐ ☒

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? ☐ ☒

Box 2

YES NO

6. Is the current site use consistent with the use(s) listed below? ☒ ☐

7. Are all ICs in place and functioning as designed? ☒ ☐

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. 510016

Box 3

Description of Institutional Controls

Parcel

Owner

NYSEG

Institutional Control

Ground Water Use Restriction
Soil Management Plan

Landuse Restriction
Site Management Plan

Box 4

Description of Engineering Controls

Parcel

Engineering Control

Monitoring Wells
Cover System

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 complete.

YES NO



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



**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. 510016

Box 6

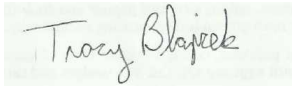
SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

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 Tracy Blazicek at PO Box 5524, Binghamton, New York 13902,
print name print business address

am certifying as Owner (Owner or Remedial Party)

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



9/28/21

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

Date

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.

I Craig F. Butler at 301 Plainfield Road; Suite 350
print name print business address
Syracuse, NY 13212

am certifying as a Qualified Environmental Professional for the New York State Electric & Gas Corporation

(Owner or Remedial Party)



Craig F. Butler
Signature of Qualified Environmental Professional, for
the Owner or Remedial Party, Rendering Certification

Stamp
(Required for PE)

09/22/21
Date