

May 9, 2018

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

**Re: *National Grid Johnstown Former MGP Site
NYSDEC Site No. 518020
Johnstown, New York
2017 Periodic Review Report***

Dear Mr. Omorogbe:

Enclosed for your review is the 2018 Periodic Review Report (PRR) for the National Grid Johnstown MGP Site. The PRR pertains to the period from April 15, 2017 through April 15, 2018 and includes a brief report and Institutional Controls/Engineering Controls (IC/EC) Certification Form.

Please feel free to contact me at 315.428.5652.

Sincerely,



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

Cc: Russ Huyck, NYSDEC Region 4

I. Introduction

A. Brief Site Summary –

An investigation of the Site began in 1997 with a Preliminary Site Assessment (PSA), which found that the Site was impacted with MGP wastes. A Supplemental PSA was then conducted at the Site in 1998, which was followed by a RI (January 2000) and subsequent remedial measures. Remedial measures are discussed separately below in this section.

A 2009 Supplemental RI was initiated to collect data to address potential residual MGP-related contaminants remaining in groundwater at the Site and to assess hydrogeologic conditions and groundwater quality on the Site. The results of the Supplemental RI were used to formulate potential remedial alternatives for groundwater and residual soil contamination. The Supplemental RI results were evaluated and presented in the 2010 FS Report.

Several IRMs were performed to address the MGP impacts. In 2002 and 2003, the former holders and associated impacted soil were removed. During this IRM, former Holder #2 and the northern half of former Holder #3 were demolished and removed from the Site. Approximately 13,870 cubic yards of soil were excavated and disposed off site at a NYSDEC-approved facility. Permanent steel sheeting was left in place along the northeastern perimeter of the Site to avoid disturbance of the roadway and to provide containment of residual material left at depth.

Between 2005 and 2006, National Grid provided support to the City of Johnstown for subsurface work associated with the replacement of the North Market Street Bridge across Cayadutta Creek. Approximately 1,413 cubic yards of impacted soil were excavated from within the cofferdam area and disposed off-site at a NYSDEC-approved facility.

In August 2009, the rip-rap area along the bank of Cayadutta Creek that had been restored during the previous IRMs was enhanced to allow for establishment of stream-side vegetation. Post-IRM inspections of the restored Cayadutta Creek bank were conducted in September 2009 and May 2010.

A Record of Decision (ROD) was issued by the NYSDEC, dated March 2010, in accordance with the requirements of New York State Environmental Conservation Law and Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York, 6 NYCRR Part 375. Based upon the results of the remedial investigation/feasibility study (RI/FS) for the Site, the interim remedial measures (IRMs) previously completed, and the ROD, the draft Final Engineering Report and Site Management Plan (SMP) were developed and submitted to the NYSDEC in June 2010. The Final Engineering Report, the Final SMP, and the Final Environmental Easement were approved by the NYSDEC in their June 2016 Fact Sheet.

National Grid- Johnstown MGP Site (NYSDEC Site No. 518020)

Reporting Period – April 15, 2017 through April 15, 2018

The Final SMP includes:

- 1) Semi-annual (April & October) site inspection and groundwater level measurements at monitoring wells MW-4, MW-7, MW-10, MW-11, MW-12, MW-13, MW-14, MW-15, MW-16, RMW-1, and the creek surface gauging station (bridge);
 - 2) Semi-annual groundwater sampling/analysis [Volatile Organic Compounds (VOCs), Semi-Volatile Organic Compounds (SVOCs), Heavy Metals, and Natural Attenuation Parameters] for monitoring wells MW-4, MW-7, MW-10, MW-11, MW-12, MW-13, MW-14, MW-15, and MW-16 (RMW-1 will not be sampled);
 - 3) Semi-annual reporting (June & December) to NYSDEC.
- B. Remedial Program Effectiveness** – During the reporting period (April 15, 2017 to April 15, 2018), 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 Project Review Report (PRR) be submitted. The next PRR submittal will cover the period April 15, 2018 to April 15, 2019.

II. Site Overview

A. Site Location and Boundaries –

The Site is located in the City of Johnstown, County of Fulton, New York (Figure 1 presents the site location map) and is identified as Block 14 and Lot 7 on the Johnstown City Tax Map. The Site is an approximate 0.7-acre area bounded by Cayadutta Creek to the north, the Colonial Cemetery to the south, Market Street to the east, and a wooded parcel of property to the west (Figure 2 presents the site plan). The Site is located in a mixed commercial, industrial, and residential area. Currently, National Grid operates a natural gas regulator station at the Site with equipment contained in fenced enclosures along the Site's southern boundary. The rest of the Site is grass covered, including the stream bank adjacent to Cayadutta Creek along the northern boundary of the Site. An embankment exists along the north end of the Site that slopes down to Cayadutta Creek. A chain-link fence exists along the north and west sides of the Site, and a retaining wall runs along the south side of the Site. Access to the Site is from North Market Street to the east.

B. Regulatory History and Remedy Features –

The site was remediated in accordance with Order on Consent Index Number A4-0473-0000, Site Number 518020, which was signed on November 7, 2003.

The “remaining contamination” was investigated during a 2009 Supplemental RI to collect data to address potential residual MGP-related contaminants remaining in groundwater at the Site and to assess hydrogeologic conditions and groundwater quality at the Site. The results of the SRI were used to formulate potential remedial alternatives for contaminated groundwater and residual soil contamination that were evaluated in a 2010 Feasibility Study (FS) report.

In March of 2010, the NYSDEC issued a Record of Decision (ROD) after evaluating the alternatives and selecting the future remedial actions at the Site that focus on MGP-related contamination in soil and groundwater. The overall site remedy selected by NYSDEC is Site Management, which is composed of several elements:

- Installation, maintenance, and monitoring of the Engineering Controls, including a sheet pile wall, a four-inch monitoring/extraction well, and a soil cover system.
- Imposition of an institutional control in the form of an Environmental Easement for the Controlled Property that restricts the use of the site to commercial and industrial use. In addition, the environmental easement will restrict the use of groundwater as a source of potable or process water, and prohibit agriculture or vegetable gardens on the Controlled Property.
- A Monitoring Plan to assess the performance and effectiveness of the remedy. The plan will include monitoring of the groundwater through the existing monitoring well network to assess the performance and effectiveness of the remedy.
- Development and implementation of a Site Management Plan for long-term management of remaining contamination, as required by the Environmental Easement, which includes plans for: (1) institutional and engineering controls, (2) monitoring, (3) operation and maintenance, and (4) 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, soil cap, and sheet pile wall. Semi-annual groundwater sampling is conducted at wells MW-4, MW-7, MW-10, MW-11, MW-12, MW-13, MW-14, MW-15, and MW-16. 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:

- **Sheet Pile Wall:** Quarterly site inspection will include the condition of the sheet pile wall. The sheet pile wall is buried and cannot be observed, however, the wall appears to be functioning properly and influencing groundwater flow towards the Cayadutta Creek.
- **Soil Cover System:** Quarterly site inspection of the cover system will include identification of any damage to the cover.
- **Groundwater Monitoring:** Semi-Annual low flow groundwater sampling of the following monitoring wells: MW-4, MW-7, MW-10, MW-11, MW-12, MW-13, MW-14, MW-15, and MW-16. 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 Groundwater Monitoring Report will be submitted June 15, 2018.

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 in the Site Management Plan 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 reporting period will cover April 15, 2018 through April 15, 2019.

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. **518020**

Site Name **NM - Johnstown MGP**

Site Address: 103 N. Market St **Zip Code:** 12095

City/Town: Johnstown

County: Fulton

Site Acreage: 0.7

Reporting Period: April 15, 2017 to April 15, 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?
Commercial and Industrial

☒ ☐

7. Are all ICs/ECs 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. 518020

Box 3

Description of Institutional Controls

Parcel

Owner

Institutional Control

162.20-14-7

National Grid

Ground Water Use Restriction
Landuse Restriction
Site Management Plan
IC/EC Plan

- Use must be for commercial or industrial
- Compliance with a site management plan
- Groundwater use prohibited
- The potential for vapor intrusion must be evaluated for any buildings developed, and any potential impacts identified must be monitored or mitigated
- Vegetable gardens and farming prohibited
- Periodic Certification of ICs and ECs

Box 4

Description of Engineering Controls

Parcel

Engineering Control

162.20-14-7

Cover System

- Soil Cover
- Sheet Pile Wall
- Monitoring/Extraction Well

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. 518020

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

5/9/2012
Date



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

am certifying as a Qualified Environmental Professional for the National Grid
(Owner or Remedial Party)

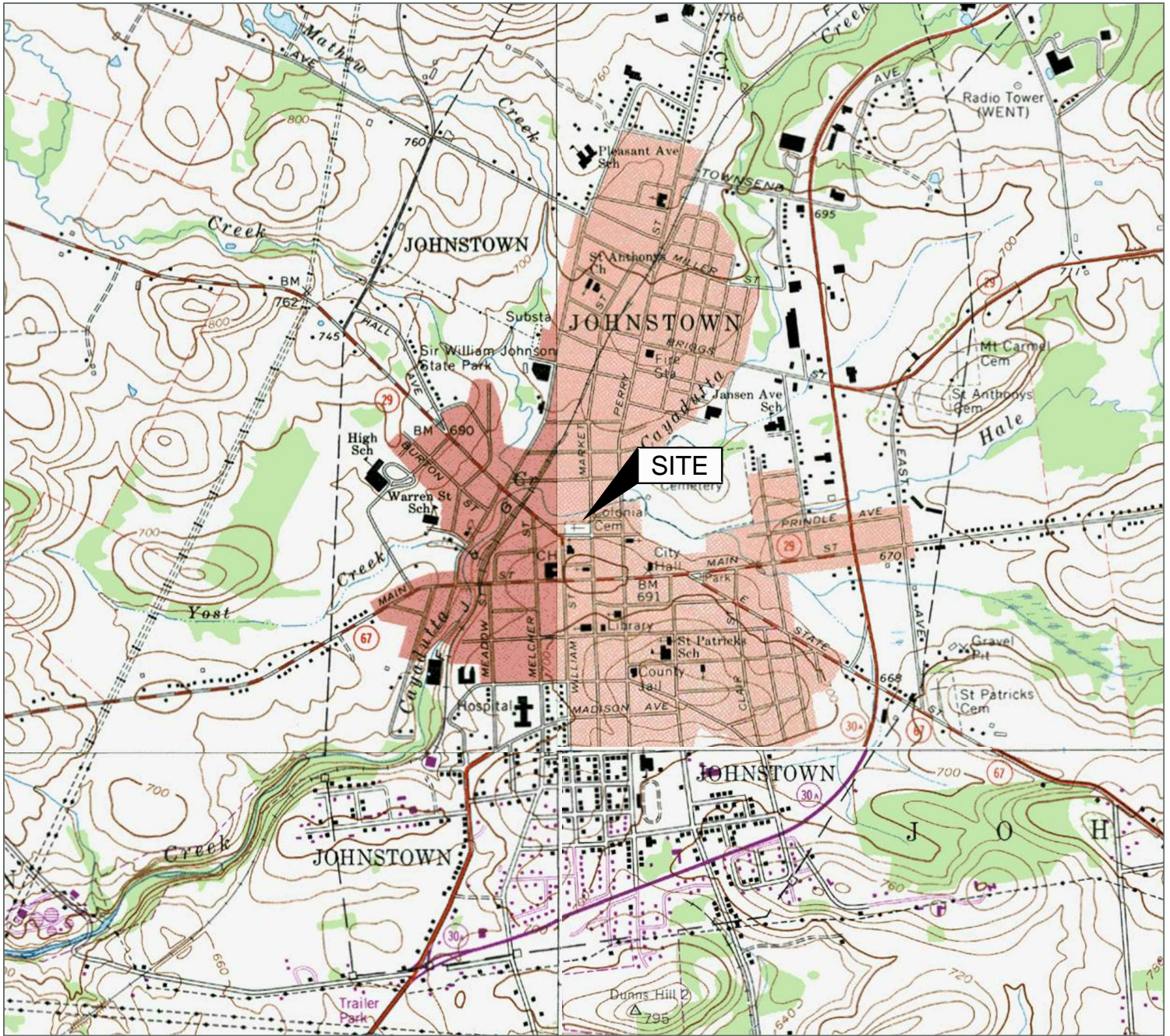

Signature of Qualified Environmental Professional, for
the Owner or Remedial Party, Rendering Certification

5/9/2019
Date

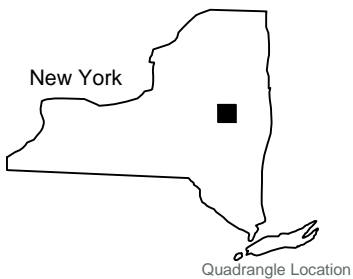
Stamp
(Required for PE)



FIGURES



Source:
USGS 7.5 Minute Series
Topographic Quadrangle, 1970
Gloversville, New York
Contour Interval = 20'



Site Location Map

National Grid
Former MGP Site
105 N Market Street
Johnstown, New York

Drawn
W.G.S.
Designed
Approved



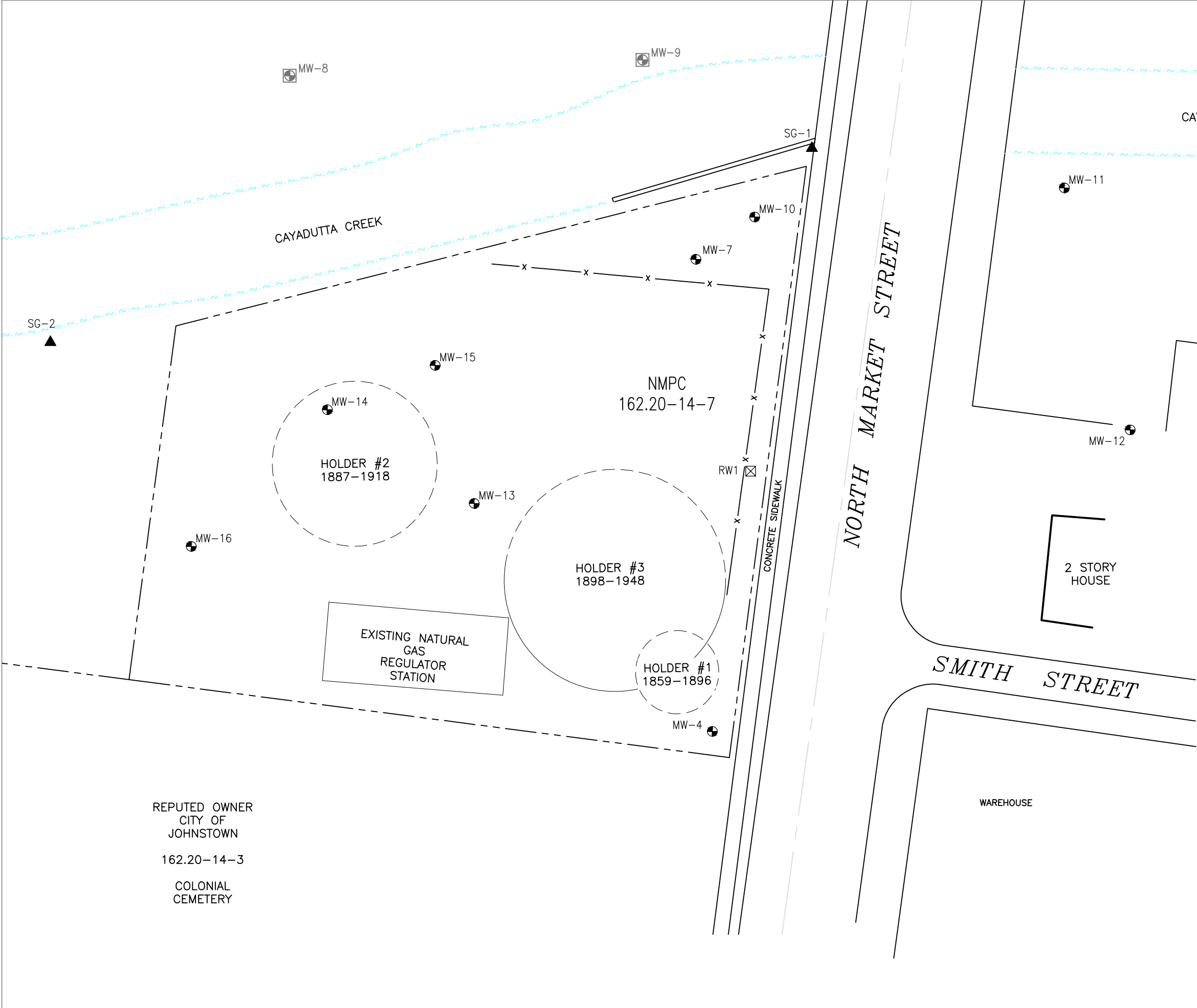
Date
12-20-17
Figure
1

Scale In Feet



Groundwater & Environmental Services, Inc.

M:\Graphics\0600-Syracuse\Misc\National Grid\Johnstown\Johnstown SM.dwg, Template B, WShea



LEGEND

- PROPERTY BOUNDARY
- x - EXISTING SHEET PILE WALL
- MONITORING WELL
- ⊗ DESTROYED/ABANDONED WELL
- ▲ STREAM GAUGE
- ⊠ RECOVERY WELL

REPUTED OWNER
CITY OF
JOHNSTOWN
162.20-14-3
COLONIAL
CEMETERY

Site Map

National Grid
Former MGP Site
105 N Market Street
Johnstown, New York

Drawn
W.G.S.
Designed
Approved

Date
12-20-17
Figure

Scale In Feet
0 40

Quarterly Site Inspection reports

Site Management Plan Inspection Form

109 North Market Street

Johnstown, New York

Date: 7/17/2017

Technician: KL

Time: 14:00

Weather: Sunny 80

Vegetation Cap				
Condition of Grass	GOOD	FAIR	POOR	COMMENTS:
Condition of Site Trees	GOOD	FAIR	POOR	COMMENTS:broken limb
Surface Erosion	NONE	MINOR	SIGNIFICANT	COMMENTS:lawn entrance
Has the site been maintained/mowed?	YES	NO		COMMENTS:

Sheet Pile Wall			
Has any construction occurred that may have impacted the sheet pile wall?	YES	NO	COMMENTS:

Site Wide			
Does the property continue to be used for commercial and/or industrial uses?	YES	NO	COMMENTS:
Does the use of groundwater for potable or process water continue to be restricted?	YES	NO	COMMENTS:
Are agricultural or vegetable gardens present on the property?	YES	NO	COMMENTS:
Do the Engineering Controls continue to perform as designed?	YES	NO	COMMENTS:
Do the Engineering Controls continue to be protective of human health and environment?	YES	NO	COMMENTS:
Are the requirements of the Site Management Plan being met?	YES	NO	COMMENTS:
Are the requirements of the Environmental Easement being met?	YES	NO	COMMENTS:
Since the last inspection has the groundwater been sampled in accordance with the SMP?	YES	NO	COMMENTS:
Since the last inspection have there been any changes to the remedial system?	YES	NO	COMMENTS:
Are there any needed changes?	YES	NO	COMMENTS:
Are the site records complete and up to date?	YES	NO	COMMENTS:

Miscellaneous				
Evidence of Trespassing	YES	NO		COMMENTS:
Litter	NONE	MINOR	SIGNIFICANT	COMMENTS:

General Comments:

Site Management Plan Inspection Form

109 North Market Street

Johnstown, New York

Date: 10/11/2017

Technician: KL

Time: 13:00

Weather: Partly Cloudy 57

Vegetation Cap				
Condition of Grass	GOOD	FAIR	POOR	COMMENTS:
Condition of Site Trees	GOOD	FAIR	POOR	COMMENTS:broken limb
Surface Erosion	NONE	MINOR	SIGNIFICANT	COMMENTS:lawn entrance
Has the site been maintained/mowed?	YES	NO		COMMENTS:

Sheet Pile Wall			
Has any construction occurred that may have impacted the sheet pile wall?	YES	NO	COMMENTS:

Site Wide			
Does the property continue to be used for commercial and/or industrial uses?	YES	NO	COMMENTS:
Does the use of groundwater for potable or process water continue to be restricted?	YES	NO	COMMENTS:
Are agricultural or vegetable gardens present on the property?	YES	NO	COMMENTS:
Do the Engineering Controls continue to perform as designed?	YES	NO	COMMENTS:
Do the Engineering Controls continue to be protective of human health and environment?	YES	NO	COMMENTS:
Are the requirements of the Site Management Plan being met?	YES	NO	COMMENTS:
Are the requirements of the Environmental Easement being met?	YES	NO	COMMENTS:
Since the last inspection has the groundwater been sampled in accordance with the SMP?	YES	NO	COMMENTS:
Since the last inspection have there been any changes to the remedial system?	YES	NO	COMMENTS:
Are there any needed changes?	YES	NO	COMMENTS:
Are the site records complete and up to date?	YES	NO	COMMENTS:

Miscellaneous				
Evidence of Trespassing	YES	NO		COMMENTS:
Litter	NONE	MINOR	SIGNIFICANT	COMMENTS:

General Comments:

Site Management Plan Inspection Form

109 North Market Street

Johnstown, New York

Date: 1/16/2018

Technician: KL

Time: 12:45

Weather: Snow 23

Vegetation Cap				
Condition of Grass	GOOD	FAIR	POOR	COMMENTS:
Condition of Site Trees	GOOD	FAIR	POOR	COMMENTS:
Surface Erosion	NONE	MINOR	SIGNIFICANT	COMMENTS:
Has the site been maintained/mowed?	YES	NO		COMMENTS: Winter

Sheet Pile Wall			
Has any construction occurred that may have impacted the sheet pile wall?	YES	NO	COMMENTS:

Site Wide			
Does the property continue to be used for commercial and/or industrial uses?	YES	NO	COMMENTS:
Does the use of groundwater for potable or process water continue to be restricted?	YES	NO	COMMENTS:
Are agricultural or vegetable gardens present on the property?	YES	NO	COMMENTS:
Do the Engineering Controls continue to perform as designed?	YES	NO	COMMENTS:
Do the Engineering Controls continue to be protective of human health and environment?	YES	NO	COMMENTS:
Are the requirements of the Site Management Plan being met?	YES	NO	COMMENTS:
Are the requirements of the Environmental Easement being met?	YES	NO	COMMENTS:
Since the last inspection has the groundwater been sampled in accordance with the SMP?	YES	NO	COMMENTS:
Since the last inspection have there been any changes to the remedial system?	YES	NO	COMMENTS:
Are there any needed changes?	YES	NO	COMMENTS:
Are the site records complete and up to date?	YES	NO	COMMENTS:

Miscellaneous				
Evidence of Trespassing	YES	NO		COMMENTS:
Litter	NONE	MINOR	SIGNIFICANT	COMMENTS:

General Comments:

Site Management Plan Inspection Form

109 North Market Street

Johnstown, New York

Date: 4/26/2018

Technician: KL

Time: 7:30

Weather: Partly Cloudy 46

Vegetation Cap				
Condition of Grass	GOOD	FAIR	POOR	COMMENTS:
Condition of Site Trees	GOOD	FAIR	POOR	COMMENTS:
Surface Erosion	NONE	MINOR	SIGNIFICANT	COMMENTS:
Has the site been maintained/mowed?	YES	NO		COMMENTS: Winter

Sheet Pile Wall			
Has any construction occurred that may have impacted the sheet pile wall?	YES	NO	COMMENTS:

Site Wide			
Does the property continue to be used for commercial and/or industrial uses?	YES	NO	COMMENTS:
Does the use of groundwater for potable or process water continue to be restricted?	YES	NO	COMMENTS:
Are agricultural or vegetable gardens present on the property?	YES	NO	COMMENTS:
Do the Engineering Controls continue to perform as designed?	YES	NO	COMMENTS:
Do the Engineering Controls continue to be protective of human health and environment?	YES	NO	COMMENTS:
Are the requirements of the Site Management Plan being met?	YES	NO	COMMENTS:
Are the requirements of the Environmental Easement being met?	YES	NO	COMMENTS:
Since the last inspection has the groundwater been sampled in accordance with the SMP?	YES	NO	COMMENTS:
Since the last inspection have there been any changes to the remedial system?	YES	NO	COMMENTS:
Are there any needed changes?	YES	NO	COMMENTS:
Are the site records complete and up to date?	YES	NO	COMMENTS:

Miscellaneous				
Evidence of Trespassing	YES	NO		COMMENTS:
Litter	NONE	MINOR	SIGNIFICANT	COMMENTS:

General Comments: