New York State Department of Environmental Conservation

FACT SHEET

Manufactured Gas Plant Program

NM Glens Falls – Mohican Street **February 2010**
Former MGP Site, Operable Unit 1
Site Number 557016
Glens Falls, NY

Proposed Record of Decision Amendment for Manufactured Gas Plant Site Public Comment Period and Public Meeting Announced

Public Meeting
Thursday February 25, 2010
6:30 pm

Crandall Public Library
251 Glen Street
Glens Falls, New York

NYSDEC invites you to a public meeting to discuss the proposed Record of Decision Amendment for the site. You are encouraged to provide comments at the meeting, and during the 30-day comment period described in this fact sheet.

The public is invited to comment on an amended remedy proposed by the New York State Department of Environmental Conservation (NYSDEC) to address contamination related to the NM Glens Falls – Mohican Street, Former Manufactured Gas Plant (MGP). The site is located at 14 Mohican Street in Glens Falls, Warren County. See the attached figure for the site location. National Grid (the successor company to Niagara Mohawk Power Corporation (NMPC), the site owner, was directed in 2003 by the NYSDEC to remediate the site to a level that is protective of public health and the environment. The previously completed investigation and upcoming remediation are being performed with the oversight of the NYSDEC and the New York State Department of Health (NYSDOH).

The Proposed Record of Decision Amendment

The amended remedy proposed for the site addresses new information generated since the original Record of Decision (ROD) was issued in March 2003. The original ROD outlined a set of remedial actions for the site that included excavation of coal tar source areas and a passive, in-situ groundwater treatment/NAPL containment barrier. This passive groundwater treatment barrier was intended to treat groundwater using an absorptive material to remove contaminants, and the barrier would prevent the offsite migration of tar. Following the issuance of the ROD, engineering design work was completed by National Grid. The results of the engineering work indicated that two significant problems existed with the original remedy. First, the volume of soil containing concentrations of contaminants in excess of the ROD remediation levels was found to be significantly greater than what was estimated in the ROD. Secondly, the passive groundwater treatment/tar containment barrier was found to be infeasible due to revised estimates of groundwater flow and higher contaminant mass loading on the absorptive material.

National Grid has proposed a revised remedial approach that includes a greater amount of contaminated soil excavation and a more feasible method of treating the groundwater contamination. Because of the proposed increased excavation of tar-contaminated soils, the need for a tar

About the Manufactured Gas Plant Program:

NYSDEC has one of the most aggressive Manufactured Gas Plant (MGP) site investigation and remediation programs in the country. Since the problems associated with the former MGP sites were identified, NYSDEC has been working with all the utilities on a state-wide basis to identify and address the issue of MGP sites for which they may have responsibility. This effort has resulted in approximately 253 sites identified for action by the eight utilities operating in New York State.

Currently we have multi-site orders or agreements with six utilities, including National Grid, and several other individual site volunteers, to address 222 MGP sites in NYS. Multi-site agreements are under negotiation with a seventh utility and several other responsible parties which have newly-identified sites.

NYSDEC continues to seek to identify any other possible MGP sites throughout the State.

For more information about the NYSDEC's MGP program, visit:
www.dec.ny.gov/chemical/8430.html

containment barrier would be eliminated. Additionally, the groundwater treatment would be changed from a passive system to an active groundwater treatment system.

All other elements of the 2003 ROD remedial action would remain unchanged. These elements include sediment removal from within the Feeder Canal, removal of MGP-related structures, the installation of a site-wide soil cover and the isolation of the Henry Street substation with a containment barrier.

The original ROD and the proposed ROD Amendment were developed under New York's State Manufactured Gas Plant Program. Each of these documents is available for public review at the locations identified below under "Where to Find Information". The documents are also available on the NYSDEC web site under the Warren County listing at:
www.dec.ny.gov/chemical/37562.html

How to Comment

NYSDEC is accepting written comments about the proposed remedy for 30 days, from **February 9, 2010** through **March 11, 2010**.

Submit written comments to:

Mr. Charles Post, Project Manager
NYSDEC
625 Broadway, 11th Floor
Albany, NY 12233-7014
chpost@gw.dec.state.ny.us

Summary of the Proposed Amended Remedy

The proposed remedy represents the alternative preferred by NYSDEC and NYSDOH to address site impacts. The proposed amended cleanup plan includes:

- Removal of approximately 16,000 cubic yards of contaminated material containing visual indications of coal tar and contaminant levels that exceed the cleanup levels established for the site. This includes contaminated soil, former MGP structures that are sources of MGP contamination and contaminated sediment from the Feeder Canal.
- Backfilling the upland portion of the excavation with clean material. The final design of the canal bottom will be coordinated with New York State Canal Corp.
- The construction of an impermeable barrier around the Henry Street electric sub-station, where contaminated soils cannot be excavated without disrupting electric service.
- The construction and operation of a groundwater treatment system.
- Placing a soil cover over the site.
- Institutional controls in the form of an environmental easement that would limit the use and development of the property to restricted residential and commercial use.
- Development and implementation of a site management plan.

The proposed ROD Amendment remedy would achieve the remediation goals for the site by permanently removing contaminated soil from the site and contaminated sediment from the Feeder Canal. Additionally, the proposed ROD Amendment would actively remediate groundwater contamination present on site and would thereby create the conditions needed to restore groundwater quality to the extent possible.

The estimated cost to implement the proposed remedy is $18,700,000, of which the cost of construction is estimated to be $15,000,000. The remainder of the cost is associated with long term monitoring and maintenance. National Grid will be financially responsible for implementation of the remedy.

Progress Made to Date

Certain elements of the 2003 ROD and the proposed amendment have already been implemented. Specifically, the service center building was demolished in advance of the large-scale excavation. Also, the coal tar previously identified within a former MGP structure was excavated and replaced with clean backfill.

As required in the ROD National Grid initiated engineering design work and conducted two pilot tests at the Mohican Street site. These tests were conducted to evaluate if injecting oxygen into the groundwater to promote biological grown of microbes would effectively reduce the MGP related contamination present within the groundwater. These tests required almost two years to design, construct, run and then monitor the effectiveness. The results of the tests proved the technology as a viable and effective remedial alternative at this site.

In 2007, in order to protect the public from accidental contact with coal-tar emerging from the bottom of the Feeder Canal along the site,, National Grid placed a temporary cap over the portion of the canal where the coal-tar was observed. This temporary cap has performed well and will remain in place until removed as part of the final remedy.

Operable Unit 2 Also to be Discussed During the Public Meeting

Contamination resulting from the MGP operations has been identified on the bottom of the Hudson River upstream of the dam adjacent to the site. This area of the river bottom, which contains a significant deposit of coal tar, has been designated as Operable Unit 2 (OU2) of the site. National Grid has performed investigions and collected samples that identify the extent of the coal tar in this area. Based on the preliminary findings, National Grid was directed to remove the coal tar from the river bottom. An engineering design for this work, to be undertake as an Interim Remedial Measure, is underway. During the public meeting the preliminary investigation results and IRM will be presented.

Next Steps

NYSDEC will consider public comments as it finalizes the ROD amendment for the site. The selected remedy will be described in a document called a “Record of Decision Amendment” that will explain why the remedy was selected and respond to public comments. This document will be made available to the public (see “Where to Find Information” below). The project will then proceed to the final design and construction phases. NYSDEC will continue to keep the public informed during the cleanup of the site.

Background

The Glens Falls – Mohican Street Former MGP Site is one of approximately 250 former MGP sites that existed across New York State in the early 20th century. The Mohican Street plant was operated by Niagara Mohawk and Niagara Mohawk’s predecessor companies from approximately 1854 to

1950. Gas was manufactured by heating coal. Freshly-manufactured gas had to be cooled and its impurities removed before it could be used. A coal tar resulted from these processes, some of which was released to the environment. The coal tar contains a number of chemical contaminants, primarily benzene, toluene, ethylbenzene, xylene (BTEX) and polycyclic aromatic hydrocarbons (PAH). The extent of MGP impacts was delineated by a series of investigations conducted by National Grid. MGP impacts were found in soil, groundwater, Feeder Canal sediments adjacent to the site and a portion of the Hudson River bottom upstream of the dam.

Most of the OU1 is covered with clean gravel or blacktop and thus direct contact with MGP-related contaminants is not likely. Some sediments in the Feeder Canal were temporarily capped to prevent migration of coal tar and reduce potential exposure to people using the canal. The coal tar identified on the bottom of the Hudson River is being addressed as part of OU2.

FOR MORE INFORMATION

Where to Find Information

Project documents are available at the following locations to help the public to stay informed. These documents include the proposed cleanup plan for the site, called the "Proposed Remedial Action Plan", and the Remedial Investigation and Feasibility Study reports.

Crandall Public Library
251 Glen Street
Glens Falls, New York 12801
(518) 792-6508

Monday – Thursday	9 am – 9 pm
Friday	9 am – 6 pm
Saturday	9 am – 5 pm
Sunday	1 pm – 5 pm

NYSDEC
625 Broadway
Albany, NY 12233-7014
By appointment, contact Mr. Charles Post
(518) 402-9662
(866) 520-2334

Who to Contact

Comments and questions are always welcome and should be directed as follows:

Project Related Questions
Charles Post
New York State Department of Environmental Conservation
625 Broadway, 11th Floor
Albany, NY 12233
(866) 520-2334
chpost@gw.dec.state.ny.us

Site-Related Health Questions
Nathan Freeman
New York State Department of Health
River Street
Troy, NY
518-4027870
ntf01@health.state.ny.us

To direct questions to National Grid, please contact:
Mr. Brian Stearns
National Grid
300 Erie Boulevard West
Syracuse, NY 13202
Brian.stearns@us.ngrid.com
(315) 428-5731

If you know someone who would like to be added to the site contact list, have them contact the NYSDEC project manager listed above. We encourage you to share this fact sheet with neighbors and tenants, and/or post this fact sheet in a prominent area of your building for others to see.