

July 24, 2023

Mr. Scott Deyette, Project Manager
New York State Department of Environmental Conservation
Division of Environmental Remediation, BURC
625 Broadway
Albany, NY 12233-7014

**Re: National Grid Fort Edward (Canal Street.) Former MGP Site
 NYSDEC Site No. 558045
 Fort Edward, New York
 2022 Periodic Review Report**

Dear Mr. Deyette:

Enclosed for your review is the Institutional Controls/Engineering Controls (IC/EC) Certification Form for the 2022 Periodic Review Report (PRR) for the National Grid Fort Edward (Canal St.) Former MGP Site in Fort Edward, NY. The PRR pertains to the period from June 24, 2022 to June 24, 2023.

Please feel free to contact me at 315.428.5652.

Sincerely,



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

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

I. Executive Summary

A. Brief Site Summary –

The Former Canal Street Manufactured Gas Plant (MGP) Site (the Site) appears to have operated from approximately 1900 to sometime around 1924. According to the 1924 Sanborn® map, the gasometer still existed and the gas building was used for storage. The 1932 Sanborn® map shows the gasometer had been removed and the gas building was vacant.

Prior to 2001, the on-site gas building was used as a private residence, however it is unknown when it first was used as such. Former residents of the property installed an in-ground swimming pool within the foundation of the former gasometer and had a burn pit southeast of the swimming pool. The site was previously owned by a predecessor company to Niagara Mohawk Power Corporation. In October 2001, National Grid purchased the Site and in 2004, they demolished the building, perforated the concrete bottom of the pool, and backfilled it.

B. Remedial Program Effectiveness – During the reporting period (June 24, 2022 to June 24, 2023), 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 the Periodic Review Report (PRR) submittal frequency (annual) remain the same. The next PRR submittal deadline would be July 24, 2024.

II. Site Overview

A. Site Location and Boundaries –

The Site is located at 22 Canal Street, in the Village of Fort Edward, Washington County, New York and is identified as Section 171.66 Block 3 and Lot 30.2 on the Washington County Tax Map. The site is designated as Parcel 171.6-3-30.2. The property was last purchased by National Grid in October 2001. The MGP Site is an approximately 1.6-acre area, and is relatively flat. The Site consists of an open lot. The Site is zoned restricted residential and is currently vacant. It is located on the east side of Canal Street, south of Notre Dame Street. Adjoining properties include residential properties to the north, south, and east, and residential properties and a cemetery beyond Canal Street to the west.

B. Regulatory History and Remedy Features –

National Grid entered into a Voluntary Cleanup Order (VCO) with the New York State Department of Environmental Conservation (NYSDEC) as part of the Voluntary Cleanup Program (VCP), which was executed on July 3, 2001.

National Grid entered into the aforementioned VCO to remediate the Site. Remediation activities included *Interim Remedial Measure* (IRM) (2008) and *Remedial Action Work Plan* (RAWP)

(2012). The IRM in 2008 included the removal of a tar tank, tar patties and shallow soils in the western portion of the site, as well as a clay tile pipe containing coal tar from the eastern edge of the shallow excavation, and a former peat-lined trench with coal tar from the northern terminus near the former gas holder to the southern property boundary. The 2012 RAWP was drafted to address soils being removed as part of a Remedial Action (RA) which would include the off-site soils south of the Site (McCue property) and off-site soils east of the Site (Miller [formerly Robinson] and O'Mara properties). The RAWP was implemented in November 2013 and included the removal of off-site soils, associated clay pipe, and an off-site septic tank. In January 2021, GEI Consultants, P.C., (GEI) submitted a Site Management Plan (SMP) to the NYSDEC to manage remaining contamination at the Site. Engineering Controls (ECs) were adopted to restrict the potential exposure to deeper soils, and a deed restriction was set in place to restrict excavation, groundwater use, and single family home construction.

III. Evaluate Remedy Performance, Effectiveness, and Protectiveness

- A. **Evaluation of Remedy Performance** - A comprehensive site-wide inspection will be conducted and documented annually by National Grid. The inspections will determine and document compliance with requirements of the SMP and the Deed Restriction.

If an emergency, such as a natural disaster occurs, an inspection of the Site will be conducted within 5 business days of the event, or as soon as possible thereafter, in order to verify the effectiveness of the ICs implemented at the Site. A qualified environmental professional, as determined by NYSDEC, will perform the inspection.

Site-wide inspections will be performed on a regular schedule at a minimum of once a year. Site-wide inspections will also be performed after all severe weather. During these inspections, an inspection form will be completed. The form will compile sufficient information to assess the following:

- Compliance with all ICs, including site usage.
- General site conditions at the time of the inspection.
- The site management activities being conducted including, where appropriate, a health and safety inspection.
- Appropriate site use.
- No disturbances have occurred without adherence to Excavation Work Plan.
- Adequate postings, where required.
- No erosion and runoff of soil.
- Maintenance of adequate ground cover.

IV. IC/EC Plan Compliance Report

A. IC/EC Requirements and Compliance

1. IC/EC Controls

The ICs/ECs include:

- The Site has a series of ICs in the form of site restrictions. Adherence to these ICs is required by the Deed Restriction. Site restrictions that apply to the controlled property are:
 - The property may only be used for restricted residential, commercial or industrial purposes provided that the ICs included in the SMP are employed. The property may not be used for a higher level of use, such as unrestricted residential use without additional remediation and amendment of the Deed Restriction, as approved by the NYSDEC.
 - All future activities on the property that will disturb remaining contaminated material must be conducted in accordance with the SMP.
 - The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended use.
 - Vegetable gardens and farming on the property are prohibited.
 - The site owner or remedial party will submit to NYSDEC a written statement that certifies, under penalty of perjury, that: (1) controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and, (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP.
- NYSDEC retains the right to access such controlled property at any time in order to evaluate the continued maintenance of any and all controls. This certification shall be submitted annually, or an alternate period of time that NYSDEC may allow and will be made by an expert that the NYSDEC finds acceptable.

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

3. IC/EC Corrective Measures – No deficiencies were noted during the monthly inspections conducted during this reporting period.

4. IC/EC Conclusions/Recommendations – The program is in compliance and there are no recommendations at this time.

B. IC/EC Certification – Refer to PRR Form - Attachment 2 for the certification.

V. Monitoring Plan Compliance Report – This PRR is the annual report that documents compliance to the SMP.



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. See Section VIII below.
2. **Exposure Pathways** – There are no new completed exposure pathways resulting in unacceptable risk.
3. **Proposed Plans and Schedule to Meet Compliance** – No plan required.

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 July 24, 2024.

Additional Guidance - Not Needed



Attachment 1 – Site Inspection Documentation

Field Inspection Report
Former MGP Site
Fort Edward, New York

Date: 6/21/2023
Technician: KL

Time: 6:00
Weather: Sunny 60

Site Controls				
Fence Condition	GOOD	FAIR	DAMAGED	COMMENTS:
Front Boulders	GOOD	FAIR	DAMAGED	COMMENTS:
Soil Above Geotextile	GOOD	FAIR	DAMAGED	COMMENTS:
Rear Gate Condition	GOOD	FAIR	DAMAGED	COMMENTS:
Padlock-NG	OPERATIONAL	NON-OPERATIONAL	COMMENTS:	

General Site Conditions				
Condition of Parking area	GOOD	FAIR	POOR	COMMENTS:
Evidence of any Intrusive Activities	NONE	MINOR	SIGNIFICANT	COMMENTS:
Vegetative Growth	GOOD	FAIR	POOR	COMMENTS:
Agricultural or Vegetable Gardens	YES	NO	COMMENTS:	
Site Been Mowed	YES	NO	COMMENTS:	
Evidence of Vandalism	YES	NO	COMMENTS:	
Litter	NONE	MINOR	SIGNIFICANT	COMMENTS:

General Comments:

Asplundh had cleaned up the downed tree limbs from the previous inspection.

Field Inspection Report
Former MGP Site
Fort Edward, New York

Date: 3/29/2023
Technician: KL

Time: 11:45
Weather: Sunny 47

Site Controls				
Fence Condition	GOOD	FAIR	DAMAGED	COMMENTS:
Front Boulders	GOOD	FAIR	DAMAGED	COMMENTS:
Soil Above Geotextile	GOOD	FAIR	DAMAGED	COMMENTS:
Rear Gate Condition	GOOD	FAIR	DAMAGED	COMMENTS:
Padlock-NG	OPERATIONAL	NON-OPERATIONAL		COMMENTS:

General Site Conditions				
Condition of Parking area	GOOD	FAIR	POOR	COMMENTS:
Evidence of any Intrusive Activities	NONE	MINOR	SIGNIFICANT	COMMENTS:
Vegetative Growth	GOOD	FAIR	POOR	COMMENTS:
Agricultural or Vegetable Gardens	YES	NO		COMMENTS:
Site Been Mowed	YES	NO		COMMENTS:
Evidence of Vandalism	YES	NO		COMMENTS:
Litter	NONE	MINOR	SIGNIFICANT	COMMENTS:

General Comments:

Several tree limbs have fallen down from the winter storms.
Asplundh has been contacted.

**Field Inspection Report
Former MGP Site
Fort Edward, New York**

Date: 12/29/2022
Technician: KL

Time: 12:00
Weather: Sunny 41

Site Controls				
Fence Condition	GOOD	FAIR	DAMAGED	COMMENTS:
Front Boulders	GOOD	FAIR	DAMAGED	COMMENTS:
Soil Above Geotextile	GOOD	FAIR	DAMAGED	COMMENTS:
Rear Gate Condition	GOOD	FAIR	DAMAGED	COMMENTS:
Padlock-NG	OPERATIONAL	NON-OPERATIONAL	COMMENTS:	

General Site Conditions				
Condition of Parking area	GOOD	FAIR	POOR	COMMENTS:
Evidence of any Intrusive Activities	NONE	MINOR	SIGNIFICANT	COMMENTS:
Vegetative Growth	GOOD	FAIR	POOR	COMMENTS:
Agricultural or Vegetable Gardens	YES	NO	COMMENTS:	
Site Been Mowed	YES	NO	COMMENTS:	
Evidence of Vandalism	YES	NO	COMMENTS:	
Litter	NONE	MINOR	SIGNIFICANT	COMMENTS:

General Comments:

**Field Inspection Report
Former MGP Site
Fort Edward, New York**

Date: 9/27/2022
Technician: TB

Time: 14:00
Weather: Cloudy 64

Site Controls				
Fence Condition	GOOD	FAIR	DAMAGED	COMMENTS:
Front Boulders	GOOD	FAIR	DAMAGED	COMMENTS:
Soil Above Geotextile	GOOD	FAIR	DAMAGED	COMMENTS:
Rear Gate Condition	GOOD	FAIR	DAMAGED	COMMENTS:
Padlock-NG	OPERATIONAL	NON-OPERATIONAL	COMMENTS:	

General Site Conditions				
Condition of Parking area	GOOD	FAIR	POOR	COMMENTS:
Evidence of any Intrusive Activities	NONE	MINOR	SIGNIFICANT	COMMENTS:
Vegetative Growth	GOOD	FAIR	POOR	COMMENTS:
Agricultural or Vegetable Gardens	YES	NO	COMMENTS:	
Site Been Mowed	YES	NO	COMMENTS:	
Evidence of Vandalism	YES	NO	COMMENTS:	
Litter	NONE	MINOR	SIGNIFICANT	COMMENTS:

General Comments:

tree limp down. Cut up and placed at road



Attachment 2 – IC/EC Certification



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. **558045**

Site Name **NM - Fort Edward MGP**

Site Address: Canal St Zip Code: 12828
City/Town: Fort Edward
County: Washington
Site Acreage: 1.600

Reporting Period: June 24, 2022 to June 24, 2023

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?
Restricted-Residential, Commercial, and Industrial ☒ ☐

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

Description of Institutional ControlsParcelOwnerInstitutional Control

NMPC d/b/a National Grid

Ground Water Use Restriction

Landuse Restriction

Site Management Plan

An environmental easement has been placed on the site with restricted residential land use and groundwater use prohibited. The cover system inspections are handled under a site management plan.

Description of Engineering ControlsParcelEngineering Control

Cover System

The site has a two-foot cover system consisting of soil and grass that meets the restricted residential use.

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. 558045

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 6780 Northern Blvd., Suite 100, East Syracuse, NY 13057,
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



7-24-2023
Date

EC CERTIFICATIONS

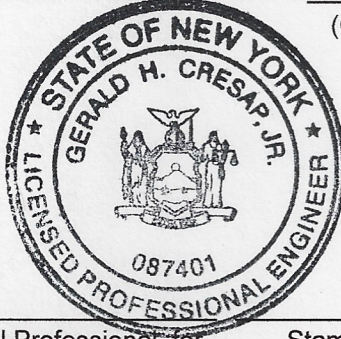
Box 7

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 Gerald Cresap, PE at 6780 Northern Blvd., Suite 100, East Syracuse, NY 13057,
print name print business address

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



A handwritten signature in blue ink, appearing to read "Gerald Cresap", written over a horizontal line.

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

Stamp
(Required for PE)

7-24-2023
Date



Attachment 3 – Site Photographs

8/3/2022 Inspection



9/27/2022 Inspection



12/29/2022 Inspection



3/29/2023 Inspection



6/21/2023 Inspection

