

January 10, 2025

Mr. Gerald Pratt
New York State Department of Environmental Conservation
Division of Environmental Remediation
Section Chief, Remedial Bureau C, Section E
625 Broadway
Albany, New York 12233-7014

**Re: National Grid Ilion Former MGP Site
 NYSDEC Site No. 622019
 Ilion, New York
 2024 Periodic Review Report**

Dear Mr. Pratt:

Enclosed for your review is the 2024 Periodic Review Report (PRR) for the National Grid Ilion Former MGP Site. The PRR pertains to the period from December 21, 2023 to December 21, 2024 and includes a brief report and Institutional Controls/Engineering Controls (IC/EC) Certification Form.

Please feel free to contact me at 315.428.5652 if you have any questions.

Sincerely,



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

I. Introduction

A. Brief Site Summary –

The Former Ilion Manufactured Gas Plant (MGP) Site (the Site) is located on an approximate 1.3-acre lot in Ilion, New York (refer to Figure 1 Site Location Map). The Site was owned by a predecessor to Niagara Mohawk Power Corporation (NM) and coal gas was produced from the 1870s through 1912. In 1950 NM assumed control of the Site operation, and introduced natural gas into the local distribution system in 1951. By 1956 most of the gas holding and remaining equipment was removed from the Site. The outdoor electrical substation was decommissioned and removed in 1997, and the remaining buildings were demolished in September 2000.

An investigation of the Site began in 1997 with an Initial Site Characterization/Interim Remedial Measure (IRM) Study performed by Parsons Engineering Science, Inc. (Parsons). This study was followed by a Remedial Investigation between August 1999 and December 2008 (Tetra Tech EC, Inc. [Tetra Tech], 2009), and a Feasibility Study (Tetra Tech, 2010). Pre-design investigations including Pre-design Activities were completed between November 2011 and January 2013 by National Grid.

The site investigations identified impacted soils from MGP related activities, specifically coal tar and purifier waste. The constituents of concern (COCs) are primarily the volatile organic compounds (VOCs) benzene, toluene, ethylbenzene, and xylenes (collectively, BTEX), the general class of semi-volatile organic compounds (SVOCs) known as polycyclic aromatic hydrocarbons (PAHs), and cyanide, all of which can be found at the Site and the off-Site area.

- B. **Remedial Program Effectiveness** – During the reporting period (December 21, 2023 to December 21, 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 will cover the period December 21, 2024 to December 21, 2025.

II. Site Overview

A. Site Location and Boundaries –

The Site is located in the Village of Ilion, County of Herkimer, New York (Figure 1 presents the site location map). The Site is an approximate 1.3-acre area bounded by East Clark Street and privately-owned residential properties to the north, Sate Street to the south, East Street to the east, and privately-owned commercial and residential properties to the west. Currently, the property is grass-covered and surrounded by a 6-foot chain link fence.

B. Regulatory History and Remedy Features –

The site was remediated in accordance with the multi-site Voluntary Consent Order (VCO) (NYSDEC, 2002) Index No. A4-0473-0000 Site #V00471, which was executed in November 2003.

III. Evaluate Remedy Performance, Effectiveness, and Protectiveness

A. Evaluation of Remedy Performance – Annual visual inspections of the cover system are conducted on the Site. The remedy performance has been effective in protecting the public.

IV. IC/EC Plan Compliance Report

A. IC/EC Requirements and Compliance

1. IC/EC Controls

The ICs/ECs:

- **Soil Cover System:** Annual site inspection of the cover system includes identification of any damage to the cover. National Grid conducts quarterly inspections for internal security purposes.
- **Monitoring Wells Associated with Monitored Natural Attenuation (MNA):** Semi-annual groundwater sampling of the monitoring well system, until either water quality is consistently below NYSDEC standards, or has become asymptotic at an acceptable level over an extended period.

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

3. **IC/EC Corrective Measures** – No deficiencies were noted during the site inspections.
4. **IC/EC Conclusions/Recommendations** – The EC program is in compliance and there are no recommendations for the program at this time.
5. **IC/EC Certification** – Refer to PRR Form - Attachment 1 for the certification.

V. **Monitoring Plan Compliance Report** – The Annual Monitoring Report was submitted to the NYSDEC on December 19, 2024.

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 December 21, 2024 through December 21, 2025.

VIII. **Additional Guidance** – Not needed.

REFERENCES

Arcadis, 2018. "Site Management Plan, Ilion (East Street) Former MGP Site", October 2018.

Attachment 1: PRR Certification Form



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. **622019**

Site Name **NM - Ilion MGP**

Site Address: 1 East St. Zip Code: 13357-
City/Town: Ilion
County: Herkimer
Site Acreage: 1.300

Reporting Period: December 21, 2023 to December 21, 2024

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**120.037-4-19**

National Grid Corporation

Ground Water Use Restriction
Landuse Restriction
Site Management Plan

An Environmental Easement is in place that restricts land use to restricted-residential, and restricts the use of groundwater at the site. A Site Management Plan has been approved which details the controls in place, and the monitoring requirements for the site.

Description of Engineering ControlsParcelEngineering Control**120.037-4-19**Cover System
Fencing/Access Control
Monitoring Wells

The site is restricted to restricted residential, commercial, or industrial use. A soil cover system is in place across the entire site. Groundwater use is restricted at the site unless approved by Herkimer County DOH and/or NYSDOH. Groundwater monitoring will be conducted on the site on a semi-annual basis for the first five years to assess the performance of the remedy.

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. 622019

Box 6

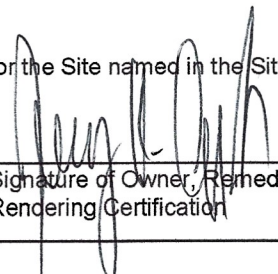
SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

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

am certifying as an 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

1-6-2025
Date



EC CERTIFICATIONS

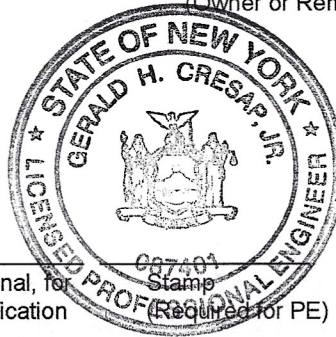
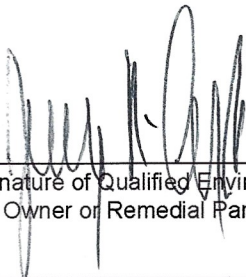
Box 7

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

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



Signature of Qualified Environmental Professional, for
the Owner or Remedial Party, Rendering Certification
(Required for PE)

Date

1-6-2025

Attachment 2: Site Inspection Forms

Field Inspection Report**Former MGP Site****Ilion, New York**Date: 10/10/2024Technician: AJTime: 12:00Weather: Cloudy 50**Site Controls**

Fence Condition	GOOD	FAIR	DAMAGED	COMMENTS:
Front Gate Condition	GOOD	FAIR	DAMAGED	COMMENTS:
Rear Man 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:
Conditions of the Site Trees	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:

Is the site being used in a manner inconsistent with Environmental Easement?

☐ Yes☒ No**Site Monitoring Wells**

Well ID.	Location Secure	
MW-02R	Yes	No
MW-03	Yes	No
MW-06	Yes	No
MW-07	Yes	No
MW-08R	Yes	No
MW-13	Yes	No

General Comments:

Field Inspection Report**Former MGP Site****Ilion, New York**Date: 7/10/2024Technician: Kevin LeoTime: 09:00Weather: PC 79**Site Controls**

Fence Condition	Good	COMMENTS:
Front Gate Condition	Good	COMMENTS:
Rear Man Gate Condition	Good	COMMENTS:
Padlock-NG	Operational	COMMENTS:

General Site Conditions

Condition of Parking area	Good	COMMENTS:
Evidence of any Intrusive Activities	None	COMMENTS:
Vegetative Growth	Good	COMMENTS:
Conditions of the Site Trees	Good	COMMENTS:
Agricultural or Vegetable Gardens	No	COMMENTS:
Site Been Mowed	Yes	COMMENTS:
Evidence of Vandalism	No	COMMENTS:
Litter	None	COMMENTS:

Is the site being used in a manner inconsistent with Environmental Easement?

Site Monitoring Wells

Well ID.	Location Secure
MW-02R	Yes
MW-03	Yes
MW-06	Yes
MW-07	Yes
MW-08R	Yes
MW-13	Yes

General Comments:

Field Inspection Report**Former MGP Site****Ilion, New York**Date: 4/3/2024Technician: Kevin LeoTime: 09:00Weather: Rain 37**Site Controls**

Fence Condition	Good	COMMENTS:
Front Gate Condition	Good	COMMENTS:
Rear Man Gate Condition	Good	COMMENTS:
Padlock-NG	Operational	COMMENTS:

General Site Conditions

Condition of Parking area	Good	COMMENTS:
Evidence of any Intrusive Activities	None	COMMENTS:
Vegetative Growth	Good	COMMENTS:
Conditions of the Site Trees	Good	COMMENTS:
Agricultural or Vegetable Gardens	No	COMMENTS:
Site Been Mowed	No	COMMENTS:
Evidence of Vandalism	No	COMMENTS:
Litter	Minor	COMMENTS:

Is the site being used in a manner inconsistent with Environmental Easement?

Site Monitoring Wells

Well ID.	Location Secure
MW-02R	Yes
MW-03	Yes
MW-06	Yes
MW-07	Yes
MW-08R	Yes
MW-13	Yes

General Comments:

Field Inspection Report**Former MGP Site****Ilion, New York**Date: 1/11/2024Technician: Kevin LeoTime: 11:30Weather: Cloudy 37**Site Controls**

Fence Condition	Good	COMMENTS:
Front Gate Condition	Good	COMMENTS:
Rear Man Gate Condition	Good	COMMENTS:
Padlock-NG	Operational	COMMENTS:

General Site Conditions

Condition of Parking area	Good	COMMENTS:
Evidence of any Intrusive Activities	None	COMMENTS:
Vegetative Growth	Good	COMMENTS:
Conditions of the Site Trees	Good	COMMENTS:
Agricultural or Vegetable Gardens	No	COMMENTS:
Site Been Mowed	No	COMMENTS:
Evidence of Vandalism	No	COMMENTS:
Litter	None	COMMENTS:

Is the site being used in a manner inconsistent with Environmental Easement?

Site Monitoring Wells

Well ID.	Location Secure
MW-02R	Yes
MW-03	Yes
MW-06	Yes
MW-07	Yes
MW-08R	Yes
MW-13	Yes

General Comments:



January 11, 2024 – Site Conditions



January 11, 2024 – Site Conditions



April 3, 2024 – Site Conditions



July 10, 2024 – Site Conditions