2023 - 2024 PERIODIC REVIEW REPORT
CLARK STREET FORMER MANUFACTURED GAS PLANT SITE
AUBURN, NEW YORK
NYSDEC SITE NUMBER: 706008

Prepared For:

NYSEG

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MAY 2024

CERTIFICATION STATEMENT

I, JEFFREY POULSEN, certify that I am currently a Qualified Environmental Professional as defined in 6 NYCRR Part 375 and that this Periodic Review Report was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

For each institutional or engineering control identified for the site, I certify that all of the following statements are true:

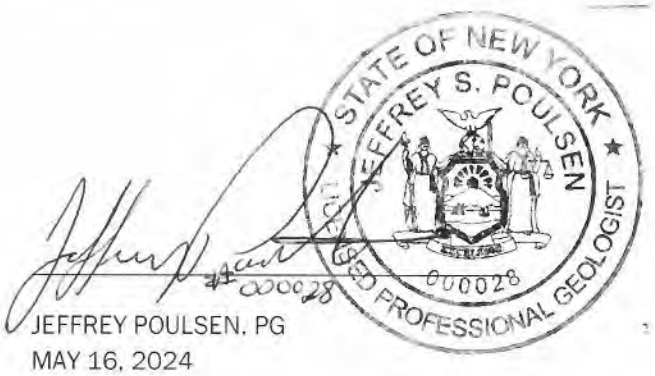
A. The institutional control and/or engineering control employed at this site is unchanged from the date the control was put in place, or last approved by the Department.

B. Nothing has occurred that would impair the ability of such control to protect the public health and environment.

C. Nothing has occurred that would constitute a violation or failure to comply with any Site Management Plan for this control.

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.

E. If a financial assurance mechanism is required under the oversight document for the site, the mechanism remains valid and sufficient for their intended purpose under the document.



JEFFREY POULSEN, PG
MAY 16, 2024

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LIST OF ACRONYMS

ACRONYM	Definition
AWQS	Ambient Water Quality Standards
BTEX	benzene, toluene, ethylbenzene and xylene
CAMP	Community Air Monitoring Plan
EC	engineering control
EWP	Excavation Work Plan
HASP	Health and Safety Plan
IC	institutional control
ISS	*in situ* stabilization
MGP	Manufactured Gas Plant
NAPL	non-aqueous phase liquid
NYCRR	New York Codes, Rules and Regulations
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
NYSEG	New York State Electric and Gas
PAH	polycyclic aromatic hydrocarbon
ppm	parts per million
PRR	Periodic Review Report
RAO	Remedial Action Objectives
ROD	Record of Decision
SCO	Soil Cleanup Objectives
SMP	Site Management Plan
SVOC	semivolatile organic compound
ug/L	micrograms per liter
VOC	volatile organic compound

1.0 EXECUTIVE SUMMARY

New York State Electric and Gas Corporation (NYSEG) entered into an Order on Consent (Index No. DO-0002-9309) with the New York State Department of Environmental Conservation (NYSDEC) in March 1994, to investigate and, where necessary, remediate 33 former Manufactured Gas Plant (MGP) sites in New York State (NYSDEC 2009). One of these sites, the Clark Street Former MGP Site (NYSDEC Site No. 706008) (Site) is an approximately 1.6-acre property located on Clark Street in Auburn, Cayuga County, New York. Volatile organic compounds (VOCs) (benzene, toluene, ethylbenzene, and xylene [BTEX]), semivolatile organic compounds (SVOCs) (polyaromatic hydrocarbons [PAHs]), and non-aqueous phase liquid (NAPL) were identified as compounds of concern for the Site. The Site was remediated from June 2015 to December 2018 in accordance with the remedy selected by the NYSDEC in the Record of Decision (ROD) (NYSDEC 2009). In addition to the Site, adjacent off-site areas were remediated, including a Site-adjacent portion of the Owasco Outlet.

In accordance with the *Site Management Plan* (SMP; Parsons 2021), sitewide inspections and monitoring were completed at the Site for the January 13, 2023 to May 13, 2024 reporting period. Sitewide inspections included cover system (erosion and vegetation), invasive species, and site access control inspections. Sitewide monitoring included groundwater monitoring and NAPL removal.

The reporting period inspection results verified that the cover system remains compliant with the design intent and Site access controls remain in place. A visual erosion inspection and a comprehensive vegetative plot analysis were performed. Inspection results indicated that the cover system was intact, with no observed erosion or bare spots. Overall percent cover of seeded areas was 100 percent, exceeding the performance goal of 85 percent cover. Vegetation plots were generally dominated by perennial native grasses and herbs.

Sampling conducted in 2023 marked the third annual post-remedy monitoring event (previous events occurred in 2021 and in 2022). A network of six monitoring wells is being used for annual post-remedy groundwater monitoring. Groundwater samples were collected from all six monitoring wells in the network, analyzed for BTEX and PAHs, and concentrations were compared to NYSDEC Class GA Ambient Water Quality Standards (AWQS). Groundwater analytical results in 2023 for BTEX exceeded criteria in five wells, with the highest detection (MW-10D) for a single BTEX analyte as 1,700 micrograms per liter (ug/L) (ethylbenzene). Summed concentrations of BTEX for each of the samples collected ranged from 5 ug/L to 2,877 ug/L. Groundwater analytical results for PAHs exceeded criteria in five monitoring wells with the highest detection for a single PAH analyte as 14,000 ug/L (naphthalene). From 2021 to 2023, BTEX concentrations remained stable in one monitoring well and decreased in all remaining monitoring wells except one (MW-08D), which increased slightly. PAH concentrations are generally consistent over the past three years, with naphthalene and acenaphthene exceeding the criteria in all wells.

A network of 10 NAPL collection wells is being used for quarterly NAPL removal at the Site. NAPL removal was conducted in 2023 (March, May, September, and November) and 2024 (March). Previous NAPL removal occurred in 2021 (August, October, and November) and 2022 (January, May, September, and November). Quantities on recovered NAPL continue to decrease from 2021 with measurable quantities only being observed in three wells (RW-03, RW-04, and RW-07).

Requirements of the SMP were met during the reporting period and no changes to the SMP are recommended at this time. The institutional controls/engineering controls (IC/ECs) at the Site remain in place. Because remedial elements were functioning as designed, no maintenance or corrective actions were required during the reporting period. No changes to the frequency of Site management or Periodic Review Report (PRR) submittals are recommended at this time.

2.0 SITE OVERVIEW

2.1 Site Description

NYSEG entered into an Order on Consent (Index No. DO-0002-9309) with the NYSDEC in March 1994, to investigate and, where necessary, remediate 33 former MGP sites in New York State (NYSDEC 2009). One of these sites, the Clark Street Former MGP Site (NYSDEC Site No. 706008) (Site) is an approximately 1.6-acre property (a portion of Block 2, Lot 37) located on Clark Street in Auburn, Cayuga County, New York (**Figure 2.1**). The Site was remediated in accordance with the remedy selected by the NYSDEC in the ROD (NYSDEC 2009). In addition to the Site, adjacent off-site areas were remediated, including a Site-adjacent portion of the Owasco Outlet.

The Site consists of an empty lot covered with compacted gravel and is bounded by the Owasco Outlet to the north and east, a Finger Lakes Railway railroad right-of-way and U.S. Route 20 to the south, and a vehicle maintenance shop to the west. The Owasco Outlet is bounded by the Site and commercial businesses to the south, residences and a commercial business to the north, residences to the east, and North Division Street to the west.

2.2 Remedial Program

2.2.1 Remedial Action Objectives

Remedial Action Objectives (RAOs) were developed for the Site with the goal of protecting both the environment and human health. VOCs (BTEX), SVOCs (PAHs), and NAPL were identified as compounds of concern for the Site. The RAOs for the Site as listed in the ROD (NYSDEC 2009) are as follows:

Soil RAOs

1. Prevent ingestion/direct contact with contaminated soil
2. Prevent inhalation of contaminants from the soil
3. Prevent migration of contaminants that would result in groundwater or surface water contamination
4. Prevent impacts to biota from ingestion/direct contact with soil causing toxicity or impacts from bioaccumulation through the terrestrial food chain

Groundwater RAOs

1. Prevent ingestion of groundwater with contaminant levels exceeding drinking water standards
2. Prevent contact with contaminated groundwater
3. Prevent inhalation of contaminants from groundwater
4. Prevent discharge of contaminated groundwater to surface water
5. Restore the groundwater aquifer to meet ambient groundwater quality criteria to the extent practicable

Soil Vapor RAOs

1. Mitigate impacts to public health resulting from the potential for soil vapor intrusion into future buildings at a site

Sediment RAOs

1. Prevent direct contact with contaminated sediments
2. Prevent releases of MGP-related contaminants from sediment that would result in surface water levels exceeding the ambient water quality criteria
3. Prevent impacts to biota from ingestion/direct contact with MGP-related sediments causing toxicity and impacts from bioaccumulation through the aquatic food chain
4. Restore, to the extent practicable, MGP-impacted sediments to site background conditions

2.2.2 Selected Remedy

To achieve these RAOs, the Site was remediated in accordance with the remedy selected by the NYSDEC in the ROD (NYSDEC 2009). The remedy consisted of the following:

1. Excavation to the top of bedrock of all soil containing PAH concentrations greater than 500 parts per million (ppm) or soil containing visual tar or NAPL (approximately 17,000 cubic yards). Off-site disposal and treatment for excavated soil. Following excavation but prior to backfill a fabric "demarcation" layer provided to mark the limit of the removal.
2. Coverage of the entire site with at least one foot of backfill material that satisfies the soil cleanup objectives (SCOs) for restricted commercial use and the protection of groundwater. An ecological buffer zone along the southern edge of the Owasco Outlet, approximately 25 feet wide measured laterally from the high-water level as part of the soil cover system. The top two feet of soil in this zone to consist of soils that meet the SCO for protection of ecological resources and to be vegetated.
3. Implementation of a bedrock NAPL collection program, including implementation of a pilot study. Fourteen NAPL recovery wells designed and strategically placed with the goal of maximizing the recovery of NAPL from the bedrock.
4. Removal of approximately 100 cubic yards of sediment to the bedrock at locations SED-9 and SED-12. Undertaking of a sampling program in the Owasco Outlet to delineate contamination in the sediment area of concern to the bedrock. Removal of sediments containing visible tar, produce a tar-related sheen when agitated in water, or which contain site-related PAH compounds at levels above upstream background levels.
5. Restoration of the Owasco Outlet bed and banks in accordance with the requirements at Part 608 of Title 6 of the New York Codes, Rules and Regulations (NYCRR).
6. Imposition of an IC in the form of an environmental easement that will require (a) limiting the use and development of the property to commercial use, which will also permit industrial use; (b) compliance with the approved SMP (Parsons 2021), (c) restricting the use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the New York State Department of Health (NYSDOH); and (d) periodic certification of ICs and ECs.

2.2.3 Implementation of the Remedy

Remediation of the Site was completed from June 2015 to December 2018 in four phases and included:

1. Phase 1 – Upland Remediation to Support Utility Relocation (June 2015 to January 2016)
    - Removal of former MGP structures
    - Installation of an *in situ* stabilization (ISS) wall to provide excavation stability and minimize ground and surface water infiltration
    - Excavation of soil to bedrock at the west end of the Site

2. Phase 2 – Utility Relocation (October 2015 to January 2016)
    - Relocation of subsurface gas lines and yard light
    - Removal of electrical substation
    - Installation of new overhead utilities
3. Phase 3 – Remediation of Remaining Upland Portion (January 2016 to June 2016)
    - Installation of ISS wall to provide excavation stability and minimize ground and surface water infiltration
    - Excavation of remaining upland soil and portions of ISS wall
    - Placement of backfill
4. Phase 4 – Sediment Remediation and Final Site Restoration (June 2018 to December 2018)
    - Removal of sediment from the Owasco Outlet
    - Restoration of the Site

3.0 REMEDY PERFORMANCE, EFFECTIVENESS AND PROTECTIVENESS

Remediation of the Site was completed from June 2015 to December 2018. The remedy was effective in achieving the RAOs as described in the ROD.

3.1 Excavation, Treatment, and Disposal

Excavation, treatment, and disposal at the Site was effective in meeting the Soil RAOs for the Site. Excavation at the Site was completed to the top of bedrock within an ISS wall during Phases 1 and 3 of the remedy (**Figure 3.1**). Approximately 27,900 tons of soil containing PAH concentrations greater than 500 ppm or soil containing visual tar or NAPL was transported off-site for treatment and disposal. Excavated soil that had no visible tar or NAPL and PAH concentrations of less than 500 ppm, was eligible for on-site reuse as backfill. Approximately 4,900 tons of reuse eligible soil was transported off-site for disposal due to space constraints. Following excavation, but prior to backfill, a demarcation layer was installed to mark the limit of the removal. Additionally, a demarcation layer was installed over any areas of reuse backfill material. After upland excavations were complete, portions of the ISS wall were removed to minimize the potential for groundwater mounding within the wall, approximately 550 cubic yards of the ISS wall were removed and managed consistent with excavated soil (i.e., transported off-site for disposal).

3.2 Cover System

Cover system installation at the Site was effective in meeting the Soil RAOs for the Site. Exposure to remaining contamination in bedrock and soil at the Site is prevented by a soil cover system. This cover system is comprised of a minimum of 12 inches of backfill that satisfied the SCOs for restricted commercial use and the protection of groundwater. Where impacted soils (i.e., NYSDEC-approved reuse material) remained on-site, a demarcation geotextile layer was placed between these materials and the clean soil cover. As a part of the cover system, an ecological buffer zone was established along the southern edge of the Owasco Outlet, approximately 25 feet wide measured laterally from the high-water level. The top two feet of soil in this zone was vegetated and consisted of soils that met the SCO for protection of ecological resources. **Figure 3.1** presents the location of the cover system in relation to other remedial elements and **Figure 3.2** presents an overview of the location of the cover system and demarcation layers, where applicable.

3.3 NAPL Collection Program

The NAPL Collection Program is designed to achieve the Groundwater RAOs for the Site by recovering residual NAPL, or free product, to the extent practical. Ten bedrock NAPL collection wells (RW-01 through RW-10) were installed around the perimeter of the upland portion of the Site from March 29, 2021, through April 26, 2021, as shown on **Figure 3.1**. Collection wells were installed to depths of approximately 24 to 73 feet in areas where NAPL has historically been observed. NAPL collection well locations were selected based on the results of the multi-year NAPL monitoring program conducted by Arcadis from 2010 through 2015 (Arcadis 2012 and 2015) and are expected to optimize NAPL collection at the Site.

Periodic NAPL monitoring was conducted to facilitate passive recovery of NAPL in bedrock in accordance with the NYSDEC-approved *NAPL Collection Well Installation Plan and Groundwater Monitoring Memorandum* (Parsons 2020). NAPL removal was recommended to be conducted on a quarterly basis for a minimum of two years, continuing until negligible quantities (i.e., less than 0.01 gallons) of NAPL are recovered for three successive collection events (quarters) for each well. Following two years of NAPL collection, the frequency of monitoring will be evaluated in conjunction with NYSDEC to either increase, decrease, or remain the same depending on the amount of NAPL being collected.

3.4 Sediment Removal

Sediment removal at the Site was effective in achieving the Sediment RAOs for the Site. Sediment removal was conducted in the Owasco Outlet during Phase 4 of remedy implementation and was completed to the surface of bedrock. In accordance with the ROD, all sediment containing visible tar, producing an MGP-related sheen when agitated in water, or containing Site-related PAH compounds that exceeded upstream background levels (i.e., 62 ppm) was removed from the Owasco Outlet. Sediment removal limits were expanded based on the results of a sampling program that occurred in the Owasco Outlet to delineate contamination in the sediment area of concern to bedrock and also to include visual removal of sediment that produced a sheen as indicated on **Figure 3.1**.

After completion of the remedy, one sample location (T-12-C) remained where PAH compounds exceeded background levels of 62 ppm (150 ppm) and produced a sheen (**Figure 3.1**). However, during the Supplemental Remedial Investigation, environmental forensic analysis was completed on sediment samples to assess sources of PAH contamination; during this analysis, PAH compounds at sample location T-12-C were determined to show characteristics indicative of multiple PAH sources unrelated to the MGP. Since no contamination remains in Owasco Outlet sediment that is attributable to the MGP (i.e., sediment containing visible tar, producing an MGP-related sheen when agitated in water, or containing Site-related PAH compounds that exceeded upstream background levels), Sediment RAOs for the Site were met by the remedy.

3.5 Owasco Outlet Restoration

Restoration measures in and along the Owasco Outlet were completed in accordance with the requirements at 6 NYCRR 608. Disturbed channel was backfilled with stone to pre-construction grades and disturbed bank was backfilled and reconstructed following excavation activities. As a part of the cover system, an ecological buffer zone was established along the southern edge of the Owasco Outlet, approximately 25 feet wide measured laterally from the high-water level. The top two feet of soil in this zone was vegetated and consisted of soils that met the SCO for protection of ecological resources. The topsoil on the channel banks was seeded and planted with trees and shrubs.

3.6 Institutional Controls/Engineering Controls

An IC, in the form of an environmental easement, was established for the Site to (1) implement, maintain, and monitor EC systems; (2) prevent future exposure to remaining contamination; (3) limit the use and development of the Site to commercial and industrial uses; and (4) restrict the use of groundwater at the Site as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH. The environmental easement for the Site was executed by the NYSDEC on August 18, 2020 and filed with the Cayuga County Clerk on September 3, 2020 (**Appendix A**).

4.0 INSTITUTIONAL CONTROLS/ENGINEERING CONTROLS PLAN COMPLIANCE

4.1 Institutional Controls/Engineering Controls Requirements and Compliance

Since remaining contamination exists at the Site, ICs and ECs are required. Based on the findings of the January 13, 2023 to May 13, 2024 reporting period, the Site ICs/ECs remain in place.

4.1.1 Institutional Controls

An IC, in the form of an environmental easement, was established for the Site to (1) implement, maintain, and monitor EC systems; (2) prevent future exposure to remaining contamination; (3) limit the use and development of the Site to commercial and industrial uses; and (4) restrict the use of groundwater at the Site as a source of potable or process water, without necessary water quality treatment as determined by the NYSDOH.

The environmental easement for the Site was executed by the NYSDEC on August 18, 2020 and filed with the Cayuga County Clerk on September 3, 2020. The receipt number for this filing is 2020242965, deed number 2020-197719. A copy of the easement and proof of filing is provided in **Appendix A**.

4.1.2 Engineering Controls

ECs are provided by two components: a cover system and fencing/access control.

Exposure to remaining contamination in bedrock and soil at the Site is prevented by a soil cover system. This cover system is comprised of a minimum of 12 inches of backfill that satisfied the SCOs for restricted commercial use and the protection of groundwater. Where impacted soils (i.e., NYSDEC-approved reuse material) remain on-site, a demarcation geotextile layer was placed between these materials and the clean soil cover. As a part of the cover system, an ecological buffer zone was established along the southern edge of the Owasco Outlet, approximately 25 feet wide measured laterally from the high-water level. The top two feet of soil in this zone is vegetated and consists of soils that meet the SCO for protection of ecological resources. **Figure 3.2** presents the location of the cover system demarcation layers, where applicable.

Procedures that must be implemented in the event the cover system is breached, penetrated, or temporarily removed, and any underlying remaining contamination is disturbed are provided in the Excavation Work Plan (EWP) presented in Appendix F of the SMP (Parsons 2021). Any work conducted pursuant to the EWP must also be conducted in accordance with the procedures defined in a Health and Safety Plan (HASP) and associated Community Air Monitoring Plan (CAMP) prepared for the Site and provided in Appendices G and H of the SMP, respectively.

Site access is controlled with a secured entry gate.

4.1.3 Status of Institutional Controls/Engineering Controls

An IC, in the form of an environmental easement, was executed by the NYSDEC on August 18, 2020 and filed with the Cayuga County Clerk on September 3, 2020 (**Appendix A**). The Site IC remains in place.

Based on the findings of the January 13, 2023 to May 13, 2024 reporting period, the Site ECs remain in place and are meeting the intent of the remedy.

4.1.4 Corrective Measures

No corrective measures were required for the ICs/ECs based on the findings of the January 13, 2023 to May 13, 2024 reporting period.

4.1.5 Conclusions and Recommendations

No deficiencies in the ICs/ECs were identified during the January 13, 2023 to May 13, 2024 reporting period; therefore, no changes to ICs/ECs are recommended.

4.2 Institutional Controls/Engineering Controls Certification

Certification of the ICs/ECs is provided on the NYSDEC Site Management PRR Notice IC/ECs Certification Form (**Appendix B**).

5.0 MONITORING PLAN COMPLIANCE REPORT

5.1 Components of the Monitoring Plan

As specified in the SMP, sitewide inspections and monitoring will be performed at a minimum of once per year. The following table summarizes the inspection, monitoring, and reporting activities required by the SMP (Parsons 2021).

Inspections: 1. Cover System Inspection 2. Invasive Species Inspection 3. Fencing or other means to control site access	Frequency: 1. Annually 2. Annually 3. Annually
Monitoring: 1. Groundwater Monitoring Program 2. NAPL Collection Program	Frequency: 1. Annually 2. Quarterly/As needed
Reporting: 1. Groundwater Monitoring Report 2. NAPL Collection Report 3. Periodic Review Report	Frequency: 1. Annually 2. Quarterly/As needed 3. Annually

5.2 Inspections Completed During Reporting Period

Inspections were completed at the Site during the January 13, 2023 to May 13, 2024 reporting period and included cover system, invasive species, and site access control inspections. No severe conditions were recorded during the reporting period; therefore, no severe conditions inspections were completed.

5.2.1 Cover System Inspection

In accordance with the SMP, a cover system inspection (erosion and vegetation) was performed on September 12, 2023 to assess cover system condition and effectiveness. The reporting period inspection results verified that the cover system remains compliant with the design intent. A visual erosion inspection and a comprehensive vegetative plot analysis were performed. The visual erosion inspection results indicated that the cover system was intact, with no observed erosion or bare spots. The vegetation inspection indicated that overall percent cover of seeded areas was 100 percent, exceeding the performance goal of 85 percent cover.

Five 1-square-meter plots were selected across the Site to represent the typical Site plant community as accurately as possible (**Figure 5.1**). Vegetation plots were generally dominated by perennial native grasses and herbs including switchgrass (*Panicum virgatum*) and Canada goldenrod (*Solidago canadensis*).

Trees and shrubs that were planted at the conclusion of the remedy as a part of Site restoration (2018) were inventoried to inform survival rates. In 2023, 10 percent of planted shrubs and trees were found surviving on-site. Based on Site conditions and typical outcomes for small potted woody plantings, this rate of survival is consistent with expectations. Willow live stakes (*Salix* sp.) had the highest rate of survival at 14 percent, and speckled alder (*Alnus incana* ssp. *rugosa*) had the lowest rate of survival at zero percent. Overall, no planted trees that were planted at the conclusion of the remedy were found surviving on Site in 2023. Although no

planted trees were observed, natural colonization of the Site by native woody trees is high. Numerous saplings of eastern cottonwood (*Populus deltoides*), eastern sycamore (*Platanus occidentalis*), staghorn sumac (*Rhus typhina*), box elder (*Acer negundo*), and black walnut (*Juglans nigra*) were observed on-site. The number of naturally colonized trees exceeds the number of trees planted at the conclusion of the remedy, meeting the intent of the design plantings.

5.2.2 Invasive Species Inspection

An invasive species inspection was performed on September 12, 2023. No invasive species were observed during the inspection.

5.2.3 Site Access Inspection

Site access is controlled with a secured entry gate. The gate was in place and secured during the Site access inspection on September 12, 2023.

5.3 Monitoring Completed During Reporting Period

Monitoring was completed at the Site during the January 13, 2023 to May 13, 2024 reporting period and included groundwater monitoring and NAPL removal.

5.3.1 Groundwater Monitoring Program

A network of six monitoring wells is being used for annual groundwater monitoring at the Site. Overburden monitoring well MW-01B is located at the southeastern border of the Site and serves as an upgradient monitoring well. Three bedrock wells north of the Owasco Outlet (MW-08D, MW-09D, and MW-10D) are also monitored due to historic impacts. Two additional overburden monitoring wells (PAR-MW-01 and PAR-MW-02) were installed at the Site in 2021 to supplement the pre-existing well network. Groundwater samples are collected annually and analyzed for BTEX and PAHs.

An annual groundwater sampling event was conducted on October 17, 2023. Groundwater samples were collected from monitoring wells MW-01B, MW-08D, MW-09D, MW-10D, PAR-MW-01, and PAR-MW 02 and analyzed for BTEX and PAHs. The laboratory analytical results are provided in **Table 5.1**. BTEX and PAH concentrations were compared to NYSDEC Class GA AWQS, which are listed in the Division of Water Technical and Operational Guidance Series (1.1.1). The NYSDEC Class GA AWQS are referred to as “criteria” in the following paragraphs.

Groundwater analytical results in 2023 for BTEX exceeded criteria in MW-08D, MW-09D, MW-10D, MW-PAR-01, and MW-PAR-02. The highest detection for a single BTEX analyte was 1,700 ug/L of ethylbenzene in MW-08D and MW-10D. The concentrations of BTEX were summed for each of the groundwater samples collected. Concentrations of BTEX in 2023 ranged from 5 ug/L in MW-01B to 2,877 ug/L in MW-08D.

Groundwater analytical results for PAHs exceeded criteria in MW-08D, MW-09D, MW-10D, MW-PAR-01, and MW-PAR-02. The highest detection for a single PAH analyte was 14,000 ug/L of naphthalene in MW-09D.

Analytical results of BTEX and PAHs for each monitoring well are presented on **Figure 5.2**.

5.3.2 NAPL Collection Program

A network of 10 NAPL collection wells is being used for quarterly NAPL removal at the Site. NAPL collection wells are presented on **Figure 3.1**.

NAPL removal was conducted in 2023 (March, May, September, and November) and 2024 (March) and was performed using a combination of passive and active removal methods.

The passive removal method consisted of deploying hydrophobic absorbent socks in the recovery wells and allowing the socks to absorb NAPL between removal events. This method was implemented in wells where there was not enough accumulated NAPL to collect using active methods. Absorbent socks were deployed in the bottom 24 inches of RW-01, RW-02, RW-05, RW-06, RW-08, RW-09, and RW-10 during the 2023 NAPL removal events. The mass of each sock was measured prior to deployment, and again following removal. The difference between the initial mass and final mass was assumed to be due to NAPL absorption because of the hydrophobic nature of the absorbent material. NAPL removal volumes are provided in **Table 5.2**.

The active removal method consisted of removing NAPL accumulated within a recovery well using a peristaltic pump. Active NAPL recovery allowed for direct measurement of NAPL thickness in wells with accumulating product. Sufficient NAPL to warrant active removal was observed in RW-03, RW-04, and RW-07. The amount of NAPL measured in these wells ranged from zero inches to 6.0-inches-thick during the reporting period. Measured NAPL thicknesses were used to estimate the volume of NAPL present in each well. The largest accumulated volume of NAPL estimated during a single event was 0.326 gallons in RW-03.

A graphical representation of accumulated NAPL thickness by recovery well collected using the active removal method for the March 2023 through March 2024 removal events is provided in **Figure 5.3** below. NAPL removal volumes for these events are provided in **Table 5.2**.

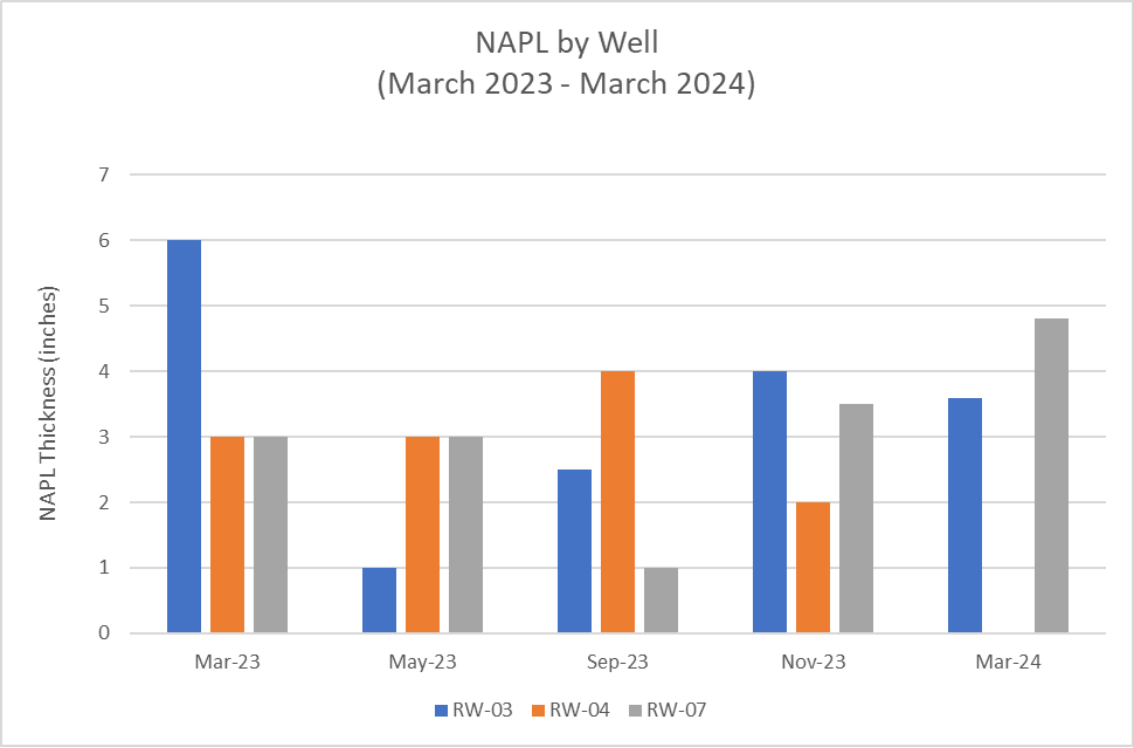


Figure 5.3. Accumulated NAPL Thickness by Recovery Well Collected Using the Active Removal Method – March 2023 – March 2024

5.4 Comparison with Remedial Objectives

5.4.1 Cover System

The January 13, 2023 to May 13, 2024 reporting period inspection results verified that the cover system remains in place, with no observed erosion or bare spots. The vegetation inspection indicated that overall percent cover of seeded areas was 100 percent, exceeding the performance goal of 85 percent cover. This EC was functioning as designed to prevent contact with and migration of contaminated media.

5.4.2 Invasive Species

No invasive species were observed during the January 13, 2023 to May 13, 2024 reporting period. This element was functioning as designed to minimize establishment of invasive species.

5.4.3 Site Access

Site access remained controlled with a secured entry gate during the January 13, 2023 to May 13, 2024 reporting period. This EC was functioning as designed to prevent contact with contaminated media.

5.4.4 Groundwater Monitoring Program

Groundwater sampling was conducted at the Site on September 30, 2021, September 21, 2022, and October 17, 2023. Consistent with the RAO to restore the groundwater aquifer to meet NYSDEC Class GA AWQS criteria to the extent practicable, concentrations of Site constituents of concern are generally trending downward.

BTEX concentrations remained stable in MW-01B with concentrations at 5 ug/L from 2021 to 2023. BTEX concentration decreased in all wells from 2021 to 2023 except MW-08D, which increased from 1,287.2 ug/L in 2022 to 2,877 ug/L in 2023. Analytical results of BTEX and PAHs for each monitoring well for all monitoring events (September 2021 through October 2023) are presented in **Table 5.3**. A graphical representation of total BTEX concentrations by monitoring well for the 2021, 2022, and 2023 sampling events is provided in **Figure 5.4** below. PAH concentrations are generally consistent over the past three years, with naphthalene and acenaphthene exceeding the criteria in all wells.

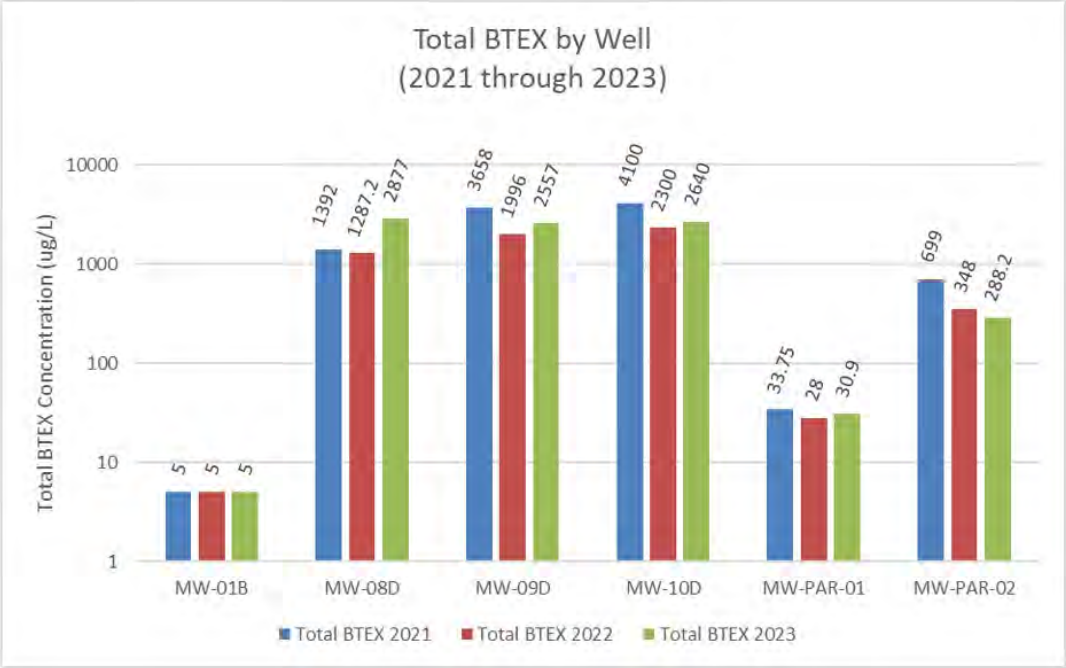


Figure 5.4. Total BTEX Concentration by Monitoring Well – 2021 through 2023

5.4.5 NAPL Collection Program

NAPL removal was conducted at the Site in 2021 (August, October, and November), 2022 (January, May, September, and November) 2023 (March, May, September, and November) and 2024 (March). The active removal method was used to collect NAPL from January 2022 through March 2024. Consistent with the RAO to restore the groundwater aquifer to meet NYSDEC Class GA AWQS criteria to the extent practicable, NAPL accumulation observed in recovery wells using the active removal method is generally trending downward over collection events.

Quantities on recovered NAPL continue to decrease from 2021 with measurable quantities only being observed in three wells (RW-03, RW-04, and RW-07). A graphical representation of accumulated NAPL thickness by recovery well collected using the active removal method for the January 2022 through March 2024 removal events is provided in **Figure 5.5** below. NAPL removal volumes for all collection events using the passive and active removal methods are provided in **Table 5.4** (the August 2021 collection event has been excluded from Table 5.4 since this event consisted of deployment of hydrophobic absorbent socks and no NAPL was collected).

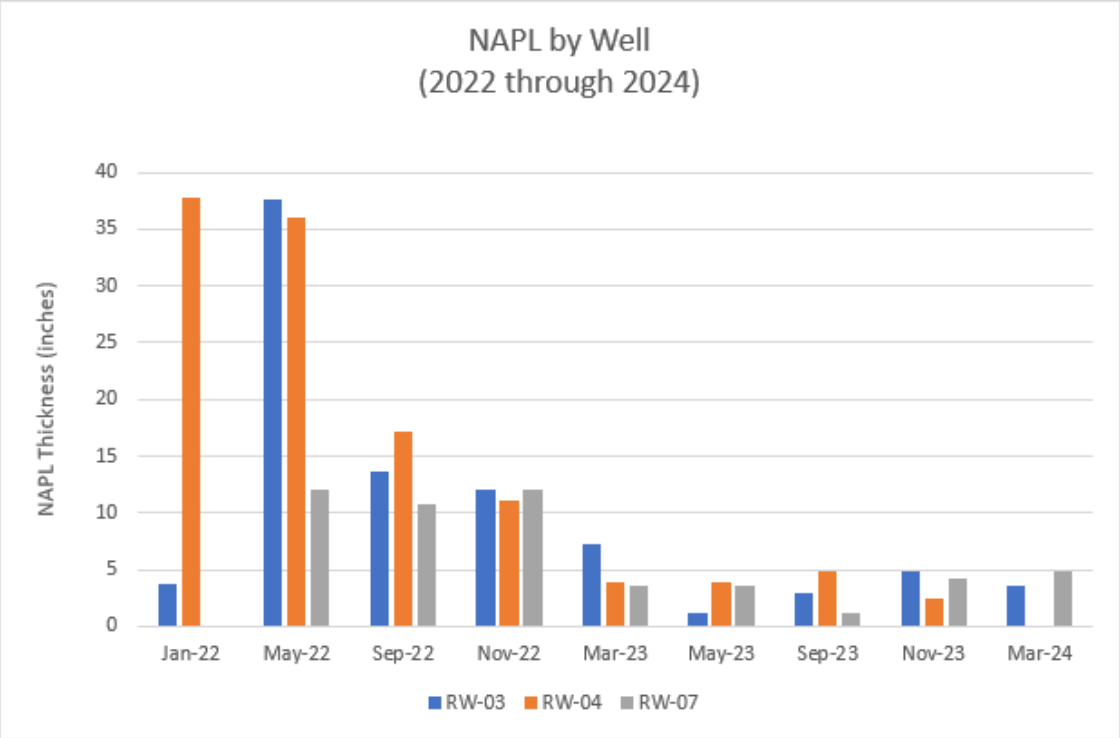


Figure 5.5. Accumulated NAPL Thickness by Recovery Well Collected Using the Active Removal Method – January 2022 – March 2024

5.5 Inspection and Monitoring Deficiencies

Sitewide inspections and monitoring completed during the January 13, 2023 to May 13, 2024 reporting period complied with the inspection and monitoring plan as outlined in the SMP; therefore, no deficiencies were identified.

5.6 Conclusions and Recommendations for Changes

The reporting period inspection results verified that the cover system remains compliant with the design intent and Site access controls remain in place. A visual erosion inspection and a comprehensive vegetative plot analysis were performed. Inspection results indicated that the cover system was intact, with no observed erosion or bare spots. Overall percent cover of seeded areas was 100 percent, exceeding the performance goal of 85 percent cover. Vegetation plots were generally dominated by perennial native grasses and herbs. No modifications to the Sitewide inspections are recommended at this time and it is recommended that inspections continue annual through 2024.

Sampling conducted in 2023 marked the third post-remedy monitoring event (previous events occurred in 2021 and in 2022). A network of six monitoring wells is being used for annual groundwater monitoring. Groundwater samples were collected from all six monitoring wells in the network, analyzed for BTEX and PAHs, and concentrations were compared to NYSDEC Class GA AWQS. Groundwater analytical results in 2023 for BTEX exceeded NYSDEC Class GA AWQS criteria in five wells, with the highest detection for a single BTEX analyte as 1,700 ug/L of ethylbenzene. Summed concentrations of BTEX for each of the groundwater samples collected ranged from 5 ug/L to 2,877 ug/L. Groundwater analytical results for PAHs exceeded criteria in five

monitoring wells with the highest detection for a single PAH analyte as 14,000 ug/L of naphthalene. From 2021 to 2023, BTEX concentrations remained stable in one monitoring well (5 ug/L) and decreased in all monitoring wells except one, which increased (from 1,287.2 ug/L in 2022 to 2,877 ug/L in 2023). PAH concentrations are generally consistent over the past three years, with naphthalene and acenaphthene exceeding the criteria in all wells. Due to detections of contaminants of concern in collected groundwater, it is recommended that groundwater sampling continues annually through 2024.

A network of 10 NAPL collection wells is being used for quarterly NAPL removal at the Site. NAPL removal was conducted in 2023 (March, May, September, and November) and 2024 (March). Previous NAPL removal occurred in 2021 (August, October, and November) and 2022 (January, May, September, and November). Quantities on recovered NAPL continue to decrease from 2021 with measurable quantities only being observed in three wells (RW-03, RW-04, and RW-07). Due to observation of continual NAPL buildup during the reporting period, it is recommended that NAPL removal continues quarterly through 2024.

6.0 MAINTENANCE PLAN COMPLIANCE REPORT

6.1 Components of the Maintenance Plan

As specified in the SMP, sitewide maintenance must be performed on an as needed basis. The following table summarizes the maintenance and reporting activities required by the SMP (Parsons 2021).

Maintenance: 1. Cover System 2. Invasive Species Removal 3. Fencing or other means to control site access	Frequency: 1. As needed 2. As needed 3. As needed
Reporting: 1. Groundwater Monitoring Report 2. NAPL Collection Report 3. Periodic Review Report	Frequency: 1. Annually 2. Quarterly/As needed 3. Annually

6.2 Maintenance Completed During Reporting Period

Based on the results of the cover system, invasive species, and Site access control inspections performed at the Site during the January 13, 2023 to May 13, 2024 reporting period, no maintenance was required.

6.3 Comparison with Remedial Objectives

Based on the results of the cover system, invasive species, and Site access control inspections performed during the January 13, 2023 to May 13, 2024 reporting period, these remedial elements were functioning as designed.

6.4 Maintenance Plan Deficiencies

No maintenance was required during the January 13, 2023 to May 13, 2024 reporting period. No maintenance plan deficiencies were identified.

6.5 Conclusions and Recommendations for Changes

The maintenance plan is functioning as intended by the SMP; therefore, no changes to the maintenance plan are recommended at this time.

7.0 CONCLUSIONS AND RECOMMENDATIONS

7.1 Compliance with SMP

Requirements of the SMP were met during the January 13, 2023 to May 13, 2024 reporting period. In accordance with the SMP, sitewide inspections and monitoring was completed at the Site for the reporting period. Inspections included cover system (erosion and vegetation), invasive species, and site access control inspections. Sitewide monitoring included groundwater monitoring and NAPL removal. Data was submitted electronically to the NYSDEC in accordance with SMP requirements.

Because remedial elements and ECs were functioning as designed, no maintenance was required during the reporting period. The ICs/ECs for the Site were in place during the reporting period.

7.2 Performance and Effectiveness of Remedy

The reporting period inspection results verified that the cover system remains compliant with the design intent and Site access controls remain in place. A visual erosion inspection and a comprehensive vegetative plot analysis were performed. Inspection results indicated that the cover system was intact, with no observed erosion or bare spots. Overall percent cover of seeded areas was 100 percent, exceeding the performance goal of 85 percent cover. Vegetation plots were generally dominated by perennial native grasses and herbs. No modifications to the sitewide inspections are recommended at this time; it is recommended that inspections continue annually through 2024.

Sampling conducted in 2023 marked the third annual post-remedy monitoring event (previous events occurred in 2021 and in 2022). A network of six monitoring wells is being used for annual post-remedy groundwater monitoring. Groundwater samples were collected from all six monitoring wells in the network, analyzed for BTEX and PAHs, and concentrations were compared to NYSDEC Class GA Ambient Water Quality Standards (AWQS). Groundwater analytical results in 2023 for BTEX exceeded criteria in five wells, with the highest detection (MW-10D) for a single BTEX analyte as 1,700 micrograms per liter (ug/L) (ethylbenzene). Summed concentrations of BTEX for each of the samples collected ranged from 5 ug/L to 2,877 ug/L. Groundwater analytical results for PAHs exceeded criteria in five monitoring wells with the highest detection for a single PAH analyte as 14,000 ug/L (naphthalene). From 2021 to 2023, BTEX concentrations remained stable in one monitoring well and decreased in all remaining monitoring wells except one (MW-08D), which increased slightly. PAH concentrations are generally consistent over the past three years, with naphthalene and acenaphthene exceeding the criteria in all wells.

A network of 10 NAPL collection wells is being used for quarterly NAPL removal at the Site. NAPL removal was conducted in 2023 (March, May, September, and November) and 2024 (March). Previous NAPL removal occurred in 2021 (August, October, and November) and 2022 (January, May, September, and November). Quantities on recovered NAPL continue to decrease from 2021 with measurable quantities only being observed in three wells (RW-03, RW-04, and RW-07).

The ICs/ECs for the Site were in place during the reporting period. Because remedial elements were functioning as designed, the remedy remains effective.

7.3 Future Periodic Review Report Submittals

No change to the frequency of PRR submittals is recommended at this time.

8.0 REFERENCES

Arcadis, 2012. *Monthly NAPL Monitoring Program – Annual Report, NYSEG Clark Street Former MGP Site*. January 25, 2012.

Arcadis. 2015. *NYSEG Clark Street Former MGP Site. Semi-Annual NAPLS Monitoring*. July 2015.

NYSDEC. 2009. *Record of Decision, NYSEG Clark Street – Auburn MGP Site*. Site Number 7-06-008. March.

Parsons. 2020. *NAPL Collection Well Installation Plan and Groundwater Monitoring Memorandum.* NYSEG Clark St. Former MGP Site (Site No. 7-06-010). August 5.

Parsons. 2021. *Site Management Plan.* Clark Street Former Manufactured Gas Plant Site, Cayuga County, Auburn New York. NYSDEC Site No. 7-06-008. Prepared for New York State Electric & Gas Corporation. July 29.

TABLES

TABLE 5.1
2023-2024 PERIODIC REVIEW REPORT
NYSEG CLARK STREET FORMER MGP SITE (SITE NO. 706008)
GROUNDWATER ANALYTICAL RESULTS: OCTOBER 2023

			Location ID	MW-01B	MW-08D	MW-09D	MW-10D	MW-PAR-01	MW-PAR-02
			Field Sample ID	MW-01B-10172023	MW-08D-10172023	MW-09D-10172023	MW-10D-10172023	MW-PAR-01-10172023	MW-PAR-02-10172023
			Matrix	WG	WG	WG	WG	WG	WG
			Lab Sample ID	480-213851-5	480-213851-4	480-213851-8	480-213851-3	480-213851-1	480-213851-2
			SDG	4802138511	4802138511	4802138511	4802138511	4802138511	4802138511
			Sample Date	10/17/2023	10/17/2023	10/17/2023	10/17/2023	10/17/2023	10/17/2023
Chemical Name	CAS_RN	Unit	NYSDEC Class GA						
Volatile Organic Compounds (8260)									
Benzene	71-43-2	ug/L	1	1 U	680	140	540	26	190
Ethylbenzene	100-41-4	ug/L	5	1 U	1700	1300	1700	3.1	61
Toluene	108-88-3	ug/L	5	1 U	17 J	17 J	20 U	1 U	1.2 J
Xylenes	1330-20-7	ug/L	5	2 U	480	1100	380	0.76 J	36
m,p-Xylene	179601-23-1	ug/L	NS	2 U	97	730	60	0.76 J	3.7 J
o-Xylene	95-47-6	ug/L	NS	1 U	380	340	320	1 U	32
Semi Volatile Organic Compounds (8270)									
Acenaphthene	83-32-9	ug/L	20	5.4 U	200 J	900 J	170 J	210	320
Acenaphthylene	208-96-8	ug/L	NS	5.4 U	1.8 J	15	1.6 J	3.9 J	2.5 J
Anthracene	120-12-7	ug/L	50	5.4 U	4.8 J	46	4.3 J	2.8 J	12
Benzo(A)Anthracene	56-55-3	ug/L	0.002	5.4 U	5.4 U	26	5 U	5 U	5.2 U
Benzo(A)Pyrene	50-32-8	ug/L	ND	5.4 U	5.4 U	28	5 U	5 U	5.2 U
Benzo(B)Fluoranthene	205-99-2	ug/L	0.002	5.4 U	5.4 U	18	5 U	5 U	5.2 U
Benzo(G,H,I)Perylene	191-24-2	ug/L	NS	5.4 U	5.4 U	16	5 U	5 U	5.2 U
Benzo(K)Fluoranthene	207-08-9	ug/L	0.002	5.4 U	5.4 U	9	5 U	5 U	5.2 U
Chrysene	218-01-9	ug/L	0.002	5.4 U	5.4 U	24	5 U	5 U	5.2 U
Dibenz(A,H)Anthracene	53-70-3	ug/L	NS	5.4 U	5.4 U	3 J	5 U	5 U	5.2 U
Fluoranthene	206-44-0	ug/L	50	5.4 U	1.7 J	140 J	1.8 J	8.5	7.4
Fluorene	86-73-7	ug/L	50	5.4 U	46	200 J	38	51	68
Indeno(1,2,3-C,D)Pyrene	193-39-5	ug/L	0.002	5.4 U	5.4 U	12	5 U	5 U	5.2 U
Naphthalene	91-20-3	ug/L	10	5.4 U	5600	14000	4700	4.4 J	85
Phenanthrene	85-01-8	ug/L	50	5.4 U	43	520 J	35	37	100
Pyrene	129-00-0	ug/L	NS	5.4 U	1.9 J	160 J	2.1 J	11	8.1

WG: water sample

U:Indicates the analyte was analyzed for but not detected.

J:Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

Shaded: exceeds the Class GA Criteria/Standard

ug/L: micrograms per liter (ppb)

NS: no standard or criteria is cited in TOGS 1.1.1

ND: non-detect

TABLE 5.2
2023-2024 PERIODIC REVIEW REPORT
NYSEG CLARK STREET FORMER MGP SITE (SITE NO. 706008)
NAPL REMOVAL VOLUMES: MARCH 2023 - MARCH 2024

	Mar-23			May-23			Sep-23			Nov-23			Mar-24			Total
Well ID	Sock Mass Initial (g)	Sock Mass Final (g)	Mass Removed (g)	Sock Mass Initial (g)	Sock Mass Final (g)	Mass Removed (g)	Sock Mass Initial (g)	Sock Mass Final (g)	Mass Removed (g)	Sock Mass Initial (g)	Sock Mass Final (g)	Mass Removed (g)	Sock Mass Initial (g)	Sock Mass Final (g)[2]	Mass Removed (g)[2]	Volume Removed (gal)[3]
RW-01	350	650	300	190	650	460	380	550	170	280	680	400	310	TBD	TBD	0.35
RW-02	430	630	200	290	670	380	280	470	190	320	670	350	340	TBD	TBD	0.29
RW-03[1]	-	-	5,734	-	-	5,734	-	-	11,470	-	-	3,823	-	-	302.03	7.08
RW-04[1]	-	-	3,823	-	-	7,646	-	-	7,646	-	-	3,823	-	-	99.4	6.03
RW-05	370	720	350	340	700	350	350	690	340	250	690	440	370	TBD	TBD	0.39
RW-06	370	540	170	350	650	300	350	690	340	280	630	350	360	TBD	TBD	0.30
RW-07[1]	-	-	5,734	-	-	8,220	-	-	6,500	-	-	5,734	-	-	504.67	6.98
RW-08	370	640	270	280	640	360	280	550	270	210	660	450	410	TBD	TBD	0.35
RW-09	400	690	290	280	650	370	350	540	190	200	670	470	420	TBD	TBD	0.35
RW-10	270	630	360	220	530	310	230	610	380	220	620	400	330	TBD	TBD	0.38

TOTAL NAPL REMOVED (kg)[3]	86.00
TOTAL NAPL REMOVED (gal)[3]	22.5

Notes:
1: Mass Removed for RW-03, RW-04, RW-07 was calculated based on volume of product removed via pumping, converted to mass using a product density of 1,010 kg/m^3, or 3.82 kg/gal.
2: TBD sock mass final and mass removed to be determined during Q2 of 2024.
3: Total NAPL removed for RW-01, RW-02, RW-05, RW-06, RW-08, RW-09, and RW-10 does not include March 2024 volume.
g: grams
gal: gallons
kg: kilogram
TBD: to be measured during next event

TABLE 5.3
2023-2024 PERIODIC REVIEW REPORT
NYSEG CLARK STREET FORMER MGP SITE (SITE NO. 706008)
GROUNDWATER ANALYTICAL RESULTS: SEPTEMBER 2021 - OCTOBER 2023

			Location ID	MW-01B	MW-01B	MW-01B	MW-08D	MW-08D	MW-08D
			Field Sample ID	MW-01B-09302021	MW-01B-09212022	MW-01B-10172023	MW-08D-09302021	MW-08D-09222022	MW-08D-10172023
			Lab Sample ID	480-190358-6	480-201940-2	480-213851-5	480-190358-4	480-201940-5	480-213851-4
			Sample Date	9/30/2021	9/21/2022	10/17/2023	9/30/2021	9/21/2022	10/17/2023
Chemical Name	CAS_RN	Unit	NYSDEC Class GA						
Volatile Organic Compounds (8260)									
Benzene	71-43-2	ug/L	1	1 U	1 U	1 U	320	390	680
Ethylbenzene	100-41-4	ug/L	5	1 U	1 U	1 U	800	720	1700
Toluene	108-88-3	ug/L	5	1 U	1 U	1 U	12	7.2 J	17 J
Xylenes	1330-20-7	ug/L	5	2 U	2 U	2 U	260	170	480
Semi Volatile Organic Compounds (8270)									
Acenaphthene	83-32-9	ug/L	20	5 U	5 U	5.4 U	170 J	140 J	200 J
Acenaphthylene	208-96-8	ug/L	NS	5 U	5 U	5.4 U	1.7 J	1000 U	1.8 J
Anthracene	120-12-7	ug/L	50	5 U	5 U	5.4 U	3.5 J	1000 U	4.8 J
Benzo(A)Anthracene	56-55-3	ug/L	0.002	5 U	5 U	5.4 U	5 U	1000 U	5.4 U
Benzo(A)Pyrene	50-32-8	ug/L	ND	5 U	5 U	5.4 U	5 U	1000 U	5.4 U
Benzo(B)Fluoranthene	205-99-2	ug/L	0.002	5 U	5 U	5.4 U	5 U	1000 U	5.4 U
Benzo(G,H,I)Perylene	191-24-2	ug/L	NS	5 U	5 U	5.4 U	5 U	1000 U	5.4 U
Benzo(K)Fluoranthene	207-08-9	ug/L	0.002	5 U	5 U	5.4 U	5 U	1000 U	5.4 U
Chrysene	218-01-9	ug/L	0.002	5 U	5 U	5.4 U	5 U	1000 U	5.4 U
Dibenz(A,H)Anthracene	53-70-3	ug/L	NS	5 U	5 U	5.4 U	5 U	1000 U	5.4 U
Fluoranthene	206-44-0	ug/L	50	5 U	5 U	5.4 U	1.7 J	1000 U	1.7 J
Fluorene	86-73-7	ug/L	50	5 U	5 U	5.4 U	33	1000 U	46
Indeno(1,2,3-C,D)Pyrene	193-39-5	ug/L	0.002	5 U	5 U	5.4 U	5 U	1000 U	5.4 U
Naphthalene	91-20-3	ug/L	10	5 U	5 U	5.4 U	3800	4000	5600
Phenanthrene	85-01-8	ug/L	50	5 U	5 U	5.4 U	36	1000 U	43
Pyrene	129-00-0	ug/L	NS	5 U	5 U	5.4 U	2.1 J	1000 U	1.9 J

U:Indicates the analyte was analyzed for but not detected.

J:Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

Shaded: exceeds the Class GA Criteria/Standard

ug/L: micrograms per liter (ppb)

NS: no standard or criteria is cited in TOGS 1.1.1

ND: non-detect

TABLE 5.3
2023-2024 PERIODIC REVIEW REPORT
NYSEG CLARK STREET FORMER MGP SITE (SITE NO. 706008)
GROUNDWATER ANALYTICAL RESULTS: SEPTEMBER 2021 - OCTOBER 2023

			Location ID	MW-09D	MW-09D	MW-09D	MW-10D	MW-10D	MW-10D
			Field Sample ID	MW-09D-09302021	MW-09D-09212022	MW-09D-10172023	MW-10D-09302021	MW-10D-09212022	MW-10D-10172023
			Lab Sample ID	480-190358-3	480-201940-4	480-213851-8	480-190358-7	480-201940-6	480-213851-3
			Sample Date	9/30/2021	9/21/2022	10/17/2023	9/30/2021	9/21/2022	10/17/2023
Chemical Name	CAS_RN	Unit	NYSDEC Class GA						
Volatile Organic Compounds (8260)									
Benzene	71-43-2	ug/L	1	130	120	140	700	480	540
Ethylbenzene	100-41-4	ug/L	5	1800	940	1300	2600	1400 J	1700
Toluene	108-88-3	ug/L	5	28	16 J	17 J	20 J	40 U	20 U
Xylenes	1330-20-7	ug/L	5	1700	920	1100	780	380	380
Semi Volatile Organic Compounds (8270)									
Acenaphthene	83-32-9	ug/L	20	480 J	370 J	900 J	260 J	1100 U	170 J
Acenaphthylene	208-96-8	ug/L	NS	7.8 J	2600 U	15	2.5 J	1100 U	1.6 J
Anthracene	120-12-7	ug/L	50	23 J	2600 U	46	7.4	1100 U	4.3 J
Benzo(A)Anthracene	56-55-3	ug/L	0.002	6.9 J	2600 U	26	5 U	1100 U	5 U
Benzo(A)Pyrene	50-32-8	ug/L	ND	6.2 J	2600 U	28	5 U	1100 U	5 U
Benzo(B)Fluoranthene	205-99-2	ug/L	0.002	4.6 J	2600 U	18	5 U	1100 U	5 U
Benzo(G,H,I)Perylene	191-24-2	ug/L	NS	3.3 J	2600 U	16	5 U	1100 U	5 U
Benzo(K)Fluoranthene	207-08-9	ug/L	0.002	25 U	2600 U	9	5 U	1100 U	5 U
Chrysene	218-01-9	ug/L	0.002	5 J	2600 U	24	5 U	1100 U	5 U
Dibenz(A,H)Anthracene	53-70-3	ug/L	NS	25 U	2600 U	3 J	5 U	1100 U	5 U
Fluoranthene	206-44-0	ug/L	50	26	2600 U	140 J	2.9 J	1100 U	1.8 J
Fluorene	86-73-7	ug/L	50	89	2600 U	200 J	52	1100 U	38
Indeno(1,2,3-C,D)Pyrene	193-39-5	ug/L	0.002	2.4 J	2600 U	12	5 U	1100 U	5 U
Naphthalene	91-20-3	ug/L	10	12000	13000	14000	8300	5400	4700
Phenanthrene	85-01-8	ug/L	50	140	2600 U	520 J	57	1100 U	35
Pyrene	129-00-0	ug/L	NS	34	2600 U	160 J	3.8 J	1100 U	2.1 J

U:Indicates the analyte was analyzed for but not detected.

J:Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

Shaded: exceeds the Class GA Criteria/Standard

ug/L: micrograms per liter (ppb)

NS: no standard or criteria is cited in TOGS 1.1.1

ND: non-detect

TABLE 5.3
2023-2024 PERIODIC REVIEW REPORT
NYSEG CLARK STREET FORMER MGP SITE (SITE NO. 706008)
GROUNDWATER ANALYTICAL RESULTS: SEPTEMBER 2021 - OCTOBER 2023

			Location ID	MW-PAR-01	MW-PAR-01	MW-PAR-01	MW-PAR-02	MW-PAR-02	MW-PAR-02
			Field Sample ID	MW-PAR-01-09302021	MW-PAR-01-09212022	MW-PAR-01-10172023	MW-PAR-02-09302021	MW-PAR-02-09212022	MW-PAR-02-10172023
			Lab Sample ID	480-190358-1	480-201940-3	480-213851-1	480-190358-5	480-201940-1	480-213851-2
			Sample Date	9/30/2021	9/21/2022	10/17/2023	9/30/2021	9/21/2022	10/17/2023
Chemical Name	CAS_RN	Unit	NYSDEC Class GA						
Volatile Organic Compounds (8260)									
Benzene	71-43-2	ug/L	1	29	24	26	170	150	190
Ethylbenzene	100-41-4	ug/L	5	2.9	1 U	3.1	440	170	61
Toluene	108-88-3	ug/L	5	1	1 U	1 U	10 U	10 U	1.2 J
Xylenes	1330-20-7	ug/L	5	0.85	2 U	0.76 J	79	18 J	36
Semi Volatile Organic Compounds (8270)									
Acenaphthene	83-32-9	ug/L	20	250	190	210	380	370	320
Acenaphthylene	208-96-8	ug/L	NS	4.8	50 U	3.9 J	4.5 J	250 U	2.5 J
Anthracene	120-12-7	ug/L	50	5.6	2.9 J	2.8 J	11	250 U	12
Benzo(A)Anthracene	56-55-3	ug/L	0.002	5 U	50 U	5 U	5 U	250 U	5.2 U
Benzo(A)Pyrene	50-32-8	ug/L	ND	5 U	50 U	5 U	5 U	250 U	5.2 U
Benzo(B)Fluoranthene	205-99-2	ug/L	0.002	5 U	50 U	5 U	5 U	250 U	5.2 U
Benzo(G,H,I)Perylene	191-24-2	ug/L	NS	5 U	50 U	5 U	5 U	250 U	5.2 U
Benzo(K)Fluoranthene	207-08-9	ug/L	0.002	5 U	50 U	5 U	5 U	250 U	5.2 U
Chrysene	218-01-9	ug/L	0.002	5 U	50 U	5 U	5 U	250 U	5.2 U
Dibenz(A,H)Anthracene	53-70-3	ug/L	NS	5 U	50 U	5 U	5 U	250 U	5.2 U
Fluoranthene	206-44-0	ug/L	50	8	4.9 J	8.5	6.8	250 U	7.4
Fluorene	86-73-7	ug/L	50	67	42 J	51	74 J	59 J	68
Indeno(1,2,3-C,D)Pyrene	193-39-5	ug/L	0.002	5 U	50 U	5 U	5 U	250 U	5.2 U
Naphthalene	91-20-3	ug/L	10	3.1 J	50 U	4.4 J	670	84 J	85
Phenanthrene	85-01-8	ug/L	50	73	35 J	37	110 J	120 J	100
Pyrene	129-00-0	ug/L	NS	11	5.3 J	11	7.7	250 U	8.1

U:Indicates the analyte was analyzed for but not detected.

J:Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

Shaded: exceeds the Class GA Criteria/Standard

ug/L: micrograms per liter (ppb)

NS: no standard or criteria is cited in TOGS 1.1.1

ND: non-detect

TABLE 5.4
2023-2024 PERIODIC REVIEW REPORT
NYSEG CLARK STREET FORMER MGP SITE (SITE NO. 706008)
NAPL REMOVAL VOLUMES: OCTOBER 2021 - MARCH 2024

	Oct-21			Nov-21			Jan-22			May-22		
Well ID	Sock Mass Initial (g)	Sock Mass Final (g)	Mass Removed (g)	Sock Mass Initial (g)	Sock Mass Final (g)	Mass Removed (g)	Sock Mass Initial (g)	Sock Mass Final (g)	Mass Removed (g)(1)	Sock Mass Initial (g)	Sock Mass Final (g)	Mass Removed (g)(2)
RW-01	345	2,410	2,065	345	2,400	2,055	338	2,408	2,070	1,084	2,780	1,696
RW-02	345	2,807	2,462	345	2,050	1,705	398	1,860	1,462	1,356	3,020	1,664
RW-03	345	2,353	2,008	345	2,360	2,015	-	-	9,560	-	-	7,034
RW-04	345	3,005	2,660	345	2,400	2,055	-	-	9,560	-	-	5,046
RW-05	345	3,033	2,688	345	2,670	2,325	271	2,549	2,278	1,515	3,930	2,415
RW-06	345	3,062	2,717	345	2,710	2,365	369	2,681	2,311	2,227	3,150	923
RW-07	345	2,540	2,195	345	2,170	1,825	361	3,021	2,660	-	-	5,046
RW-08	345	3,090	2,745	345	2,400	2,055	350	2,300	1,950	2,168	3,170	1,002
RW-09	345	3,090	2,745	345	2,800	2,455	328	1,469	1,141	2,309	3,210	901
RW-10	345	2,807	2,462	345	2,500	2,155	SNOW COVERED			921	4,550	3,629

TOTAL NAPL REMOVED (kg)(4)	224
TOTAL NAPL REMOVED (gal)(4)	58.66

(1) Mass removed for RW-03 and RW-04 was calculated based on volume of product removed via pumping, converted to mass using a product density of 1,010 kg/m3, or 3.82 kg/gal.
(2) Mass removed for RW-03, RW-04, and RW-07 was calculated based on volume of product removed via pumping, converted to mass using a product density of 1,010 kg/m^3, or 3.82 kg/gal.
(3) TBD sock mass final and mass removed to be determined during the second quarter of 2024.
(4) Total NAPL removed for RW-01, RW-02, RW-05, RW-06, RW-08, RW-09, and RW-10 does not include March 2024 volume.
(5) The August 2021 collection event has been excluded from this table since this event consisted of deployment of hydrophobic absorbent socks and no NAPL was collected.
g : grams
gal: gallons
kg: kilogram
TBD: to be measured during next event

TABLE 5.4
2023-2024 PERIODIC REVIEW REPORT
NYSEG CLARK STREET FORMER MGP SITE (SITE NO. 706008)
NAPL REMOVAL VOLUMES: OCTOBER 2021 - MARCH 2024

	Sep-22			Nov-22			Mar-23			May-23		
Well ID	Sock Mass Initial (g)	Sock Mass Final (g)	Mass Removed (g)[2]	Sock Mass Initial (g)	Sock Mass Final (g)	Mass Removed (g)[2]	Sock Mass Initial (g)	Sock Mass Final (g)	Mass Removed (g)[2]	Sock Mass Initial (g)	Sock Mass Final (g)	Mass Removed (g)[2]
RW-01	250	430	180	280	610	330	350	650	300	190	650	460
RW-02	300	460	160	340	460	120	430	630	200	290	670	380
RW-03	-	-	1,911	-	-	9,558	-	-	5,734	-	-	5,734
RW-04	-	-	3,823	-	-	3,823	-	-	3,823	-	-	7,646
RW-05	280	730	450	330	710	380	370	720	350	340	700	360
RW-06	310	460	150	330	530	200	370	540	170	350	650	300
RW-07	-	-	3,823	-	-	3,823	-	-	5,734	-	-	8,220
RW-08	270	480	210	290	450	160	370	640	270	280	640	360
RW-09	250	330	80	330	490	160	400	690	290	280	650	370
RW-10	280	670	390	240	650	410	270	630	360	220	530	310

TOTAL NAPL REMOVED (kg)[4]	224
TOTAL NAPL REMOVED (gal)[4]	58.66

(1) Mass removed for RW-03 and RW-04 was calculated based on volume of product removed via pumping, converted to mass using a product density of 1,010 kg/m3, or 3.82 kg/gal.
(2) Mass removed for RW-03, RW-04, and RW-07 was calculated based on volume of product removed via pumping, converted to mass using a product density of 1,010 kg/m^3, or 3.82 kg/gal.
(3) TBD sock mass final and mass removed to be determined during the second quarter of 2024.
(4) Total NAPL removed for RW-01, RW-02, RW-05, RW-06, RW-08, RW-09, and RW-10 does not include March 2024 volume.
(5) The August 2021 collection event has been excluded from this table since this event consisted of deployment of hydrophobic absorbent socks and no NAPL was collected.
g : grams
gal: gallons
kg: kilogram
TBD: to be measured during next event

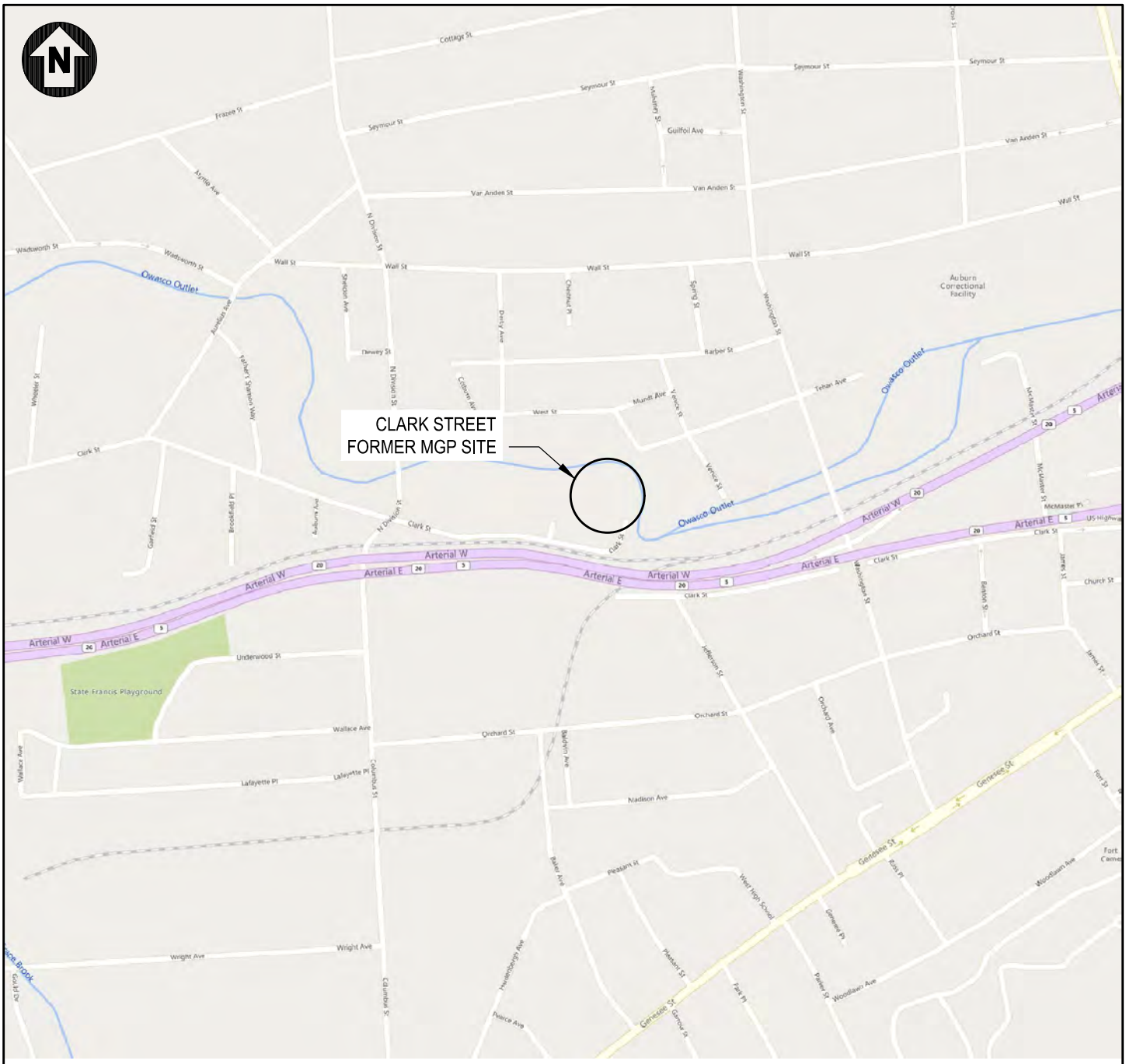
TABLE 5.4
2023-2024 PERIODIC REVIEW REPORT
NYSEG CLARK STREET FORMER MGP SITE (SITE NO. 706008)
NAPL REMOVAL VOLUMES: OCTOBER 2021 - MARCH 2024

	Sep-23			Nov-23			Mar-24			Total
Well ID	Sock Mass Initial (g)	Sock Mass Final (g)	Mass Removed (g)[2]	Sock Mass Initial (g)	Sock Mass Final (g)	Mass Removed (g)[2]	Sock Mass Initial (g)	Sock Mass Final (g)[3]	Mass Removed (g)[2][3]	Volume Removed (gal)[4]
RW-01	380	550	170	280	680	400	310	TBD	TBD	2.54
RW-02	280	470	190	320	670	350	340	TBD	TBD	2.27
RW-03	-	-	11,470	-	-	3,823	-	-	302.03	15.47
RW-04	-	-	7,646	-	-	3,823	-	-	99.4	13.08
RW-05	350	690	340	250	690	440	370	TBD	TBD	3.15
RW-06	350	690	340	280	630	350	360	TBD	TBD	2.57
RW-07	-	-	6,500	-	-	5,734	-	-	504.67	12.05
RW-08	280	550	270	210	660	450	410	TBD	TBD	2.48
RW-09	350	540	190	200	670	470	420	TBD	TBD	2.30
RW-10	230	610	380	220	620	400	330	TBD	TBD	2.75

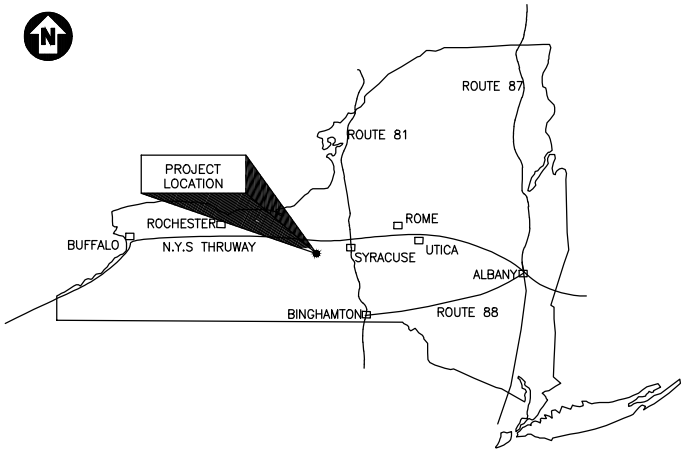
TOTAL NAPL REMOVED (kg)[4]	224
TOTAL NAPL REMOVED (gal)[4]	58.66

(1) Mass removed for RW-03 and RW-04 was calculated based on volume of product removed via pumping, converted to mass using a product density of 1,010 kg/m3, or 3.82 kg/gal.
(2) Mass removed for RW-03, RW-04, and RW-07 was calculated based on volume of product removed via pumping, converted to mass using a product density of 1,010 kg/m^3, or 3.82 kg/gal.
(3) TBD sock mass final and mass removed to be determined during the second quarter of 2024.
(4) Total NAPL removed for RW-01, RW-02, RW-05, RW-06, RW-08, RW-09, and RW-10 does not include March 2024 volume.
(5) The August 2021 collection event has been excluded from this table since this event consisted of deployment of hydrophobic absorbent socks and no NAPL was collected.
g : grams
gal: gallons
kg: kilogram
TBD: to be measured during next event

FIGURES



NOT TO SCALE



THE STATE OF NEW YORK

NOT TO SCALE

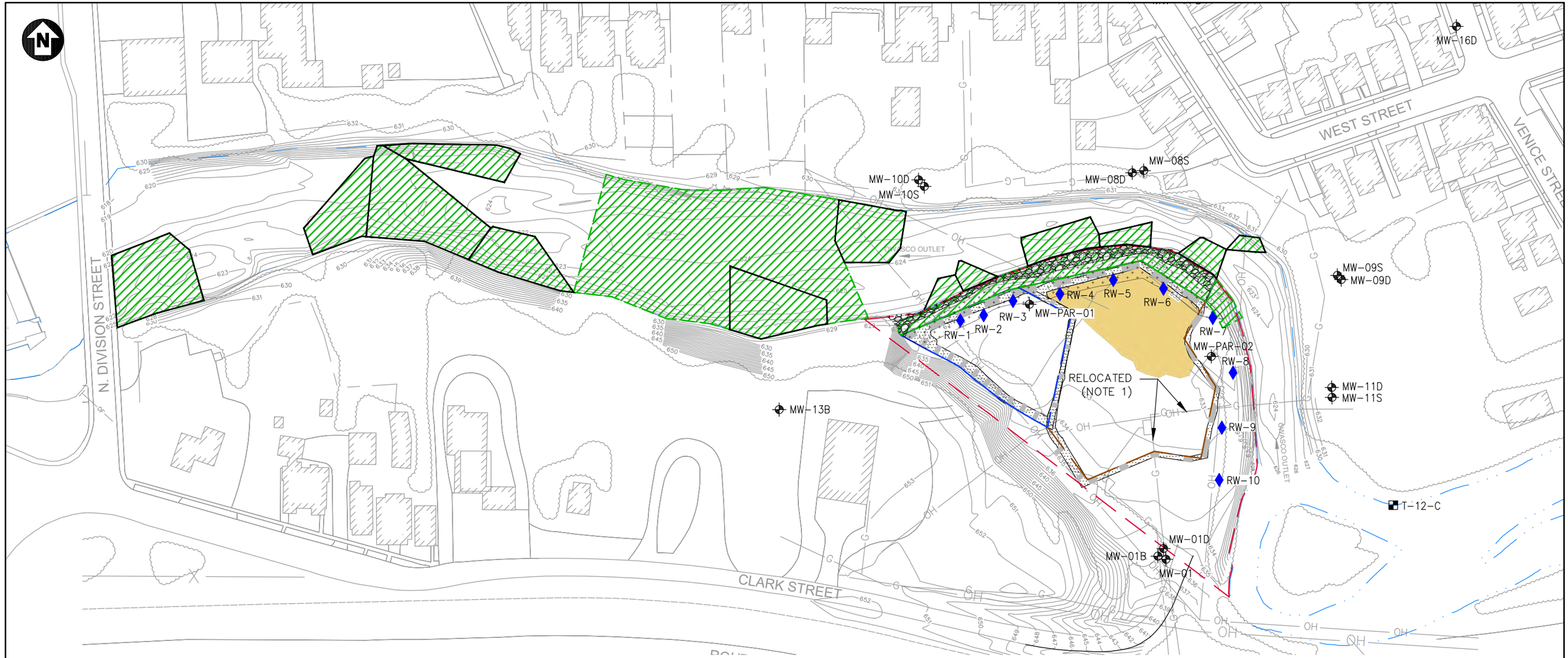
FIGURE 2.1

2023–2024 PERIODIC REVIEW REPORT
NYSEG CLARK STREET FORMER MGP SITE
(SITE NO. 706008)
AUBURN, NEW YORK

SITE LOCATION MAP

PARSONS
301 Plainfield Rd, Ste 350, Syracuse, NY, Ph: 315-451-9560

FILE NAME: P:\IBERDROLA_AVANGRID\452562 & 452563 AUBURN CLARK & MCMASTER STREETS\08 TECHNICAL\CAD\CLARK ST\2023–2024 PRR FIGURES\FIGURE 2.1 – SITE LOCATION MAP.DWG
PLOT DATE: 4/4/2024 3:48 PM PLOTTED BY: NASSIMOS, JEFFREY [US–US]



LEGEND:

- NATURAL GAS LINE
- OVERHEAD ELECTRIC
- EXISTING CONTOUR
- EXISTING UTILITY POLE
- EXISTING BUILDING
- DESIGN SEDIMENT REMOVAL LIMITS (NOTE 4)
- EDGE OF WATER
- REMEDIAL CONSTRUCTION PHASE 1
- *PHASE 2 (NOT SHOWN) – ACTIVITIES COMPLETED BY NYSEG
- REMEDIAL CONSTRUCTION PHASE 3
- ENVIRONMENTAL EASEMENT/SITE BOUNDARY (NOTE 2)
- REMEDIAL CONSTRUCTION PHASE 4
- SOIL STABILIZATION WALL
- SOIL STABILIZATION WALL REMOVED SECTION (NOTE 3)
- SITE COVER
- ECOLOGICAL BUFFER ZONE
- MONITORING WELL
- NAPL COLLECTION WELL
- 2010 PDI SAMPLE LOCATION T-12-C (NOTE 5)

NOTES:

1. GAS LINES AND OVERHEAD ELECTRIC/POLES WITHIN THE PHASE 3 AREA WERE RELOCATED DURING PHASE 2 ACTIVITIES.
2. THE ENVIRONMENTAL EASEMENT/SITE BOUNDARY FOR CLARK ST (APPENDIX A) CONTAINS THE ENTIRETY OF PARCEL 115.50-2-37. NO PARCEL BOUNDARY SURVEY WAS LOCATED DURING PREPARATION OF THIS DOCUMENT, THE LINE SHOWN IS ESTIMATED FOR ILLUSTRATION ONLY.
3. DESIGN LOCATION OF ISS WALL REMOVED SECTIONS FROM ARCADIS DESIGN DRAWING G22 "SOIL STABILIZATION WALL REMOVAL PLAN" AUGUST 2014.
4. LOCATIONS OF DESIGN SEDIMENT REMOVAL LIMITS TAKEN FROM ARCADIS DESIGN DRAWING G6 "GENERAL REMOVAL PLAN", AUGUST 2014.
5. LOCATION OF 2010 SEDIMENT SAMPLE T-12-C TAKEN FROM ARCADIS DESIGN DRAWING G16 "SEDIMENT REMOVAL PLAN (PHASE 4)", AUGUST 2014.

100 50 0 100 200

SCALE: 1"=100'

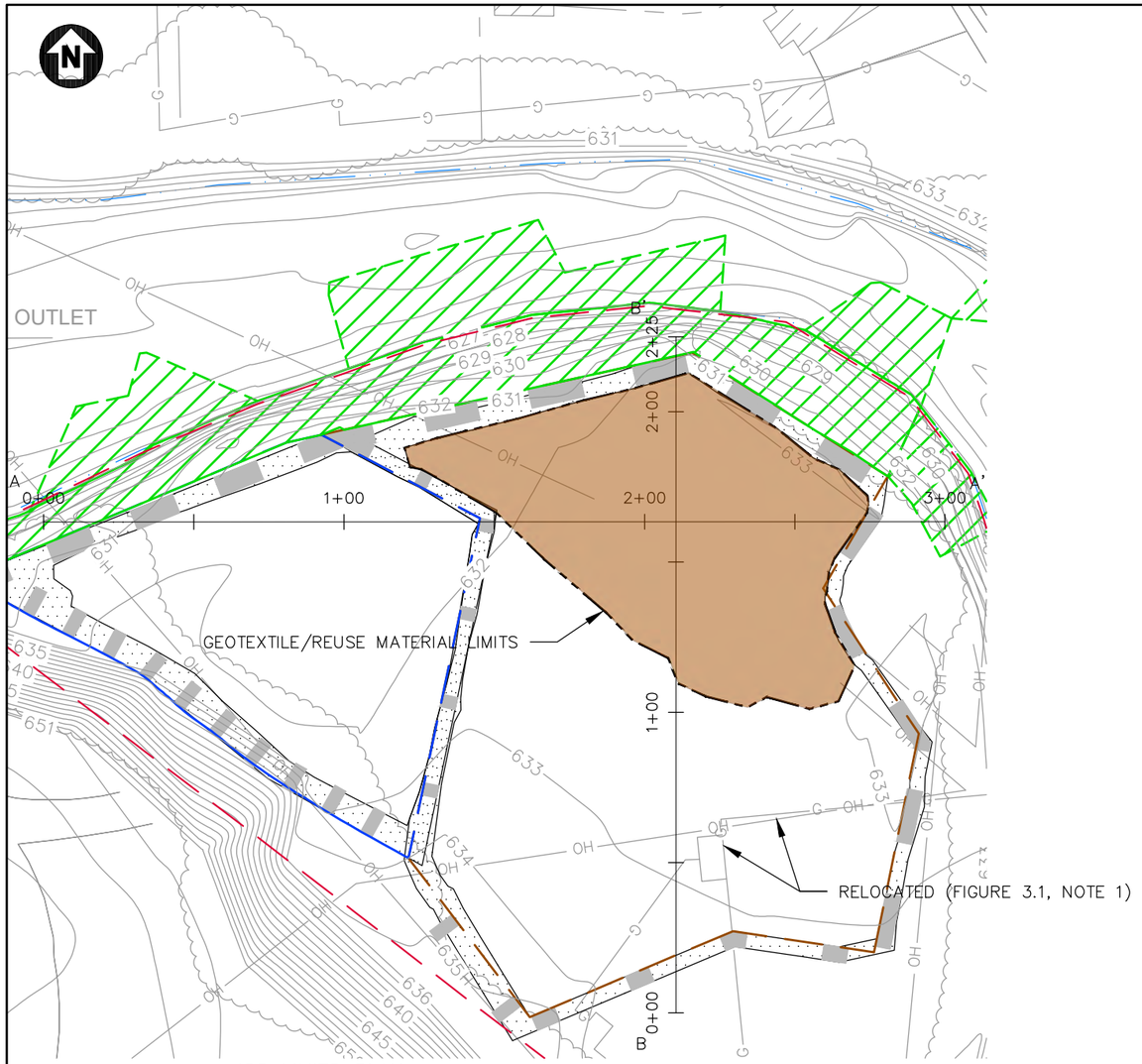
FIGURE 3.1

2023-2024 PERIODIC REVIEW REPORT
NYSEG CLARK STREET FORMER MGP SITE
(SITE NO. 706008)
AUBURN, NEW YORK

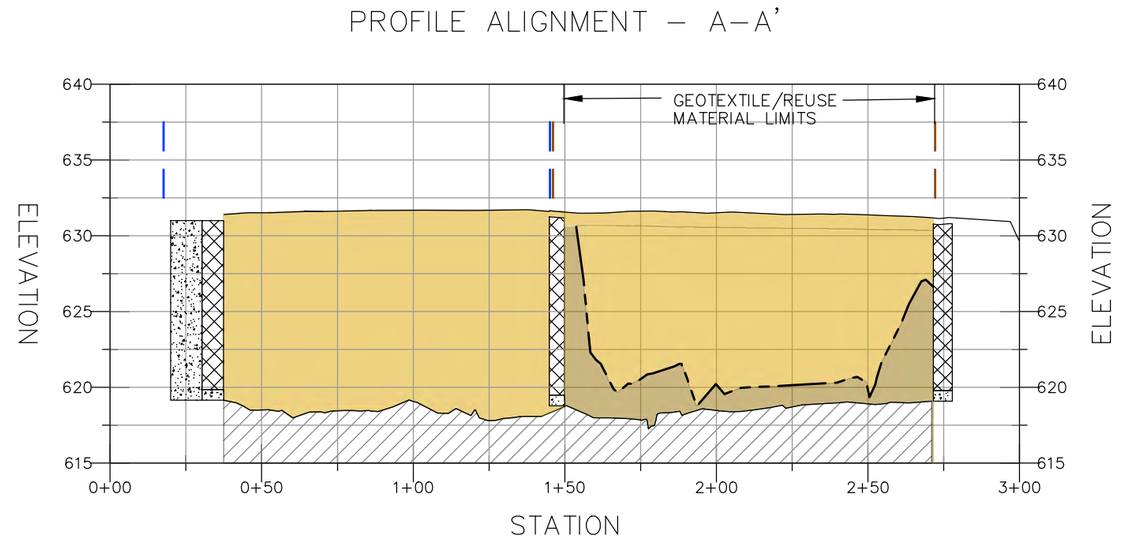
SITE/REMEDY LAYOUT

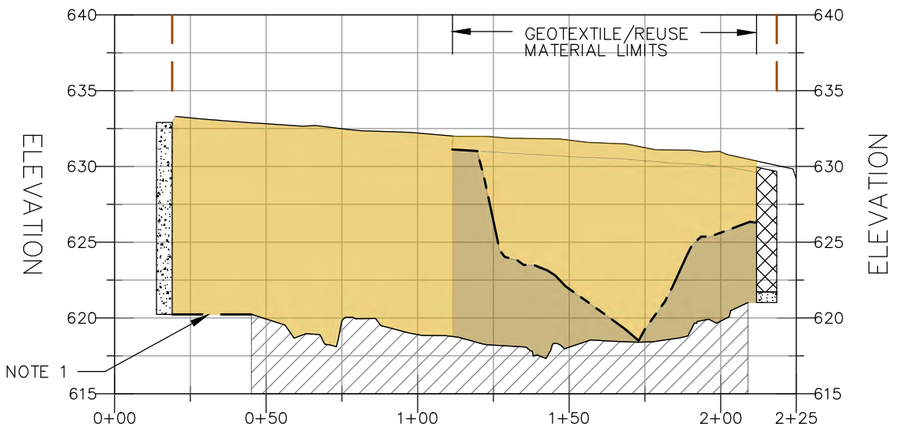
PARSONS
301 Plainfield Rd. Ste 350, Syracuse, NY. Ph: 315-451-9560

FILE NAME: P:\IBERDROLA_AVANGRID\452562 & 452563 AUBURN CLARK & MCMASTER STREETS\08 TECHNICAL\CAD\CLARK ST\2023-2024 PRR FIGURES\FIGURE 3.1 SITE REMEDY LAYOUT.DWG
PLOT DATE: 4/5/2024 9:58 AM PLOTTED BY: NASSIMOS, JEFFREY [US-US]



ISS LIMITS PLAN
1" = 50'-0"





ISS LIMITS PROFILE
1" = 50'-0" HORIZONTAL
1" = 10'-0" VERTICAL 5X EXAGGERATION

PLAN

- ENVIRONMENTAL EASEMENT/SITE BOUNDARY (FIGURE 3.1, NOTE 2)
- EDGE OF WATER
- REMEDIAL CONSTRUCTION PHASE 1
- REMEDIAL CONSTRUCTION PHASE 3
- REMEDIAL CONSTRUCTION PHASE 4
- SOIL STABILIZATION WALL
- SOIL STABILIZATION WALL REMOVED SECTIONS (FIGURE 3.1, NOTE 3)
- SITE COVER

LEGEND:

PROFILE

- REMEDIAL CONSTRUCTION PHASE 1
- REMEDIAL CONSTRUCTION PHASE 3
- ISS WALL PORTION REMOVED
- ISS WALL PORTION REMAINING
- IMPORTED GENERAL FILL
- GEOTEXTILE/REUSE MATERIAL LIMITS
- REUSE MATERIAL
- BEDROCK

NOTES:

1. BEDROCK SURFACE FROM STATION 0+19 TO 0+45 ON PROFILE ALIGNMENT B–B' IS APPROXIMATED TO FACILITATE PLACEMENT OF IMPORTED GENERAL FILL FOR ILLUSTRATION.

50 25 0 50 100

PLAN AND PROFILE: 1"=50' HORIZONTAL SCALE

10 5 0 10 20

PROFILE VERTICAL SCALE: 1"=10'

FIGURE 3.2

2023–2024 PERIODIC REVIEW REPORT
NYSEG CLARK STREET FORMER MGP SITE
(SITE NO. 706008)
AUBURN, NEW YORK

COVER SYSTEM EXTENTS AND HORIZONTAL PROFILE

PARSONS
301 Plainfield Rd. Ste 350, Syracuse, NY. Ph: 315-451-9560

FILE NAME: P:\IBERDROLA_AVANGRID\452562 & 452563 AUBURN CLARK & MCMASTER STREETS\08 TECHNICAL\CAD\CLARK ST\2023-2024 PRR FIGURES\FIGURE 3.2 COVER SYSTEM EXTENTS AND HORIZONTAL PROFILE.DWG
PLOT DATE: 5/13/2024 3:10 PM PLOTTED BY: NASSIMOS, JEFFREY [US-US]

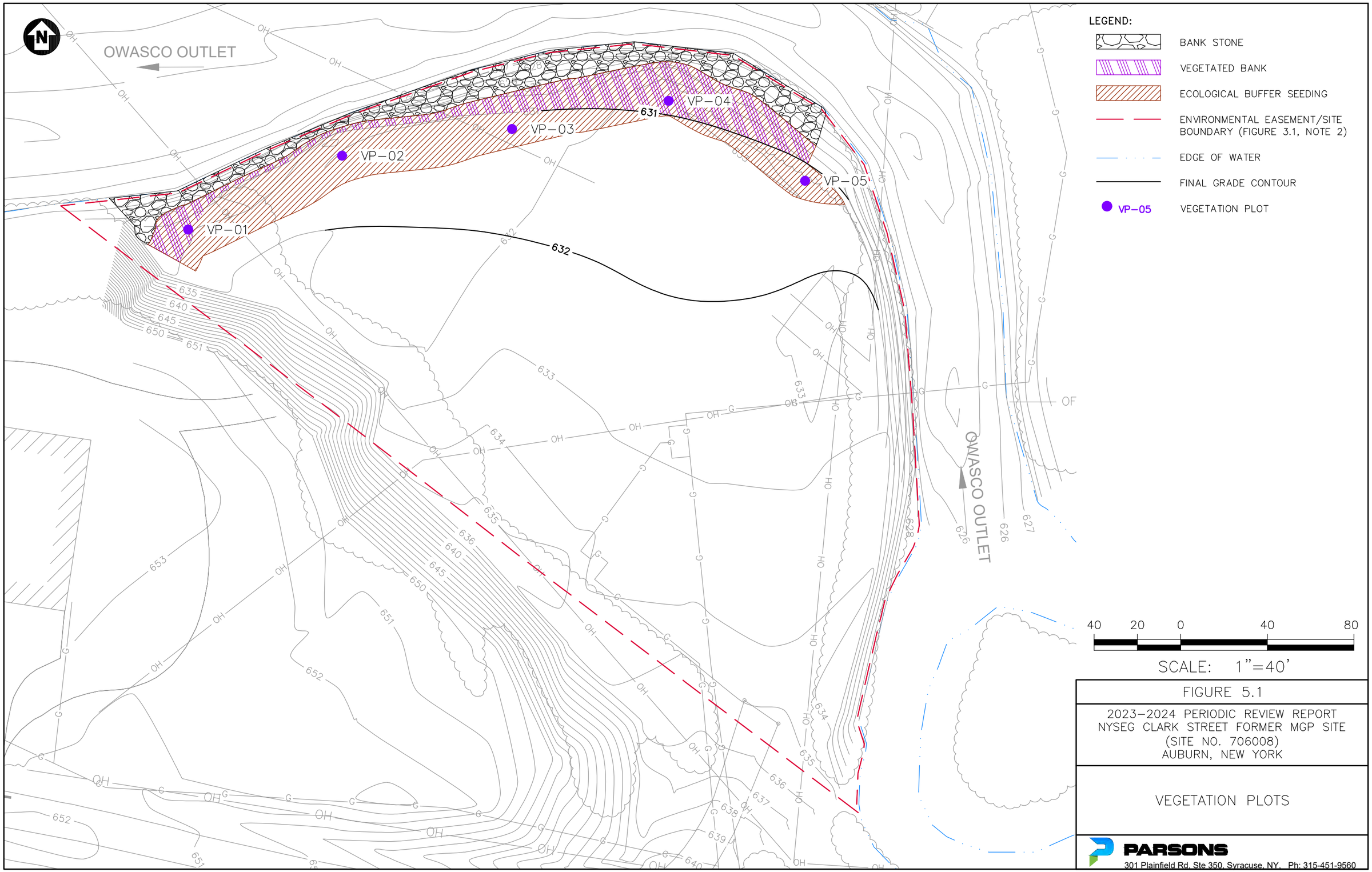


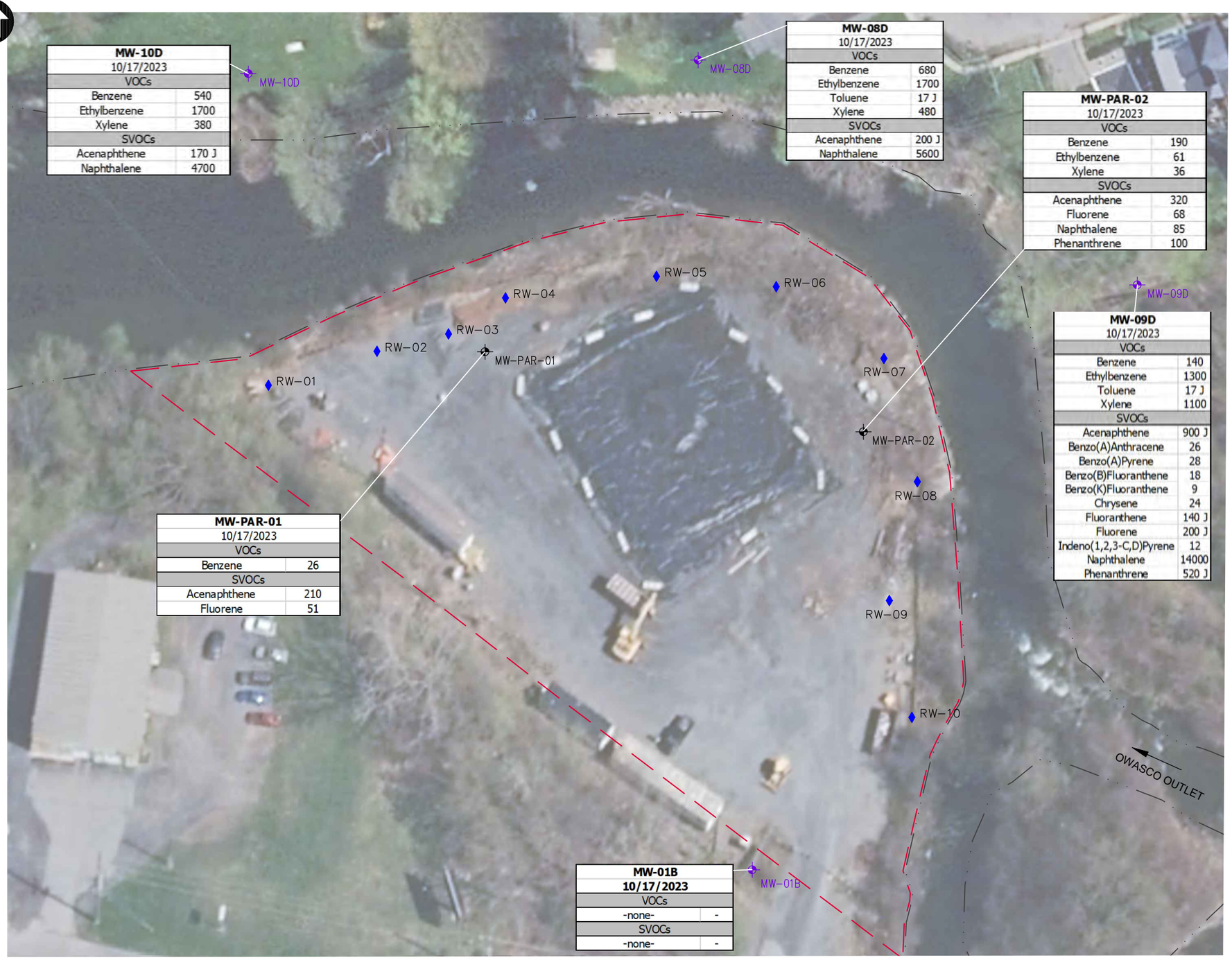
FIGURE 5.1

2023–2024 PERIODIC REVIEW REPORT
NYSEG CLARK STREET FORMER MGP SITE
(SITE NO. 706008)
AUBURN, NEW YORK

VEGETATION PLOTS

PARSONS
301 Plainfield Rd. Ste 350, Syracuse, NY. Ph: 315-451-9560

FILE NAME: P:\IBERDROLA_AVANGRID\452562 & 452563 AUBURN CLARK & MCMASTER STREETS\08 TECHNICAL\CAD\CLARK ST\2023–2024 PRR FIGURES\FIGURE 5.1 VEGETATION PLOTS.DWG
PLOT DATE: 4/5/2024 1:49 PM PLOTTED BY: NASSIMOS, JEFFREY [US–US]



MW-10D	
10/17/2023	
VOCs	
Benzene	540
Ethylbenzene	1700
Xylene	380
SVOCs	
Acenaphthene	170 J
Naphthalene	4700

MW-08D	
10/17/2023	
VOCs	
Benzene	680
Ethylbenzene	1700
Toluene	17 J
Xylene	480
SVOCs	
Acenaphthene	200 J
Naphthalene	5600

MW-PAR-02	
10/17/2023	
VOCs	
Benzene	190
Ethylbenzene	61
Xylene	36
SVOCs	
Acenaphthene	320
Fluorene	68
Naphthalene	85
Phenanthrene	100

MW-09D	
10/17/2023	
VOCs	
Benzene	140
Ethylbenzene	1300
Toluene	17 J
Xylene	1100
SVOCs	
Acenaphthene	900 J
Benzo(A)Anthracene	26
Benzo(A)Pyrene	28
Benzo(B)Fluoranthene	18
Benzo(K)Fluoranthene	9
Chrysene	24
Fluoranthene	140 J
Fluorene	200 J
Indeno(1,2,3-C,D)Pyrene	12
Naphthalene	14000
Phenanthrene	520 J

MW-PAR-01	
10/17/2023	
VOCs	
Benzene	26
SVOCs	
Acenaphthene	210
Fluorene	51

MW-01B	
10/17/2023	
VOCs	
-none-	-
SVOCs	
-none-	-

50 25 0 50 100

SCALE: 1”=50’

LEGEND:

- ENVIRONMENTAL EASEMENT/SITE BOUNDARY (FIGURE 3.1, NOTE 2)
- RECOVERY WELL
- OVERBURDEN MONITORING WELL
- BEDROCK MONITORING WELL

NOTES:

1. PROPERTY LINE DIGITIZED FROM INFORMATION TAKEN FROM CAYUGA COUNTY GIS, 2024. LOCATION IS APPROXIMATE.
2. VALUES SHOWN IN ug/L.
3. TABLE QUALIFIERS:
   - 3.A. U: COMPOUNDS NOT DETECTED ABOVE THE REPORTING LIMIT
   - 3.B. J: ESTIMATED VALUE
4. ONLY COMPOUNDS WITH VALUES EXCEEDING THE NYS CLASS GA STANDARDS CRITERIA ARE SHOWN.

FIGURE 5.2

2023–2024 PERIODIC REVIEW REPORT
NYSEG CLARK STREET FORMER MGP SITE
(SITE NO. 706008)
AUBURN, NEW YORK

GROUNDWATER MONITORING
ANALYTICAL RESULTS
2023

PARSONS
301 Plainfield Rd, Ste 350, Syracuse, NY, Ph: 315-451-9560

FILE NAME: P:\IBERDROLA_AVANGRID\452562 & 452563 AUBURN CLARK & MCMASTER STREETS\08 TECHNICAL\CAD\CLARK ST\2023–2024 PRR FIGURES\FIGURE 5.2 GROUNDWATER RESULTS ANALYTICAL MONITORING – 2023.DWG
PLOT DATE: 5/13/2024 3:43 PM PLOTTED BY: NASSIMOS, JEFFREY [US–US]

APPENDIX A ENVIRONMENTAL EASEMENT

CAYUGA COUNTY – STATE OF NEW YORK
SUSAN M. DWYER, COUNTY CLERK
160 GENESEE ST 1ST FLOOR, AUBURN, NEW YORK 13021

COUNTY CLERK'S RECORDING PAGE
*****THIS PAGE IS PART OF THE DOCUMENT – DO NOT DETACH*****

BOOK/PAGE: 3918 / 91
INSTRUMENT #: 2020-197719

Receipt#: 2020242965
Clerk: JB
Rec Date: 09/03/2020 02:21:48 PM
Doc Grp: RP
Descrip: EASEMENT
Num Pgs: 10
Rec'd Frm: STEWART TITLE INSURANCE COMPANY - UPSTATE

Party1: NEW YORK STATE ELECTRIC & GAS CORPORATION
Party2: NEW YORK STATE PEOPLE OF
Town: AUBURN

Recording:	
Cover Page	0.00
Recording Fee	0.00
Cultural Ed	0.00
Records Management - Coun	0.00
Records Management - Stat	0.00
Cross References	0.00
TP584	0.00
Sub Total:	0.00
Transfer Tax	
Transfer Tax - State	0.00
Sub Total:	0.00
Total:	0.00

****** NOTICE: THIS IS NOT A BILL ******

***** Transfer Tax *****
Transfer Tax #: 246
Exempt
Consideration: 0.00

Total: 0.00

WARNING***
*** Information may be amended during the verification process, and may not be reflected on this cover page.

THIS PAGE CONSTITUTES THE CLERK'S ENDORSEMENT, REQUIRED BY SECTION 316-a (5) & 319 OF THE REAL PROPERTY LAW OF THE STATE OF NEW YORK.

Susan M. Dwyer
Cayuga County Clerk

Record and Return To:

ELECTRONICALLY RECORDED BY CSC INGEO

ENVIRONMENTAL EASEMENT GRANTED PURSUANT TO ARTICLE 71, TITLE 36 OF THE NEW YORK STATE ENVIRONMENTAL CONSERVATION LAW

THIS INDENTURE made this 10th day of August, 2020 between Owner, New York State Electric & Gas Corporation, having an office at 89 East Avenue, Rochester, County of Monroe, State of New York (the "Grantor"), and The People of the State of New York (the "Grantee"), acting through their Commissioner of the Department of Environmental Conservation (the "Commissioner", or "NYSDEC" or "Department" as the context requires) with its headquarters located at 625 Broadway, Albany, New York 12233,

Barclay Damon LLP
2000 First Federal Plaza
28 East Main Street
Rochester NY 14614

WHEREAS, the Legislature of the State of New York has declared that it is in the public interest to encourage the remediation of abandoned and likely contaminated properties ("sites") that threaten the health and vitality of the communities they burden while at the same time ensuring the protection of public health and the environment; and

WHEREAS, the Legislature of the State of New York has declared that it is in the public interest to establish within the Department a statutory environmental remediation program that includes the use of Environmental Easements as an enforceable means of ensuring the performance of operation, maintenance, and/or monitoring requirements and the restriction of future uses of the land, when an environmental remediation project leaves residual contamination at levels that have been determined to be safe for a specific use, but not all uses, or which includes engineered structures that must be maintained or protected against damage to perform properly and be effective, or which requires groundwater use or soil management restrictions; and

WHEREAS, the Legislature of the State of New York has declared that Environmental Easement shall mean an interest in real property, created under and subject to the provisions of Article 71, Title 36 of the New York State Environmental Conservation Law ("ECL") which contains a use restriction and/or a prohibition on the use of land in a manner inconsistent with engineering controls which are intended to ensure the long term effectiveness of a site remedial program or eliminate potential exposure pathways to hazardous waste or petroleum; and

WHEREAS, Grantor, is the owner of real property located at the address of 211 Clark Street, in the City of Auburn, County of Cayuga and State of New York, known and designated on the tax map of the County Clerk of Cayuga as tax map parcel numbers: Section 115.50 Block 02 Lot 37, being the same as that property conveyed to Grantor by deed dated October 9, 1905 and recorded in the Cayuga County Clerk's Office in Liber and Page 36/328. The property subject to this Environmental Easement (the "Controlled Property") comprises approximately 1.6 +/- acres, and is hereinafter more fully described in the Land Title Survey dated June 10, 2016 prepared by Paul J. Olszewski, P.L.S., which will be attached to the Site Management Plan. The Controlled Property description is set forth in and attached hereto as Schedule A; and

WHEREAS, the Department accepts this Environmental Easement in order to ensure the protection of public health and the environment and to achieve the requirements for remediation established for the Controlled Property until such time as this Environmental Easement is extinguished pursuant to ECL Article 71, Title 36; and

NOW THEREFORE, in consideration of the mutual covenants contained herein and the terms and conditions of Order on Consent Index Number: DO-0002-9309, Grantor conveys to Grantee a permanent Environmental Easement pursuant to ECL Article 71, Title 36 in, on, over, under, and upon the Controlled Property as more fully described herein ("Environmental Easement").

1. Purposes. Grantor and Grantee acknowledge that the Purposes of this Environmental Easement are: to convey to Grantee real property rights and interests that will run with the land in perpetuity in order to provide an effective and enforceable means of encouraging the reuse and redevelopment of this Controlled Property at a level that has been determined to be safe for a specific use while ensuring the performance of operation, maintenance, and/or monitoring requirements; and to ensure the restriction of future uses of the land that are inconsistent with the above-stated purpose.

2. Institutional and Engineering Controls. The controls and requirements listed in the Department approved Site Management Plan ("SMP") including any and all Department approved amendments to the SMP are incorporated into and made part of this Environmental Easement. These controls and requirements apply to the use of the Controlled Property, run with the land, are binding on the Grantor and the Grantor's successors and assigns, and are enforceable in law or equity against any owner of the Controlled Property, any lessees and any person using the Controlled Property.

A. (1) The Controlled Property may be used for:

Commercial as described in 6 NYCRR Part 375-1.8(g)(2)(iii) and Industrial as described in 6 NYCRR Part 375-1.8(g)(2)(iv)

(2) All Engineering Controls must be operated and maintained as specified in the Site Management Plan (SMP);

(3) All Engineering Controls must be inspected at a frequency and in a manner defined in the SMP;

(4) The use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the NYSDOH or the Cayuga County Department of Health to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval to do so from the Department;

(5) Groundwater and other environmental or public health monitoring must be performed as defined in the SMP;

(6) Data and information pertinent to Site Management of the Controlled Property must be reported at the frequency and in a manner defined in the SMP;

(7) All future activities on the property that will disturb remaining contaminated material must be conducted in accordance with the SMP;

(8) Monitoring to assess the performance and effectiveness of the remedy must be performed as defined in the SMP;

(9) Operation, maintenance, monitoring, inspection, and reporting of any mechanical or physical components of the remedy shall be performed as defined in the SMP;

(10) Access to the site must be provided to agents, employees or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by this Environmental Easement.

B. The Controlled Property shall not be used for Residential or Restricted Residential purposes as defined in 6NYCRR 375-1.8(g)(2)(i) and (ii), and the above-stated engineering controls may not be discontinued without an amendment or extinguishment of this Environmental Easement.

C. The SMP describes obligations that the Grantor assumes on behalf of Grantor, its successors and assigns. The Grantor's assumption of the obligations contained in the SMP which may include sampling, monitoring, and/or operating a treatment system, and providing certified reports to the NYSDEC, is and remains a fundamental element of the Department's determination that the Controlled Property is safe for a specific use, but not all uses. The SMP may be modified in accordance with the Department's statutory and regulatory authority. The Grantor and all successors and assigns, assume the burden of complying with the SMP and obtaining an up-to-date version of the SMP from:

Site Control Section
Division of Environmental Remediation
NYSDEC
625 Broadway
Albany, New York 12233
Phone: (518) 402-9553

D. Grantor must provide all persons who acquire any interest in the Controlled Property a true and complete copy of the SMP that the Department approves for the Controlled Property and all Department-approved amendments to that SMP.

E. Grantor covenants and agrees that until such time as the Environmental Easement is extinguished in accordance with the requirements of ECL Article 71, Title 36 of the ECL, the property deed and all subsequent instruments of conveyance relating to the Controlled Property shall state in at least fifteen-point bold-faced type:

This property is subject to an Environmental Easement held by the New York State Department of Environmental Conservation

pursuant to Title 36 of Article 71 of the Environmental Conservation Law.

F. Grantor covenants and agrees that this Environmental Easement shall be incorporated in full or by reference in any leases, licenses, or other instruments granting a right to use the Controlled Property.

G. Grantor covenants and agrees that it shall, at such time as NYSDEC may require, submit to NYSDEC a written statement by an expert the NYSDEC may find acceptable certifying under penalty of perjury, in such form and manner as the Department may require, that:

(1) the inspection of the site to confirm the effectiveness of the institutional and engineering controls required by the remedial program was performed under the direction of the individual set forth at 6 NYCRR Part 375-1.8(h)(3).

(2) the institutional controls and/or engineering controls employed at such site:

(i) are in-place;

(ii) are unchanged from the previous certification, or that any identified changes to the controls employed were approved by the NYSDEC and that all controls are in the Department-approved format; and

(iii) that nothing has occurred that would impair the ability of such control to protect the public health and environment;

(3) the owner will continue to allow access to such real property to evaluate the continued maintenance of such controls;

(4) nothing has occurred that would constitute a violation or failure to comply with any site management plan for such controls;

(5) the report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;

(6) to the best of his/her 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

(7) the information presented is accurate and complete.

3. Right to Enter and Inspect. Grantee, its agents, employees, or other representatives of the State may enter and inspect the Controlled Property in a reasonable manner and at reasonable times to assure compliance with the above-stated restrictions.

4. Reserved Grantor's Rights. Grantor reserves for itself, its assigns, representatives, and successors in interest with respect to the Property, all rights as fee owner of the Property, including:

A. Use of the Controlled Property for all purposes not inconsistent with, or limited by the terms of this Environmental Easement;

B. The right to give, sell, assign, or otherwise transfer part or all of the underlying fee interest to the Controlled Property, subject and subordinate to this Environmental Easement;

5. Enforcement

A. This Environmental Easement is enforceable in law or equity in perpetuity by Grantor, Grantee, or any affected local government, as defined in ECL Section 71-3603, against the owner of the Property, any lessees, and any person using the land. Enforcement shall not be defeated because of any subsequent adverse possession, laches, estoppel, or waiver. It is not a defense in any action to enforce this Environmental Easement that: it is not appurtenant to an interest in real property; it is not of a character that has been recognized traditionally at common law; it imposes a negative burden; it imposes affirmative obligations upon the owner of any interest in the burdened property; the benefit does not touch or concern real property; there is no privity of estate or of contract; or it imposes an unreasonable restraint on alienation.

B. If any person violates this Environmental Easement, the Grantee may revoke the Certificate of Completion with respect to the Controlled Property.

C. Grantee shall notify Grantor of a breach or suspected breach of any of the terms of this Environmental Easement. Such notice shall set forth how Grantor can cure such breach or suspected breach and give Grantor a reasonable amount of time from the date of receipt of notice in which to cure. At the expiration of such period of time to cure, or any extensions granted by Grantee, the Grantee shall notify Grantor of any failure to adequately cure the breach or suspected breach, and Grantee may take any other appropriate action reasonably necessary to remedy any breach of this Environmental Easement, including the commencement of any proceedings in accordance with applicable law.

D. The failure of Grantee to enforce any of the terms contained herein shall not be deemed a waiver of any such term nor bar any enforcement rights.

6. Notice. Whenever notice to the Grantee (other than the annual certification) or approval from the Grantee is required, the Party providing such notice or seeking such approval shall identify the Controlled Property by referencing the following information:

County, NYSDEC Site Number, NYSDEC Brownfield Cleanup Agreement, State Assistance Contract or Order Number, and the County tax map number or the Liber and Page or computerized system identification number.

Parties shall address correspondence to:

Site Number: 706008
Office of General Counsel
NYSDEC
625 Broadway
Albany New York 12233-5500

With a copy to:

Site Control Section
Division of Environmental Remediation
NYSDEC
625 Broadway
Albany, NY 12233

All notices and correspondence shall be delivered by hand, by registered mail or by Certified mail and return receipt requested. The Parties may provide for other means of receiving and communicating notices and responses to requests for approval.

7. Recordation. Grantor shall record this instrument, within thirty (30) days of execution of this instrument by the Commissioner or her/his authorized representative in the office of the recording officer for the county or counties where the Property is situated in the manner prescribed by Article 9 of the Real Property Law.

8. Amendment. Any amendment to this Environmental Easement may only be executed by the Commissioner of the New York State Department of Environmental Conservation or the Commissioner's Designee, and filed with the office of the recording officer for the county or counties where the Property is situated in the manner prescribed by Article 9 of the Real Property Law.

9. Extinguishment. This Environmental Easement may be extinguished only by a release by the Commissioner of the New York State Department of Environmental Conservation, or the Commissioner's Designee, and filed with the office of the recording officer for the county or counties where the Property is situated in the manner prescribed by Article 9 of the Real Property Law.

10. Joint Obligation. If there are two or more parties identified as Grantor herein, the obligations imposed by this instrument upon them shall be joint and several.

11. Consistency with the SMP. To the extent there is any conflict or inconsistency between the terms of this Environmental Easement and the SMP, regarding matters specifically addressed by the SMP, the terms of the SMP will control.

Remainder of Page Intentionally Left Blank

IN WITNESS WHEREOF, Grantor has caused this instrument to be signed in its name.

New York State Electric & Gas Corporation:

By: _____

Print Name: Timothy Altier

Title: Manager Date: 7/27/20

Grantor's Acknowledgment

STATE OF NEW YORK)
) ss:
COUNTY OF Monroe)

On the 27 day of July, in the year 2020, before me, the undersigned, personally appeared Timothy Altier, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s) on the instrument, the individual(s), or the person upon behalf of which the individual(s) acted, executed the instrument.

_____
Notary Public - State of New York

Amanda S Deegan
Notary Public State of NY
No. 01DE6315681
Qualified in Orleans County
Commission Expires 12/01/22

THIS ENVIRONMENTAL EASEMENT IS HEREBY ACCEPTED BY THE PEOPLE OF THE STATE OF NEW YORK, Acting by and Through the Department of Environmental Conservation as Designee of the Commissioner,

By: _____
Michael J. Ryan, Director
Division of Environmental Remediation

Grantee's Acknowledgment

STATE OF NEW YORK)
) ss:
COUNTY OF ALBANY)

On the 18th day of August, in the year 2020 before me, the undersigned, personally appeared Michael J. Ryan, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name is (are) subscribed to the within instrument and acknowledged to me that he/she/ executed the same in his/her/ capacity as Designee of the Commissioner of the State of New York Department of Environmental Conservation, and that by his/her/ signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

_____
Notary Public - State of New York

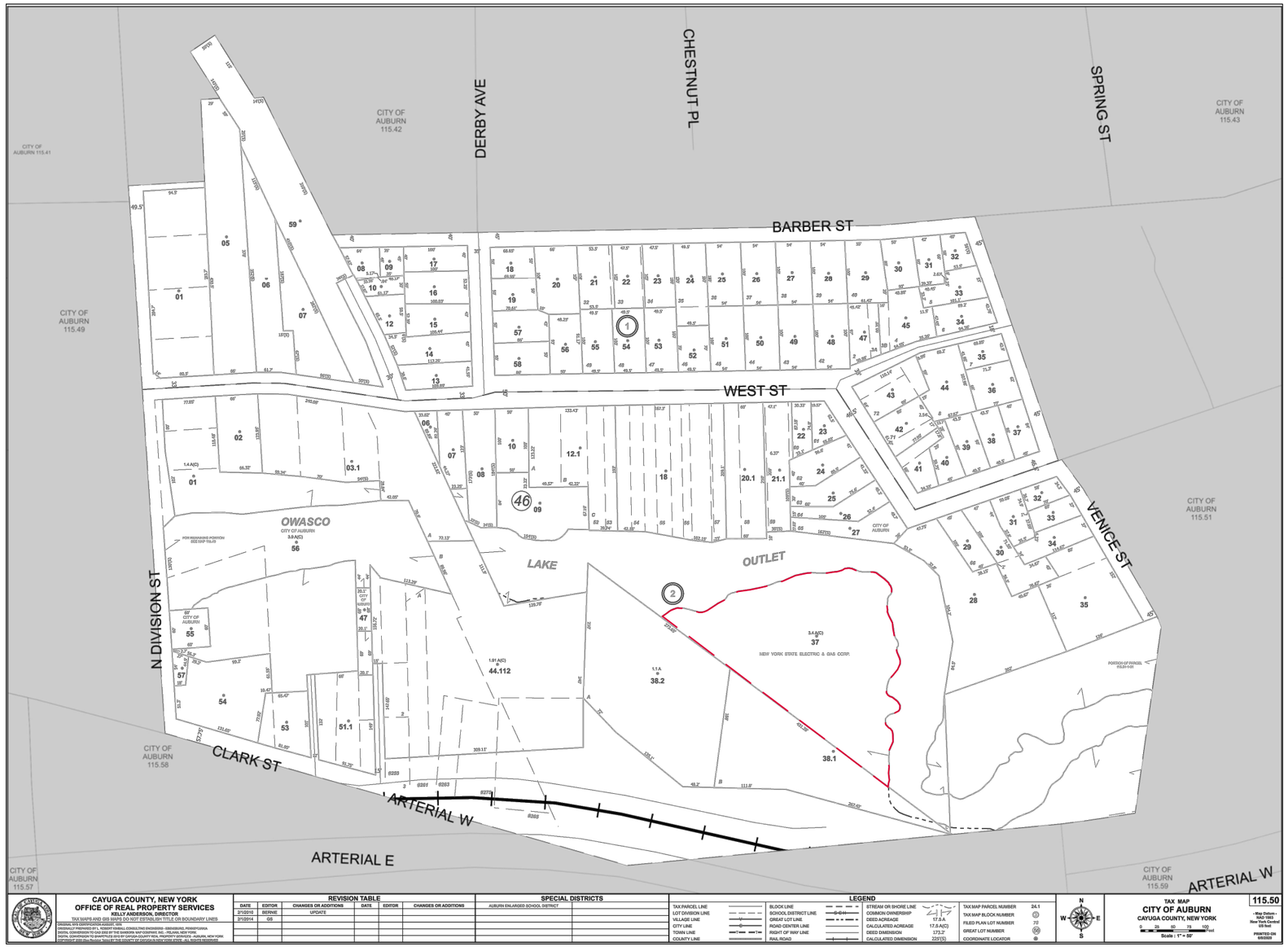
Drew A. Wellette
Notary Public, State of New York
Qualified In Schenectady Co.
No. 01WE6089074
Commission Expires 03/17/ 2023

SCHEDULE "A" PROPERTY DESCRIPTION

NEW YORK STATE ELECTRIC AND GAS
CLARK STREET, AUBURN SITE
TAX MAP NO. 115.50-02-37

ALL THAT TRACT OR PARCEL OF LAND SITUATE IN THE CITY OF AUBURN, COUNTY OF CAYUGA AND STATE OF NEW YORK BOUNDED AND DESCRIBED AS FOLLOWS: BEGINNING AT A POINT ON THE NORTHEASTERLY CORNER OF PARCEL A, OF A MAP SHOWING THE DIVISIONS OWNED BY ROBERT A. AND LORATTA M. SACKEL, MAP FILED IN THE CAYUGA COUNTY CLERKS OFFICE ON 03-22-1994 AS MAP NUMBER 94-50; THENCE N53°06'35"W, ALONG SAID NORTHERLY LINE OF SAID LOT A, FOR A DISTANCE OF 132.5 FEET TO A POINT ON THE SOUTHERLY BANK OF OWASCO LAKE OUTLET; THENCE EASTERLY AND SOUTHERLY ALONG SAID BANK, FOR A DISTANCE OF 692 FEET TO A POINT ON THE NORTHERLY LINE OF PARCEL B MAP NUMBER 94-50; THENCE N53°06'35"W ALONG SAID NORTHERLY BOUNDARY OF PARCEL B, FOR A DISTANCE OF 307.5 FEET TO A AND PLACE OF BEGINNING, CONTAINING 1.6 PLUS OR MINUS ACRES OF LAND.

SUBJECT TO ALL COVENANTS, EASEMENTS AND RESTRICTIONS OF RECORD.



CAYUGA COUNTY, NEW YORK OFFICE OF REAL PROPERTY SERVICES KELLY ANDERSON, DIRECTOR TAX MAPS AND GIS MAPS DO NOT ESTABLISH TITLE OR BOUNDARY LINES	REVISION TABLE						SPECIAL DISTRICTS	
	DATE	EDITOR	CHANGES OR ADDITIONS	DATE	EDITOR	CHANGES OR ADDITIONS	AUBURN ENLARGED SCHOOL DISTRICT	
	3/1/2010	BERNIE	UPDATE					
	2/1/2014	GS						

LEGEND					
TAX PARCEL LINE	BLOCK LINE	STREAM OR SHORE LINE	TAX MAP PARCEL NUMBER	34.1
LOT DIVISION LINE	SCHOOL DISTRICT LINE	COMMON OWNERSHIP	TAX MAP BLOCK NUMBER	69
VILLAGE LINE	GREAT LOT LINE	DEED ACREAGE	FILED PLAN LOT NUMBER	72
CITY LINE	ROAD CENTER LINE	CALCULATED ACREAGE	GREAT LOT NUMBER	46
TOWN LINE	RIGHT OF WAY LINE	DEED DIMENSION	COORDINATE LOCATOR	
COUNTY LINE	RAIL ROAD	CALCULATED DIMENSION		

TAX MAP
CITY OF AUBURN
CAYUGA COUNTY, NEW YORK

115.50

- Map Datum - NAD 1983 New York Central US feet
- Scale : 1" = 50'

PRINTED ON 9/2/2020

LEGEND:

ENVIRONMENTAL EASEMENT (NOTE 2)

NOTES:

1. TAX MAP OBTAINED FROM THE CAYUGA COUNTY, NEW YORK OFFICE OF REAL PROPERTY SERVICES ONLINE DATABASE MAP NUMBER 115.050.
2. THE ENVIRONMENTAL EASEMENT FOR CLARK ST. (APPENDIX A) CONTAINS THE ENTIRETY OF PARCEL 115.50–2–37. THE LINE SHOWN IS FOR ILLUSTRATION ONLY.

FIGURE A1

NYSEG
CLARK STREET FORMER MGP SITE
AUBURN, NEW YORK

ENVIRONMENTAL EASEMENT

PARSONS
301 PLAINFIELD ROAD * SUITE 350 * SYRACUSE, NY 13212 * 315/451-9560
OFFICES IN PRINCIPAL CITIES

FILE NAME: P:\IBERDROLA_AVANGRID\449523 AUBURN CLARK STREET 2018\07 CAD ASBUILT SURVEYS\CAD\FER\FER FIGURE A1 ENVIRONMENTAL EASEMENT BOUNDARY.DWG
PLOT DATE: 9/14/2020 10:47 AM PLOTTED BY: NASSIMOS, JEFFREY

APPENDIX B IC/EC 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. 706008

Site Name NYSEG - Auburn Clark St. MGP

Site Address: Clark St. Zip Code: 13021-
City/Town: Auburn
County: Cayuga
Site Acreage: 1.600

Reporting Period: January 13, 2023 to May 13, 2024

	YES	NO
1. Is the information above correct?	X	☐
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?	☐	X
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	☐	X
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	☐	X
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?	☐	X

Box 2

	YES	NO
6. Is the current site use consistent with the use(s) listed below? Commercial and Industrial	X	☐
7. Are all ICs in place and functioning as designed?	X	☐

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. 706008 **Box 3**

Description of Institutional Controls

Parcel	Owner	Institutional Control
	New York State Electric & Gas Corp	Ground Water Use Restriction Landuse Restriction Site Management Plan Monitoring Plan

- Property use must be commercial, or industrial
- Groundwater use is prohibited without treatment
- Groundwater must be monitored per the SMP
- Data must be reported per the SMP
- Implement HASP and Excavation Work Plan prior to ground intrusive activity that penetrates the soil cover

Box 4

Description of Engineering Controls

Parcel	Engineering Control
	Cover System Fencing/Access Control

Box 5

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 compete.

YES	NO
X	☐

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
X	☐

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. 706008

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 Levia Terrell (print name) at 18 Link Drive, Binghamton, NY 13902 (print business address),

am certifying as Owner (Owner or Remedial Party)

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

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

May 16, 2024
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, Jeffrey Poulsen, PG at 40 LaRiviere Drive, Buffalo, NY 14202

am certifying as a Qualified Environmental Professional for the NYSEG CLARK ST 2023-29 PRR

Signature of Qualified Environmental Professional, for the Owner or Remedial Party, Rendering Certification	Stamp (Required for PE)	Date
		May 16 2024