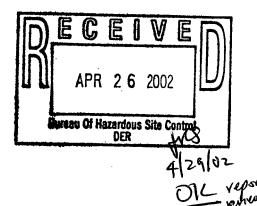


John ST FIR 4/26

2975 Bee Ridge Road Suite C Sarasota, FL 34239 (941) 926-7929 Fax (941) 926-0829

April 5, 2002

Patricia Simmons Pierre
Central New York Remedial Section
New York Remediation Branch
Emergency and Remedial Response Division
U.S. Environmental Protection Agency, Region II
20th Floor, 290 Broadway
New York, New York 10007



Subject:

Quarterly Progress Report - 1Q02

Operations and Maintenance and Long Term-Monitoring Activities

PAS Site, Oswego, NY

Dear Ms. Simmons:

The April 2002 Quarterly Progress Report is submitted under Consent Decree 98-CV0112NPMGJD for operation, maintenance, and long-term monitoring activities at the PAS Site in Oswego, New York (Consent Decree) is attached. This attached Progress Report, which covers the period January through March 2002, conforms with requirements of Paragraph 30 of the Consent Decree, which was entered on August 10, 1998.

If you have any questions, please call me at (941) 926-7929.

Sincerely,

de maximis, incl

Mark Valentino

cc: Performing Settling Defendants

L. McDavid, USEPA

G. Rider, NYSDEC, Division of Hazardous Waste Remediation

R. Parker, NYSDEC, Region 7 Office

D. Geraghty, NYDOH, Office of Public Health

QUARTERLY PROGRESS REPORT Operation, Maintenance and Long-term Monitoring Activities

PROJECT NAME:

Pollution Abatement Services Site

Oswego, New York

PERIOD COVERED:

JANUARY - MARCH 2002

ACTIONS TAKEN DURING PREVIOUS QUARTER (JAN - MAR 2002):

- Removal activities were conducted at the PAS Oswego Site in accordance with the Operation, Maintenance and Long-term Monitoring Activities Plan (BBL, 1998) (Work Plan). A total of 30,502 gallons of leachate was removed during the period January through March of 2002. Specific quantities of leachate removed during each month, along with removal dates and manifest numbers, are described in this progress report under the section entitled "Documentation of Removal Activities". Subsequent to each of these events, leachate and ground water was disposed of at the BFI/CECOS Niagara Falls, New York, disposal facility. Buffalo Fuels Corporation was the transportation subcontractor for OBG leachate removal activities.
- Routine ground-water elevation monitoring was performed on January 7 and 21, February 4, and 18, March 4 and 17, 2002
- On February 4, 2002, quarterly ground-water elevation monitoring was also performed. Quarterly ground-water elevation results for the M-series and LR-series monitoring wells indicated upward vertical gradients calculated for the leachate collection well LCW-4 area were less than 1.5 feet per foot. Therefore leachate removal activities were conducted at LCW locations (including LCW-4) during the period January through March 2002, in accordance with the November 15, 1999 leachate removal protocol.
- Site maintenance activities were conducted on January 23, February 20, and March 20, 2002, which included inspection of spill control materials, perimeter fencing, and monitoring wells, as well as cleanup of the storage shed and clearing of any debris accumulated in the concrete surface drainage trenches. These maintenance activities were performed in accordance with the approved Work Plan.
- The PSDs are awaiting a response from USEPA on the revised draft version of the Environmental Protection Easement and Restrictive Covenant provided to USEPA on June 7, 2001.

ACTION ITEMS FOR FOLLOWING QUARTER (JAN - MAR 2002):

- OMM activities will be performed in April, May and June 2002, in accordance with the approved Work Plan. The OMM activities include pumping 15,000 gallons of leachate during the first week of the month, or whatever volume can be efficiently removed during a one-day pumping event, up to 15,000 gallons. The ground-water slurry wall wells and leachate wells will be monitored during the beginning of the third week of the month. If leachate elevations measured during the third week indicate that an additional 10,000 gallons of removable leachate has accumulated in the collection trenches, then a contingency removal event will be promptly scheduled to remove the 10,000 gallons of additional leachate.
- Quarterly ground-water elevation monitoring will be conducted on May 6, 2002.
- Semi-annual groundwater sampling event will be conducted on May 6, 2002.
- Routine maintenance activities will be conducted, including inspection of spill control materials and perimeter fence. Snow removal will be performed on an as needed basis throughout the following quarter. These maintenance activities will be performed in accordance with the approved Work Plan.

• The schedule for leachate removal events and tasks is provided below.

	LEACH	ATE REMOV	AL ÉVE	NTS AND TA	SK SCHE	DULE (2nd C	Duarter 2002)
	F	pril 2002 Removal Events	# 26/2 DE WORK	002 Removal Events	F	ne 2002 Removal Events	Task
	First Event	Contingency Event	First Event	Contingency Event	First Event	Contingency Event	
Pre-Pumping Monitoring	Apr 1	Apr 15	May 6	May 8	June 3	June 17	LCW- and SWW- Series Wells for Apr. May, and June LCW-, SWW-, M-, and LR- Series Wells for May. (first event
Removal	Apr 3	Apr 17	May 8	May 22	June 5	June 19	nonly). Remove leachate from LCW-1, -2, -3, and -4 wells.

	LEACH	ATE REMOV	AL EVE	NTS AND TA	SKSCHE	DULE (3rd Q	uarter 2002)
	1807 C. 1989 C. T.	002 Removal Events	P	gust 2002 Lemoval Events	R	mber 2002 emoval	Task
	First Event	Contingency Event «	First Event	Contingency Event	First Event	Contingency Event	
Pre-Pumping Monitoring	Jul 1	Jul 15	Aug 6	Aug 20	Sep 3	Sep 17	LCW- and SWW- Series Wells for Jul, Aug, Sep. LCW-, SWW-, M-, and LR- Series Wells for Aug (first event only).
Removal	Jul 3	Jul 17	Aug 8	Aug 22	Sep 5	Sep 19	Remove leachate from LCW-1, -2, -3, and -4 wells.

ANTICIPATED DELAYS/PROBLEMS:

There are no anticipated delays or problems for the succeeding maintenance and monitoring period.

RESULTS OF FIELD ACTIVITIES:

- Ground-water elevation data collected on January 7, and 21, February 4, and 18 March 4 and 18, 2002 are attached, along with the SWW-series monitoring well charts for the past 12 months (See Attachment 1).
- The routine leachate disposal and site inspection checklists are attached (See Attachment 2).

DOCUMENTATION OF REMOVAL ACTIVITIES DURING PREVIOUS QUARTER:

- Hazardous Waste Manifests and Gallons Removed (See Attachment 3)
- Waste Treatment/Disposal Certifications (See Attachment 4)

JANUARY 2002 January 9, 2002

Manifest#	Amount (gal)	Date Removed 3
NYG2534634	5,231	1/9/02
NYG2534643	4,520	1/9/02

January 9, 2002 Total = 9,751 gallons January 2002 Total = 9,751 gallons

FEBRUARY 2002 February 6, 2002

Manifest#	Amount (gal)	Date Removed
NYG2534661	5,227	2/6/02
NYG2534652	5,217	2/6/02

February 6, 2002 Total = 10,444 gallons February 2002 Total = 10,444 gallons

MARCH 2002 March 6, 2002

Manifest #	Amount (gal)	Date Removed
NYG2534688	5,116	2/6/02
NYG2534679	5,191	2/6/02

March 6, 2002 Total = 10,307 gallons March 2002 Total = 10,307 gallons

• CUMULATIVE REMOVAL QUANTITIES

Cumulative gallons removed during quarter under OMM Plan - January through March 2002

<u>30,502</u>

HISTORICAL SUMMARY OF LEACHATE REMOVAL ACTIVITIES

Order/Decree	Disposal Facility/Period	Quantities
1991		
IGR Order	Dupont:	
(2/92 - 10/94)	1992 (2/98 -12/98)	221,808
]	1993	337,619
	<u>1994 (1/94-10/94)</u>	<u>254,898</u>
	Subtotal	814,325
1994	DuPont:	
IGR Order	1994 (From 10/94)	50,683
(10/94 - 10/98)	1995	279,164
	1996 (To 5/96)	<u>119,901</u>
	Subtotal (To 5/96)	449,748
	BFI/CECOS:	
]	1996	163,446
	1997	269,371
· .	<u>1998</u> (1/98-10/98	<u>207,541</u>
	Subtotal	640,358
	94 IGR Order Total	1,090,106
Final IGR Total		1,904,431
OMM	BFI/CECOS	
Consent Decree	1998 (11/98-12/98)	18,423
(Beginning 11/98)	1999	177,710 4
	2000	196,613
	2001	130,212
	2002	30,502
	(Thru Mar2002) OMM Subtotal	553,460
GRAND TOTAL		2,457,891

LEACHATE DISPOSAL DOCUMENTATION

January 9, 2002

BFI/CECOS Work Order Number	Manifest# √	Date Disposed
284571	NYG2534634	1/9/02
284570	NYG2534643	1/9/02

February 6, 2002

BFI/CECOS Work Order Number	Manifest#	Date Disposed
284614	NYG2534661	2/6/02
284613	NYG2534652	2/6/02

March 6, 2002

BFI/CECOS Work Order Number	Manifest#	Date Disposed
284651	NYG2534688	3/6/02
284652	NYG2534679	3/6/02

Note: "Gallons removed" is based upon BFI/CECOSIIs measurement of the "loaded" and "tare" weights as measured at the Niagara Falls, New York facility and shown on the weight tickets included in Attachment 4, and a density of 8.346 pounds per gallon.

	File on eDOCs YesNo
	Site Name 738001
•	County Conego
	Town Obiego
	Foilable Yes Yes
	File Name 2002 -04-05, Qtoz Peport
	Scanned & eDOC
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