



New York State Department of Environmental Conservation – Division of Environmental Remediation

PERIODIC REVIEW REPORT

Oswego Castings Site

Site Number 7-38-033

March 2021

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Site Number 7-38-033

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ACRONYMS AND ABBREVIATIONS

AMSL Above Mean Sea Level

Arcadis Arcadis of New York, Inc.

DNAPL Dense Non-Aqueous Phase Liquid

DO Dissolved Oxygen

EC Engineering Control

EN Environmental Notice

Ft Feet

IC Institutional Control

IRM Interim Remedial Measure

μg/L micrograms per liter

ng/L nanograms per liter

NOV Notice of Violation

NYS New York State

NYSDEC New York State Department of Environmental Conservation

O&M Operation and Maintenance

OM&M Operation, Maintenance, and Monitoring

ORP oxidation-reduction potential

OU Operable Unit

PCB Polychlorinated biphenyl

PFAS Perfluorinated Alkyl Substances

ppm parts per million

PRR Periodic Review Report

RI/FS Remedial Investigation/Feasibility Study

ROD Record of Decision

SCG Standards, Criteria and Guidance

SIM selective ion monitoring

SMP Site Management Plan

TSCA Toxic Substance Control Act

USEPA United States Environmental Protection Agency

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WA Work Assignment

1 EXECUTIVE SUMMARY

The New York State Department of Environmental Conservation (NYSDEC) has issued a Work Assignment (WA) D009804-12 to Arcadis of New York, Inc., (Arcadis) for Site Management at the Oswego Castings Site (NYSDEC Site number 7-38-033) in New York State (the Site). This Periodic Review Report (PRR) documents the findings and observations associated with the monitoring program for the Site for the following reporting period: December 31, 2016 through December 31, 2019.

The Site was contaminated with polychlorinated biphenyls (PCBs) during operations as an aluminum die casting facility between 1956 and 1986. The PCB contamination was found in the Site soils, groundwater, surface water, and pond sediment. In 1997 and 2000, two Records of Decision (RODs) (NYSDEC 1997 and 2000; respectively) were issued. Remedial work at the Site included:

- Excavation of surface and subsurface soils, core sand, and other foundry wastes
- Excavation of wetland sediments
- Removal of septic tank and tank contents for off-Site disposal
- Off-Site disposal of excavated material with PCB concentrations greater than 10 parts per million (ppm).
- Consolidation of foundry wastes and excavated surface soil and sediment with PCB concentrations less than 10 ppm in the existing landfill area.
- Installation of a geotextile and stone cover over the landfill area
- Construction of a reinforced concrete pad to cover contaminated soils in the yard area
- Dewatering of a cooling water pond and installation of a geotextile and soil cover
- Construction of a new pond
- Imposition of Institutional Controls including requirements for monitoring of the Site

Site monitoring currently involves inspection of the concrete pad, landfill, former cooling water pond area, and building floors which are the cover preventing access to contaminated soils beneath. Additionally, groundwater monitoring takes place once every five quarters to assess the water quality and potential movement of contamination.

The Site is currently being used by the City of Oswego (City) as storage for trucks and equipment. An inspection performed by NYSDEC on July 18, 2019 identified improper storage of drums and barrels; a new storage tank on the concrete cover area; placement of road millings surrounding groundwater monitoring wells and over the landfill area; removal of required site fencing; and lack of notification of a change in use of the property. The NYSDEC issued a Notice of Violation (NOV) to the City on October 2, 2019 indicating it was not in compliance with the SMP and other NYSDEC and State regulations. The NOV stipulated the Corrective Measures (CM) and timeframes required by the City to bring the Site into compliance. A subsequent inspection by NYSDEC on July 29, 2020 identified continued deficiencies related to CMs for the NOV. The NYSDEC issued a letter to the City on September 28, 2020

summarizing the remaining work to bring the Site into compliance by October 20, 2020 or the NYSDEC would move forward with an Order on Consent for the continued violations.

Groundwater samples collected in 2019 contained concentrations of PCBs greater than the corresponding NYSDEC Standards at six sampling locations. Based on these data, an additional source of PCB contamination may be present. As discussed in Section 6.0, an investigation is required to evaluate the source, nature, and fate of the elevated PCB concentrations in groundwater.

2 SITE OVERVIEW

2.1 Location and Features

The Oswego Castings Site is located at 375 Mitchell Street, Oswego, Oswego County, New York (Figure 2-1). The Site is approximately 10 acres and contains three former manufacturing buildings. A small pond (approximately one-third acre) is located west of the buildings. The Site is currently zoned industrial and was most-recently the location of a sawmill operation. However, the Site is currently used for vehicle and equipment storage by the City of Oswego. The Site is listed as a Class 4 Site on the NYSDEC Registry of Inactive Hazardous Waste Sites.

2.2 Site History and Remediation

The Site was originally owned by B and K Metals Inc. (B&K Metals; previously Oberdorfer Foundries, Inc.). Oswego Castings Inc., a subsidiary of Oberdorfer Foundries, Inc. operated an aluminum die casting facility on the Site from 1956 to1986. After the facility closed, PCBs were detected at the Site during an investigation performed by a prospective buyer. Preliminary investigations of the facility were then performed by Oberdorfer Foundries starting in June 1988. These investigations identified the presence of PCBs above the New York State (NYS) hazardous classification of 50 ppm. PCBs were detected at the Site in core sands, foundry waste, and wastewater discharged to a process line/septic tank discharge line. The suspected sources of the PCBs included leaks in hydraulic equipment and binders or coatings applied to core sand surfaces.

In July 1993, B&K Metals entered into an Order on Consent with the NYSDEC to conduct a Remedial Investigation/Feasibility Study (RI/FS). The RI/FS was conducted between July 1993 and February 1997. In October of 1996, B&K Metals entered into a second Order on Consent with the NYSDEC that allowed for the completion of Interim Remedial Measures (IRMs). These IRMs included:

- Moving 240 cubic yards of soil from the West Gate area to the landfill area (Figure 2-2), and
- Moving 150 cubic yards of soil from the loading dock area to the landfill area.

Following completion of the IRMs, the NYSDEC assumed responsibility for implementation of the FS. Based on the results of the FS, a ROD was issued in March 1997 for Operable Unit (OU)-1, which included excavation with off-Site disposal as the preferred remedy (NYSDEC 1997). The OU-1 ROD called for excavation of approximately 4,100 cubic yards of the following contaminated media:

- Surface soil containing PCBs greater than 1 ppm in the landfill area
- Surface and subsurface wastes containing PCBs greater than 10 ppm, including core sands and foundry waste
- Sediment in the wetland area and drainage swale (Figure 2-2) containing PCBs greater than 1 ppm

The OU-1 ROD called for off-Site disposal of excavated media at permitted disposal facilities. Material with concentrations from 10 ppm to less than 50 ppm would be disposed as non-hazardous waste at an industrial landfill. Materials with concentrations greater than 50 ppm would be disposed at a Toxic Substance Control Act (TSCA)-permitted hazardous waste landfill. The remaining foundry wastes in the

landfill area and any excavated surface soil and sediments with concentrations of PCBs less than 10 ppm would be consolidated in the landfill area prior to placement of a cover.

In addition, the OU-1 ROD called for removal and off-Site disposal of the septic tank and sludge, flushing or removal of the associated septic system piping, and restoration of disturbed wetland areas. The remedial activities associated with the OU-1 ROD were completed by Site Remedial Services from July 1998 to the fall of 1998 (NYSDEC 2000).

A ROD for OU-2, was issued in 2000 (NYSDEC 2000). The OU-2 ROD called for the following elements:

- Construction of a concrete cover over contaminated media in the yard area and maintaining the existing floor over contaminated media identified beneath the sawmill.
- Dewatering of the pond to allow application of a geotextile and soil cover layer over the former cooling water pond area (Figure 2-2).

Additional work performed under the OU-2 ROD included construction of a new pond to replace the former cooling water pond, placement of stockpiled materials excavated for construction of the concrete cover in the former cooling pond and re-grading the landfill cover for improved drainage. In addition, the NYSDEC conducted an IRM in May 1999 to remove a source of PCBs that impacted discharges from the foundry building roof drain to the cooling water pond. The foundry roof was cleaned and the roof drain was extended to the newly constructed pond. The remedial activities associated with the OU-2 ROD were completed by Abscope from July 1998 to October 2001.

In April 2010, groundwater monitoring well MW-2 was replaced and three new monitoring wells were installed (MW-5, MW-6, and MW-7). Well locations are presented on Figure 2-3. In May 2010, the cover for the landfill was re-graded and geotextile fabric and new stone were placed over the landfill area.

An Environmental Notice (EN) was filed for the Site in May 2012 as an institutional control (IC) for the remedy. The purpose of the EN was to limit the use of the Site to industrial and/or commercial use; prohibit Site owners from disturbing the remedial controls; prevent use of on-Site groundwater; and grant access to the NYSDEC and its agents for purposes of maintaining the remedy. According to the Oswego County Real Property database, the property was acquired by the City of Oswego from Great Lakes Veneer Corp. in November 2012.

Based on routine Site inspections performed by Arcadis and/or NYSDEC since 2012, the vacant buildings at the Site are deteriorating, are not secured, and have been vandalized. In addition, copper wires and/or pipe have been removed from the buildings and a pad-mounted transformer.

On April 23, 2015, oil spills were identified in two on-Site buildings that resulted from deteriorated and/or upturned storage containers. Upon identification of the spills, the incident was reported by Arcadis to the NYSDEC Project Manager and NYSDEC Spills Hotline. The associated NYSDEC Spill Number is 1500821. The NYSDEC subsequently removed the containers and cleaned the spill areas. According to the NYSDEC Spills Database, the incident was closed on October 22, 2015.

A NYSDEC-approved SMP was prepared by Arcadis in February 2016. The SMP provides procedures for OM&M to manage the remaining contamination at the Site.

On July 18, 2019 the NYSDEC performed a routine inspection at the Site and identified improper storage of drums and barrels; a new storage tank on the concrete cover area; placement of road millings surrounding groundwater monitoring wells and over the landfill area; removal of required site fencing and signage; and lack of notification of a change in use of the property. The NYSDEC issued a NOV to the City on October 2, 2019 indicating it was not in compliance with the requirements of the SMP, New York Codes Rules and Regulation Section 6 Part 375 (6 NYCRR Part 375) and NYSDEC Division of Environmental Restoration Part 10 (DER-10) (NYSDEC 2019). The NOV stipulated the following CMs:

- Immediately sealing, labeling, and securing drums on an impervious surface, followed by removal and disposal of all drums within 90 days.
- Cleanup of spillage identified on the concrete cover area.
- An engineer's evaluation of tank loading on the concrete cover; placement of the tank on an impervious surface; and properly securing, labeling, and managing the storage tank and its contents.
- Removal of road millings surrounding monitoring wells and landfill area and grading the landfill area to improve drainage and prevent ponding of water.
- Replacement of site fencing and signage required by the ROD.
- Provide proper change of use notifications to the NYSDEC indicating the new site use.

A subsequent inspection by NYSDEC on July 29, 2020 identified continued deficiencies related to the NOV. The NYSDEC issued a letter to the City on September 28, 2020 summarizing the remaining work to bring the Site into compliance by October 20, 2020 or the NYSDEC would move forward with an Order on Consent for the continued violations. The remaining work includes:

- Installation of permanent fencing around the tank on the concrete cover.
- Correctly labeling the tank volume.
- Providing records for tank contents.
- Further removal of road millings from the monitoring wells based on groundwater sample results.
- Providing an engineering study for the proposed parking area indicating it will not interfere with the
 monitoring well network and the water table.
- Grading the landfill area due to continued ponding of water and provide survey to document final grade.
- Removal road millings from landfill area and provide documentation of disposal or perform testing to indicate millings do not contain hazardous constituents.
- Removal of vegetation debris from the landfill area and place signage to delineate the limits of the landfill that indicate no staging of materials can occur in the area.
- Submit change of use notifications to the NYSDEC for proper filing.

3 REMEDY PERFORMANCE, EFFECTIVENESS, AND PROTECTIVENESS

In accordance with the OU-1 and OU-2 RODs (NYSDEC 1997 and 2000, respectively), the Site remediation goals are as follows:

- Reduce, control, or eliminate, to the extent practicable, the contamination present within the soils/waste on the Site and the generation of leachate within the fill mass.
- Eliminate the threat to surface waters and Lake Ontario by eliminating future contaminated surface run-off from the contaminated soils on the Site, and by reducing, controlling, or eliminating contaminated wetland sediment migration.
- Prevent, to the extent possible, migration of the contaminants in the landfill to groundwater.
- Provide for attainment of Standards, Criteria and Guidance (SCGs) for groundwater quality at the limits of the area of concern, to the extent practicable.
- Eliminate, to the extent practicable, the potential for direct human contact with PCB contaminated soil and dust.
- Eliminate, to the extent practicable, the exposure for fish and wildlife to levels of PCBs above standards/guidance values.

The selected remedies for the Site were implemented in accordance with each of the ROD documents (NYSDEC 1997 and 2000). Soil, sediment, and foundry wastes from the landfill area, loading dock, cooling water pond, and wetland areas containing PCB concentrations greater than 10 ppm were excavated and disposed off-Site. PCBs at concentrations greater than 10 ppm remain beneath certain areas of the former sawmill building slab and beneath the concrete cap in the yard area (Figure 2-2) (NYSDEC 2002). All other excavated material, including surface soil containing PCB concentrations greater than 1 ppm, were consolidated, and disposed of in an on-Site in landfill or former cooling water pond. These materials were then covered with a geotextile and stone or soil cover layer.

A SMP is in place and provides information regarding OM&M activities for the selected remedy. The SMP includes an EN that restricts excavation or disturbance of the remedy. Therefore, only those who are actively performing work on the Site, either in accordance the SMP, or at the direction of the NYSDEC, would likely be exposed to the remaining Site contamination. In addition, groundwater use restrictions are in place to prevent use or ingestion of groundwater.

Based on the current Site management activities, including inspections, groundwater monitoring, and the EN that is in place for the Site, it appears that the selected remedies are performing as intended. However, as indicated in Section 2.2, recent activities at the Site have resulted in violations requiring several CMs. Therefore, the site is not currently in compliance with the requirements of the SMP.

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4 OPERATION AND MAINTENANCE

Since the last (2017) PRR cycle, operation and maintenance (O&M) activities have been performed in accordance with the NYSDEC-approved SMP. Arcadis performed routine O&M activities on October 26, 2017 and March 13, 2019. Non-routine O&M activities such as a Site inspection and photograph documentation of the Site to support the NOV were conducted on September 10, 2019 at the request of the NYSDEC Project Manager.

The routine O&M activities included inspection of the respective landfill, former cooling water pond, and yard area protective covers (Figure 2-2) which are the Engineering Controls (EC) that have been established at the Site. In addition, a general inspection of Site features (buildings and grounds) was also completed to assess for potential environmental hazards. An O&M Checklist (Appendix A) was used to document the condition of the ECs during the October 2017 and March 2019 inspections. Photographs from the October 2017, March 2019, and September 2019 inspections are provided in Appendix B.

4.1 General Site Conditions

Based on the 2017 and 2019 observations, the buildings are generally not secured and copper wire and/or plumbing components have apparently been removed. Based on visual observations conducted without entering the buildings, metal components are located in two of the Site buildings. Trucks and equipment are also being stored on the concrete cover and within one of the buildings. Plastic drums were also identified in a gated area between two of the Site buildings. Road millings were observed to have been placed and graded in the areas surrounding MW-1, MW-2R, and MW-4. A fallen tree has partially damaged the Site boundary fence in the southeast section of the property near monitoring well MW-6.

4.2 Landfill Cover

The landfill cover was installed to limit human and ecological exposure to PCB contaminated materials and minimize or eliminate contaminated surface water runoff. The landfill cover consists of 12-inches of soil over the consolidated foundry wastes and excavated materials, overlain by a geotextile and six-inches of stone (NYSDEC 2002).

A visual inspection of the landfill was performed during each visit to the Site to assess the landfill cover for erosion, settlement, ponded water, burrowing rodents, and brush or woody vegetation. As shown in the O&M Checklist (Appendix A), during the October 2017 and March 2019 visits, brush and thick vegetation were present across the cover and near the groundwater monitoring wells but did not appear to be impacting the performance of the cover. In addition, during the March and September 2019 visits, the northern area of the cover contained areas of ponded water. During the March and September 2019 inspections, soil and tree cutting stockpiles were present on the landfill cover.

4.3 Concrete Cover

The concrete cover was installed to create a barrier between the surface and the contaminated soils remaining beneath. This reinforced concrete slab is a minimum of 6-inches thick, prevents human and ecological exposure to the underlying contamination, and limits surface water from entering the soils.

A visual inspection of the concrete cover was performed during each visit to the Site to assess the integrity of the remedy. As indicated in the October 2017 and March 2019 O&M Checklist (Appendix A),

the concrete cover had minor cracks but did not show evidence of settling or other damage. Cracks in the concrete cover were also noted by NYSDEC in the 2002 Remediation Summary Report, but were found to not affect the performance of the remedy (NYSDEC 2002). In addition, as shown in Appendix A and Appendix B, some debris (primarily wood chips and boards) were present on the concrete cover. As shown in Appendix B, in September 2019, trucks and equipment were stored on the concrete cover and staining was observed in the area surrounding a new above ground storage tank.

4.3 Cooling Water Pond

The former cooling pond area cover was installed to cover PCB-impacted sediment and wastes that were consolidated and placed in the former cooling water pond. The purpose of the cover is to prevent human and ecological exposure to the contaminated materials and minimize or eliminate contaminated surface water runoff. Prior to placement of the waste, the cooling pond was dewatered by discharging the water into a newly constructed pond. The new pond serves as the collection point for surface water runoff from the landfill protective cover, and as the new discharge point for the roof drain of the foundry building. The former cooling water pond cover consists of geotextile fabric and 12-inches of soil over the consolidated foundry wastes (NYSDEC 2002).

Although there are no specific inspection items for the former cooling water pond area on the O&M checklist, based on a review of photographs from the Site, there was no evidence of disturbance or significant settling in the former cooling water pond soil cover. In addition, the new pond area was inspected for erosion and areas of sparse vegetation. No erosion issues were identified and vegetation along the perimeter of the pond appeared to be well established.

5 GROUNDWATER MONITORING PROGRAM

Groundwater monitoring is conducted to provide information on groundwater quality and assess hydrogeologic Site conditions, including groundwater flow direction. Groundwater monitoring well locations are shown on Figure 2-3.

Since the last (2017) PRR Cycle, groundwater monitoring wells were inspected and sampled in October 2017 and March 2019. At the request of the NYSDEC Project Manager, MW-1, MW-2R, MW-5, and MW-6 were resampled on March 29, 2019, and MW-6 was resampled again in May 2019.

During each groundwater sampling event, the integrity of each monitoring well is inspected, and the results recorded on a groundwater monitoring well inspection form (Appendix C). As indicated in the inspection forms, during the October 2017 and March 2019 inspections, the MW-5 surface cement seal is loose. The remaining monitoring wells were in acceptable condition.

5.1 Water Level Survey

Prior to collecting groundwater samples, water levels were measured to the nearest hundredth of a foot. A summary of the October 2017 and March 2019 data is presented on the groundwater level data forms in Appendix D.

As shown in Appendix D, dense, non-aqueous phase liquid (DNAPL) was observed during the 2017 sampling event at monitoring well MW-1 when the oil-water interface probe was removed from the well. DNAPL was not observed during the 2019 sampling event.

Table 5-1 summarizes the groundwater elevations measured during the 2012, 2013, 2015, 2016, 2017, and 2019 monitoring events. As shown in Table 5-1, groundwater elevations ranged from 307.82 feet (ft) above mean sea level (amsl) at MW-5 to 325.82 ft amsl at MW-6 on March 13, 2019. These elevations are approximately two feet higher compared to the previous (October 2017) sampling event. However, as shown in Table 5-1, the March 13, 2019 elevations are comparable to the historic seasonal elevation data. As shown on Figures 5-1 and 5-2, the direction of groundwater flow is generally toward the northwest.

5.2 Groundwater Sampling

In accordance with the SMP, groundwater sampling is conducted once every five quarters. In October 2017 and March 2019, groundwater samples were collected from seven groundwater monitoring wells (MW-1, MW-2R, MW-3, MW-4, MW-5, MW-6, and MW-7) using low-flow groundwater purging and sampling procedures. At the request of the NYSDEC Project Manager, MW-1, MW-2R, MW-5, and MW-6 were resampled on March 29, 2019, and MW-6 was resampled again in May 2019 to further assess elevated PCB concentrations detected in groundwater samples collected during the routine (March 2019) groundwater sampling event. Details of both March 2019 sampling event and the May 2019 sampling event are discussed in the 2019 Annual Groundwater Monitoring Report (Arcadis 2019a), and Monitoring Well MW-6 Additional Sampling Results report (Arcadis 2019b), respectively.

Prior to collecting groundwater samples, pH, conductivity, turbidity, dissolved oxygen (DO), temperature, and oxidation-reduction potential (ORP) were measured using a Horiba U-52 water quality meter and recorded on groundwater sampling purge logs.

Groundwater samples were submitted to Spectrum Analytical by chain-of-custody procedures and analyzed for PCBs by United States Environmental Protection Agency (USEPA) Method 8082 in accordance with the SMP. At the request of NYSDEC, groundwater samples collected during the October 2017 monitoring event were also analyzed for Perfluorinated Alkyl Substances (PFAS) by USEPA Method 537 Modified, and 1,4-Dioxane by USEPA Method 8260C selective ion monitoring (SIM) by TestAmerica.

5.3 Groundwater Sampling Results

5.3.1 PCB Results

Historic groundwater monitoring PCB results are summarized in Table 5-2. As shown in Table 5-2, the groundwater samples collected from MW-1 in October 2017 and March 2019 contained PCBs at concentrations that exceed the corresponding NYSDEC Class GA Standard of 0.09 μ g/L. PCB Aroclor-1248 was detected at 700 micrograms per liter (μ g/L) and 73 μ g/L, during the March 13 and 29, 2019 sampling events, respectively. PCB-1260 was detected at MW-1 during the October 2017 sampling event but was not detected during the March 2019 sampling events.

At MW-2R, PCB Aroclor-1248 was detected at a concentration of 23 μ g/L on March 13, 2019 and PCB Aroclor-1242 was detected at a concentration of 2.6 μ g/L on March 29, 2019. PCB Aroclor-1242 and PCB Aroclor-1248 were not detected during the previous sampling events from 2012 to 2017 at MW-2R.

The groundwater samples collected from MW-3 and MW-4 in March 2019 contained PCB Aroclor-1248 at estimated concentrations of 0.28 μ g/L and 0.14 μ g/L, respectively. These values are generally consistent with historical results.

PCB Aroclor-1248 was detected in MW-5 at a concentration of 11 μ g/L on March 13, 2019 and PCB Aroclor-1242 was detected at a concentration of 6.3 μ g/L on March 29, 2019. PCB Aroclor-1248 and PCB Aroclor-1242 were not detected during the October 2017 sampling event at MW-5.

At MW-6, PCB Aroclor-1248 was detected at a concentration of 8.1 μ g/L on March 13, 2019, and PCB Aroclor-1242 was detected at a concentration of 33 μ g/L on March 29, 2019. In May 2019, PCB Aroclor-1248 was detected at 7.7 μ g/L. PCB Aroclor-1248 and PCB Aroclor-1242 were not detected during the previous sampling events from 2012 to 2017 at MW-6.

As shown in Table 5-2, the groundwater samples collected from MW-7 from 2016 to 2019 have not had estimated or detected concentrations of PCBs that exceed the corresponding NYSDEC Class GA Standard of 0.09 μ g/L.

5.3.2 PFAS and 1,4-Dioxane Results

PFAS and 1,4-Dioxane data from the October 2017 sampling event is summarized on Table-5-3. PFAS was not detected in the groundwater samples collected from monitoring wells MW-1, MW-3, MW-4, MW-5, MW-6, and MW-7. PFAS was detected below both the USEPA Health Advisory Limits and NYSDEC

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Guidance Values at samples collected from monitoring well MW-2 and the duplicate sample MW-X collected from MW-2. Perfluorooctanoic acid (PFOA) and perfluorooctanesulfonic acid (PFAS) was detected at MW-2 at 3.02 nanograms per liter (ng/L) and 1.96 ng/L, estimated, respectively. 1,4-Dioxane was non-detect for all groundwater samples collected in October 2017.

6 OVERALL PRR CONCLUSIONS AND RECOMMENDATIONS

6.1 Conclusions

The landfill and former cooling water pond protective covers do not show indications of significant settling or erosion, are in acceptable condition, and appear to be operating as intended. The yard area concrete cover contains some minor cracks but does not show indications of settlement or other damage. Although soil, wood and/or other debris are present on each of the protective cover areas, it does not appear to be impacting the performance of the cover systems.

Based on July and October 2019 site inspections, a NOV was issued to the City of Oswego for improper storage of drums and barrels; improper management and documentation of the storage tank on the concrete cover area; improper placement of road millings surrounding groundwater monitoring wells and on the landfill area; removal of required site fencing and signage; and lack of notification of a change in use of the property. The City of Oswego was required to implement CMs stipulated in the NOV for site compliance with the SMP, 6 NYCRR Part 375, and NYSDEC DER-10 by October 2020.

Monitoring well MW-1 showed evidence of DNAPL during the 2017 water level survey; however, DNAPL was not observed during the March or May 2019 groundwater sampling events. Based on groundwater level data, the direction of groundwater flow is generally toward the northwest. The samples collected from groundwater monitoring wells MW-1, MW-2R, MW-3, MW-4, MW-5, and MW-6 contained PCBs at concentrations greater than the respective NYSDEC Class GA Standard. Down-gradient monitoring well MW-7 did not contain detectable concentrations of PCBs. None of the October 2017 samples contained detectable concentrations of 1,4-Dioxane, or PFAS concentrations above the USEPA Health Advisory Limit or NYSDEC Guidance Values.

6.2 Recommendations

A site inspection should be performed to confirm that all CMs stipulated in the October 2019 NOV have been properly implemented and documented. In addition, the SMP should be updated to reflect changes in site ownership and site conditions, or inspection processes.

Based on the concentrations of PCBs in groundwater detected during the 2019 sampling events, the following actions are suggested:

- Perform groundwater investigation upgradient of monitoring well MW-6 to evaluate the potential source of PCBs and extent of contamination (if present). The groundwater investigation would include a desktop search of historic environmental Sites and monitoring wells within a one-mile radius of the Site, and installation and development of additional wells both off-Site and on-Site. Groundwater samples would be collected from new wells and existing Site wells to evaluate the vertical and horizontal extent of contamination (if present).
- Increase sampling frequency from once every five quarters to semi-annual to evaluate PCB concentration trends and the fate of existing contamination.

7 SUMMARY AND CERTIFICATION

O&M activities were conducted in October 2017, March 2019, May 2019, and September 2019. The landfill and yard area protective covers and pond area were inspected and appear to be performing as intended. A NOV was issued to the City of Oswego in October 2019. CMs stipulated in the NOV require completion of remaining violations by October 20, 2020. Physical hazards associated with the Site buildings may exist as the buildings have been previously vandalized and are unsecured.

Monitoring wells were inspected and are in acceptable condition. Groundwater levels indicate that the direction of groundwater flow across the Site is generally toward the northwest. The last detection of DNAPL at the Site was in 2017 at monitoring well MW-1. The groundwater samples collected in 2019 contained concentrations of PCB greater than the corresponding NYSDEC Standards at six sampling locations.

A groundwater investigation is suggested to assess areas upgradient of the site to evaluate the potential source of PCBs and extent of contamination, if present. Groundwater sampling frequency is recommended to be increased form from once every five quarters to semi-annual to evaluate PCB concentration trends and the fate of existing contamination.

The completed NYSDEC certification is provided as Appendix E. As indicated on the Certification Form and based on current site conditions and CMs being implemented as indicated herein, the site is not in compliance with the requirements of the SMP and certification of the IC/ECs can not be completed at this time.

8 REFERENCES

NYSDEC 1997. Record of Decision, Oswego Castings Site, Oswego (C), Oswego County. Site Number 7-38-033. March 1997.

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TABLES

Table 5-1 Groundwater Elevation Data Oswego Castings Site NYSDEC Site Number 7-38-033



	Date	9/25	5/2012	10/1	7/2013	4/23	/2015	9/13	3/2016
	Measuring Point	Depth to	Groundwater						
Well	Elevation	Water	Elevation	Water	Elevation	Water	Elevation	Water	Elevation
	Ft AMSL	Ft BTOC	Ft AMSL	Ft BTOC	Ft AMSL	Ft BTOC	Ft AMSL	Ft BTOC	Ft AMSL
MW-1	313.29	10.85	302.44	5.37	307.92	2.82	310.47	9.65	303.64
MW-2R	313.11	6.67	306.44	3.13	309.98	2.42	310.69	6.32	306.79
MW-3	311.72	10.61	301.11	6.45	305.27	2.43	309.29	9.69	302.03
MW-4	312.45	4.46	307.99	3.80	308.65	3.04	309.41	5.11	307.34
MW-5	312.70	14.91	297.79	9.55	303.15	4.88	307.82	14.91	297.79
MW-6	331.82	14.35	317.47	10.85	320.97	6.82	325.00	14.68	317.14
MW-7	314.11	12.20	301.91	6.54	307.57	2.70	311.41	12.82	301.29

	Date	10/26	6/2017	3/13	/2019	3/29	/2019	5/29	/2019
	Measuring Point	Depth to	Groundwater						
Well	Elevation	Water	Elevation	Water	Elevation	Water	Elevation	Water	Elevation
	Ft AMSL	Ft BTOC	Ft AMSL	Ft BTOC	Ft AMSL	Ft BTOC	Ft AMSL	Ft BTOC	Ft AMSL
MW-1	313.29	4.78	308.51	2.80	310.49	3.24	310.05	NM	NM
MW-2R	313.11	3.73	309.38	2.51	310.60	3.00	310.11	NM	NM
MW-3	311.72	3.00	308.72	2.33	309.39	NM	NM	NM	NM
MW-4	312.45	3.72	308.73	2.74	309.71	NM	NM	NM	NM
MW-5	312.70	6.46	306.24	4.88	307.82	5.00	307.70	NM	NM
MW-6	331.82	10.98	320.84	6.00	325.82	6.73	325.09	6.00	325.82
MW-7	314.11	5.58	308.53	2.62	311.49	NM	NM	NM	NM

Ft AMSL - feet above mean sea level Ft BTOC - feet below top of casing

NM - Not Measured

Table 5-2 Summary of Groundwater Sampling Results - PCBs Oswego Castings Site NYSDEC Site Number 7-38-033



Sample ID	NYSDEC Class	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1	MW-1
Sampling Date	GA Standards	9/25/2012	10/17/2013	4/23/2015	9/13/2016	10/26/2017	3/13/2019	3/29/2019
PCBs (μg/L)								
Aroclor-1016	0.09**	54	5.0 U	5.0 U	1.0 U	0.2 U	100 U	2.5 U
Aroclor-1221	0.09**	0.17 U	5.0 U	5.0 U	1.0 U	0.2 U	100 U	2.5 U
Aroclor-1232	0.09**	0.17 U	5.0 U	5.0 U	1.0 U	0.2 U	100 U	2.5 U
Aroclor-1242	0.09**	0.17 U	5.0 U	5.0 U	1.0 U	0.2 U	100 U	2.5 U
Aroclor-1248	0.09**	0.17 U	29	120	9.9 P	28.6	700	73
Aroclor-1254	0.09**	0.17 U	5.0 U	5.0 U	1.0 U	0.2 U	100 U	2.5 U
Aroclor-1260	0.09**	0.17 U	5.0 U	5.0 U	1.0 U	1.4	100 U	2.5 U
Aroclor-1262	0.09**	NA	5.0 U	5.0 U	1.0 U	02 U	100 U	2.5 U
Aroclor-1268	0.09**	NA	5.0 U	5.0 U	1.0 U	0.2 U	100 U	2.5 U

- Concentration exceeds NYSDEC Class GA Standard.

μg/L - microgram per liter.

- U Compound was not detected at the indicated concentration.
- P This flag is used for pesticides/PCB/herbicide compound when there is a greater than 40% difference for detected concentration between the two GC columns used for primary and confirmation analyses. This difference typically indicates interference, causing one value to be unusually high.
- ** Sum of these compounds can not exceed 0.09 ug/L.

NA - Compound not analyzed

Table 5-2 Summary of Groundwater Sampling Results - PCBs Oswego Castings Site NYSDEC Site Number 7-38-033



Sample ID	NYSDEC Class	MW-2R	MW-2R	MW-2R	MW-2R	MW-2R	MW-2R	MW-X*	MW-2R	MW-X*
Sampling Date	GA Standards	9/24/2012	10/17/2013	4/23/2015	9/13/2016	10/26/2017	3/13/2019	3/13/2019	3/29/2019	3/29/2019
PCBs (μg/L)										
Aroclor-1016	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	2.5 U	2.5 U	0.25 U	0.25 U
Aroclor-1221	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	2.5 U	2.5 U	0.25 U	0.25 U
Aroclor-1232	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	2.5 U	2.5 U	0.25 U	0.25 U
Aroclor-1242	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	2.5 U	2.5 U	2.5	2.6
Aroclor-1248	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	23	38	0.25 U	0.25 U
Aroclor-1254	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	2.5 U	2.5 U	0.25 U	0.25 U
Aroclor-1260	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	2.5 U	2.5 U	0.25 U	0.25 U
Aroclor-1262	0.09**	NA	0.05 U	0.05 U	0.05 U	0.19 U	2.5 U	2.5 U	0.25 U	0.25 U
Aroclor-1268	0.09**	NA	0.05 U	0.05 U	0.05 U	0.19 U	2.5 U	2.5 U	0.25 U	0.25 U

- Concentration exceeds NYSDEC Class GA Standard.

μg/L - microgram per liter.

- U Compound was not detected at the indicated concentration.
- J Compound detected below the reporting limit or reported concentration is estimated.
- * MW-X is a duplicate sample collected from MW-2R
- ** Sum of these compounds can not exceed 0.09 ug/L.

NA - Compound not analyzed

Table 5-2 Summary of Groundwater Sampling Results - PCBs Oswego Castings Site NYSDEC Site Number 7-38-033



Sample ID	NYSDEC Class	MW-3	MW-3	MW-3	MW-3	MW-3	MW-3
Sampling Date	GA Standards	9/24/2012	10/17/2013	4/23/2015	9/13/2016	10/26/2017	3/13/2019
PCBs (μg/L)							
Aroclor-1016	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.2 U	0.48 U
Aroclor-1221	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.2 U	0.48 U
Aroclor-1232	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.2 U	0.48 U
Aroclor-1242	0.09**	0.17 U	0.13	0.05 U	0.05 U	0.2 U	0.48 U
Aroclor-1248	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.643	0.28 J
Aroclor-1254	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.2 U	0.48 U
Aroclor-1260	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.2 U	0.48 U
Aroclor-1262	0.09**	NA	0.05 U	0.05 U	0.05 U	0.2 U	0.48 U
Aroclor-1268	0.09**	NA	0.05 U	0.05 U	0.05 U	0.2 U	0.48 U

- Concentration exceeds NYSDEC Class GA Standard.

μg/L - microgram per liter.

- U Compound was not detected at the indicated concentration.
- J Compound detected below the reporting limit or reported concentration is estimated.
- ** Sum of these compounds can not exceed 0.09 ug/L.
- NA Compound not analyzed

Table 5-2 Summary of Groundwater Sampling Results - PCBs Oswego Castings Site NYSDEC Site Number 7-38-033



Sample ID	NYSDEC Class	MW-4	MW-4	MW-4	MW-4	MW-4	MW-4
Sampling Date	GA Standards	9/24/2012	10/17/2013	4/23/2015	9/13/2016	10/26/2017	3/13/2019
PCBs (μg/L)							
Aroclor-1016	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	0.48 U
Aroclor-1221	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	0.48 U
Aroclor-1232	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	0.48 U
Aroclor-1242	0.09**	0.17 U	0.89	0.05 U	0.05 U	0.19 U	0.48 U
Aroclor-1248	0.09**	0.17 U	0.05 U	0.56	0.15	0.89	0.14 J
Aroclor-1254	0.09**	0.17 U	0.05 U	0.13	0.05 U	0.19 U	0.48 U
Aroclor-1260	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	0.48 U
Aroclor-1262	0.09**	NA	0.05 U	0.05 U	0.05 U	0.19 U	0.48 U
Aroclor-1268	0.09**	NA	0.05 U	0.05 U	0.05 U	0.19 U	0.48 U

- Concentration exceeds NYSDEC Class GA Standard.

μg/L - microgram per liter.

- U Compound was not detected at the indicated concentration.
- J Compound detected below the reporting limit or reported concentration is estimated.
- ** Sum of these compounds can not exceed 0.09 ug/L.
- NA Compound not analyzed

Table 5-2 Summary of Groundwater Sampling Results - PCBs Oswego Castings Site NYSDEC Site Number 7-38-033



Sample ID	NYSDEC Class	MW-5	MW-5	MW-5	MW-5	MW-5	MW-5	MW-5
Sampling Date	GA Standards	9/25/2012	10/17/2013	4/23/2015	9/13/2016	10/27/2017	3/13/2019	3/29/2019
PCBs (μg/L)								
Aroclor-1016	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	0.51 U	0.25 U
Aroclor-1221	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	0.51 U	0.25 U
Aroclor-1232	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	0.51 U	0.25 U
Aroclor-1242	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	0.51 U	6.3
Aroclor-1248	0.09**	0.17 U	0.05 U	0.05 U	0.26 PJ	0.19 U	11	0.25 U
Aroclor-1254	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	0.51 U	0.25 U
Aroclor-1260	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	0.51 U	0.25 U
Aroclor-1262	0.09**	NA	0.05 U	0.05 U	0.05 U	0.19 U	0.51 U	0.25 U
Aroclor-1268	0.09**	NA	0.05 U	0.05 U	0.05 U	0.19 U	0.51 U	0.25 U

- Concentration exceeds NYSDEC Class GA Standard.

μg/L - microgram per liter.

- U Compound was not detected at the indicated concentration.
- J Compound detected below the reporting limit or reported concentration is estimated.
- P This flag is used for pesticides/PCB/herbicide compound when there is a greater than 40% difference for detected concentration between the two GC columns used for primary and confirmation analyses. This difference typically indicates interference, causing one value to be unusually high.
- ** Sum of these compounds can not exceed 0.09 ug/L.

NA - Compound not analyzed

Table 5-2 Summary of Groundwater Sampling Results - PCBs Oswego Castings Site NYSDEC Site Number 7-38-033



Sample ID	NYSDEC Class	MW-6	MW-6	MW-6	MW-6	MW-6	MW-6	MW-6	MW-6
Sampling Date	GA Standards	9/24/2012	10/17/2013	4/23/2015	9/13/2016	10/26/2017	3/13/2019	3/29/2019	5/29/2019
PCBs (μg/L)									
Aroclor-1016	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	0.48 U	1.3 U	0.48 U
Aroclor-1221	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	0.48 U	1.3 U	0.48 U
Aroclor-1232	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	0.48 U	1.3 U	0.48 U
Aroclor-1242	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	0.48 U	33	0.48 U
Aroclor-1248	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	8.1	1.3 U	7.7
Aroclor-1254	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	0.48 U	1.3 U	0.48 U
Aroclor-1260	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.19 U	0.48 U	1.3 U	0.48 U
Aroclor-1262	0.09**	NA	0.05 U	0.05 U	0.05 U	0.19 U	0.48 U	1.3 U	0.48 U
Aroclor-1268	0.09**	NA	0.05 U	0.05 U	0.05 U	0.19 U	0.48 U	1.3 U	0.48 U

- Concentration exceeds NYSDEC Class GA Standard.

μg/L - microgram per liter.

- U Compound was not detected at the indicated concentration.
- J Compound detected below the reporting limit or reported concentration is estimated.
- ** Sum of these compounds can not exceed 0.09 ug/L.
- NA Compound not analyzed

Table 5-2 Summary of Groundwater Sampling Results - PCBs Oswego Castings Site NYSDEC Site Number 7-38-033



Sample ID	NYSDEC Class	MW-7	MW-7	MW-X*	MW-7	MW-X*	MW-7	MW-7	MW-7	MW-7
Sampling Date	GA Standards	9/25/2012	10/17/2013	10/17/2013	4/23/2015	4/23/2015	9/13/2016	10/26/2017	10/26/2017	3/13/2019
PCBs (μg/L)										
Aroclor-1016	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.2 U	0.2 U	0.48 U
Aroclor-1221	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.2 U	0.2 U	0.48 U
Aroclor-1232	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.2 U	0.2 U	0.48 U
Aroclor-1242	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.2 U	0.2 U	0.48 U
Aroclor-1248	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.46	0.05 U	0.2 U	0.2 U	0.48 U
Aroclor-1254	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.10	0.05 U	0.2 U	0.2 U	0.48 U
Aroclor-1260	0.09**	0.17 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.2 U	0.2 U	0.48 U
Aroclor-1262	0.09**	NA	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.2 U	0.2 U	0.48 U
Aroclor-1268	0.09**	NA	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.2 U	0.2 U	0.48 U

- Concentration exceeds NYSDEC Class GA Standard.

μg/L - microgram per liter.

U - Compound was not detected at the indicated concentration.

** - Sum of these compounds can not exceed 0.09 ug/L.

NA - Compound not analyzed

Table 5-3
Summary of Groundwater Sampling Results - PFAS and 1,4-Dioxane
Oswego Castings Site
NYSDEC Site Number 7-38-033



Sample ID	USEPA Health	NYSDEC	MW-1	MW-2	MW-X*	MW-3	MW-4	MW-5	MW-6	MW-7
Sampling Date	Advisory Limit	Guidance Value	10/26/2017	10/26/2017	10/26/2017	10/26/2017	10/26/2017	10/27/2017	10/26/2017	10/26/2017
PFAS (ng/L)										
Perfluorobutanesulfonic acid (PFBS)		100	2.0 U	1.42 J	1.30 J	2.0 U				
Perfluorohexanesulfonic acid (PFHxS)		100	2.0 U							
Perfluoroheptanoic acid (PFHpA)		100	2.0 U	1.65 J	1.69 J	2.0 U				
Perfluorooctanoic acid (PFOA)	70	10*	2.0 U	3.02	2.72	2.0 U				
Perfluorooctanesulfonic acid (PFOS)	70	10*	2.0 U	1.96 J	1.89 J	2.0 U				
Perfluorononanoic acid (PFNA)		100	2.0 U							
Total PFOA + PFOS	70		ND	4.98	4.61	ND	ND	ND	ND	ND
Total PFAS		500	ND	8.05	7.60	ND	ND	ND	ND	ND
1,4-Dioxane (µg/L)				•	•				•	
1,4-Dioxane			0.4 U							

The current USEPA Public Health Advisory for drinking water is 70 ng/L.

Concentrations detected above the reporting limit are in **bold**.

Concentrations detected above the United States Environmental Protection Agency Lifetime Health Advisory are highlighted in orange.

Concentrations detected above the New York State Department of Environmental Conservation Guidance Value are highlighted in yellow.

μg/L - microgram per liter.

ng/L - nanogram per liter.

- U Compound was not detected at the indicated concentrat
- J Compound detected below the reporting limit or reported concentration is estimated.
- "--" No standard currently exists for this compound.
- ND Not Detected.

^{*} The Proposed New York State Maximum Contaminant Level.

FIGURES



2,000 ft

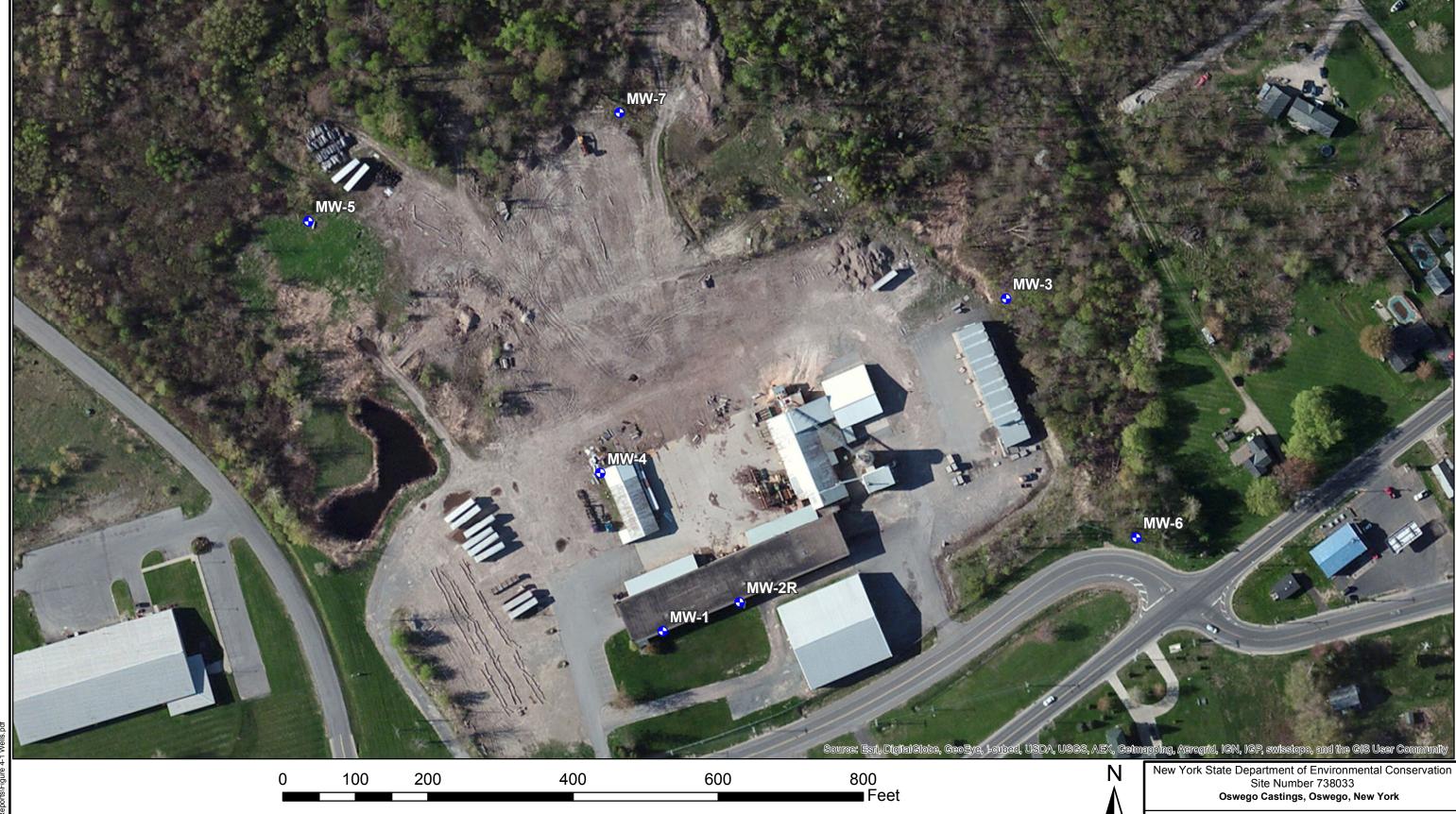
Figure 2-1 Site Location Oswego Castings Site Oswego, New York





Source: USGS 7.5-minute Series Topographic Quadrangle, Oswego East





Legend

Monitoring Well

MONITORING WELL LOCATIONS





5-1

306.24 Groundwater Elevation (Feet Above Mean Sea Level)



APPENDICES

APPENDIX A

O&M Checklists

OSWEGO CASTINGS SITE

Landfill and Concrete Cap Operation and Maintenance Checklist

Inspected by	Jasmine Mullins				
Date:	10 26 17 Time:	098	0		
Weather Co	nditions: Partly Cloudy @ 5	OF			
LANDFILL (COVER SYSTEM				
	Erosion		YES		NO
	Cap Settlement		YES		NO
	Ponded Water or Wet Areas		YES		NO
	Burrowing Rodents		YES		NO
	Brush or Other Woody Vegetation		YES		NO
Comments:	Thick regetation/frush along MW-5, MW-6, and MW-7.	Pezine	tere	zwells	<u>MW-</u> 3,
CONCRETE	COVER	,			
	Cracked Concrete		YES		NO
	Damaged Concrete	-	YES		NO
	Concrete Settlement		YES		NO
	Ponded Water or Wet Areas		YES		NO
	Presence of Vegetation		YES		NO
Comments:	along concrete eggos & in SE	of cov			uldings
INSPECTOR	R'S SIGNATURE JAMES MILES		DATE	10/26	17

OSWEGO CASTINGS SITE

Landfill and Concrete Cap Operation and Maintenance Checklist

Inspected by	. Jasmine Mellins		
Date:	3 13 2019 Time: 1636		
Weather Co	nditions: Chady @ 340F		-
LANDFILL (COVER SYSTEM		
	Erosion	YES	NO
	Cap Settlement	YES	NO
	Ponded Water or Wet Areas	YES	NO
	Burrowing Rodents	YES	NO
	Brush or Other Woody Vegetation	YES	NO
Comments:	Benshaftmoley water observed.	Mangho	<u>t</u>
CONCRETE	COVER		
	Cracked Concrete	YES	NO
	Damaged Concrete	YES	NO
	Concrete Settlement	YES	NO
	Ponded Water or Wet Areas	YES	NO
	Presence of Vegetation	YES	NO
Comments:	piled up in part curior of cover. Re partially down 230-40 Sect From	corneter (euse I
INSPECTOR	R'S SIGNATURE Jambe Milling	DATE 3/13	2019

APPENDIX B

Site Photographs



Oswego Castings Site Appendix B – Site Photographs



Photo: 1

Date:

October 26, 2017

Description:

Monitoring Well MW-1



Photo: 2

Date:

October 26, 2017

Description:

Metal Pile in closed building behind MW-1



Oswego Castings Site Appendix B – Site Photographs



Photo: 3

Date:

October 26, 2017

Description:

Monitoring Well MW-2R



Photo: 4

Date:

October 26, 2017

Description:

Drums stored between closed buildings



Oswego Castings Site Appendix B – Site Photographs



Photo: 5

Date:

October 26, 2017

Description:

Site facing West



Photo: 6

Date:

October 26, 2017

Description:

Equipment stored on Concrete Cover



Oswego Castings Site Appendix B – Site Photographs



Photo: 7

Date:

October 26, 2017

Description:

Monitoring Well MW-4



Photo: 8

Date:

October 26, 2017

Description:

Site facing East



Oswego Castings Site Appendix B – Site Photographs



Photo: 9

Date:

October 26, 2017

Description:

Site facing East



Photo: 10

Date:

October 26, 2017

Description:

Site facing building and silo



Oswego Castings Site Appendix B – Site Photographs



Photo: 11

Date:

October 26, 2017

Description:

Brush leading to Monitoring Well MW-3



Photo: 12

Date:

October 26, 2017

Description:

Monitoring Well MW-3



Oswego Castings Site Appendix B – Site Photographs



Photo: 13

Date:

October 26, 2017

Description:

Monitoring Well MW-7



Photo: 14

Date:

October 26, 2017

Description:

Site facing Loading Dock Area



Oswego Castings Site Appendix B – Site Photographs



Photo: 15

Date:

October 26, 2017

Description:

Monitoring Well MW-6



Photo: 16

Date:

October 26, 2017

Description:

Collapsed tree on Site Boundary Fence



Oswego Castings Site Appendix B – Site Photographs



Photo: 17

Date:

October 27, 2017

Description:

Monitoring Well MW-5



Photo: 18

Date:

October 27, 2017

Description:

View of Concrete Cover and

site facing North



Oswego Castings Site Appendix B – Site Photographs



Photo: 19

Date:

October 27, 2017

Description:

Vegetation in broken concrete section



Photo: 20

Date:

October 27, 2017

Description:

Vegetation growing in corner of Concrete Cover



Oswego Castings Site Appendix B – Site Photographs



Photo: 21

Date:

October 27, 2017

Description:

Debris and vegetation on Concrete Cover



Photo: 22

Date:

October 27, 2017

Description:

Inside view of open building



Oswego Castings Site Appendix B – Site Photographs



Photo: 1

Date:

March 13, 2019

Description:

Monitoring Well MW-1



Photo: 2

Date:

March 13, 2019

Description:

Snow covered soil stockpiles on property.



Oswego Castings Site Appendix B – Site Photographs



Photo: 3

Date:

March 13, 2019

Description:

Monitoring Well MW-2R



Photo: 4

Date:

March 13, 2019

Description:

Drums stored between closed buildings.



Oswego Castings Site Appendix B – Site Photographs



Photo: 5

Date:

March 13, 2019

Description:

Inside view of unlocked building.



Photo: 6

Date:

March 13, 2019

Description:

Trailers stored adjacent to Concrete Cover.



Oswego Castings Site Appendix B – Site Photographs



Photo: 7

Date:

March 13, 2019

Description:

Monitoring Well MW-4



Photo: 8

Date:

March 13, 2019

Description:

Ponded frozen water on Landfill area.



Oswego Castings Site Appendix B – Site Photographs



Photo: 9

Date:

March 13, 2019

Description:

Vegetation and debris stockpiles adjacent to concrete cover area.



Photo: 10

Date:

March 13, 2019

Description:

View of site facing buildings and silo.



Oswego Castings Site Appendix B – Site Photographs



Photo: 11

Date:

March 13, 2019

Description:

Inside view of unlocked

building.



Photo: 12

Date:

March 13, 2019

Description:

Monitoring Well MW-3



Oswego Castings Site Appendix B – Site Photographs



Photo: 13

Date:

March 13, 2019

Description:

Monitoring Well MW-7



Photo: 14

Date:

March 13, 2019

Description:

Collapsed fencing 30 to 40

feet from MW-6.



Oswego Castings Site Appendix B – Site Photographs



Photo: 15

Date:

March 13, 2019

Description:

Monitoring Well MW-6



Photo: 16

Date:

March 13, 2019

Description:

View of broken section of concrete cover.



Oswego Castings Site Appendix B – Site Photographs



Photo: 17

Date:

October 27, 2017

Description:

Monitoring Well MW-5



Photo: 18

Date:

October 27, 2017

Description:

View of Concrete Cover and site facing North.



Oswego Castings Site Appendix B – Site Photographs



Photo: 19

Date:

October 27, 2017

Description:

Broken concrete section



Oswego Castings Site Appendix B – Site Photographs



Photo: 1

Date:

September 10, 2019

Description:

Front view of buildings.



Photo: 2

Date:

September 10, 2019

Description:

Monitoring well MW-1 partially buried.



Oswego Castings Site Appendix B – Site Photographs



Photo: 3

Date:

September 10, 2019

Description:

Monitoring Well MW-2R partially buried.



Photo: 4

Date:

September 10, 2019

Description:

Inside view of unlocked building.



Oswego Castings Site Appendix B – Site Photographs



Photo: 5

Date:

September 10, 2019

Description:

View of equipment and trailers on concrete cover area.



Photo: 6

Date:

September 10, 2019

Description:

View of ponding water between concrete cover area and landfill area.



Oswego Castings Site Appendix B – Site Photographs



Photo: 7

Date:

September 10, 2019

Description:

View of stained concrete cover area.



Photo: 8

Date:

September 10, 2019

Description:

View of storage tank and stained concrete cover area.



Oswego Castings Site Appendix B – Site Photographs



Photo: 9

Date:

September 10, 2019

Description:

Monitoring Well MW-4 partially buried.



Photo: 10 Date:

September 10, 2019

Description:

View of stockpiles on landfill area.



Oswego Castings Site Appendix B – Site Photographs



Photo: 11

Date:

September 10, 2019

Description:

View of ponding water and tree cuttings stockpile on landfill area.





Oswego Castings Site Appendix B – Site Photographs







Oswego Castings Site Appendix B – Site Photographs



Photo: 15

Date:

September 10, 2019

Description:

View of soil stockpiles.



Photo: 16

Date:

September 10, 2019

Description:

View of graded soil base.

APPENDIX C

Well Inspection Forms

Groundwater Monitoring Well Inspection



10/26/17	Inspector	J. Mullins
111111111111111111111111111111111111111		- PETMAINING
MW-1		
South of main	building	
inches	N/A [X]	
∼3 feet	0.0 (a) (a) (b)	
The Part of the Pa		Other
	Samuel Same 1	
No. of the second secon	No IVI	
		Not apparent [] Other
The state of the s	Domonico []	THE EXPLORATION TO THE STATE OF
	Toward Wellhead []	
	H. 항상 당시 전 = 시항 전 [11] 11 11 11 11 11 11 11 11 11 11 11 11	
		DO Casina
		917 665/113
ALM 505"		
. 00 [k]	HOL 1 DOGGIDG.	
Describe: Good, In-	tad	
Describe: Good		
Yes[]	No [X] Describe:	
4 inches		
PVC [X]	Steel []	Stainless Steel []
Threaded []		Expansion Plug [X] None []
		None []
Yes[]	No [🔾] Describe:	Contract Apr
Yes []	No [x1] Describe	
	no yu	
	Depth to I NAPI	feet (nearest 0.01) N/A []
and the state of t	- april 18 - 110 ii -	rest (risaliset sign) (Wift 1
Describe:		
coted w/ Probe -	oil smell u	uas observed and tra
API were presen		
	inches 23	inches N/A [\forall \] Describe: \(\frac{Good}{Good} \) \(Frac{Frac{Frac{Frac{Frac{Frac{Frac{F



Site/Project Name: 0	Oswego Castings	Project Number: 00266404.0000		
Date of Inspection:	10/2/17	Inspector	. J. Mullins	
Well Designation:	MW-2R	* 10000000		
Well Location:	South of 1	Main Build	ing-	
Outward Appearance				
lushmount Diameter	inches	N/A [V]		
Approximate Stickup Height	× 2 feet	N/A []		
ntegrity of Protective Casing	Describe: Grood In	start		
Protective Casing Material 5	Steel [V	Stainless Steel []	Other	
Protective Casing Width or Dia.	4 inches	Approximately 2		
Weep Hole in Protective Casing	Yes[]	NoIN		
Surface Seal/Apron Material (Cement [V]	Bentonite []	Not apparent [] Other	
ntegrity of Surface Seal/Apron	Describe: FAIR			
Surface Drainage A	Away from Wellhead [V]	Toward Wellhead []		
Bollards Present?	Yes[]	No [4 Describe:		
Well ID, Visible?	Yes [\]	No [] Describe:		
ock Present and Functional?	Yes [V	No [] Describe:		
Photograph Taken? Photo#	Yes [V	No [] Describe:		
nner Appearance				
	Describe: Good TN	trot		
	Describe: Grand	1009		
	the state of the s	No [/ Describe:		
Vell Casing Diameter	Yes [] inches	No [Describe:		
	PVC [V	L Heet?	Stainless Steel I	
And the second s	Threaded []	Steel []	Stainless Steel [] Expansion Plug [] None []	
	Groove []	Slip [] Indelible Mark [\]	Expansion Plug [] None []	
내용 나는 사람들이 가능하는 유럽하는 것으로 보다 되었다.	Yes[]	No Describe:	Moue I. I.	
	7.000	The second secon		
Downhole				
Odor	Yes[]	No [] Describe:		
PID Reading	OV ppm			
Depth to Water (to top of casing)	feet (nearest 0.01)	Depth to LNAPL	feet (nearest 0.01) N/A [/]	
otal Well Depth (to top of casing)	feet (nearest 0.1)	- 27		
Sediment (Hard/Soft Bottom)	Describe: MRM 190	Hom		
additional Comments:				
	Describe: FIRM BO	Hom		



Site/Project Name: Oswego Castings Date of Inspection: MW-3		Project Number: 00266404.0000 Inspector: J. Mullins		
Well Location	East Side of	S.te		
Outward Appearance				
Flushmount Diameter	inches	N/A[X]		
Approximate Stickup Height	~ 2 feet	N/A[]		
Integrity of Protective Casing	Describe: Good In	tact		
Protective Casing Material	Steel [\v]	Stainless Steel []	Other	
Protective Casing Width or Dia.	inches	2 NOT CLEE 2 MADE: #14		
Weep Hole in Protective Casing	Yes []	No [X]		
Surface Seal/Apron Material	Cement [x]	Bentonite []	Not apparent [] Other	
Integrity of Surface Seal/Apron	Describe: 600d	- Transmission		
Surface Drainage	Away from Wellhead [\v]	Toward Wellhead []		
Bollards Present?	Yes[]	No [¥] Describe:		
Well ID, Visible?	Yes [x]	No [] Describe:	on casing	
Lock Present and Functional?	Yes [x]	No[] Describe:	3	
Photograph Taken? Photo#	Yes [x]	No [] Describe:		
Inner Appearance				
Integrity of Well Casing	Describe: Good In	itact		
Integrity of Cap Seal	Describe: good			
Surface Water in Casing?	Yes [/]	No [] Describe:		
Well Casing Diameter	inches			
Well Casing Material	PVC [X]	Steel []	Stainless Steel []	
Inner Cap	Threaded []	Slip []	Expansion Plug [X] None []	
Reference/Measuring Point	Groove []	Indelible Mark [🖍]	None []	
Evidence of Double Casing?	Yes[]	No [X] Describe:		
Downhole		,		
Odor	Yes []	No [/] Describe:		
PID Reading	<i>O-O</i> ppm			
Depth to Water (to top of casing)	3.00 feet (nearest 0.01)	Depth to LNAPL	feet (nearest 0.01) N/A [x]	
Total Well Depth (to top of casing)	17 3 feet (nearest 0.1)			
Sediment (Hard/Soft Bottom)	Describe:			
Additional Comments:				
Additional Comments.				



Site/Project Name	Oswego Castings	Project Number	00266404.0000
Date of Inspection	10/26/17	Inspector	J. Mullins
Well Designation	MW-4		
Well Location	Central Area of	Site	
Outward Appearance			
Flushmount Diameter	inches	N/A[X	
Approximate Stickup Height	~ a feet	N/A[]	
Integrity of Protective Casing	Describe: Good, Into		
Protective Casing Material	Steel [x]	Stainless Steel []	Other
Protective Casing Width or Dia.	(a inches		
Weep Hole in Protective Casing	Yes []	No [X]	
Surface Seal/Apron Material	Cement [X	Bentonite []	Not apparent [] Other
Integrity of Surface Seal/Apron	Describe: Good	Domonto []	issi apparanti 1
Surface Drainage	Away from Wellhead []	Toward Wellhead []	
Bollards Present?	Yes [X]	No [] Describe:	
Well ID. Visible?	Yes [X]	No [] Describe:	a casing
Lock Present and Functional?	Yes [(]	No [] Describe:	wi uising
Photograph Taken? Photo#	Yes [X]	No [] Describe:	
		A. A	
Inner Appearance	<i>r</i>		
Integrity of Well Casing	Describe: Good Into	act	
Integrity of Cap Seal	Describe: good		
Surface Water in Casing?	Yes[]	No [x] Describe:	
Well Casing Diameter	inches		
Well Casing Material	PVC [X]	Steel []	Stainless Steel []
Inner Cap	Threaded []	Slip []	Expansion Plug [X] None []
Reference/Measuring Point	Groove []	Indelible Mark [X]	None []
Evidence of Double Casing?	Yes[]	No [X] Describe:	****
Downhole			
Odor	Yes[]	No [-x] Describe:	
PID Reading	o o ppm		
Depth to Water (to top of casing)	3.72 feet (nearest 0.01)	Depth to LNAPL	feet (nearest 0.01) N/A [
Total Well Depth (to top of casing)	16. 47 feet (nearest 0.1)		
Sediment (Hard/Soft Bottom)	Describe: Soft bottom	1	
Additional Comments:			



Site/Project Name	e: Oswego Castings	Proj	ect Number	00266404.0000
Date of Inspection	10 27 17		Inspector	; J. Mullins
Well Designation	: MW-5			1
Well Location	NW side of s	itejpe	hind	concrete plak
Outward Appearance				
Flushmount Diameter	inches	N/A [9		
Approximate Stickup Height	23.5 feet 1	N/A []		
Integrity of Protective Casing	Describe: 6000 INT	act		
Protective Casing Material	Steel []	Stainless 5	Steel []	Other
Protective Casing Width or Dia.	4 inches	1		
Weep Hole in Protective Casing	Yes[]	No No		
Surface Seal/Apron Material	Cement [Bentonite,	i i	Not apparent [] Other
Integrity of Surface Seal/Apron	Describe: Slightly	FOUR !	oose s	ection of surface cement
Surface Drainage	Away from Wellhead [1]	-	ellhead []	
Bollards Present?	Yes[]	No M	Describe:	Concrete block 25 Hohear of m
Well ID. Visible?	Yes [V	No[]	Describe	1 30 37 9
Lock Present and Functional?	Yes [V]	No[]	Describe:	=
Photograph Taken? Photo #	Yes ()	No[]	Describe:	
Inner Appearance	1	Y_		
Integrity of Well Casing	Describe: 600 Chinton	T		
ntegrity of Cap Seal	Describe: Good			
Surface Water in Casing?	Yes[]	No [4	Describe:	
Well Casing Diameter	2 inches			
Well Casing Material	PVC [V]	Steel []		Stainless Steel []
nner Cap	Threaded []	Slip []	1	Expansion Plug [None []
Reference/Measuring Point	Groove []	Indelible N	lark [None []
Evidence of Double Casing?	Yes[]	NoM	Describe:	
Dannahala		/	6	
Downhole	Vant i	Neck	Develop	
Odor	Yes[]	No [Y]	Describe:	-
PID Reading	0.0 ppm	63-00-V-1		
Depth to Water (to top of casing)	0.90 feet (nearest 0.01)	Depth to L	NAPL	feet (nearest 0.01) N/A [Y
Total Well Depth (to top of casing)	11101 -	Travas		
Sediment (Hard/Soft Bottom)	Describe: MARY 13	o7 Tom		
Additional Comments:				



] Other
3 7000
na
3
[]
[X] None[]
My Mouel 1
arest 0.01) N/A [💉]
ILOSE O.O.L.) INVA [X]



Site/Project Name: Oswego Castings Date of Inspection: 100017		Project Number: 00266404.0000 Inspector: J. Mullins		
Well Location	N (D)	of site	2	
Outward Appearance	,			
Flushmount Diameter	inches	NAIY		
Approximate Stickup Height	<u>23</u> feet	N/A[]		
Integrity of Protective Casing	Describe: GEEd That	act		
Protective Casing Material	Steel [V]	Stainless Steel []	Other	
Protective Casing Width or Dia.	inches			
Weep Hole in Protective Casing	Yes[]	Now		
Surface Seal/Apron Material	Cement [V	Bentonite []	Not apparent [] Other	
Integrity of Surface Seal/Apron	Describe: Good	2.000.004.4		
Surface Drainage	Away from Wellhead []	Toward Wellhead [\		
Bollards Present?	Yes[]	No [1] Describe:		
Well ID. Visible?	Yes [V	No[] Describe:	On Casing	
Lock Present and Functional?	Yes [V	No [] Describe:	9	
Photograph Taken? Photo#	Yes M	No[] Describe:		
Inner Appearance				
Integrity of Well Casing	Describe: Good; T	Ntart		
Integrity of Cap Seal	Describe: Good		÷	
Surface Water in Casing?	Yes[]	No [1 Describe:		
Well Casing Diameter	inches	No[-] Describe.	-	
Well Casing Material	PVC N	Steel []	Stainless Steel []	
Inner Cap	Threaded []	Stip []	Expansion Plug [None []	
Reference/Measuring Point	Groove []	Indelible Mark [4	None []	
Evidence of Double Casing?	Yes[]	No M Describe:		
Downhole		-		
Odor	Yes []	No [V Describe:		
PID Reading	D.O ppm	2000 M		
Depth to Water (to top of casing)	5 58 feet (nearest 0.01)	Depth to LNAPI	feet (nearest 0.01) N/A [V	
Total Well Depth (to top of casing)	16.09 feet (nearest 0.1)	- akan as an an a		
Sediment (Hard/Soft Bottom)	Describe: HARIN B	rottom		
Additional Comments:				



Site/Project Name: Oswego Castings Date of Inspection: 3 13 2019		Project Number: 00266404.0000		
		Inspector: J. Mullins		
Well Designation	- MW-1			
Well Location	: South of Mo	in Building		
Outward Appearance			NA.	
Flushmount Diameter	inches	N/A [V]		
Approximate Stickup Height	≈ 3 feet	,N/A []		
Integrity of Protective Casing	Describe: Goodin	tact		
Protective Casing Material	Steel [V]	Stainless Steel []	Other	
Protective Casing Width or Dia.	6 inches	, ,		
Weep Hole in Protective Casing	Yes []	No [V]		
Surface Seal/Apron Material	Cement [V]	Bentonite []	Not apparent [] Other	
Integrity of Surface Seal/Apron	Describe: Good		· · · · · · · · · · · · · · · · · · ·	
Surface Drainage	Away from Wellhead [Toward Wellhead []		
Bollards Present?	Yes[]	No Describe:		
Well ID. Visible?	Yes [No [] Describe:	Dalcasir	
Lock Present and Functional?	Yes [V]	No [] Describe:	2	
Photograph Taken? Photo#	Yes [No [] Describe:		
	[0]	December		
Inner Appearance	201			
Integrity of Well Casing	Describe:	act		
Integrity of Cap Seal	Describe: G	200		
Surface Water in Casing?	Yes [V	No [] Describe:		
Well Casing Diameter	inches			
Well Casing Material	PVC V	Steel []	Stainless Steel []	
Inner Cap	Threaded []	Slip[]	Expansion Plug [\ None []	
Reference/Measuring Point	Groove []	Indelible Mark M	None []	
Evidence of Double Casing?	Yes[]	No 1 Describe:		
Downhole				
Odor	Yes []	No [Describe:		
PID Reading	O.O ppm			
Depth to Water (to top of casing)	2.60 feet (nearest 0.01)	Depth to LNAPL	feet (nearest 0.01) N/A [V]	
Total Well Depth (to top of casing)	17.4] feet (nearest 0.1)		, , ,	
Sediment (Hard/Soft Bottom)	Describe: \$12.1\ 301	TON		
Additional Comments:				



Site/Project Name: Oswego Castings		Project Number: 00266404.0000		
Date of Inspection	1: 3 13 2019	Inspector	: J. Mullins	
Well Designation	1: MW-ZR			
Well Location	: South of M	in Bulding		
Outward Appearance				
Flushmount Diameter	inches	N/A [V]		
Approximate Stickup Height	≈ 2 feet	N/A []		
Integrity of Protective Casing	Describe: Good inte	ict		
Protective Casing Material	Steel [Stainless Steel []	Other	
Protective Casing Width or Dia.	<u></u> inches			
Weep Hole in Protective Casing	Yes []	No [V		
Surface Seal/Apron Material	Cement [Bentonite []	Not apparent [] Other	
Integrity of Surface Seal/Apron	Describe: TAIL			
Surface Drainage	Away from Wellhead [V	Toward Wellhead []		
Bollards Present?	Yes[]	No Describe:		
Well ID. Visible?	Yes	No [] Describe:	On -J	
Lock Present and Functional?	Yes [V	No [] Describe:		
Photograph Taken? Photo #	Yes [V	No [] Describe:		
Inner Appearance	Je . J. 1	a f		
Integrity of Well Casing	Describe:	01		
Integrity of Cap Seal	Describe: G			
Surface Water in Casing?	Yes[]	No [] Describe:		
Well Casing Diameter	inches			
Well Casing Material	PVC [V]	Steel []	Stainless Steel []	
Inner Cap	Threaded []	Slip []	Expansion Plug [V None []	
Reference/Measuring Point	Groove []	Indelible Mark [V	None []	
Evidence of Double Casing?	Yes []	No Describe:		
Downhole				
Odor	Yes []	No Describe:		
PID Reading	<u>O O</u> ppm	[0]		
Depth to Water (to top of casing)	2.5 feet (nearest 0.01)	Depth to LNAPL	feet (nearest 0.01) N/A [V	
Total Well Depth (to top of casing)	•			
Sediment (Hard/Soft Bottom)	Describe: FILM BOT	TISM		
Additional Comments:				



Site/Project Name	: Oswego Castings	Project Number: 00266404.0000		
Date of Inspection	3/13/2019	Inspector	r: J. Mullins	
Well Designation	_ Muj-3			
Well Location	East of bui	ldings fin	treeline	
Outward Appearance				
Flushmount Diameter	inches	N/A [V		
Approximate Stickup Height	≥ 2 feet	N/A []		
Integrity of Protective Casing	Describe: (Saudin	trict		
Protective Casing Material	Steel [V]	Stainless Steel []	Other	
Protective Casing Width or Dia.	inches			
Weep Hole in Protective Casing	Yes []	No [V		
Surface Seal/Apron Material	Cement [v]	Bentonite []	Not apparent [] Other	
Integrity of Surface Seal/Apron	Describe: G			
Surface Drainage	Away from Wellhead [Toward Wellhead []		
Bollards Present?	Yes []	No Describe:		
Well ID. Visible?	Yes [Y	No [] Describe:	On casi	
Lock Present and Functional?	Yes [V	No [] Describe:	3/	
Photograph Taken? Photo #	Yes [\]	No [] Describe:		
Inner Appearance				
Integrity of Well Casing	Describe: G	tact		
Integrity of Cap Seal	Describe: Gal			
Surface Water in Casing?	Yes [V]	No [] Describe:		
Well Casing Diameter	inches			
Well Casing Material	PVC [V	Steel []	Stainless Steel []	
Inner Cap	Threaded []	Slip []	Expansion Plug [] None []	
Reference/Measuring Point	Groove []	Indelible Mark [V]	None []	
Evidence of Double Casing?	Yes[]	No Describe:		
Downhole				
Odor	Yes []	No Describe:		
PID Reading	D.O ppm	THE DESCRIBE.		
Depth to Water (to top of casing)	2.33 feet (nearest 0.01)	Depth to I NAPI	feet (nearest 0.01) N/A []	
Total Well Depth (to top of casing)	[7.3] feet (nearest 0.1)		ioot (nearest 0.01) TVA[]	
Sediment (Hard/Soft Bottom)	Describe:	thisne		
Additional Comments:				



Site/Project Name	Site/Project Name: Oswego Castings		Project Number: 00266404.0000		
Date of Inspection	3 3 2019	Inspector: J. Mullins			
Well Designation:	MW-H				
Well Location:	Northwest of	mais buildia			
Outward Appearance			C)		
Flushmount Diameter	inches	N/A [\]			
Approximate Stickup Height	≈ 2_feet	N/A []			
Integrity of Protective Casing	Describe: Goo?	turst	,e**		
Protective Casing Material	Steel [Stainless Steel []	Other		
Protective Casing Width or Dia.	inches				
Weep Hole in Protective Casing	Yes []	No [\]			
Surface Seal/Apron Material	Cement [V	Bentonite []	Not apparent [] Other		
Integrity of Surface Seal/Apron	Describe:				
Surface Drainage	Away from Wellhead [Toward Wellhead []			
Bollards Present?	Yes [\]	No [] Describe:			
Well ID. Visible?	Yes [\]	No [] Describe:	ON CASIMON		
Lock Present and Functional?	Yes [V	No [] Describe:	3		
Photograph Taken? Photo #	Yes [\]	No [] Describe:	-		
Inner Appearance		-			
Integrity of Well Casing	Describe: Good 17	act			
Integrity of Cap Seal	Describe:				
Surface Water in Casing?	Yes []	No [Describe:			
Well Casing Diameter	inches				
Well Casing Material	PVC [\]	Steel []	Stainless Steel []		
Inner Cap	Threaded []	Slip []	Expansion Plug [None []		
Reference/Measuring Point	Groove []	Indelible Mark [\(\frac{1}{2} \)	None []		
Evidence of Double Casing?	Yes[]	No [Describe:			
Downhole					
Odor	Yes []	No [Describe:	-		
PID Reading	O-O ppm				
Depth to Water (to top of casing)	2.74 feet (nearest 0.01)	Depth to LNAPL	feet (nearest 0.01) N/A []		
Total Well Depth (to top of casing)		V			
Sediment (Hard/Soft Bottom)	Describe: Soft for	ton			
Additional Comments:					



Site/Floject Name.	: Oswe o Castings	Pro	ject Number	: 00266404.0000
Date of Inspection:	: 3 13 2019		Inspector	: J. Mullins
Well Designation:	WILL -5			
Well Location:	NW side of 5	te, b	chart	concrete block
Outward Appearance			,	
Flushmount Diameter	inches	N/A [1/2]		
Approximate Stickup Height	23.5 feet	N/A []		
Integrity of Protective Casing	Describe:	toct		
Protective Casing Material	Steel [U	Stainless	Steel []	Other
Protective Casing Width or Dia.	inches			
Weep Hole in Protective Casing	Yes []	No [
Surface Seal/Apron Material	Cement [Bentonije	[]	Not apparent [] Other
Integrity of Surface Seal/Apron	Describe:	ave, Le	mu so	chow of surface cem
Surface Drainage	Away from Well lead	Toward W	ellhead []	Compose block & S.C. ahord
Bollards Present?	Yes []	No [V]	Describe:	Concrete block & 5ft. ahead
Well ID. Visible?	Yes [\]	No []	Describe:	. 0
Lock Present and Functional?	Yes []	No []	Describe:	
Photograph Taken? Photo #	Yes [V	No[]	Describe:	
nner Appearance	2			
Integrity of Well Casing	Describe:	act		
ntegrity of Cap Seal	Describe:			
Surface Water in Casing?	Yes []	No [1]	Describe:	
Well Casing Diameter	inches			
Well Casing Material	PVC [U	Steel []		Stainless Steel []
nner Cap	Threaded []	Slip []	_	Expansion Plug [None []
Reference/Measuring Point	Groove []	Indelible M	lark [v]	None []
Evidence of Double Casing?	Yes[]	No [V]	Describe:	
Downhole				
Odor	Yes []	No [/]	Describe:	
PID Reading	O O ppm			
Depth to Water (to top of casing)	4.85 feet (nearest 0.01)	Depth to L	NAPL	feet (nearest 0.01) N/A [1/
				, , , , , ,
Sediment (Hard/Soft Bottom)	Describe: Harry BE	DITON	L	
Additional Comments:				



Site/Project Name	e: Oswego Castings	Project Number: 00266404.0000		
Date of Inspection	: 3 13 2019	Inspector	r: J. Mullins	
Well Designation	11. YVVVV - lov			
Well Location	- 1 N	- site jallary	- penterfera	
Outward Appearance				
Flushmount Diameter	inches	N/A M		
Approximate Stickup Height	≈ 2 feet	N/A []_		
Integrity of Protective Casing	Describe:	daka		
Protective Casing Material	Steel [V]	Stainless Steel []	Other	
Protective Casing Width or Dia.	<u> </u>			
Weep Hole in Protective Casing	Yes[]	No [Y		
Surface Seal/Apron Material	Cement [\]	Bentonite []	Not apparent [] Other	
Integrity of Surface Seal/Apron	Describe:			
Surface Drainage	Away from Wellhead []	Toward Wellhead []		
Bollards Present?	Yes []	No [Describe:		
Well ID. Visible?	Yes 🗸	No [] Describe:	Out design.	
Lock Present and Functional?	Yes [V	No [] Describe:	C	
Photograph Taken? Photo #	Yes [No [] Describe:		
Inner Appearance				
Integrity of Well Casing	Describe: 6000 in	act		
ntegrity of Cap Seal	Describe: Go			
Surface Water in Casing?	Yes[]	No [Describe:		
Well Casing Diameter	2 inches			
Well Casing Material	PVC[]	Steel []	Stainless Steel []	
nner Cap	Threaded []	Slip[]	Expansion Plug [None []	
Reference/Measuring Point	Groove []	Indelible Mark [V	None []	
Evidence of Double Casing?	Yes []	No Mo Describe:		
Downhole				
Odor	Yes []	No No Describe:		
PID Reading	D.O ppm	[.,		
Depth to Water (to top of casing)	6-00 feet (nearest 0.01)	Depth to LNAPL	feet (nearest 0.01) N/A [V	
Total Well Depth (to top of casing)		· ·		
Sediment (Hard/Soft Bottom)	Describe: FIRM BY	OM		
Additional Comments:				



Site/Project Name	Oswego Castings	Project Number: 00266404.0000			
Date of Inspection	3 13 2019	Inspector	r: J. Mullins		
Well Designation	Mul-7				
Well Location	Mouth side of	f sitaj in p	lugmiter ares		
Outward Appearance			Q		
Flushmount Diameter	inches	N/A [Y			
Approximate Stickup Height	<u>2</u> 3 feet	N/A[]			
Integrity of Protective Casing	Describe:	tact			
Protective Casing Material	Steel [Stainless Steel []	Other		
Protective Casing Width or Dia.	inches				
Weep Hole in Protective Casing	Yes []	No [\]			
Surface Seal/Apron Material	Cement [Bentonite []	Not apparent [] Other		
Integrity of Surface Seal/Apron	Describe:				
Surface Drainage	Away from Wellhead []	Toward Wellhead			
Bollards Present?	Yes []	No [V] Describe:			
Well ID. Visible?	Yes M	No [] Describe:	Che la vie E		
Lock Present and Functional?	Yes [V	No [] Describe:			
Photograph Taken? Photo #	Yes [J	No [] Describe:			
Inner Appearance		1			
Integrity of Well Casing	Describe:	vot			
Integrity of Cap Seal	Describe: (w / ()				
Surface Water in Casing?	Yes []	No [Describe:			
Well Casing Diameter	2_ inches				
Well Casing Material	PVC [v]	Steel []	Stainless Steel []		
Inner Cap	Threaded []	Slip[]	Expansion Plug [V] None []		
Reference/Measuring Point	Groove []	Indelible Mark [1]	None []		
Evidence of Double Casing?	Yes []	No Describe:			
Downhole					
Odor	Van I. I	N - 1 - 1 - 5 - 11			
Odor PID Reading	Yes [] <u>0-0</u> ppm	No [\] Describe:			
-		D # 4 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			
Depth to Water (to top of casing) Total Well Depth (to top of casing)	2-62 feet (nearest 0.01)	Depth to LNAPL	feet (nearest 0.01) N/A []		
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	THOMA			
Sediment (Hard/Soft Bottom)	Describe: HARD &	EL TOIN L			
Additional Comments:					

Site/Project Name:	Oswego Castings	Project Number:	00266404.0000
Date of Inspection:	3/29/19	Inspector:	E. Green
Well Designation:	MW-2		
	SW Corner Of S	:L	
vveii Location:	SW CONZE OF A	1 &	
Outward Appearance			
Flushmount Diameter	inches	N/A [
Approximate Stickup Height	2 feet	N/A []	
Integrity of Protective Casing	Describe: (500)		
Protective Casing Material	Steel []	Stainless Steel	Other
Protective Casing Width or Dia.	inches	,	
Weep Hole in Protective Casing	Yes []	No [×]	
Surface Seal/Apron Material	Cement 🔀	Bentonite []	Not apparent [] Other
Integrity of Surface Seal/Apron	Describe: Gazo		
Surface Drainage	Away from Wellhead [X]	Toward Wellhead []	
Bollards Present?	Yes []	No Describe:	
Well ID. Visible?	Yes 🔀	No [] Describe:	
Lock Present and Functional?	Yes (G	No [] Describe:	
Photograph Taken? Photo #	Yes X	No [] Describe:	
Inner Appearance	0 1		
Integrity of Well Casing	Describe: 6000		
Integrity of Cap Seal	Describe: Good		
Surface Water in Casing?	Yes []	No Describe:	
Well Casing Diameter	inches		
Well Casing Material	PVC[K]	Steel []	Stainless Steel []
Inner Cap	Threaded []	Slip 🔀	Expansion Plug [] None []
Reference/Measuring Point	Groove []	Indelible Mark 💢	None []
Evidence of Double Casing?	Yes []	No [Describe:	
Downhole			
Odor	Yes []	No Describe:	
PID Reading	<u>NA</u> ppm		
Depth to Water (to top of casing)	6.0 feet (nearest 0.01)	Depth to LNAPL	feet (nearest 0.01) N/A 🔀
Total Well Depth (to top of casing)			,
Sediment (Hard/Soft Bottom)	Describe: Hww		
,			
Additional Comments:			Lock was
C. L.			#2333 IXL
Cut			

APPENDIX D

Water Level Data Forms

GROUNDWATER LEVEL DATA FORM



PROJECT NAME:	Oswego Castings	DATE:	10/26/2017 - 10/27/2017
PROJECT NUMBER:	00266404.0000	PERSONNEL:	J. Mullins
			K. Liloia (Precision)

WELL ID	Date	Time	Headspace VOCs (ppm)	Depth to Water (feet)	Total Depth (feet)	Reference Point
MW-1	10/26/2017	09:30 - 05:30	0.0	4.78	17.41	TOC
MW-2R	10/26/2017	09:30 - 05:30	0.0	3.73	15.77	TOC
MW-3	10/26/2017	09:30 - 05:30	0.0	3.00	17.31	TOC
MW-4	10/26/2017	09:30 - 05:30	0.0	3.72	16.42	TOC
MW-5	10/27/2017	08:45 - 09:40	0.0	6.46	16.88	TOC
MW-6	10/26/2017	09:30 - 05:30	0.0	10.98	36.77	TOC
MW-7	10/26/2017	09:30 - 05:30	0.0	5.58	16.09	TOC

Notes:		
		-

GROUNDWATER LEVEL DATA FORM



 PROJECT NAME: Oswego Castings
 DATE: 3/13/2019 & 3/29/2019

 PROJECT NUMBER: 00266404.0000
 PERSONNEL: J. Mullins

 E. Green

WELL ID	Date	Time	Headspace VOCs (ppm)	Depth to Water (feet)	Total Depth (feet)	Reference Point
MW-1	3/13/2019	10:00 to 5:00	0.0	2.80	17.52	TOC
MW-2R	3/13/2019	10:00 to 5:00	0.0	2.51	15.79	TOC
MW-3	3/13/2019	10:00 to 5:00	0.0	2.33	17.31	TOC
MW-4	3/13/2019	10:00 to 5:00	0.0	2.74	16.42	TOC
MW-5	3/13/2019	10:00 to 5:00	0.0	4.88	17.01	TOC
MW-6	3/13/2019	10:00 to 5:00	0.0	6.00	36.77	TOC
MW-7	3/13/2019	10:00 to 5:00	0.0	2.62	16.09	TOC
MW-1	3/29/2019	8:00 to 1:00	NM	3.24	17.41	TOC
MW-2R	3/29/2019	8:00 to 1:00	NM	3.00	15.77	TOC
MW-5	3/29/2019	8:00 to 1:00	NM	5.00	17.01	TOC
MW-6	3/29/2019	8:00 to 1:00	NM	6.73	36.77	TOC

Notes:		

APPENDIX E

IC/EC Certification Form



Enclosure 1 Engineering Controls - Standby Consultant/Contractor Certification Form



Site Details Site No. 738033		Box 1
Site Name Oswego Castings		
Site Address: Mitchell Street Zip Code: 13126 City/Town: Oswego County: Oswego Site Acreage: 10.0		
Reporting Period: December 31, 2016 to December 31, 2019		
	YES	NO
Is the information above correct?	X	
If NO, include handwritten above or on a separate sheet.		
2. To your knowledge has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?		×
To your knowledge has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	X	
4. To your knowledge have any federal, state, and/or local permits (e.g., building discharge) been issued for or at the property during this Reporting Period?	,	×
If you answered YES to questions 2 thru 4, include documentation or evithat documentation has been previously submitted with this certification		
5. To your knowledge 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/ECs in place and functioning as designed?		×
IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and of DEC Principal regarding the development of Corrective Measures Work Plan to additional regarding the development of Corrective Measures Work Plan to additional regarding the development of Corrective Measures Work Plan to additional regarding the development of Corrective Measures Work Plan to additional regarding the development of Corrective Measures Work Plan to additional regarding the development of Corrective Measures Work Plan to additional regarding the development of Corrective Measures Work Plan to additional regarding the development of Corrective Measures Work Plan to additional regarding the development of Corrective Measures Work Plan to additional regarding the development of Corrective Measures Work Plan to additional regarding the development of Corrective Measures Work Plan to additional regarding the development of Corrective Measures Work Plan to additional regarding the development of Corrective Measures Work Plan to additional regarding the development of Corrective Measures Work Plan to additional regarding the Corrective Measures where Measures wh		ues.
/	12, 2021	
Signature of Standby/Co/iscltant/Contractor Date		

SITE NO. 738033 Box 3

Description of Institutional Controls

<u>Parcel</u> <u>Owner</u> <u>Institutional Control</u>

111.69-01-01.000 City of Oswego

O&M Plan

O&M Plan Monitoring Plan

Ground Water Use Restriction

Landuse Restriction

An Environmental Notice was placed on the site May 22, 2012. There is a O and M plan with a monitoring plan currently in place at the site. A SMP is currently being developed for the site.

Box 4

Description of Engineering Controls

Parcel <u>Engineering Control</u>

111.69-01-01.000

Cover System

There is a concrete cover at the site as well as a Soil cover. There is also a monitoring well network.

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 certification, including data and material prepared by previous contractors for the current certifying period, if any;
- 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. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:
 - (a) the Institutional Control and/or 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) nothing has occurred that would constitute a failure to comply with the Site Management Plan, or equivalent if no Site Management Plan exists.

NO

YES

IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and contact the DEC PM regarding the development of a Corrective Measures Work Plan to address these issues.

Signature of Standby Consultant Contractor

March 12, 2021

Date

		Box 6
	IC/EC CERTIFICATIONS	
	Signature	
	through 5 are true. I understand that a false statement made sdemeanor, pursuant to Section 210.45 of the Penal Law.	!
Iprint name	at	_
	(print hunings address)	
am certifying as a .	(print business address)	
am coranying do a .		
Signature of	Stamp Date (Required for PE)	



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