

**PERIODIC REVIEW REPORT
OWEGO FORMER MGP SITE (NO. 754008)
OWEGO, NEW YORK**



by
Haley & Aldrich of New York
Rochester, New York

for
New York State Department of Environmental Conservation
Albany, New York

File No. 134371-006
February 2023



HALEY & ALDRICH OF NEW YORK
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24 February 2023
File No. 134371-006

New York State Department of Environmental Conservation
Division of Environmental Remediation, 11th Floor
625 Broadway
Albany, New York 12223

Attention: Scott Deyette

Subject: Periodic Review Report
Owego Former MGP Site (No. 754008)
Owego, New York

Dear Mr. Deyette:

On behalf of New York State Electric & Gas (NYSEG), Haley & Aldrich of New York (Haley & Aldrich) is pleased to submit the Periodic Review Report (PRR) for NYSEG's Owego Former Manufactured Gas Plant (MGP) Site (No. 754008) located in Owego, New York. This report summarizes operations, maintenance, monitoring, and compliance with the Site Management Plan (SMP) during the period from January 2018 through January 2023.

This PRR has been prepared in response to the letter from the New York State Department of Environmental Conservation (NYSDEC) to NYSEG dated 13 December 2022. If you have questions or comments regarding this report, please contact Tracy Blazicek of NYSEG at 607.731.9702 or Doug Allen of Haley & Aldrich at 603.391.3320.

Sincerely yours,
HALEY & ALDRICH OF NEW YORK

A handwritten signature in black ink, appearing to read 'Santa E. McKenna'.

Santa E. McKenna, P.G.
Assistant Project Manager

A handwritten signature in black ink, appearing to read 'Douglas C. Allen'.

Douglas C. Allen, P.G.
Senior Associate

Enclosures

c: NYSEG; Attn: Tracy L. Blazicek, CHMM, PMP

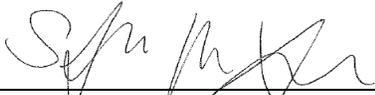
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SIGNATURE PAGE FOR

**PERIODIC REVIEW REPORT
OWEGO FORMER MGP SITE (NO. 754008)
OWEGO, NEW YORK**

**PREPARED FOR
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
625 BROADWAY
ALBANY, NEW YORK**

PREPARED BY:



Santa E. McKenna, P.G.
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Senior Associate
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1. Introduction

1.1 SITE DESCRIPTION

The Owego Former Manufactured Gas Plant (MPG) Site (the Site) is located on East Main Street in Owego, New York, approximately 1,200 feet (ft) north of the Susquehanna River (Figure 1). As shown in Figure 2, the 1-acre triangular parcel is bounded by East Main Street to the north; the Erie-Lackawanna railway to the southwest; and a former lumber mill to the east, currently operating as a building material store and party tent rental business. The surrounding area, except for former lumber mill, is generally residential.

1.2 SITE HISTORY AND USE

The Owego MGP operated from 1856 to 1935. It is believed that both coal carbonization and carbureted water gas processes may have been used at the Site, although there appears to be no historical evidence of an oil or naphtha storage vessel on the Site. There were three historical gas holders (one was subgrade) on Site, in addition to wood and brick buildings that housed the retorts, boiler, purifying room, regulators, and other operational features of the former MGP.

1.3 SUMMARY OF INVESTIGATIONS AND REMEDIAL ACTIONS

From September 1994 to July 1995, the former subgrade holder and its contents were removed, along with soils adjacent to the former holder. Approximately 13,500 tons of soils were removed from the excavation, which extended down to the groundwater table at approximately 18 to 20 ft below grade. Verification samples were collected at the limits of the excavation that showed that the unsaturated zone confirmation samples were below the cleanup objective of 500 parts per million (ppm) of total polycyclic aromatic hydrocarbons (PAHs). In addition to the deep excavation, the upper 2 ft of soil (surface soil) on the entire Site was removed.

From December 1999 to June 2001, field investigations were completed to determine the nature and extent of a continuing dissolved cyanide plume. The multi-phased field effort included subsurface soil sampling and the installation of piezometers for groundwater flow and quality monitoring. The field investigations determined that groundwater flows to the southwest at the Site and then more southerly as it moves off Site. The investigations also determined that there was a diffused on-Site source of cyanide remaining below the groundwater table in the area of the former remedial excavation and that there were not sustained off-Site exceedances of the New York State Department of Environmental Conservation (NYSDEC) Class GA groundwater quality standard for total cyanide (200 micrograms per liter [$\mu\text{g}/\text{L}$]). As part of this work, groundwater fate and transport modeling based on the available data using the Electric Power Research Institute (EPRI) MYGRTTM V3.0 model indicated that the diffused source of the cyanide plume would be depleted in approximately 22 years without further active remedial measures.

The engineering control (EC) at the Site consists of a soil cover system, while groundwater and land use restrictions were implemented for institutional control (IC). Since 2003, selected wells and piezometers have been periodically sampled and tested for cyanide and benzene.

1.4 REPORT ORGANIZATION

After this introductory section, this report is organized as follows:

- Section 2 evaluates the performance, effectiveness, and protectiveness of the existing remedy;
- Section 3 provides a summary of remedy Institutional Controls and Engineering Controls (ICs/ECs);
- Section 4 describes the monitoring program since 2018; and
- Section 5 provides the overall conclusions of the PRR.

2. Evaluation of Remedy Performance, Effectiveness, and Protectiveness

The remedial excavation performed from September 1994 to July 1995 removed MGP-related impacts in the unsaturated zone exceeding the soil cleanup objective of 500 ppm of total PAHs. Field investigations and analysis of soil and groundwater data from 1999 to 2001 indicated that the dissolved cyanide plume would be depleted in approximately 22 years and that there would not be sustained off-Site exceedances of NYSDEC Class GA groundwater quality standards. A groundwater monitoring program was initiated for cyanide and benzene to document the decline in cyanide concentrations and confirm that off-Site groundwater concentrations were not sustained above NYSDEC Class GA groundwater quality standards.

A Fifteen-Year Groundwater Monitoring Summary Report was submitted to the NYSDEC in April 2018 containing a summary of groundwater monitoring results and statistical evaluation of data collected at the Site from 2003 through 2018. The report established that data collected for both cyanide and benzene from on-Site monitoring wells did not demonstrate a strong upward or downward trend, and that on-Site and off-Site concentrations remained below NYSDEC Class GA groundwater quality standards. Haley & Aldrich requested a reduction in the sampling frequency. In July 2019, NYSDEC approved an updated schedule of monitoring every two years at locations MW-4 and PZ-2, with benzene being analyzed during every other monitoring event at PZ-8.

A Site plan with groundwater elevations from the latest monitoring event (August 2021) is provided as Figure 2. The historical total cyanide and benzene concentrations from existing wells and piezometers are presented in Table I. The existing groundwater sampling locations are shown on Figure 3, with analytical results from 2018 to the present. In addition, time series plots of total cyanide and benzene concentrations at selected wells and piezometers are provided in Appendix A.

The remedy for the Site has included soil excavation and removal, ECs, and ICs. The remedy performance, effectiveness, and protectiveness can be summarized as follows:

- The EC consisting of a vegetated soil cover at the Site is still in-place and protects trespassers to the Site from exposure to soils beneath the soil cover.
- Based on the off-Site groundwater data collected during the groundwater monitoring program, there was not a “sustained off-site exceedance of NYS groundwater quality standards which warrants active remediation,” as described in the April 1994 Record of Decision for the Site. In July 2019, NYSDEC approved discontinuation of off-Site groundwater monitoring and decommissioning of off-Site monitoring wells and piezometers.
- Emerging contaminants, including per- and polyfluoroalkyl substances (PFAS) and 1,4-dioxane were sampled at MW-1, MW-4, and PZ-6 during the January 2020 sampling event. The compound 1,4-dioxane was not detected. The greatest concentrations of PFAS were detected in off-Site monitoring well MW-1, and the concentrations of PFAS did not exceed the recommended maximum contaminant level in samples collected from on-Site well MW-4 or downgradient piezometer PZ-6.
- ICs in effect for the Site prohibit use of the groundwater for any purpose without first obtaining a written waiver of such prohibition from the NYSDEC or another Relevant Agency of the State.
- ICs in effect for the Site include land use restrictions to ensure maintenance of the soil cover and oversight of excavation activities to prevent exposure to or release of contaminants.

3. IC/EC Compliance Report

The IC/EC Certification Form is attached as Appendix B, and this section briefly summarizes the status of the controls at the Site. NYSEG maintains ownership of the parcel where the former MGP Site was located, and there are no plans to transfer ownership at this time. The soil cover EC is observed by field staff during routine groundwater monitoring and is found to be competent with a grass cover present. Oblique aerial photographs of the Site from April 2022 are provided in Appendix C, which confirm that development has not occurred on the Site. Land use and groundwater use ICs are in-place at the Site, such that excavations are not performed at the Site and Site groundwater is not used for any purpose without the prior approval of NYSDEC or another Relevant Agency of the State. These measures are effective in preventing potential exposure to Site contaminants.

4. Monitoring Plan Compliance Report

The monitoring plan for the Site during this Periodic Review Report (PRR) reporting period included the sampling of one monitoring well (MW-4) and one piezometer (PZ-2) for analysis of total cyanide, and one piezometer (PZ-8) for analysis of benzene in 2020; and one monitoring well (MW-4) and one piezometer (PZ-2) for total cyanide analysis in 2021, as summarized in Table II. As mentioned in Section 2, sampling for emerging contaminants at three monitoring locations (MW-1, MW-4, and PZ-6) was completed in January 2020.

Select monitoring wells and piezometers were decommissioned as approved in a NYSDEC letter dated 10 July 2019 and a NYSDEC email dated 4 October 2021. On 11 October 2021, three on-Site piezometers (PZ-1, PZ-3, and PZ-15), four off-Site piezometers (PZ-6, PZ-7, PZ-10, and PZ-11), one on-Site monitoring well (MW-2), and three off-Site monitoring wells (MW-1, MW-7, and MW-11) were decommissioned in accordance with NYSDEC's CP-43 Groundwater Monitoring Well Decommissioning Policy using the grout-in-place method. Decommissioned monitoring well and piezometer locations are shown on Figure 3. After the wells had been grouted, the well risers were cut approximately 3 to 5 feet below grade, the casing and associated well materials (concrete aprons and protective steel casing/road boxes) were removed from the ground, and the disturbed area was restored to match the surrounding ground surface.

The groundwater results for total cyanide and benzene collected during the PRR reporting period are included in Table I. In addition, time series plots of the total cyanide and benzene data are provided as Appendix A. The groundwater monitoring was completed according to the NYSDEC-approved plan during the PRR reporting period. Analytical results continue to demonstrate that on-Site concentrations of benzene and cyanide continue to be variable over time and remain within the range of historical concentrations. Off-Site groundwater sampling is no longer completed under the current monitoring program.

5. Conclusions

During the reporting period from January 2018 to January 2023, the ECs and ICs at the Site performed as intended. No excavation activities were performed at the Site, and the vegetated soil cover is in good functional condition. No use of Site groundwater has occurred. The groundwater monitoring program for the Site was performed and the results indicated that on-site concentrations of cyanide and benzene are comparable to previous monitoring results. The remedies for the Site, consisting of excavation of impacted materials and ongoing groundwater monitoring, are effective in protecting human health and the environment.

References

1. Haley & Aldrich of New York, *August 2021 Groundwater Monitoring Report, Owego Former MGP Site, Owego, New York*, 27 October 2021.
2. Haley & Aldrich of New York, *Fifteen-Year Groundwater Monitoring Summary, Owego Former MGP Site, Owego, New York*, 13 April 2018.
3. Haley & Aldrich of New York, *Groundwater Monitoring Well and Piezometer Decommissioning Report, Owego Former MGP Site, Owego, New York*, 14 December 2021.
4. Haley & Aldrich of New York, *January 2020 Groundwater Monitoring Report, Owego Former MGP Site, Owego, New York*, 27 March 2020.
5. Ish Inc., *Periodic Review Report for the Owego Former MGP Site*, February 2013.

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TABLES

TABLE I
SUMMARY OF GROUNDWATER ANALYTICAL RESULTS
 NEW YORK STATE ELECTRIC & GAS
 OWEGO FORMER MGP SITE
 OWEGO, NEW YORK

	NYSDEC TOGS 1.1.1 Class GA Water Quality	Chemical Name GA Water Quality Standards Units	Cyanide, Total 200 µg/L	Benzene 1 µg/L
	Sample Type	Sample Name		
MW-4				
08/28/1995	N	MW-4-082895	797	<5
10/16/1995	N	MW-4-101695	996	<5
01/24/1996	N	MW-4-012496	797	<5
04/15/1996	N	MW-4-041596	1190	<5
07/25/1996	N	MW-4-072596	3900	<5
10/15/1996	N	MW-4-101596	1380	<5
01/20/1997	N	MW-4-012097	757	<10
04/29/1997	N	MW-4-042997	4180	<10
04/29/1998	N	MW-4-042998	1600	-
10/19/1998	N	MW-4-101998	998	-
04/16/1999	N	MW-4-041699	630	-
12/14/1999	N	MW-4-121499	330	-
04/26/2000	N	MW-4-042600	570	-
09/28/2000	N	MW-4-092800	620	-
01/24/2001	N	MW-4-012401	725	-
06/20/2001	N	MW-4-062001	2240	-
04/22/2003	N	MW-4-042203	-	<0.1
04/23/2003	N	MW-4-042303	2010	-
10/22/2003	N	MW-4-102203	1150	<0.1
04/14/2004	N	MW-4-041404	1010	<0.1
10/29/2004	N	MW-4-102904	1690	<0.1
04/08/2005	N	MW-4-040805	744	<0.2
10/04/2005	N	MW-4-100405	404	270
02/14/2006	N	MW-4-021406	-	1.7
10/03/2006	N	MW-4-100306	2240	1.3
10/23/2007	N	MW-4-102307	234	<0.2
10/28/2008	N	MW-4-102808	90.4	<1
10/26/2009	N	MW-4-102609	145	0.64
10/26/2009	FD	MW-4-102609-DUP	211	0.45
10/26/2010	N	MW-4-102610	180	<1
10/26/2010	FD	MW-4-102610-DUP	207	<1
10/25/2011	N	MW-4-102511	2700	<1
10/25/2011	FD	MW-4-102511-DUP	2900	<1
03/12/2012	N	MW-4-031212	810	-
03/12/2012	FD	MW-4-031212-DUP	990	-
10/16/2012	N	MW-4-101612	610	0.7
10/16/2012	FD	MW-4-101612-DUP	650	0.47
07/11/2014	N	2293-071114-1355	1700	-
04/21/2015	N	MW04-042115-1135	400	-
05/26/2016	N	MW04-052616-1325	3300 J	-
08/23/2017	N	MW04-082317-1245	5700	-
01/13/2020	N	MW4-011320-1345	2000	-

TABLE I
SUMMARY OF GROUNDWATER ANALYTICAL RESULTS
 NEW YORK STATE ELECTRIC & GAS
 OWEGO FORMER MGP SITE
 OWEGO, NEW YORK

	NYSDEC TOGS 1.1.1 Class GA Water Quality	Chemical Name Class GA Water Quality Standards Units	Cyanide, Total 200 µg/L	Benzene 1 µg/L
	Sample Type	Sample Name		
MW-4 (Continued)				
01/13/2020	FD	4125-011320-0002	1800	-
08/24/2021	N	MW4-082421-1205	2400	-
08/24/2021	FD	4125-082421-0001	2700	-
PZ-2				
12/15/1999	N	PZ-2-121599	241	-
06/19/2000	N	PZ-2-061900	9800	-
09/28/2000	N	PZ-2-092800	1550	-
01/24/2001	N	PZ-2-012401	1320	-
06/20/2001	N	PZ-2-062001	1540	-
06/20/2001	FD	PZ-2-062001-DUP	1650	-
04/22/2003	N	PZ-2-042203	-	< 0.1
04/23/2003	N	PZ-2-042303	3230	-
10/22/2003	N	PZ-2-102203	1860	-
04/14/2004	N	PZ-2-041404	1470	-
08/03/2004	N	PZ-2-080304	804	-
10/29/2004	N	PZ-2-102904	1410	-
04/08/2005	N	PZ-2-040805	1020	-
10/04/2005	N	PZ-2-100405	535	-
10/03/2006	N	PZ-2-100306	989	-
10/23/2007	N	PZ-2-102307	352	-
10/28/2008	N	PZ-2-102808	242	-
10/26/2009	N	PZ-2-102609	< 10	-
10/26/2010	N	PZ-2-102610	262	-
10/25/2011	N	PZ-2-102511	270	-
03/12/2012	N	PZ-2-031212	730	-
10/16/2012	N	PZ-2-101612	460	-
07/11/2014	N	3159-071114-1520	2900 J	-
04/21/2015	N	PZ02-042115-1155	580	-
05/26/2016	N	PZ02-052616-1635	2700 J	-
08/23/2017	N	PZ02-082317-1430	3600	-
01/13/2020	N	PZ2-011320-1810	1900	-
08/24/2021	N	PZ2-082421-1110	2500	-
PZ-8				
12/15/1999	N	PZ-8-121599	296	-
12/15/1999	FD	PZ-8-121599-DUP	296	-
06/19/2000	N	PZ-8-061900	94	-
09/28/2000	N	PZ-8-092800	300	-
01/24/2001	N	PZ-8-012401	358	-
04/22/2003	N	PZ-8-042203	-	1200
02/14/2006	N	PZ-8-021406	-	580
10/03/2006	N	PZ-8-100306	-	500
10/23/2007	N	PZ-8-102307	-	670
10/28/2008	N	PZ-8-102808	-	590
10/26/2009	N	PZ-8-102609	-	1100
10/26/2010	N	PZ-8-102610	-	770
10/25/2011	N	PZ-8-102511	-	150
10/16/2012	N	PZ-8-101612	-	530
07/11/2014	N	3159-071114-1640	-	810
04/21/2015	N	PZ08-042115-1315	-	140
05/26/2016	N	PZ08-052616-1515	-	65 J
05/26/2016	FD	4527-052616-0001	-	57 J
08/23/2017	N	PZ08-082317-1300	-	380
08/23/2017	FD	1234-082317-0002	-	380
01/13/2020	N	PZ08-011320-1710	-	150

Notes and Abbreviations:

- Results were compared to TOGS Water Quality Standards, Table 1, Class GA (June 1998). Exceedances are shaded.
- <: Result is not detected above the indicated reporting limit.
J: Estimated result.
R: Rejected during validation.
- Results in **bold** are detected.
- Sample type codes: N - Normal, FD - Field Duplicate.
- Samples collected prior to July 2014 were obtained from Ish Inc.
- µg/L = micrograms per liter

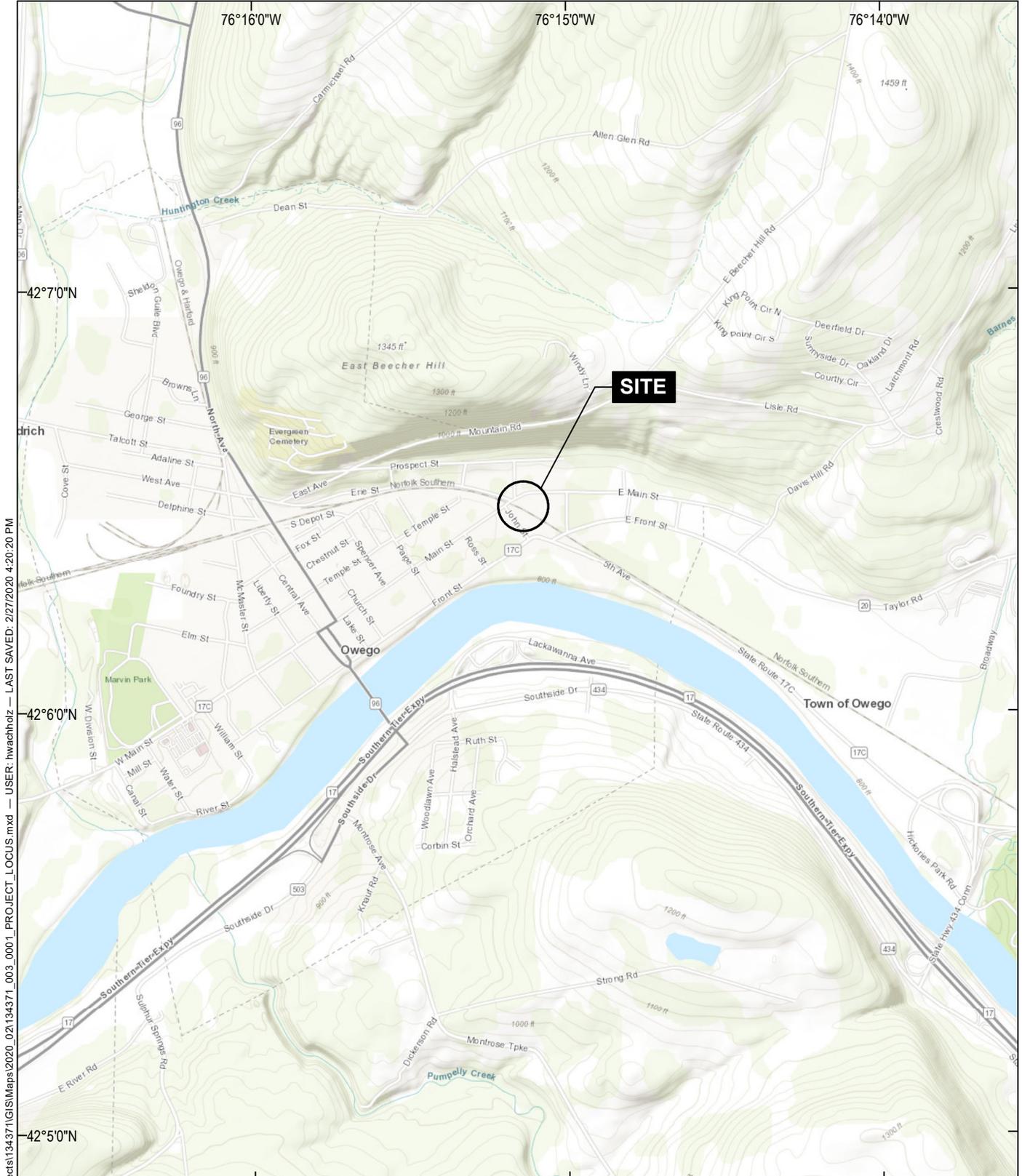
TABLE II
REPORTING PERIOD GROUNDWATER MONITORING PROGRAM SUMMARY
OWEGO FORMER MGP SITE
OWEGO, NEW YORK

	MW-4	PZ-2	PZ-8	MW-1	PZ-6
December 2019/January 2020	CN, EC	CN	BZ	EC	EC
August 2021	CN	CN	NS	-	-

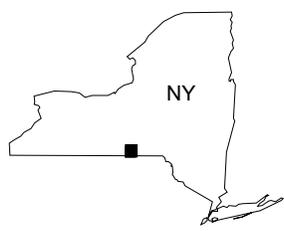
Notes and Abbreviations:

1. CN: Total cyanide
2. BZ: Benzene
3. EC: Emerging contaminants
4. NS: Not sampled
5. -: Well decommissioned

FIGURES



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MAP SOURCE: ESRI
 SITE COORDINATES: 42°06'29"N, 76°15'09"W

**HALEY
 ALDRICH**

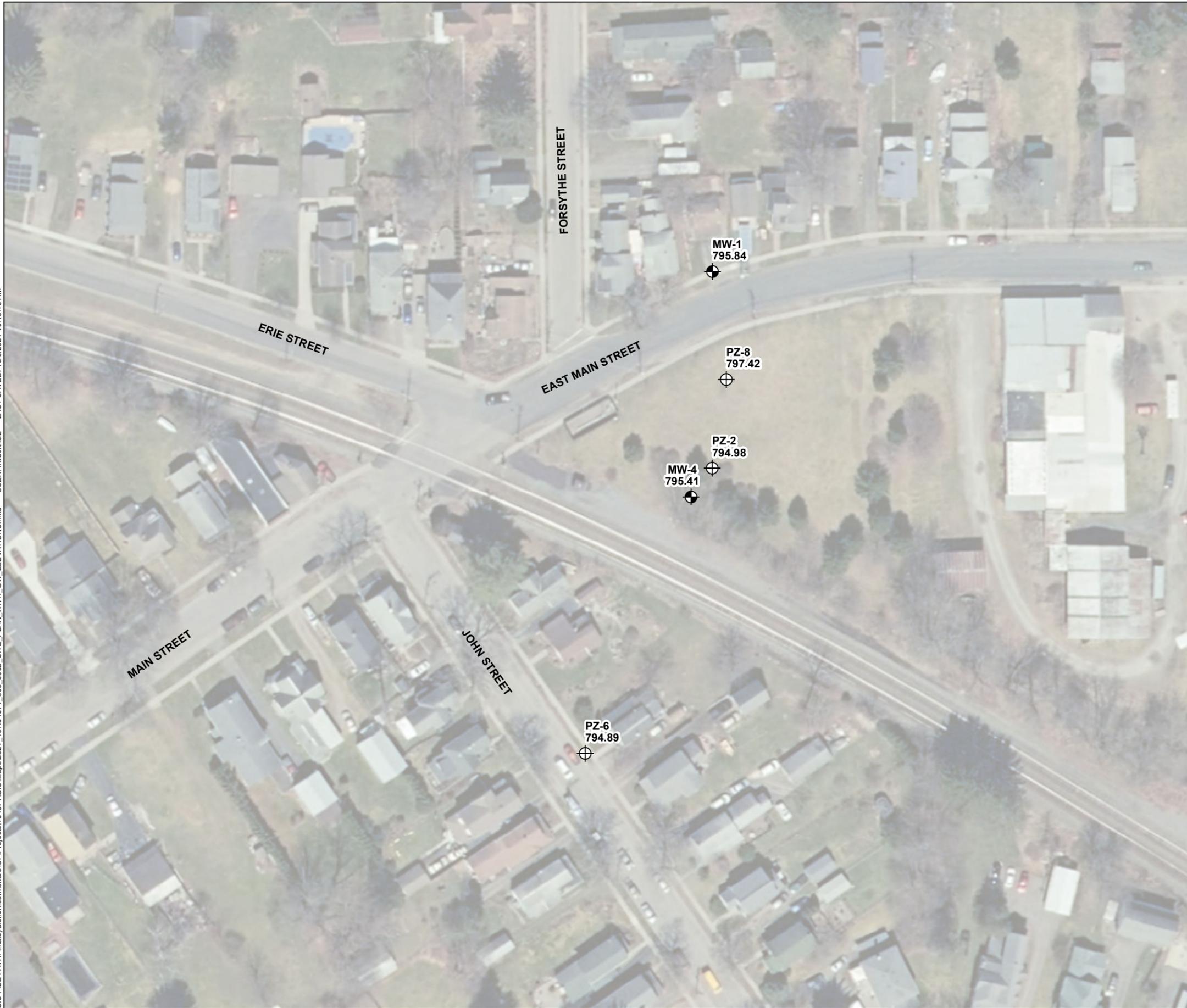
OWEGO FORMER MGP SITE
 NEW YORK STATE ELECTRIC & GAS
 OWEGO, NEW YORK

PROJECT LOCUS

APPROXIMATE SCALE: 1 IN = 2000 FT
 FEBRUARY 2023

FIGURE 1

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LEGEND

-  MONITORING WELL WITH GROUNDWATER ELEVATIONS INDICATED IN FEET
-  PIEZOMETER

NOTES

1. ALL LOCATIONS ARE APPROXIMATE.
2. GROUNDWATER ELEVATIONS WERE MEASURED ON 24 AUGUST 2021.
3. AERIAL IMAGERY SOURCE: ESRI

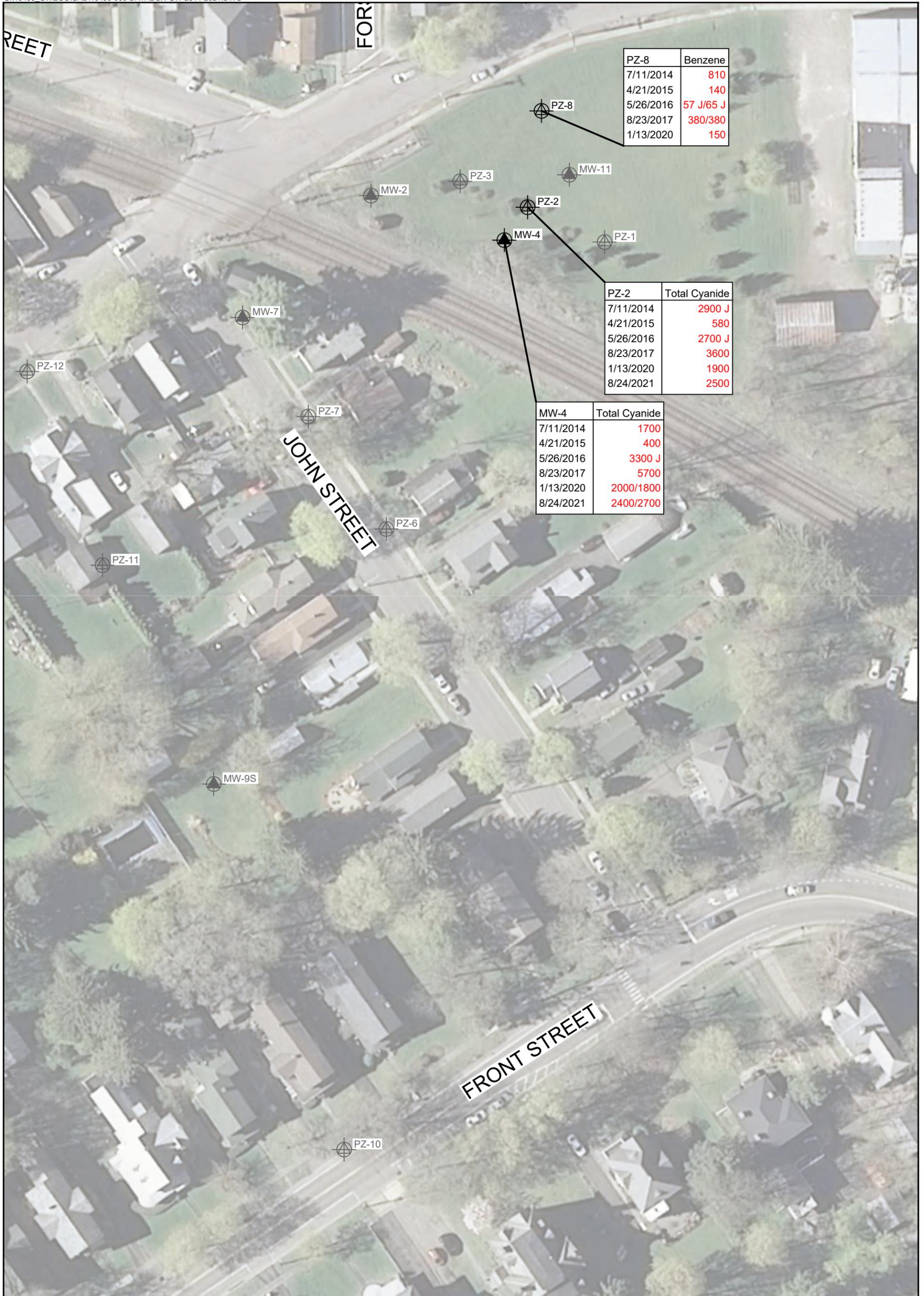


HALEY ALDRICH OWEGO FORMER MGP SITE
NEW YORK STATE ELECTRIC & GAS
OWEGO, NEW YORK

**SITE PLAN WITH
GROUNDWATER ELEVATIONS**

FEBRUARY 2023

FIGURE 2



PZ-8	Benzene
7/11/2014	810
4/21/2015	140
5/26/2016	57 J/65 J
8/23/2017	380/380
1/13/2020	150

PZ-2	Total Cyanide
7/11/2014	2900 J
4/21/2015	580
5/26/2016	2700 J
8/23/2017	3600
1/13/2020	1900
8/24/2021	2500

MW-4	Total Cyanide
7/11/2014	1700
4/21/2015	400
5/26/2016	3300 J
8/23/2017	5700
1/13/2020	2000/1800
8/24/2021	2400/2700

LEGEND

- MONITORING WELL
- PIEZOMETER
- DECOMMISSIONED MONITORING WELL
- DECOMMISSIONED PIEZOMETER

NOTES

1. ALL LOCATIONS AND DIMENSIONS ARE APPROXIMATE.
2. DATABOX RESULT UNITS ARE UG/L.
3. J: ESTIMATED RESULT
4. R: REJECTED DURING VALIDATION
5. /: INDICATES DUPLICATE SAMPLE RESULT
6. RESULTS WERE COMPARED AGAINST TOGS WATER QUALITY STANDARDS. EXCEEDANCES ARE SHOWN IN RED.



OWEGO FORMER MGP SITE
 NEW YORK STATE ELECTRIC & GAS
 OWEGO, NEW YORK

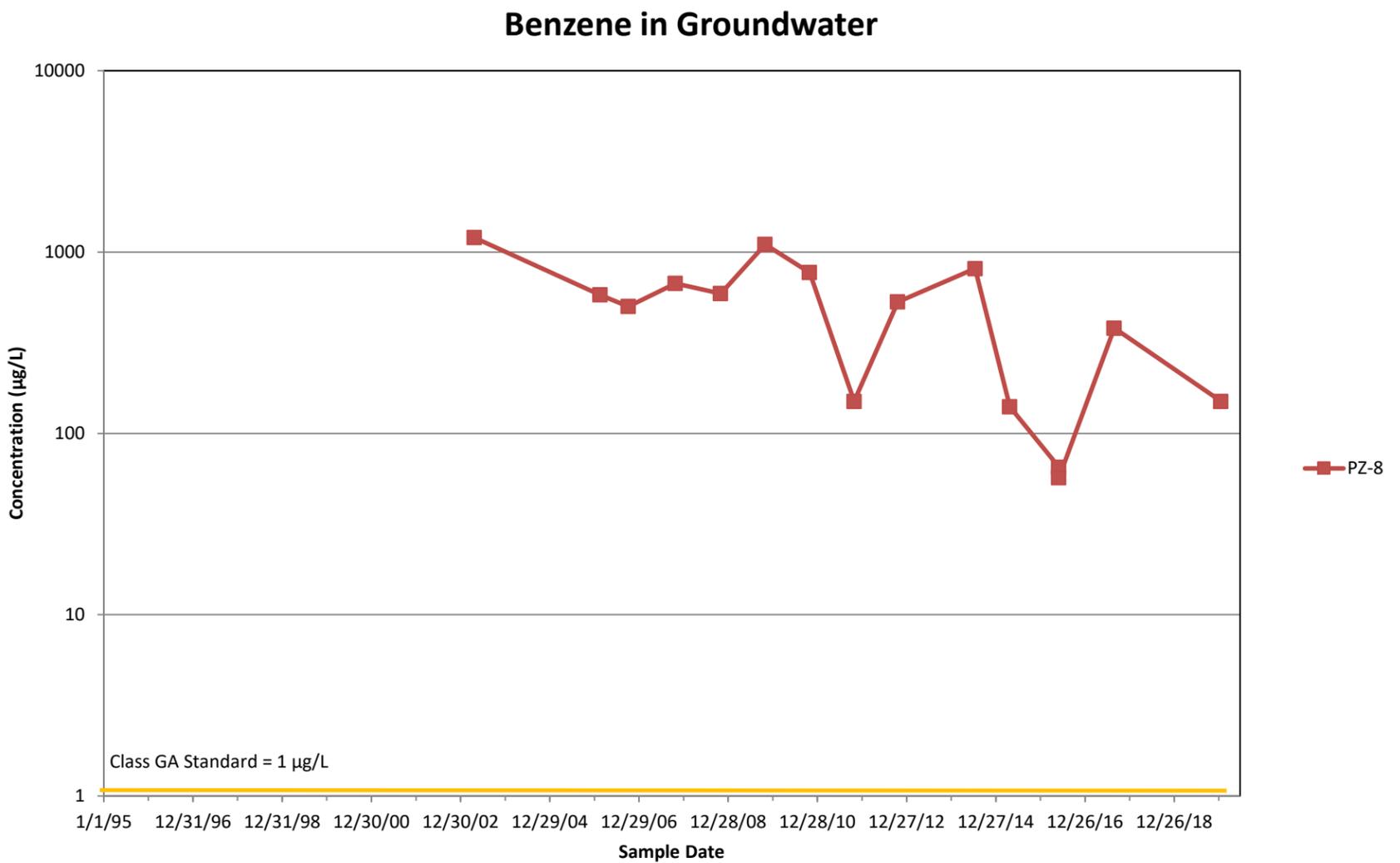
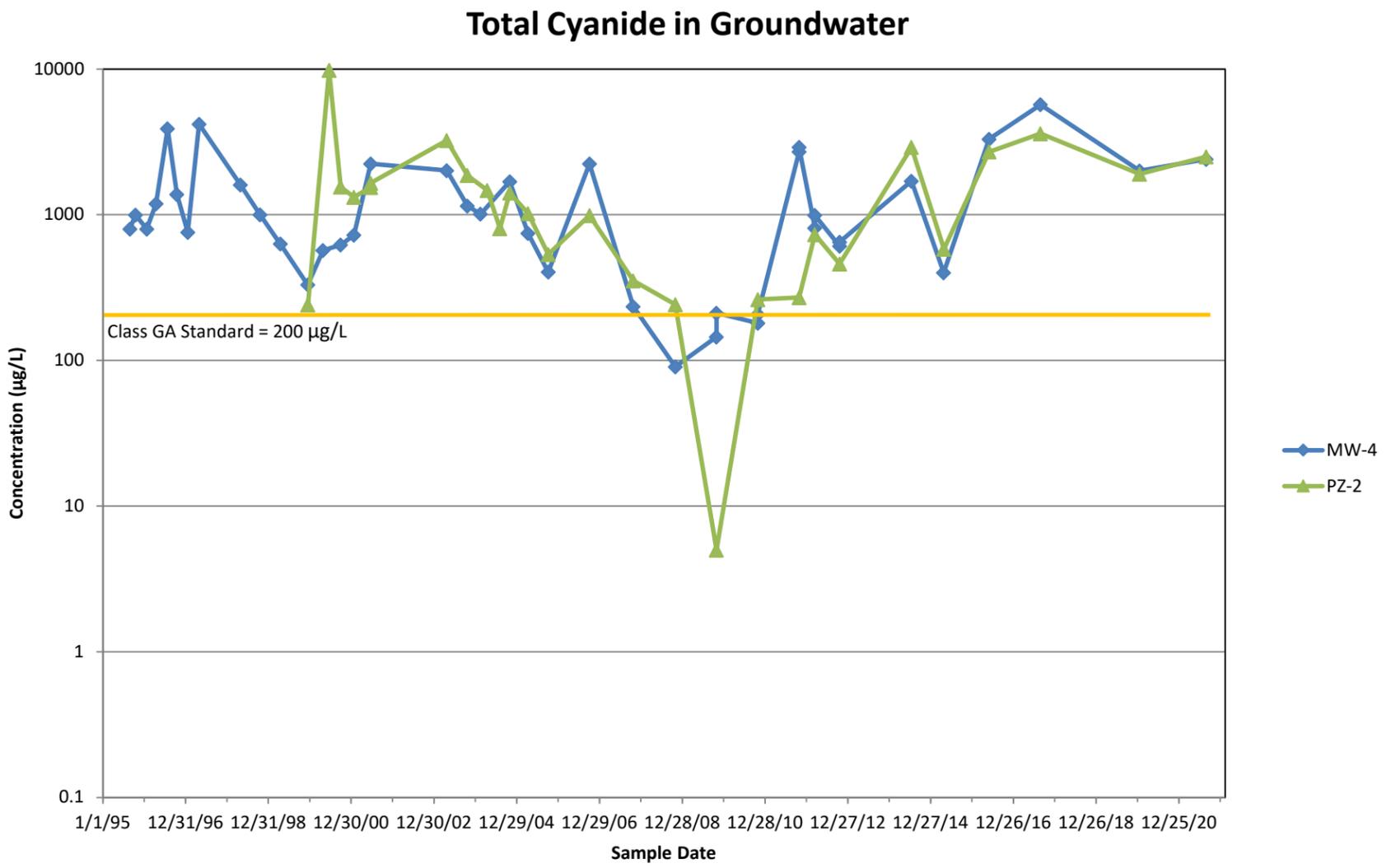
**TOTAL CYANIDE AND BENZENE
 IN GROUNDWATER**

SCALE: AS SHOWN
 FEBRUARY 2023

FIGURE 2

APPENDIX A
Time Series for Total Cyanide and Benzene in
Groundwater

APPENDIX A
TIME SERIES FOR TOTAL CYANIDE AND BENZENE IN GROUNDWATER
 OWEGO FORMER MGP SITE
 OWEGO, NEW YORK



APPENDIX B
Institutional and Engineering Controls 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

Site No. **754008**

Box 1

Site Name NYSEG - Owego Coal Gas MGP

Site Address: East Main Street Zip Code: 13827
City/Town: Owego
County: Tioga
Site Acreage: 1.000

Reporting Period: January 30, 2018 to January 30, 2023

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

Box 2

- | | YES | NO |
|--|-------------------------------------|--------------------------|
| 6. Is the current site use consistent with the use(s) listed below?
Commercial and Industrial | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 7. Are all ICs in place and functioning as designed? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

Date

Description of Institutional Controls

Parcel

Owner

N Y S E & G

Institutional Control

Ground Water Use Restriction
Soil Management Plan
Landuse Restriction

Site Management Plan

- Prohibition against use of groundwater without treatment and approval from NYSDEC, NYSDOH, and Tioga County DOH.
- Use must be maintained as Commercial/Industrial.
- Compliance with a Site Management Plan (SMP).

Description of Engineering Controls

Parcel

Engineering Control

Cover System
Monitoring Wells

- Site cover over entire site.
- Annual monitoring of groundwater through monitoring wells (onsite).

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the Engineering Control certification;

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

2. For each Engineering control listed in Box 4, I certify by checking "YES" below that all of the following statements are true:

(a) The Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

(d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and

(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

Date

**IC CERTIFICATIONS
SITE NO. 754008**

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 Douglas C. Allen, P.G. at Haley & Aldrich of New York
200 Town Centre Drive, Suite 2, Rochester, NY 14623,
print name print business address

am certifying as Designated Representative (Owner or Remedial Party)

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



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

2/23/2023
Date

EC CERTIFICATIONS

Box 7

Qualified Environmental Professional Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Douglas C. Allen, P.G. at Haley & Aldrich of New York
200 Town Centre Drive, Suite 2, Rochester, NY 14623,
print name print business address

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



Signature of Qualified Environmental Professional, for the Owner or Remedial Party, Rendering Certification Stamp (Required for PE) 2/23/2023
Date

APPENDIX C
Site Photographs

Owego Former Manufactured Gas Plant Site
Owego, New York
File No. 0134371-006
Date Photographs Taken: April 29, 2022

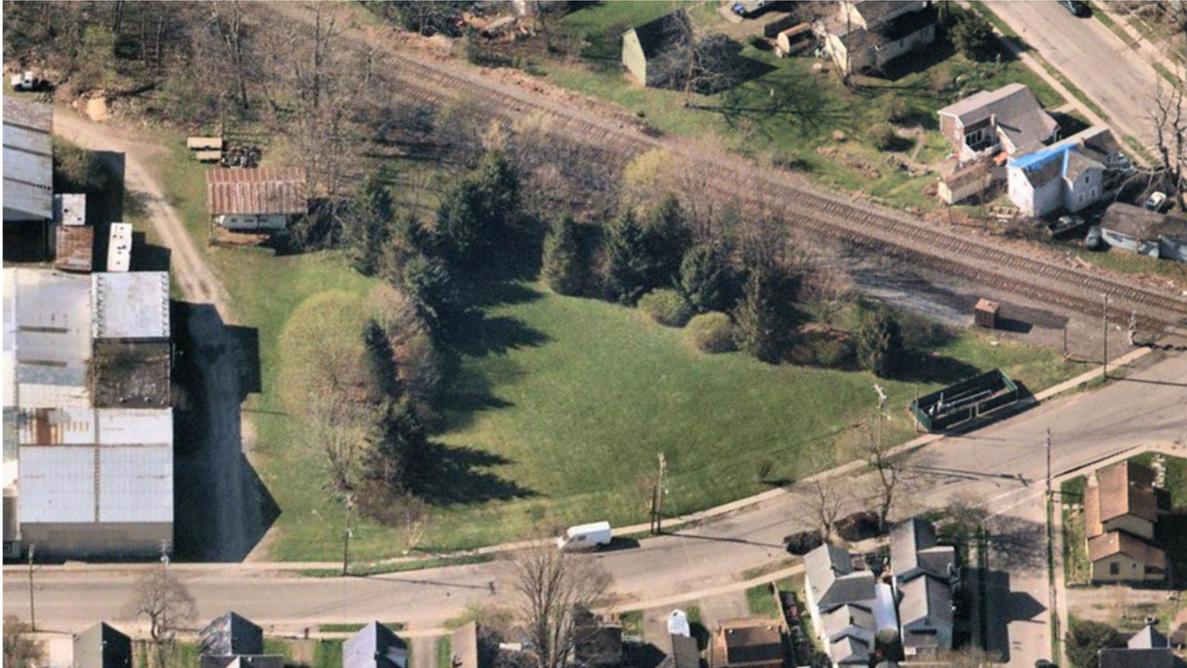


Photo 1: Oblique aerial photo looking south.

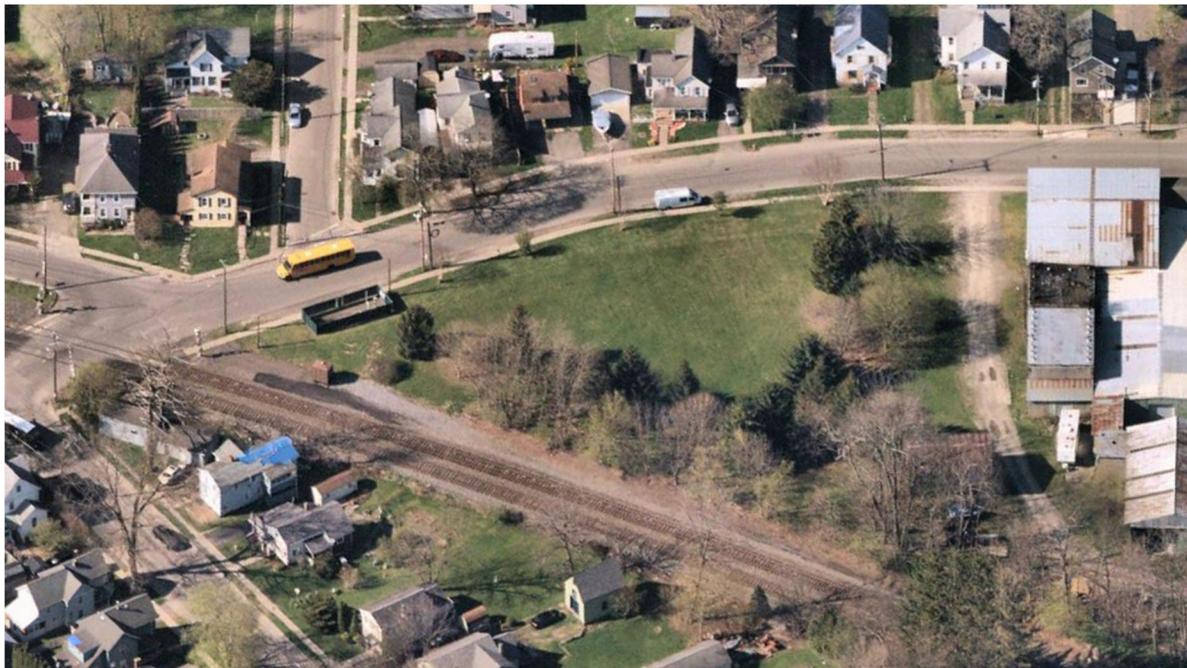


Photo 2: Oblique aerial photo looking north.

Photo Source: Nearmap (www.nearmap.com)