Tennessee Gas Pipeline
Company, L.L.C.
a Kinder Morgan company

August 21, 2017

Mr. Adam Morgan, EIT
New York State Department of Environmental Conservation
Division of Environmental Remediation - Region 8
6274 East Avon - Lima Road
Avon, NY 14414

RE: Tennessee Gas Pipeline Company, L.L.C. - Compressor Station 237
Clifton Springs, NY - Ontario County
Site No. 835011

Dear Mr. Morgan,

Enclosed please find the Site Management Periodic Review Report (PRR) and IC/EC Certification for Tennessee Gas Pipeline Company's (TGP's) Compressor Station 237 located in Clifton Springs, NY. The report is for the period November 1, 2012 to August 1, 2017.

Should you have any questions, please contact me at (724) 662-6436.

Sincerely,

Scott J. Lewis
Specialist – Permitting Compliance Lead

Attachments: Enclosure 2 Site Management PRR and IC/EC Certification Form
Attachment 1 Periodic Review Report

Enclosure 2

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Site Management Periodic Review Report Notice

Institutional and Engineering Controls Certification Form

Site Details **Box 1**

Site No. 835011

Site Name Tennessee Gas Pipeline Station 237

Site Address: ~~2041~~ 2001 Archer Road Zip Code: 14432

City/Town: Clifton Springs

County: Ontario

Site Acreage: 112.0

Reporting Period: November 01, 2012 to August 01, 2017

	YES	NO
1. Is the information above correct?	☐	☑
If NO, include handwritten above or on a separate sheet.		
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?	☐	☑
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?	☐	☑
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?	☐	☑
If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.		
5. Is the site currently undergoing development?	☐	☑

Box 2

	YES	NO
6. Is the current site use consistent with the use(s) listed below? Industrial	☑	☐
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 DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

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

Signature of Owner, Remedial Party or Designated Representative

Date

SITE NO. 835011

Box 3

Description of Institutional Controls

Parcel	Owner	Institutional Control
707.101-006	Kinder Morgan, Inc.	Monitoring Plan

Deed Restriction.

Box 4

Description of Engineering Controls

Parcel	Engineering Control
707.101-006	Cover System Fencing/Access Control

Engineered cap of soil and vegetation.

Box 5

Periodic Review Report (PRR) Certification Statements

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

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

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

YES	NO
☑	☐

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) 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. 835011

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 SCOTT J. LEWIS at 1211 GREENVILLE MERCER ROAD MERCER, PA 16137
print name print business address

am certifying as OWNER (Owner or Remedial Party)

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

Scott J. Lewis 08/21/17
Signature of Owner, Remedial Party, or Designated Representative Rendering Certification Date

IC/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 SCOTT J. LEWIS (print name) at 1211 GREENVILLE MERCER ROAD MERCER, PA 16137 (print business address)

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

Scott J. Lewis — Signature of Qualified Environmental Professional, for the Owner or Remedial Party, Rendering Certification

Stamp (Required for PE)

08/21/17 — Date

ATTACHMENT 1

Periodic Review Report – November 1, 2012 to August 1, 2017
TGP Compressor Station 237 - NYSDEC Site # 835011
Town of Clifton Springs, New York

I. Introduction

Tennessee Gas Pipeline (TGP) Compressor Station 237 is located in the Town of Clifton Springs, Ontario County, New York. Remedial activities were conducted at the Site between June 1996 and August 1997 to address contamination in site soils and sediments. The remedial activities addressed site-wide soil, sediment, and drain line remediation issues related to polychlorinated biphenyls (PCBs) and satisfied the requirements of the New York State Department of Conservation (NYSDEC) Record of Decision (ROD) issued on March 30, 1995.

Remedial activities conducted at the site include the following:

- Storm water drain lines which previously conveyed PCBs from the compressor area into Drainage Ditch F were decommissioned and filled with grout. During the grouting of the drain lines, sediments which contained PCBs with concentrations above 10 parts per million (ppm) were removed from the manholes and disposed off site.

- Excavation of all PCB contaminated soils above cleanup goals of 10 ppm. Contaminated soils with concentrations above 10 ppm, but below 50 ppm were disposed in an off-site landfill. Soils with PCB concentrations above 50 ppm were disposed in an off-site chemical waste landfill in compliance with Federal Toxic Substances Control Act (TSCA). Also, contaminated soils in the Air Receiver Tanks (ART) area were determined to be inaccessible. As such, the area was capped with a plastic liner. Soils located in unrestricted areas on TGP property (outside the fence) with PCB concentrations greater than 1 ppm but less than 10 ppm were covered with a one-foot soil cap to act as a barrier and prevent possible contact with low level contamination.

- The perimeter fence was extended around Drainage Ditch F, soils above 10 ppm PCBs were removed from the site and in areas between 1-10 ppm, vegetation was planted to prevent erosion and off-site migration.

- Annual Groundwater Monitoring. This event was initiated with the concurrence of the NYSDEC and is intended to monitor the natural attenuation of selected volatile organic compounds (VOCs) in groundwater at TGP Station 237.

Post remediation activities have been implemented at Station 237 to provide for the long-term operation, maintenance and monitoring of the remediated site. Long-term site management activities have included operations, maintenance, monitoring, and the management of data collected as part of remediation activities. Based on the results of post remediation activities and the discussion presented below in Section III, no modifications are recommended to the current post-remedial activities. Please note, per Section IV., annual groundwater monitoring wells have been plugged and abandoned at the site.

There have not been any additional remediation activities at the site.

II. Site Overview

TGP owns and operates a natural gas pipeline system that extends from Texas to New England. Compressor stations are located at various points along the pipeline to pressurize the natural gas in the pipeline to facilitate its transmission. Several of these compressor stations are located throughout New York State. Compressor Station 237 is located in the town of Clifton Springs in Ontario County, New York. This station occupies approximately 112.4 acres along Archer Township and Taylor Roads. It's located approximately 4 miles south of Clifton Springs, New York and is generally surrounded by farms, with two residences located approximately 100 feet north and 100 feet west of the station.

The station contains three reciprocal-type natural gas compressor engines in the Compressor Building, which are started with a single air starting system located in the Auxiliary Room of the Compressor Building. Other buildings at the station include a pipeline warehouse, an office/garage, a meter station, a pump building, and an administration office. Station Lake is located in the northeast corner of Station 237 and serves as a non-potable water supply for the station. Many of the storm sewers and floor drains from the Compressor Building originally discharged into Station Lake via drainage ditch that runs along the eastern boundary of the station.

Seven drainage swales are located on-site. The most significant drainage flows from a drainage ditch 300 feet west of the east property line. The drainage ditch runs from south to north and empties into Station Lake, which is approximately 3 acres in size. Significant surface runoff from the station discharges from the outfall into Station Lake.

III. Remedy Performance, Effectiveness and Protectiveness

Results of post-remediation activities have demonstrated compliance with remedial goals and action levels.

IV. Annual Groundwater Monitoring

There has been an overall trend of decreasing 1, 1, 1-TCA and daughter product concentrations in the groundwater at TGP Station 237. Recent groundwater monitoring analytical data indicate that chloroethane is the final chlorinated 1,1,1-TCA daughter product remaining at concentrations above the New York Standards, Criteria and Guidance (NY SCG) level in Monitoring Wells MW-2SR and MW-3. 1, 1, 1-TCA daughter product concentrations have decreased in these wells since the September 2008 application of HRC and ORC and should continue to naturally attenuate over time.

There have been no chlorinated VOCs detected above the NYSDEC levels within the past ten years, or more, in groundwater samples from Monitoring Wells MW-5, MW-7, MW-10S, MW-12 and MW-13. As of

the June 2012 monitoring event, there have been no VOC exceedances in groundwater from MW-9S for eight consecutive events.

Based on the data and conclusions contained in the August 2012 Annual Groundwater Monitoring Report, TGP recommended continuing annual groundwater monitoring of wells MW-2SR, MW-3 and MW-8S to document the natural attenuation of the remaining chlorinated VOCs. Additionally, TGP recommended the plugging and abandonment of wells MW-4, MW-5, MW-7, MW-9S, MW-10S, MW-12 and MW-13.

Per discussions with Mr. Jim Craft, it was agreed that TGP would perform one additional round of groundwater sampling in 2013. Monitoring wells were sampled in June 2013 and the results reported to Mr. Craft on October 7, 2013. As of the June 2013 sampling event, there were no chlorinated VOC exceedances in groundwater from Monitoring Well MW-9S for nine consecutive events, and no chlorinated VOC exceedances in groundwater from Monitoring Wells 2SR or 3 for two consecutive events.

Based on the data and conclusions contained in the June 2013 Annual Groundwater Monitoring Report, TGP recommended the plugging and abandonment of all remaining Monitoring Wells (MW-2SR, MW-3, MW-4, MW-5, MW-7, MW-8S, MW-9S, MW-10S, MW-12, and MW-13) and closure of TGP Station 237.

On April 15, 2015; Mr. Jim Craft approved the plugging and abandonment of all remaining Monitoring Wells and closure of Station 237. On September 30, 2015, the plugging and abandonment of all the Monitoring Wells was performed. The Well Abandonment Report was submitted to Mr. Jim Craft on October 28, 2015.

V. Operation and Maintenance Plan Compliance Report

Operation and maintenance activities at Compressor Station 237 have included implementation of institutional controls and engineering controls including monitoring of erosion controls, and sediment and groundwater monitoring.

a. Institutional Controls

Prior to performing excavation activities in the vicinity of the drain line, site figures (and any other available information) will be reviewed by station personnel to determine in the subject drain line or drain line components may be encountered. In the event that excavation in the immediate vicinity of the drain line is necessary, the NYSDEC and TGPL Northern Division Environmental Coordinator will be notified prior to excavation (unless there is an emergency). Notification includes the scope, nature, status and location of the proposed work.

Prior to performing excavation activities in the Compressor Building Area, site figures (and any other available information) will be reviewed by station personnel to determine if the concrete equipment pad north of the Compressor Building Area may be encountered. Due to the presence of PCBs below the concrete equipment pad, future excavation in this area will

be performed only after consultation with the NYSDEC and TGPL Northern Division Environmental Coordinator (except in an emergency situation).

The perimeter fence was extended around Drainage Ditch F to restrict access to the site.

b. Engineering Controls

A plastic liner cap was placed over soils in the ART area.

A 1-foot soil cap was placed on soils on TGP property (outside the property fence) with PCB concentrations between 1 ppm and 10 ppm.

Vegetation was planted in Drainage Ditch F in areas with PCB concentrations between 1 ppm and 10 ppm to prevent erosion and off-site migration.

Groundwater monitoring was conducted on an annual basis from multiple monitoring well locations at Compressor Station 237. Monitoring wells were sampled for VOCs, and monitoring activities were ongoing during the reporting period. However; per Section IV., the groundwater monitoring program at Compressor Station 237 was discontinued on April 15, 2015.

VI. Overall PRR Conclusions and Recommendations

Results of post-remediation activities have demonstrated compliance with remedial goals and action levels. As a result, remedial activities conducted at the Site are performing effectively and functioning as designed.

TGP believes that triennial submittal of the PRR report and IC/EC certifications are adequate and appropriate at this time.