



**Department of
Environmental
Conservation**

KATHY HOCHUL
Governor

AMANDA LEFTON
Acting Commissioner

May 20, 2025

Avangrid

Attn: Jeremy Wolf - Project Manager / Environmental Remediation
3 City Center Bldg. 5th Floor
180 South Clinton Ave.
Rochester, NY 14604
jeremy_wolf@avangrid.com

Re: 2024 Annual Site Inspection Report
NYSEG Seneca Falls Former MGP Site
187 Fall Street, Seneca Falls
Seneca County
Site No.: 850010

Dear Mr. Wolf:

The New York State Department of Environmental Conservation (NYSDEC) hereby accepts the 2024 Annual Inspection Report dated February 27, 2025, for the subject site listed above. Additionally, a review provided by NYSDEC's consultant, Ramboll, is attached.

If you have any questions, please contact me at 518-603-3163 or e-mail: tracey.garland@dec.ny.gov.

Sincerely,

Tracey Garland
Project Manager,
Section E, Remedial Bureau C

EC: Anthony Perretta (NYSDOH)
Matthew Ayers (NYSDEC)
Gerald Pratt (NYSDEC)
Logan Reid (NUE-VELLE LLC, consultant for Avangrid)
Scott Tucker (Ramboll, consultant for NYSDEC)



Tracey Garland, GIT
Division of Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway
Albany, New York 12233-5060

Re: NYSEG Seneca Falls Former MGP Site
2024 Annual Site Inspection Report

Date May 15, 2025

Dear Mr. Garland:

Per Work Assignment D009810-42, Ramboll has reviewed the attached Annual Site Inspection Report prepared by NEU-VELLE, LLC for the reporting period of 2024, for the Seneca Falls Former MGP Site No. 850010 (the Site) for compliance with the 2021 draft Site Management Plan (SMP) and associated regulatory documents.

Ramboll
333 West Washington Street
Syracuse, NY 13202
USA

Based on the review, Ramboll finds the 2024 Annual Site Inspection Report to be in compliance with the draft SMP and should therefore be considered accepted. Please see Ramboll's comments on the following pages.

T 315-956-6100
F 315-463-7554
<https://ramboll.com>

Yours sincerely

Deborah Wright
Project Officer

D 315-956-6377
M 315-546-4541
deborah.wright@ramboll.com

Attachments: 1 – Report review comments
2 – SMP compliance checklist
3 – 2024 Annual Site Inspection Report for the Seneca Falls Former MGP Site, prepared by NEU-VELLE for NYSEG and NYSDEC, dated February 27, 2025

cc: Scott Tucker – Ramboll
Luke Reusser – Ramboll

Report Review Comments

Site Name: **Seneca Falls Former MGP**
 Site No.: **850010**
 Site Owner: **NYSEG**
 Report Title: **2024 Annual Site Inspection Report**
 Prepared by: **Logan Reid – NEU-VELLE, LLC**
 Report Date: **2/27/2025**
 Report Type: Site Inspection Report
 Review By: Ramboll Americas Engineering Solutions, Inc.
 Reviewed For: Tracy Garland, GIT, DER NYSDEC

General Comments

The Site-Wide Inspection performed by NEU-VELLE, LLC (NEU-VELLE) on October 3, 2024 and presented in the 2024 Annual Site Inspection Report, dated February 27, 2025, are in compliance with the current 2021 draft Site Management Plan (SMP) by NEU-VELLE.

- Both the Site cover system and monitoring well network were observed to be in good condition during the October 2024 Site Inspection. A Site Inspection Form and photographs are included in the report.
- Refer to the SMP compliance checklist below for details.

Missing/Incomplete Components

None

Missing Documents

No historical PRRs, Site Inspection Reports, or Groundwater Sampling Reports are available on InfoLocator for this Site.

2024 Annual Site Inspection Report Recommendations by NEU-VELLE

None

Ramboll Recommendations

Ramboll finds the 2024 Site Inspection Report to be in compliance with the 2021 draft SMP and recommends that the report be accepted.

Seneca Falls Former MGP Site
NYSDEC Site No. 850010
2021 Draft Site Management Plan Compliance Checklist
For Report:
2024 Annual Site Inspection Report prepared by NEU-VELLE, LLC

RAMBOLL Recommendation

Base on the current draft SMP dated September 14, 2021, Ramboll finds the 2024 Annual Site Inspection Report to be in compliance with the draft SMP and recommends that the report be accepted.

Engineering Controls

Cover System

- Installed during Remedial Action.
- Comprised of a minimum of 12 inches of clean, imported granular fill. A crushed stone access driveway, that traverses the cover area, was installed to access the lowland portions of the Site.
- The Excavation Work Plan (EWP) provided in Appendix E outlines the procedures required to be implemented in the event the cover system is breached, penetrated or temporarily removed.
- Procedures for the inspection of this cover are provided in the Monitoring and Sampling Plan included in Section 4.0 of this SMP.

In-situ Solidification (ISS)

- Performed during the Remedial Actions.
- Implemented within the upland (northern) portion of the site, covering an area of approximately 0.5 acres, to depths of 6 to 23 feet below grade. The monolith was subsequently overlain with a clean, imported cover system to prevent direct exposure and weathering of the solidified mass. A demarcation layer (orange geotextile fabric) was placed atop the ISS monolith prior to installation of the cover.
- ISS is a process that binds the soil particles in place creating a low permeability mass.
- The resulting solid matrix reduces or eliminates the mobility of contamination and reduces or eliminates the matrix as a source of groundwater contamination.

Monitoring and Sampling Plan

	Frequency	Compliant	Ramboll Notes
Site-Wide Inspection <ul style="list-style-type: none"> - Performed annually (no snow cover), and after severe weather conditions. - ECs continue to perform as designed. - Controls continue to protect human health and the environment. - SMP and EE compliance. - Site records up to date. - Cover system inspection. - MW inspections (requested by NYSDEC on 10/3/2024 in SMP comment letter) - Results recorded on a Site Inspection Form 	Annually	Yes	Neu-Velle completed the Site-wide inspection on October 3, 2024: <ul style="list-style-type: none"> - Cover system observed to be in good condition with no visible signs of deterioration at the upland and lowland portions of the site, including the adjacent off-site property. - MW network also observed to be in good condition. - Site Inspection form filled out and included in report. - Site Inspection photographs included.
Post-Remediation Groundwater Sampling <ul style="list-style-type: none"> - Semi-annually for 3 years (2020, 2021, & 2022). Re-evaluation after 3 years. - Semi-annually for 3 years (2023, 2024, & 2025). - Gauging of water levels semi-annually with generation of groundwater elevation contours. - BTEX, PAHs, total cyanide - MW-1 - up-gradient - MW-2, MW-3, and MW-4 - down-gradient - MW inspections with notification of NYSDEC project manager of any repair/decommissioning/replacement needed. Well integrity will be noted on sampling forms. 	Semi-annually (2020 to 2022) Semi-annually (2023 to 2025)	NA	Approval letter of GW sampling plan in NYSDEC email dated 3/31/2023 referenced in the Autumn 2024 Groundwater Sampling Event Report. This letter is not currently available. Referenced details below: Groundwater sampling will continue at the same wells and frequency for an additional 3 years (2023 to 2025).

Operation and Maintenance Plan

Frequency

Compliant

Ramboll Notes

Routine Site Maintenance - Cover System - will be inspected for sloughing, cracking, settling and/or erosion. - Well inspections - will be performed during annual Site inspections.	Annually	Yes	See notes above.
Waste Handling - General refuse - will be managed as non-hazardous waste and not subject to SMP. - Water and/or NAPL will be sampled and submitted for laboratory characterization for off-Site disposal.	NA	NA	NA
Periodic Assessment/Evaluation			
Climate Change Vulnerability Assessment	Frequency	Compliant	Ramboll Notes
"This section provides a summary of vulnerability assessments that will be conducted for the Site during periodic assessments, and briefly summarizes the vulnerability of the Site and/or engineering controls to severe storms/weather events and associated flooding." - There is no further discussion of CCVA in the current draft of the SMP.	NA	NA	SMP does not currently address climate change vulnerability assessment.
Green Remediation Evaluation	Frequency	Compliant	Ramboll Notes
Modifications resulting from green remediation evaluations will be routinely implemented and scheduled to occur during planned/routine operation and maintenance activities. Reporting of these modifications will be presented in the PRR.	Annually in PRR	NA	NA
Remedial System Optimization	Frequency	Compliant	Ramboll Notes
An RSO will be conducted any time the NYSDEC PM requests it in writing; goal being to optimize achieving Remedial Goals.	As Needed	NA	NA
Reporting Requirements			
Site-Wide Inspection Report	Frequency	Compliant	Ramboll Notes
See conditions in Monitoring Plan Section.	Annually	Yes	Site Inspection completed on October 3, 2024. - Site cover system and MW network are in good condition as evidenced by the Site Inspection Form and Site Photographs.
Post-Remediation Groundwater Sampling Reports	Frequency	Compliant	Ramboll Notes
See conditions in Monitoring Plan Section. - See pg. 42 of SMP for specific reporting requirements.	Semi-annually	NA	Sampled semi-annually in 2024. See notes in Monitoring Plan Section.
Periodic Review Report (including cert of ECs/ICs)	Frequency	Compliant	Ramboll Notes
Annually starting in 2022 (or following the issuance of the COC). - Reports will be prepared in accordance with DER-10 and submitted within 30 days of the end of each certification period. - See page 44 of the SMP for specific reporting requirements.	Annually	NA	SMP states that PRRs to start in 2022, or following the issuance of the COC.
Corrective Measures Workplan	Frequency	Compliant	Ramboll Notes
If any component of the remedy is found to have failed, a CMWP will be submitted to the NYSDEC PM for approval.	As Needed	NA	NA
Remedial Site Optimization Report	Frequency	Compliant	Ramboll Notes
If an RSO is to be performed, an RSO report must be submitted to the NYSDEC PM for approval.	As Needed	NA	NA
Summary of Findings (Neu-Velle)			

Site cover system and monitoring well network are in good condition. Site Inspection Form and photographs included in the report.

Conclusions (Neu-Velle)

None

Recommendations (Neu-Velle)

None



February 27, 2025

Mr. Matthew Ayers, P.G.
New York State Department of Environmental Conservation
Division of Environmental Remediation
Remedial Bureau C, 11th Floor
625 Broadway
Albany, New York 12233-7014

Subject: 2024 Annual Site Inspection Report
NYSEG Seneca Falls Former MGP Site
187 Fall Street
Seneca Falls, Seneca County, New York
NYSDEC Site No. 850010

Dear Mr. Ayers:

On behalf of the New York State Electric & Gas Corporation (NYSEG), NEU-VELLE LLC (NEU-VELLE) has completed the fifth post-remediation annual Site Inspection of the Seneca Falls Former Manufactured Gas Plant (MGP) site [New York State Department of Environmental Conservation (NYSDEC) Site No. 850010], located at 187 Fall Street in Seneca Falls, Seneca County, New York (referred to herein as the "Site"). A Site Management Plan (SMP) for the Site is currently under NYSDEC review.

NEU-VELLE performed a visual inspection of the Site, including an evaluation of the clean surface cover system for evidence of disturbance, erosion or removal of cover materials, settlement, or other conditions that could potentially result in exposure to subsurface MGP residuals. Photographs were collected during this October 3, 2024, Site Inspection. The existing cover materials at the upland and lower portions of the Site, as well as the lowland portions of the adjacent off-Site property to the west (193 Fall Street) were observed to be in good condition, and there were no noticeable signs of significant deterioration of the surface cover. Additionally, the existing monitoring well network consisting of one upgradient and three downgradient wells was found to be in good condition. Documentation of NEU-VELLE's inspection is provided as **Attachment A** of this letter report.

Please feel free to contact me at (585) 478-3167 with any questions or concerns.

Sincerely,

A handwritten signature in cursive script that reads 'Logan Reid'.

Logan Reid
NEU-VELLE, LLC

Attachment A – Site Inspection Form and Photographs

cc: Mr. Jeremy Wolf, Avangrid

Attachment A



SITE INSPECTION FORM

NYSEG Seneca Falls Former MGP Site - NYSDEC Site No. 850010

Date: 10/3/2024 Time: 12:00-14:00

Weather Conditions: Clear

Temperature: ~50° F Precipitation: None

Personnel and Company: Andrew Rothfuss, Neu-Velle LLC

Andrew Rothfuss

Signature(s): _____

Has ownership of the property changed since the last inspection?

Yes ☐ No ☒

Are Institutional Controls/Engineering Controls (IC/ECs) in place and effective?

Yes ☒ No ☐

If not, explain why.

Are there any changes to the Site use that would affect the SMP or IC/ECs?

Yes ☐ No ☒

Is the Site used for vegetable gardens or agricultural purposes?

Yes ☐ No ☒

Is native soil, the geotextile fabric demarcation layer, or other signs of MGP impact (sheens, staining, tar-like material) visible in the upland portions of the Site?

Yes ☐ No ☒



Is there any evidence of MGP impacts (oil sheen, staining, tar-like material) visible in the lowland portions of the Site or in the southerly adjacent Seneca River/Canal?

Yes ☒ No

Is the site cover intact (i.e., no visible sign of excavations, erosion, damage)?

☒ Yes / No

Is groundwater used as a potable water source?

Yes ☒ No

Are there any changes to the Site (either surface or subsurface) since the last inspection event?

Yes ☒ No

Were photographs taken during this inspection?

☒ Yes / No

Are the on-site groundwater monitoring wells apparently in good and usable condition, free from damage, apparent vandalism etc.?

☒ Yes / No

Site Inspection Photographs

NYSEG Seneca Falls Former MGP Site – October 3, 2024



Northern, Upland Area of the Site - Viewing west.



Access ramp, south side of Site - Viewing north

Site Inspection Photographs

NYSEG Seneca Falls Former MGP Site – October 3, 2024



Lowland Area Near the Seneca River/Canal - Viewing south



Lowland area – Viewing east-southeast

Site Inspection Photographs

NYSEG Seneca Falls Former MGP Site – October 3, 2024



Eastern Portion of Lowland Area – Viewing North



MW-3 towards fence line – Viewing northeast

Site Inspection Photographs

NYSEG Seneca Falls Former MGP Site – October 3, 2024



MW-4 towards property line - Viewing east.



Lowland restoration towards canal – viewing south