

Mr. Michael Squire NYSDEC Remedial Bureau C 625 Broadway Albany, New York 12233

Subject:

Soil Sampling Results NYSEG/Clyde Former MGP Clyde, New York NYSDEC Site No. 859019

Dear Mr. Squire:

On September 25, 2018 during geotechnical soil testing associated with a planned upgrade of the Clyde, New York substation by NYSEG's Engineering group, a black discoloration was observed on a soil sample collected from within the substation. The discoloration was observed on a sample collected from soil boring C3 from approximately 6 to 8 feet below ground surface (bgs). The location of soil boring C3 is shown on the attached **Figure 1**. Drilling operations were suspended, and NYSEG's Engineering group immediately notified Mr. John Ruspantini of NYSEG's MGP Remediation Group, who subsequently requested that Arcadis perform a site visit to visually inspect the soil sample that was collected and to observe and document soil conditions in several additional soil borings in the area of the initial boring. An Arcadis representative mobilized to the site the following day with the objectives of:

- Observing the potentially impacted material that was encountered at soil boring location C3.
- Observing and documenting soil conditions during the advancement of two additional soil borings (C3A and C3B).
- Collecting soil samples for laboratory analyses.

The locations of soil borings C3A and C3B are also shown on Figure 1.

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ENVIRONMENT

Date

November 19, 2018

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B0013151.0002

RESULTS

Arcadis observed and documented the material that was collected in driller jars from soil boring C3 and soil from the two additional soil borings advanced on September 26, 2018 (soil borings C3A and C3B). Descriptions of the soil intervals are provided in **Table 1**. Potential impacts were observed from 6 to 8 feet bgs at locations C3 (trace black discoloration) and C3A (trace blebs of oil-like material on outside of sample), and from 8 to 10 feet bgs at location C3B (little to trace sheen). As presented in **Table 1**, measurements of volatile organics in soil headspace using a photoionization detector were low, ranging from 0.0 to 3.9 parts per million.

Based on the observations, one subsurface soil sample from each soil boring advanced on September 26 was collected and sent to TestAmerica Laboratories for analyses to assist with identifying the parent product(s) of the potential impact. Requested soil analyses included total petroleum hydrocarbons (TPH) DRO/GRO by Method 8015D and National Oceanic and Atmospheric Administration (NOAA) 34 polycyclic aromatic hydrocarbons (PAH) by Environmental Protection Agency Method 8270C. Five-day turnaround times for receipt of laboratory reports was requested.

The results from the laboratory analyses are included as **Table 2**. The laboratory could not analyze sample C3B for PAHs because they indicated the sample was mostly stone/gravel and they couldn't perform an extraction and get reliable results.

The data collected was evaluated along with the sample's chromatograms by an Arcadis National Expert. In general, the results indicated:

- A bar chart indicates a petrogenic distribution of 2- and 3-ring PAH and pyrogenic distribution of 4- to 6-ring PAH.
- The ratio of Total NOAA PAHs to TPH-DRO is less than 0.5%, which is not consistent with manufactured gas plant (MGP) material, which typically has ratio much greater than 5%.
- Chromatograms appear to indicate extremely weathered middle distillate petroleum hydrocarbon such as #2 fuel oil or diesel.
- PAH concentrations are consistent with urban background concentrations.

A summary report from the forensic evaluation is included as **Attachment A**.

CONCLUSON

Based on the forensic evaluation, the material encountered in not associated with MGP waste. Therefore, no additional soil investigation associated with the Clyde MGP project is warranted or proposed.

Please feel free to contact either John Ruspantini or me with any questions you may have.

Sincerely,

Arcadis of New York, Inc.



Bruce W. Ahrens Associate Vice President

Copies

J. Ruspantini, NYSEG

Enclosures:

Tables

- 1 Soil Descriptions
- 2 Soil Analytical Results

Figures

1 Substation Soil Boring Locations

Attachments

A Forensic Summary Report

Tables

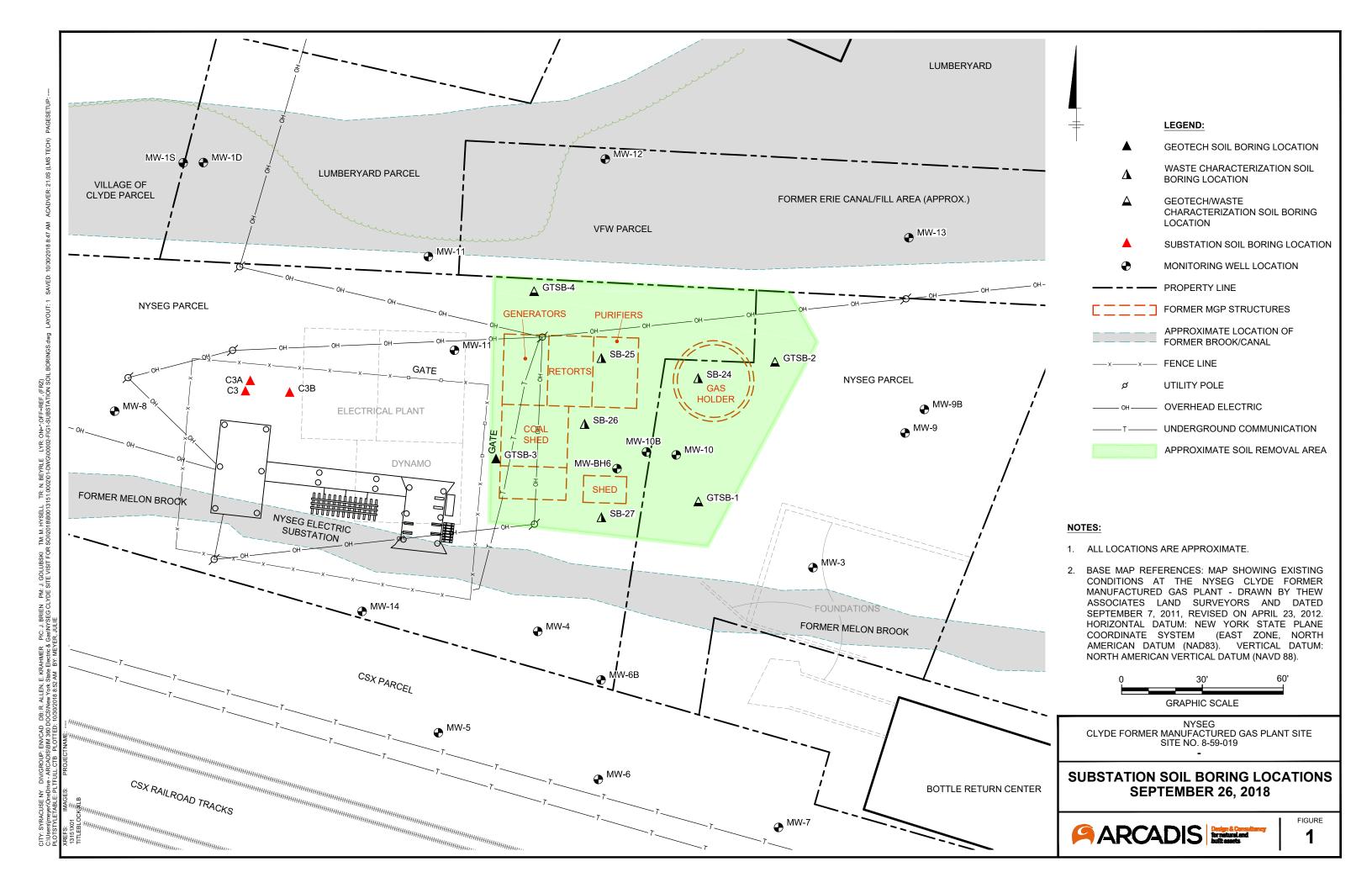
Table 1 Soil Descriptions NYSEG Clyde, New York

Depth (ft bgs)	PID (ppm)	Descriptions			
Soil Boring C3					
0 – 1	0.0	Crushed stone			
1 – 6	0.1, 0.1, 0.8, 0.8	Gray/Black SLAG and fine to coarse SAND, little to trace Silt, moist			
6 – 8	0.8	Brown fine SAND and SILT, trace, fine to medium Gravel, trace black discoloration, moist			
8 – 10	0.0	Brown fine SAND and SILT, trace fine to medium Gravel, moist to wet			
10 – 12	0.0	SAA, Wet			
13 – 14.7	0.5	Brown SILT and fine to coarse Gravel, hard			
Soil Boring C3A					
0 - 0.65	NA	Crushed stone			
0.65 – 1	NA	Brown SAND and SILT, some fine to coarse Gravel and Cobbles, moist			
1 – 6	NA	Gray/Black SLAG and fine to coarse SAND, little to trace Silt, moist			
6 – 8	3.9	Gray SILT and fine SAND, trace Clay, soft, trace oil-like-material blebs on outside of sample, moderate odor [picture]			
8 – 10	3.9	Gray SILT and fine SAND, trace Clay, soft, no visual impacts observed, slight to moderate odor. Brown fine to medium SAND and SILT, little to trace Gravel, moist to wet in the shoe.			
		Sample collected from 6 to 10 ft bgs: C3A (6-10) for analysis of TPH DRG/GRO and NOAH 34 PAH (PAH analytes) 8270C			
Soil Boring	C3B				
0 - 0.65	NA	Crushed stone			
0.65 – 1	NA	Brown SAND and SILT, some fine to coarse Gravel and Cobbles, moist			
1 – 4.6	NA	Gray/Black SLAG and fine to coarse SAND, little to trace Silt, trace brick, moist			
4.6 – 6	0.0, 0.8	Black coal fragments and Slag, moist			
6 – 8	0.5, 3.2	Gray fine SAND and SILT, trace Clay, trace very fine Gravel, soft, medium to high plasticity, moist to wet			
8 - 10	1.3, 0.8	Gray fine to coarse SAND, little Silt, little to trace fine to medium Gravel, trace Clay, very loose, saturated, little to trace sheen throughout.			
		Sample collected from 8 – 10 ft bgs: C3B (8-10) for analysis of TPH DRG/GRO and NOAH 34 PAH (PAH analytes) 8270C			



Location ID:		C3A	C3B		
Sample Depth(Feet):	Units	6 - 10	8 - 10		
			09/26/18		
Date Collected: 09/26/18 09/26/18 Petroleum Hydrocarbons					
Gasoline	mg/kg	2.20 B	1.30 B		
TPH-DRO (C10-C28)	mg/kg	3,400	1,700		
Semivolatile Organics	ilig/kg	3,400	1,700		
1-Methylnaphthalene	μg/kg	91.0 UT	NA		
2-Methylnaphthalene	μg/kg μg/kg	91.0 U	NA		
Acenaphthene	μg/kg	73.0 J	NA		
Acenaphthylene	μg/kg μg/kg	350	NA		
Anthracene	μg/kg	200	NA		
Benzo(a)anthracene	μg/kg μg/kg	880	NA		
Benzo(a)pyrene	μg/kg	830	NA		
Benzo(b)fluoranthene	μg/kg	710	NA		
Benzo(E)pyrene	μg/kg	420	NA		
Benzo(g,h,i)perylene	μg/kg	440	NA		
Benzo(k)fluoranthene	μg/kg μg/kg	610	NA		
C1-Chrysenes	μg/kg	800	NA		
C1-Fluoranthenes/Pyrenes	μg/kg	800	NA		
C1-Fluorenes	μg/kg	91.0 U	NA		
C1-Phenanthrenes/Anthracenes	μg/kg	1,300	NA		
C2-Chrysenes	μg/kg	350	NA		
C2-Fluorenes	μg/kg	1,100	NA		
C2-Naphthalene	μg/kg	150	NA		
C2-Phenanthrenes/Anthracenes	μg/kg	830	NA		
C3-Chrysenes	μg/kg	180	NA		
C3-Fluorenes	μg/kg	920	NA		
C3-Naphthalene	μg/kg	400	NA		
C3-Phenanthrenes/Anthracenes	μg/kg	550	NA		
C4-Chrysenes	μg/kg	91.0 U	NA		
C4-Naphthalene	μg/kg	91.0 U	NA		
C4-Phenanthrenes/Anthracenes	μg/kg	91.0 U	NA		
Chrysene	μg/kg	570	NA		
Dibenzo(a,h)anthracene	μg/kg	270	NA		
Fluoranthene	μg/kg	850 T	NA		
Fluorene	μg/kg	64.0 JT	NA		
Indeno(1,2,3-cd)pyrene	μg/kg	520	NA		
Naphthalene	μg/kg	91.0 U	NA		
Perylene	μg/kg	150	NA		
Phenanthrene	μg/kg	380 T	NA		
Pyrene	μg/kg	500	NA		

Figures



Attachment A

Forensic Summary Report

Summary

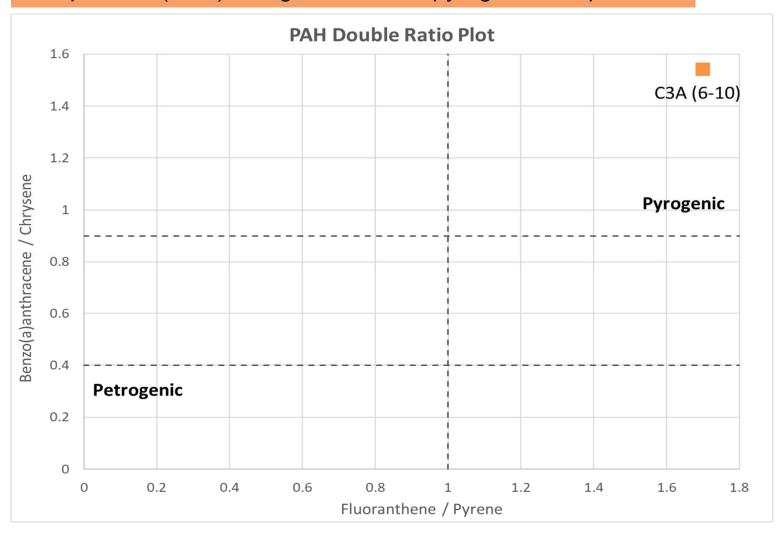


- Forensic evaluation conducted for samples C3A (6-10) and C3A (8-10) based on NOAA 34 PAH analytical results (sample C3A (6-10) only) and TPH-DRO
- PAH double ratio plot of 4-ring PAH indicates presence of pyrogenic PAH
- PAH bar chart indicates petrogenic distributions for 2- and 3-ring PAH and pyrogenic distribution of 4- to 6-ring PAH
- PAH concentrations consistent with urban background
- Total NOAA 34 PAH 15.72 mg/kg, TPH-DRO 3,400 mg/kg PAH/TPH is <0.5%, not consistent with MGP waste material which typically has PAH/TPH >>5%
- Chromatograms TPH-DRO appears to be extremely weathered middle distillate petroleum hydrocarbon such as #2 fuel oil or diesel
- Hydrocarbon material not associated with MGP waste

C3A (6-10) PAH Double Ratio Plot



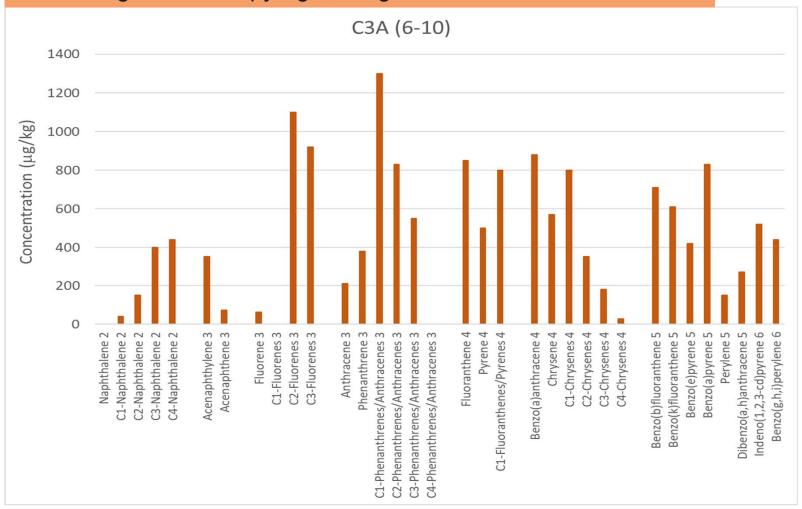
Sample C3A (6-10) 4-ring PAH have a pyrogenic composition



C3A (6-10) PAH Bar Chart

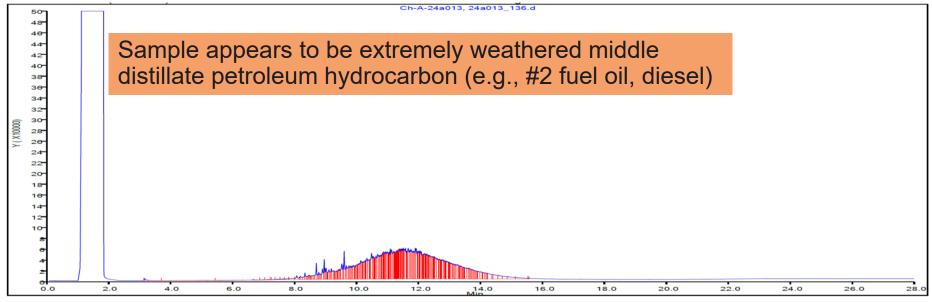


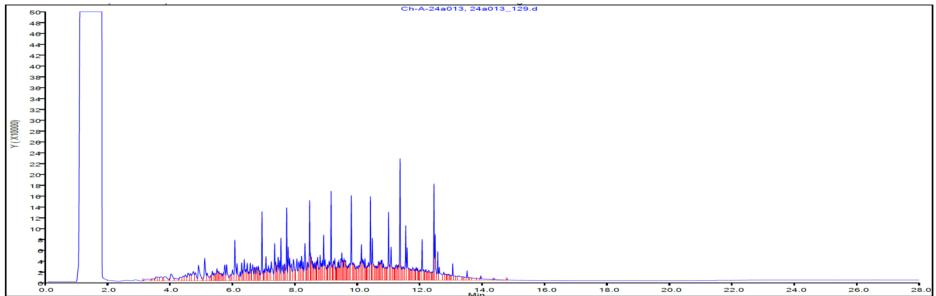
Sample C3A (6-10) 2- and 3-ring PAH have petrogenic signature, 4- to 6-ring PAH have pyrogenic signature



C3A (6-10) PAH Bar Chart







C3A (8-10) PAH Bar Chart



