

December 20, 2022

Ms. Megan Kuczka Division of Environmental Remediation NYSDEC, Region 9 700 Delaware Avenue Buffalo, NY 14209

National Grid Dewey/Kensington Service Center (Site #915144) Re: PRR - Revision 1

Dear Ms. Kuczka:

Enclosed for your review is the Periodic Review Report (PRR) for the National Grid Dewey/Kensington Service Center Site (Site No. 915144).

The PRR includes information from the period November 1, 2021 – November 1, 2022.

If you have any questions, please feel free to contact me at 315.428.5652.

Sincerely,

for SPS

Steven P. Stucker, C.P.G. Lead Environmental Engineer

Lisa Montesano – NG ecc:

Devin Shay- Groundwater & Environmental Services, Inc.

Periodic Review Report – National Grid Dewey/Kensington Service Center (Site #915144)

Reporting Period – November 01, 2021 to November 01, 2022

I. Introduction

A. Brief Site Summary -

The National Grid Dewey/Kensington Service Center Site (#915144) is located in Buffalo, New York. National Grid owns the property and services its customers from the active facility. Service trucks, equipment, and materials are stored and maintained on-site. A mechanic's shop, several administrative buildings, an above ground fuel island, and an employee parking lot are currently located on-site and are part of the service center.

Prior to 1992, the service center also served as a hazardous waste management facility permitted by the New York State Department of Environmental Conservation (NYSDEC) (Part 373 Permit No. 9-1402-00397/00001-0). National Grid stored spent electrical transformers containing polychlorinated biphenyl- (PCB-) laden oil, various solid wastes, and bulk waste oils on-site. Some liquid wastes were stored within underground storage tanks (USTs). The hazardous waste management facility was closed in December 1992, in accordance with a NYSDEC-approved closure plan.

During excavation activities in the mid 1990s, it was discovered that soil and groundwater were contaminated near a UST identified as Solid Waste Management Unit (SWMU) #7. Multiple USTs were subsequently removed, and an investigation including the advancement of soil borings and the installation of groundwater monitoring wells was completed. A remedial action was completed in 2002 and a long-term groundwater monitoring program was implemented.

On October 3, 2011, National Grid received official notification that the site was deleted from the New York State Registry of Inactive Hazardous Waste Disposal Sites (letter from Ms. Kelly Lewandowski, NYSDEC Chief Site Control Section, to Mr. Chuck Willard, NG SIR Director).

- B. **Remedial Program Effectiveness** During the reporting period (November 01, 2021, to November 01, 2022), the long-term remedial objectives were met for the site.
- C. **Remedial Program Compliance** The major elements within the Institutional Control/Engineering Control(s) (IC/EC) Plan are in compliance.
- D. Remedial Program Recommendations It is recommended that no changes be made to the IC/EC Plan. It is recommended that the Project Review Report (PRR) submittal frequency (annual) remain the same. The next PRR submittal deadline would be December 1, 2023.

Periodic Review Report – National Grid Dewey/Kensington Service Center (Site #915144)

Reporting Period – November 01, 2021 to November 01, 2022

II. Site Overview

A. Site Location and Boundaries -

The Dewey/Kensington Service Center is an active National Grid facility, encompasses approximately 23 acres, and is generally located within the center of Buffalo, New York in a predominantly residential area. To the west are Delaware Park, Canisius College, and Forest Lawn Cemetery; to the east are Fillmore Junior High School and the Erie County Medical Center; immediately to the west are the St. Mary School and Sisters of Charity Hospital; and to the south is a four lane expressway.

The site is bordered to south by Kensington Avenue and to the north by Dewey Avenue. The New York Central Railroad tracks boarder the site to the east. The expressway runs along the western side of the site.

B. Regulatory History and Remedy Features -

In September 1992, excavation activities at the facility, in the vicinity of Building #13, revealed petroleum-impacted gravel and a broken vent line connected to an underground waste oil tank. The former waste oil tank was removed and four groundwater monitoring wells (ESI-1, ESI-2, ESI-3, and ESI-4) were installed in the vicinity of the former tank to supplement an existing monitoring well (MW-1) and to facilitate periodic groundwater monitoring in this area.

In February 1994, National Grid agreed to conduct a focused Resource Conservation and Recovery Act (RCRA) Facility Assessment- (RFA-) type soil and groundwater investigation, and a Focused Risk Assessment/ Corrective Measures Study (FRA/CMS) to address the concerns identified by the RFA.

During Fall 1994, National Grid conducted soil and groundwater investigation activities in accordance with the NYSDEC-approved *Soil and Groundwater Investigation Work Plan* (1994). These investigations showed the presence of several volatile organic compounds (VOCs) and polychlorinated biphenyls (PCBs) in groundwater at concentrations above NYSDEC Division of Water Technical and Operational Guidance Series (TOGS) 1.1.1 – *Ambient Water Quality Standards and Guidance Values* (NYSDEC, 1998, amended 2000). Based on these results, NYSDEC requested implementation of the quarterly groundwater monitoring program proposed in the *SWMU #7 Soil/Groundwater Investigation Report* (1994).

The SWMU #7 Focused Risk Assessment and Corrective Measures Study Report (FRA/CMS Report) (1995, revised 1996) concluded that the limited action alternative (i.e., implementing a groundwater monitoring program) would adequately meet the corrective measure objective of mitigating the offsite migration of impacted groundwater. Following

the initial submittal of the FRA/CMS Report, a *Groundwater Sampling and Analysis Plan* (SAP) (1996) was submitted to NYSDEC in May 1996. The May 1996 SAP was then revised based upon NYSDEC comments, and the revised SAP for the groundwater monitoring program was presented in the revised FRA/CMS Report dated June 1996.

In November 1997, National Grid entered into a Consent Order with NYSDEC to guide future site monitoring and to establish a framework for implementing additional site investigation or remediation. As mandated in the Consent Order, annual (fall) groundwater monitoring events are conducted at SWMU #7 monitoring wells. The list of wells sampled during each groundwater monitoring event has been modified through time in response to NYSDEC requirements and the results of investigation/evaluation activities, as agreed to by NYSDEC.

The Consent Order specifies that a contingency plan must be implemented to evaluate additional remedial activities if analytical results from monitoring wells located at the property boundary indicate an exceedance of NYSDEC groundwater quality standards presented in TOGS 1.1.1 for two consecutive monitoring events. The monitoring wells designated as property boundary wells have changed, as new monitoring wells have been installed as part of the contingency plan implementation. For example, monitoring wells MW-7 and MW-9 were designated as property boundary wells in the Consent Order. In 1999, the property boundary wells included monitoring wells MW-6, MW-7, MW-11, MW-12, and MW-14. The current property boundary well arrangement includes monitoring wells MW-6, MW-11, MW-12, MW-20, MW-21, and MW-24 (installed spring 2002).

III. Evaluate Remedy Performance, Effectiveness, and Protectiveness

A. **Evaluation of Remedy Performance** - The wells are part of the remedy performance. However, there is no current requirement for a site inspection of the existing facility buildings, fences, or fuel tanks. Based on the well inspections and analytical data, the remedy performance has been effective in protecting facility workers and the public.

IV. IC/EC Plan Compliance Report

A. IC/EC Requirements and Compliance

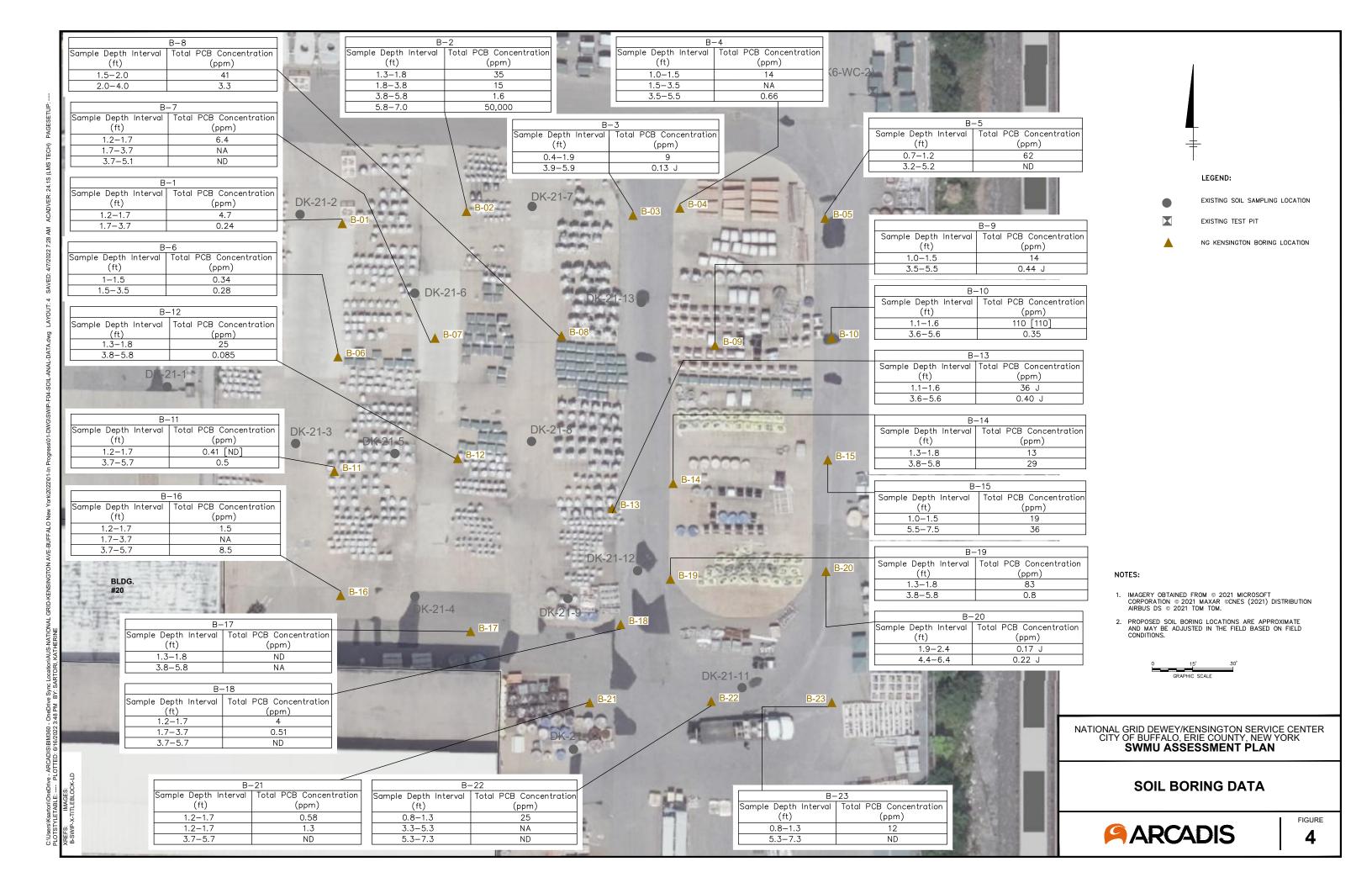
1. IC/EC Controls

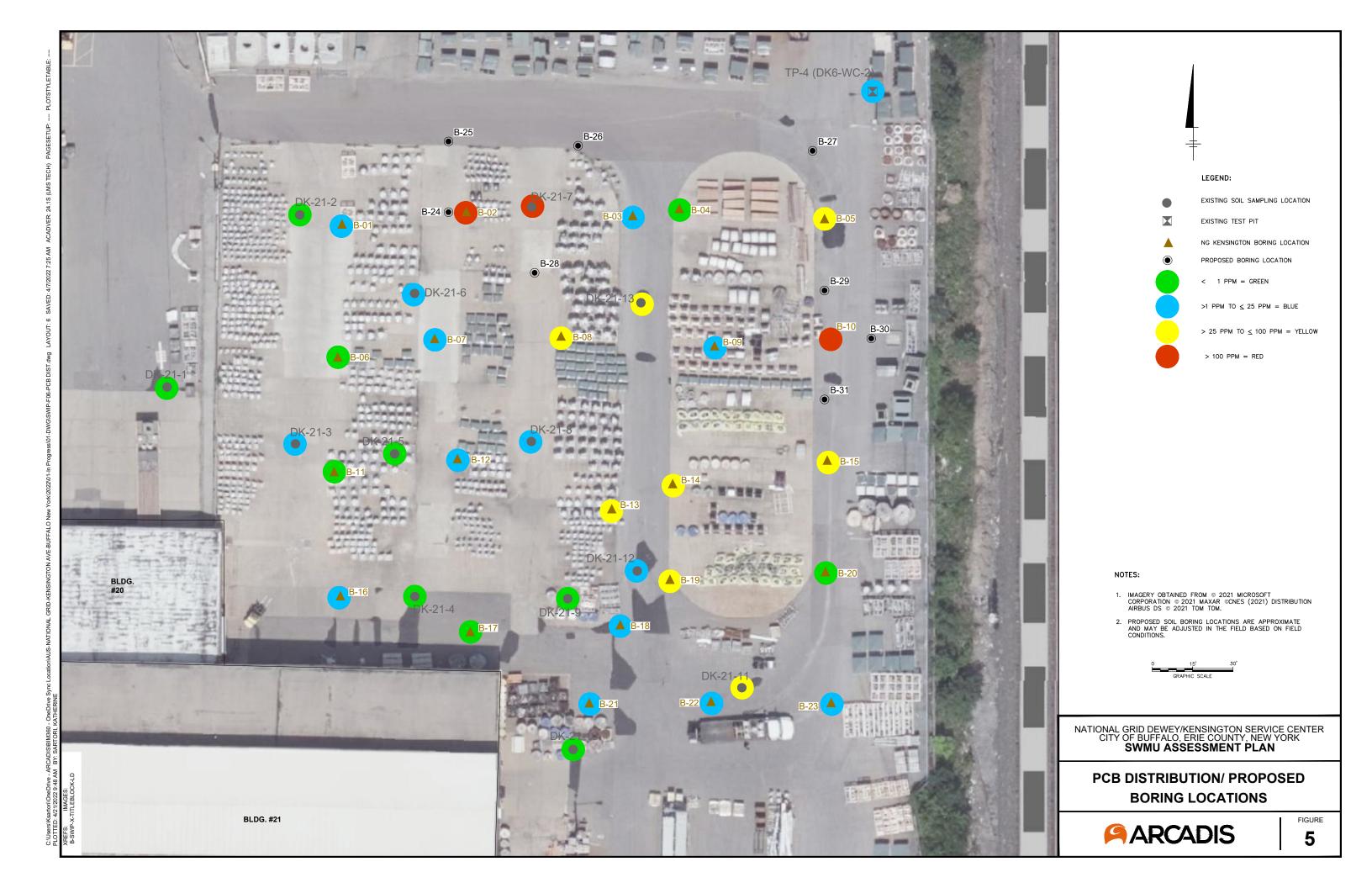
The ICs/ECs included:

- Semi-annual groundwater monitoring well inspections of the following wells: MW-1, MW-2, MW-5, MW-6, MW-7, MW-9, MW-10, MW-11, MW-12, MW-13, MW-15, MW-16, MW-17, MW-19, MW-20, MW-21, MW-24, MW-25, and ESI-1.
- Annual groundwater monitoring well sampling and analysis of the following wells: MW-1, MW-6, MW-9, MW-11, MW-12, MW-20, MW-21, MW-24. Wells MW-16 and ESI-1 will be sampled for volatile organic compounds if LNAPL is not detected.
- 2. **IC/EC Goals -** Each goal is being met and/or working effectively.
- 3. **IC/EC Corrective Measures –** No deficiencies were noted during the semi-annual inspections.
- 4. **IC/EC Conclusions/Recommendations –** The program is in compliance and there are no recommendations at this time. During the June 2022 monitoring event, NYSDEC AWQS for PCBs were exceeded in the samples collected at wells MW-1 and MW-9. All monitoring wells downgradient of MW-1 and MW-9 that were sampled (MW-6, MW-11, MW-12, MW-20, MW-21, and MW-24) exhibited concentrations below laboratory detection limits for PCBs.
- B. IC/EC Certification Refer to PRR Form Attachment 1, for the certification.
- V. Monitoring Plan Compliance Report The Annual Monitoring Report will be submitted to the NYSDEC by November 30, 2023.
- VI. Operation & Maintenance (O&M) Plan Compliance Report Not Applicable
- VII. Overall PRR Conclusions and Recommendations
 - A. Compliance with Site Management Plan (SMP)
 - 1. **Requirements -** All IC/EC Plan requirements were met during this reporting period.
 - 2. **Exposure Pathways –** There are no new completed exposure pathways resulting in unacceptable risk.

- 3. **Proposed Plans and Schedule to Meet Compliance –** No plan proposed.
- B. Performance and Effectiveness of the Remedy The remedy as described by the Consent Order and executed by National Grid has been effective in meeting the program goals.
- **C.** Future PRR Submittals The frequency of PRR Submittals should remain annual. Therefore, the next PRR submittal deadline will be December 1, 2023.

VIII. Additional Guidance - As summarized in the 2021 PRR, National Grid completed soil borings and collected soil samples for laboratory analysis to evaluate soil that was planned to be excavated as part of a paving project in the area northeast of the warehouse building (building DK-21). Analytical results for the soil borings identified elevated concentrations of PCBs in shallow subsurface soil. Since the area northeast of building DK-21 was not previously identified as a solid waste management unit (SWMU), National Grid submitted a June 24, 2021 letter to the NYSDEC which provided written notification regarding the discovery of a newly-identified SWMU at the facility. National Grid submitted a Newly-Identified SWMU Assessment Work Plan letter to the NYSDEC on July 27, 2021 and received conditional approval for the proposed SWMU assessment work on October 20, 2021. National Grid completed 23 soil borings to evaluate the newly-identified SWMU during February 2022. Manifests for investigation derived waste generated by the assessment activities are included in Attachment 3. PCB analytical results for soil samples collected as part of the SWMU assessment activities are presented on Figure 1. Based on the analytical results, National Grid submitted a Supplemental SWMU Assessment Work Plan to the NYSDEC on April 21, 2022. NYSDEC comments on the Supplemental SWMU Work Plan were presented in a June 6, 2022 letter to National Grid. A revised Supplemental SWMU Assessment Work Plan was submitted to the NYSDEC on July 1, 2022. The Supplemental SWMU Assessment Work Plan was approved by the NYSDEC on August 5, 2022. National Grid plans to complete eight (8) additional soil borings at the site during the week of December 19, 2022 (Figure 2). Analytical results for the soil borings completed as part of the SWMU assessment efforts and air monitoring results conducted in accordance with the Community Air Monitoring Plan (CAMP) will be included in the SWMU Assessment Report.





Attachment 1 – PRR Checklist



Enclosure 2 NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION Site Management Periodic Review Report Notice Institutional and Engineering Controls Certification Form



Sit	Site Details e No. 915144	Box 1	
Sit	e Name Niagara Mohawk Dewey Ave. Service Sta.		
Cit Co	e Address: 144 Kensington Avenue Zip Code: 14214 y/Town: Buffalo unty: Erie e Acreage: 23.000		
Re	porting Period: November 01, 2021 to November 01, 2022		
		YES	NO
1.	Is the information above correct?	X	
	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?		X
3.	Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?		X
4.	Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period?		X
	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?		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 in place and functioning as designed?		
	IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below a DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.	ınd	
Α (Corrective Measures Work Plan must be submitted along with this form to address t	nese iss	ues.
Sig	nature of Owner, Remedial Party or Designated Representative Date		

SITE NO. 915144 Box 3 **Description of Institutional Controls** <u>Owner</u> **Institutional Control** <u>Parcel</u> National Grid 89.16-1-2 Monitoring Plan O&M Plan National Grid 89.16-1-6 Monitoring Plan O&M Plan Box 4 **Description of Engineering Controls** None Required Not Applicable/No EC's

	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 compete. YES NO	
	${f X}$	
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	
	${f X}$	
	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. 915144

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 Gerald Cresap, PE at 6780 Northern Blvd., Suite 100, print name print business.	East Syracuse, NY ,
am certifying as <u>agent for National Grid</u>	(Owner or Remedial Party)
for the Site named in the Site Details Section of this form. OF NEW Signature of Owner, Remedial Party, or Designated Representative Rendering Certification	11-28-2022 Date
O87401 CE O87401 CE ORDER	

Attachment 2 – Inspections

Site Inspection Form Dewey Ave Service Center 144 Kensington Ave Buffalo, New York

Date:	3/3/2022	144 Kensington	
Technician:	ТВ	Buffalo, New Yo	

Time:	10:00
Weather:	Partly Sunny 22

Site Wide Inspection			
Have there been any changes to the property since the last inspection?	YES	NO	COMMENTS:
Evidence of excavation or trenching since last inspection?	YES	NO	COMMENTS:

Site Monitoring Wells				
Well ID. Location Secure				
ESI-1	YES NO			
MW-1	YES	NO		
MW-2	YES NO			
MW-5	YES	NO		
MW-6	YES	NO		
MW-7	YES	NO		
MW-9	YES	NO		
MW-10	YES	NO		
MW-11	YES	NO		
MW-12	YES NO			

Site Monitoring Wells			
Well ID.	Well ID. Location Secure		
MW-13	YES	NO	
MW-15	YES	NO	
MW-16	YES	NO	
MW-17	YES	NO	
MW-19	YES	NO	
MW-20	YES	NO	
MW-21	YES	NO	
MW-24	YES	NO	
MW-25	YES	NO	

General Comments/Suggested Action items:

Site Inspection Form Dewey Ave Service Center 144 Kensington Ave

Date:	6/15/2022	144 Kensington	
Technician:	ТВ	Buffalo, New York	

Time:	9:00
Weather:	Sunny 75

Site Wide Inspection			
Have there been any changes to the property since the last inspection?	YES	NO	COMMENTS:
Evidence of excavation or trenching since last inspection?	YES	NO	COMMENTS:

Site Monitoring Wells			
Well ID.	Locatio	n Secure	
ESI-1	YES	NO	
MW-1	YES	NO	
MW-2	YES	NO	
MW-5	YES	NO	
MW-6	YES	NO	
MW-7	YES	NO	
MW-9	YES	NO	
MW-10	YES	NO	
MW-11	YES	NO	
MW-12	YES	NO	

Site M	Site Monitoring Wells			
Well ID.	Location	n Secure		
MW-13	YES	NO		
MW-15	YES	NO		
MW-16	YES	NO		
MW-17	YES	NO		
MW-19	YES	NO		
MW-20	YES	NO		
MW-21	YES	NO		
MW-24	YES	NO		
MW-25	YES	NO		

General Comments/Suggested Action items:

Replaced the manways to MW-6, MW-20, MW-21 and MW-24.

Installed on June 14, 2022 covered with steel road plates overnight to let the concrete cure.

Removed the steel road plates on June 15, 2022.

Site Inspection Form Dewey Ave Service Center 144 Kensington Ave

Date:	9/21/2022	144 Kensington Ave
Technician:	ТВ	Buffalo, New York

Time:	8:45
Weather:	Partly Sunny 69

Site Wide Inspection					
Have there been any changes to the property since the last inspection?	YES	NO	COMMENTS:		
Evidence of excavation or trenching since last inspection?	YES	NO	COMMENTS:		

Site	Site Monitoring Wells			
Well ID.	Locatio	n Secure		
ESI-1	YES	NO		
MW-1	YES	NO		
MW-2	YES	NO		
MW-5	YES	NO		
MW-6	YES	NO		
MW-7	YES	NO		
MW-9	YES	NO		
MW-10	YES	NO		
MW-11	YES	NO		
MW-12	YES	NO		

Site M	onitoring Wells	
Well ID.	Location	n Secure
MW-13	YES	NO
MW-15	YES	NO
MW-16	YES	NO
MW-17	YES	NO
MW-19	YES	NO
MW-20	YES	NO
MW-21	YES	NO
MW-24	YES	NO
MW-25	YES	NO

General Comments/Suggested Action items:

Pothole patching on site.

Manways MW-6, MW-20, MW-21 and MW-24 that were replaced in June looked good.

Periodic Review Report – National Grid Dewey/Kensington Service Center (Site #915144) Reporting Period – November 01, 2021 to November 01, 2022					
Attachment 3 – Disposal Manifests					

D114106



BAF230

1	UNIFORM HAZARDOUS 1. Generator ID Number 2. Page 1 of 3. Emergency Response Phone 4. Manifest Tracking Number											
Ш		WASTE MANIFEST NYD 000 730 380 1 5. Generator's Name and Mailing Address				00) 424-930		022662738 JJK				
П) J. Ge				Gener	ator's Site Address	(if different t	han mailing addres	3S)			
Ш			wk Power Corporation		200							
П			West, Syracuse, NY 13202	_	SI	4 Sine - 93 L	xewey A	ve. Buffalo	, NY 14	21		
Н		rator's Phone: (31) Insporter 1 Company Nan	5) 247-6490 Att: Stave Stucke	ď				U.S. EPA ID N	Jumbar			
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Ш	7 Tra	nsporter 2 Company Nan	ental Corporation					U.S. EPA ID N		000 176	908	
	(C.T. C.S.)	rioportei 2 Company Han						1	voilibei.			
Ш	8 De	signated Facility Name ar	nd Site Address					U.S. EPA ID N	dumbar			
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LAND DISPOSAL RESTRICTION NOTIFICATION AND CERTIFICATION FORM FOR NEW YORK STATE REGULATED PCB WASTES

This form is required for wastes containing 50 ppm PCBs or greater. The profiled waste on the manifest number indicated below is listed hazardous waste (B-Coded) in NY State. Note: 50-499 ppm PCB drained articles and small capacitors (as defined in 40CFR 761.3) are not regulated by NY State. Please complete items 1-9 and send with ALL shipments of waste.

1)	Generator Name: Niagara Mohawk Pow		
2)	Generator Location Name: SIR Site 93 Dev	vey Ave., Buffalo NY 14214	
3)	Manifest No.: 022662738 JJK	4) Profile/Approval No.:	186029-PCB2

5) Please check all boxes that apply.

NYS WASTE CODE	IDENTIFY SPECIFIC TYPE OF PCB WASTE CHECK PROPER BOXES							
B001	Con	Concentrated PCB Oil						
B002	Oil/	Oil/liquid 50-499 ppm PCBs						
B003	Oil/	Oil/liquid 500 ppm or greater PCBs						
		Manufa	ctured	PCB Articles (50-49	99 ppm):			
		Transformers		Motors	Switches	T	Cable	
B004		Pipe		Lg. Capacitors	Bushings		Pumps	
		Other (specify):						
	Man	ufactured PCB Art	icles (o	ther than transform	ers) 500 ppm o	r grea	ter:	
		Motors		Switches	Cable		Pumps	
B005		Lg. Capacitors		Bushings	Pipe			
		Other (specify):						
B006		PCB Transformers	500 pp	m or greater				
			Ott	her PCB Wastes:				
D007	X	Soil		Sludge	Clothing		Rags	
B007		Wood	X	Pl'E	Coal Tar	X	Other (Specify): plastic	

6.) Check one box as appropriate:

CERTIFICATION - WASTE MEETS LAND DISPOSAL TREATMENT STANDARDS

I am the generator of the waste as identified above, that is restricted under 6 NYCRR Part 376. I have determined that this waste meets all applicable treatment standards set forth in 6 NYCRR 376 and, therefore, it can be landfilled without further treatment. Waste does not include solidified B002 material (liquid with PCBs 50-500 ppm).

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 6 NYCRR Part 376, Section 376.4, and all applicable prohibitions set forth in 376.3(b) of Part 376 or RCRA section 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

NOTIFICATION - WASTE <u>DOES NOT</u> MEET LAND DISPOSAL TREATMENT STANDARDS

X	I am the generator of a waste restricted under 6 NYCRR Part 376 as identified above. I notify that I personally have examined and am familia with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste does not comply with the treatment Standards specified in 6 NYCRR Part 376.4(f). This waste must be treated to the applicable standards set forth in 6 NYCRR 376.4(f) prior to land disposal.
	376.4(i) prior to faild disposar.

7.)	Signature:
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8.) Title:

A 1	0	1.	
Agent	1700	NI	n0
7	1		

9.) Date:

3/28/2022

LAND DISPOSAL RESTRICTION NOTIFICATION AND CERTIFICATION FORM FOR NEW YORK STATE REGULATED PCB WASTES

This for m is required for wastes containing 50 ppm PCBs or greater. The profiled waste on the manifest number indicated helow is listed hazardous waste (B-Coded) in NY State. Note: 50-499 ppm PCB drained articles and smull capacitors (as defined in 40CFR 761.3) are not regulated by NY State. Please complete items 1-9 and send with ALL shipments of waste.

	1)	Generator Name: Niagara Mohawk Power Corp (d.b.a., National Grid)			
10	2)	Generator Location Name: SIR Site 93 Dewey Ave., Buffalo NY 14214			
	3)	Manifest No.: 022662738 JJK	4) Profile/Approval No.:	186031-TWI22	

5) Please check all boxes that apply.

NYS WASTE CODE		IDENTIFY SPECIFIC TYPE OF PCB WASTE CHECK PROPER BOXES			
B001		Concentrated PCB Oil			
B002		Oil/liquid 50-499 ppm PCBs			
B003	X	Oil/liquid 500 ppm or greater PCBs			
		Manufact	ured PCB Articles (50-4)	99 ppm):	
B004		Transformers	Motors	Switches	Cable
		Pipe	Lg. Capacitors	Bushings	Pumps
		Other (specify):			
		Manufactured PCB Articl	es (other than trausform	ers) 500 ppm or (greater:
		Motors	Switches	Cable	Pumps
B005		Lg. Capacitors	Bushings	Pipe	148
		Other (specify):			
B006 PCB Transformers 500 ppm or greater					
			Other PCB Wastes:		
B00 7		Soil	Sludge	Clothing	Rags
		Wood	PPE	Coal Tar	Other (Specify):

6.) Check one box as appropriate:

CERTIFICATION - WASTE MEETS LAND DISPOSAL TREATMENT STANDARDS

I am the generator of the waste as identified above, that is restricted under 6 NYCRR Part 376. I have determined that this waste meets all applicable treatment standards set forth in 6 NYCRR 376 and, therefore, it can be landfilled without further treatment. Waste does not include solidified B002 material (liquid with PCBs 50-500 ppm).

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 6 NYCRR Part 376, Section 376.4, and all applicable prohibitions set forth in 376.3(b) of Part 376 or RCRA section 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

NOTIFICATION - WASTE DOES NOT MEET LAND DISPOSAL TREATMENT STANDARDS

	I am the generator of a waste restricted under 6 NYCRR Part 376 as identified above. I notify that I personally have examined and am familiar
X	with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste does not comply with
	the treatment Standards specified in 6 NYCRR Part 376.4(f). This waste must be treated to the applicable standards set forth in 6 NYCRR
	376.4(f) prior to land disposal.

7.)	Signature:	1	Sut	
8.)	Title:	Agent for Mr	9.) Date	3/28/202