

Technical Memorandum

February 20, 2023

To	Mr. Michael Belveg, New York State Department of Environmental Conservation	Tel	315.802.0312
Copy to	Patrick Dworaczyk, Kinder Morgan, Damian Vanetti, GHD	Email	ian.mcnamara@ghd.com
From	Ian McNamara	Ref. No.	11137172
Subject	Cold Springs Southern Terminals Site Quarterly Update – October to December 2022		

Mr. Belveg,

GHD had been performing light non-aqueous phase liquid (LNAPL) gauging and recovery activities on behalf of the Southern Terminals Group (STG) at the Cold Springs Terminals Site located in Lysander, New York (the Site). Activities had occurred in general conformance with the Revised Remedial Action Work Plan (GHD, September 9, 2021, revised: May 23, 2022), which was approved by NYSDEC on July 11, 2022, until August 22, 2022 when STG and GHD were no longer allowed to access the Site due to the expiration of the Northern Terminal Group's (NTG) Access Agreement with the property owner. The following is intended to provide a quarterly summary of activities completed at the Site between October and December 2022 (fourth quarter 2022) and planned future activities for first quarter of 2023 (January to March 2023).

LNAPL Recovery Summary

The skimmer units installed in select wells were shut down on August 22, 2022 since the access agreement was expiring (as previously reported) and it was unknown when STG or GHD would be allowed back on the Site. The STG conducted negotiations with Site property owner to no avail. Access was not allowed for the duration of the fourth quarter of 2022. As a result, no LNAPL recovery (skimmers or manual) and no gauging events occurred during this period.

Table 1 LNAPL Gauging and Recovery Schedule

Date	Activities		
	Skimmer Unit Recovery	Well Gauging	Manual LNAPL Recovery
October 2022	Unit 1 – No operating skimmers Unit 2 – No operating skimmers Unit 3 – No operating skimmers	No activities performed due to lack of access	No activities performed due to lack of access
November 2022	Unit 1 – No operating skimmers Unit 2 – No operating skimmers Unit 3 – No operating skimmers	No activities performed due to lack of access	No activities performed due to lack of access
December 2022	Unit 1 – No operating skimmers Unit 2 – No operating skimmers Unit 3 – No operating skimmers	No activities performed due to lack of access	No activities performed due to lack of access

Table 2 LNAPL Recovery Summary

Date	Activities	Approximate Amount of LNAPL Recovered (gallons)
October 2022	Unit 1 Skimmers	No skimmers in operation due to lack of access
	Unit 2 Skimmers	No skimmers in operation due to lack of access
	Unit 3 Skimmers	No skimmers in operation due to lack of access
	Skimmer Units Recovery Total	0.00
	Manual Recovery	No manual recovery performed due to lack of access
	Manual Recovery Total	0.00
	Monthly Recovery Total (Skimmers and Manual)	0.00
November 2022	Unit 1 Skimmers	No skimmers in operation due to lack of access
	Unit 2 Skimmers	No skimmers in operation due to lack of access
	Unit 3 Skimmers	No skimmers in operation due to lack of access
	Skimmer Units Recovery Total	0.00
	Manual Recovery	No manual recovery performed due to lack of access
	Manual Recovery Total	0.00
	Monthly Recovery Total (Skimmers and Manual)	0.00
December 2022	Unit 1 Skimmers	No skimmers in operation due to lack of access
	Unit 2 Skimmers	No skimmers in operation due to lack of access
	Unit 3 Skimmers	No skimmers in operation due to lack of access
	Skimmer Units Recovery Total	0.00
	Manual Recovery	No manual recovery performed due to lack of access
	Manual Recovery Total	0.00
	Monthly Recovery Total (Skimmers and Manual)	0.00
Quarterly Skimmer Recovery Total		0.00
Quarterly Manual Recovery Total		0.00
Quarterly Recovery Total (Skimmers and Manual)		0.00

LNAPL previously recovered from the Site is containerized in 55-gallon drums, which are located within a secondary containment structure within each of the skimmer unit sheds. The containerized liquids will be disposed of off-Site at a permitted facility when Site access is allowed. At the end of August 2022, the drums are approximately 33% full, on average, and no known volume has been added since. The drums could not be emptied prior to access being rescinded and will remain staged on-Site inside the sheds until Site access is granted.

Operation and Maintenance Activities

No activities occurred at the Site during the fourth quarter of 2022; however, the STG did conduct negotiations with the Site property owner to obtain access to the Site to complete remedial and maintenance activities and continued reporting activities. The second natural source zone depletion (NSZD) assessment event scheduled for October 2022 was cancelled due to GHD not being allowed access to the Site.

Future Activities

The following activities are planned to occur during the first quarter of 2023:

1. NSZD assessment report from July/August 2022 activities finalized and submitted to NYSDEC.
2. The STG legal team will attempt to secure Site access with the owner in concert with the NTG.
3. Subsequent NSZD Assessment (scheduled for Spring 2023, if access is allowed) planning and coordination to complete the following:
 - a. Gauging of water levels and apparent LNAPL thicknesses in all Site monitoring wells.
 - b. Biogenic heat measurements at select Site monitoring wells.
 - c. Soil gas readings, CH₄, CO₂, and O₂, within selected Site monitoring wells.
 - d. Performing CO₂ monitoring using dynamic closed chamber (DCC) methodology.
 - e. Deployment of passive CO₂ traps and laboratory analysis.
 - f. Preparation of a second NSZD assessment report.
4. Gauging and manual LNAPL recovery will resume at each of the Site wells on a monthly basis, generally during the first week of each month, when STG and GHD are allowed access to the Site.
5. The drums of recovered LNAPL and previously generated investigation derived wastes/materials present at the Site, that are the responsibility of the STG, will be assessed and managed for off-Site disposal as appropriate, once STG and GHD are allowed access to the Site.
6. The various drums and containers of other miscellaneous/unknown materials present at the Site will be evaluated by the NYSDEC for ownership and proper management.

Please feel free to contact me if you have any questions or require additional information.

Sincerely,



Ian McNamara
Project Manager

Enclosures: None