----- Forwarded Message ------

Subject: Re: Did you have an opportunity to check the file regarding the spill I wrote to

you about?

Date: Tue, 4 Oct 2016 09:31:47 -0400

From: Walter Hang <>

To: Brazell, Richard J (DEC) <>

CC: Parker, Reginald (DEC) \Leftrightarrow , Hale, Kevin (DEC) \Leftrightarrow , Quinn, James A (DEC) \Leftrightarrow

Thank you for your response. I know you are very busy.

Very best regards,

Walter

On 10/4/2016 9:21 AM, Brazell, Richard J (DEC) wrote:

Walter

In theory the spill could have been closed as meeting standards per Department policy regarding the implementation of Stars Memo 1 at the time of this release. The initial excavation of soil in AOC #5-Loading Dock Area (Former Inactive Trash Pit) still had soil exceedances above the STARS Values. Additional soil was removed and additional confirmatory samples were collected. The results of these new samples indicated that there were still some exceedances of PAHs. However, at the time the Department allowed that samples could also be analyzed for TCLP and if these values were not exceeded the soil was deemed remediated. Even though the RP met the TCLP criteria, and groundwater was not impacted, I elected at the time as checking the box in the database as not meeting standards. The Department no longer uses Stars Memo #1.

Comparing these results to CP-51 which are the cleanup levels we now use for contaminated soil. There are **exceedances** (emphasis added) for Benzo(a)anthracene and chrysene.

Keep in mind this was a quick review.

Richard J. Brazell P.E.

Regional Spill Engineer, NYS DEC Spill Response

New York State Department of Environmental Conservation

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www.dec.ny.gov

From: Walter Hang [mailto:walter@toxicstargeting.com]

Sent: Monday, October 03, 2016 8:58 PM

To: Brazell, Richard J (DEC) crichard.brazell@dec.ny.gov

Subject: Re: Did you have an opportunity to check the file regarding the spill I

wrote to you about?

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Again, I just want to confirm that the spill does <u>not</u> meet clean up standards. That is what the DEC spill profile clearly indicates.

I also want to know which applicable clean up standard(s) was exceeded when the spill was administratively closed.

Thanks. I know you are very busy.

Walter

NYSDEC SPILL REPORT FORM	N٦	YSD	EC	SP	11 1	RFP(ORT	FORM
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SE Technologies, Inc. 98 Vanadium Road Bridgeville, PA 15017 412.221.1100 Site Characterization Report Additional Sampling Activities Borger Compressor Station Tompkins County, New York

July 13, 1999

Prepared for:

CNG TRANSMISSION CORP.

R.R. 3, Box 24T Westfield, PA 16950



SITE CHARACTERIZATION REPORT ADDITIONAL SAMPLING ACTIVITIES - BORGER COMPRESSOR STATION TOMPKINS COUNTY, NEW YORK

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SITE CHARACTERIZATION REPORT ADDITIONAL SAMPLING ACTIVITIES - BORGER COMPRESSOR STATION TOMPKINS COUNTY, NEW YORK

1.0 INTRODUCTION

This site characterization report (SCR) describes results of additional soil and groundwater sampling at the CNG Transmission Corporation (CNG), Borger Compressor Station. The purpose was to delineate and characterize areas of concern (AOCs) identified by previous investigations and assess their potential impact to groundwater and an identified jurisdictional wetland at the site.

New York Department of Environmental Conservation (NYDEC) guidance for sampling and selection of remediation standards were used to direct the site characterization. NYDEC guidance is presented in two documents:

- Spill Technology and Remediation Series (STARS) Memo #1; Petroleum-Contaminated Soil Guidance Policy," dated August 1992, and
- 2) "Division Technical and Administrative Guidance Memorandum: Determination of Soil Cleanup Objectives and Cleanup Levels", (TAGM) dated January 24,1994 (revised).

The SCR presents a site description, a summary of previously conducted assessments and the results of this phase of soil and groundwater sampling conducted by SE Technologies (SET). SET identified the AOCs that will require remedial actions using the appropriate NYDEC standards. A Remedial Action Plan (RAP) will be prepared as a separate document based on these data and the previous characterizations. The RAP will present selected cleanup standards and appropriate activities to remediate identified AOCs.

2.0 BACKGROUND

2.1 Site Description

The Borger Compressor Station is on Ellis Hollow Creek Road, approximately 8 miles east of Ithaca in Dryden Township, Tompkins County, New York. Borger is a compressor station that boosts pipeline pressure to send natural gas to transmission lines. Main buildings at the station include a Compressor Building, Auxiliary Buildings, an Office Building, company houses, and a Field Shop. The station has been in operation since the 1940's.

Constituents of concern at the station are primarily petroleum byproducts including light gas distillates, lubricating oils and glycol. Unlike many other natural gas transmission companies, most of the CNG system is considered "PCB-free" since CNG historically has not used PCB oils in their system. However, very old stations and stations with transmission lines in common with other transmission companies sometimes exhibit PCB concentrations from oils associated with pipeline liquids and compressor engine oils.

The station is in a small valley adjacent to Cascadilla Creek at an elevation between 1000 and 1050 feet above mean sea level within the Appalachian Plateau Physiographic Province. Soils underlying the station consist of glacial sediments of loose sand and gravel, and clay deposited

as terraces in front of the receding Wisconsin-aged ice sheet. A state inventoried freshwater Class 1 wetland (TA-10) abuts the station property along the east bank of Cascadilla Creek, and extends onto portions of the station property. Small intermittent feeder streams to Cascadilla Creek are present on the property and in the identified wetlands. Some of the native soil at the station has been used as fill to create staging areas, and more recently to build an access road across a portion of the site for the New York Department of Transportation.

2.2 Summary Of Previous Assessment Results

A site characterization program conducted at the station in July and August of 1998 identified four areas of concern (AOC). Figure 1 presents the location of each identified AOC. The sampling program and results of this investigation are presented in the "Site Characterization Report, Borger Compressor Station, Tompkins County, New York" dated October 23, 1998 by Dames & Moore.

Two AOCs were identified based on confirmation of field screening results. One sample (BGR-019) exhibited 4,206 mg/kg of TPH as DRO from a blowdown stack in Gate Area #102 (AOC #1). Another sample (BGR-017) exhibited a TPH concentration of 55,650 mg/kg at a valve with operator east of the Compressor Building (AOC #2). A shallow soil sample below a drain from the station field shop identified a PCB concentration (11 mg/kg) which exceeds the NYDEC action limit (1 mg/kg). This area is identified this area as AOC #4. In addition, test pit and trenching excavations were dug north and south of an old loading dock and on either side of a dirt access road where an inactive trash pit was reported by station personnel. The trash pit was not found and impacts to soil were not identified.

Soil sampling, test pit and trenching activities identified a release to soil and groundwater from an inactive liquids pit (Former Liquids Pit - AOC #3). The constituents consisted of benzene, toluene, ethylbenzene, total xylenes, and TPH as DRO and GRO over an approximate 100 by 150 foot area. The release was reported to the NYDEC Spills program (Spill # 9806491). The Former Liquids Pit is upgradient to the identified wetland. The degree of remediation required for this AOC was not defined because neither the extent of groundwater contamination nor the extent of potentially impacted wetlands was determined during this study.

In December 1998, SET conducted a wetlands determination below in the area near AOC #3 and the reported inactive trash pit area to determine the extent of the jurisdictional wetland so that additional investigation could be undertaken at the station. The wetlands determination is presented in the SET report "Wetland Determination Report, Borger Compressor Station, Dryden Township, Tompkins County, New York" dated February 5, 1999. Figure 1 presents the limits of the wetlands determined in this report.

3.0 SITE CHARACTERIZATION ACTIVITIES

SET performed additional Phase II sampling activities in each of the identified AOCs to assess the type and extent of potential impacts from each identified AOC so that remedial measures could be assessed. Figure 2 presents the locations of the samples collected for this investigation. In addition, groundwater sampling was conducted at the presumed location of the reported inactive trash pit and a staging area to determine if any impacts to groundwater may have occurred from the reported inactive trash pit. The following sections describe the activities

that were undertaken by SET. Site sampling activities were conducted on March 30 through April 2, 1999.

3.1 Soil Sampling

Soil sampling was conducted in four AOCs on March 30 and 31, 1999. These AOCs were:

- AOC #1-Blowdown Stack at Gate Area 102
- AOC #2- Compressor Building Area
- AOC #3-Former Liquid Pit
- AOC #4-Drain Below Field Shop

Soil samples were collected from the surface (0-1 foot) and at depth (between 1 and 3 feet) in each AOC and submitted for laboratory analysis. Eastern Laboratories, Ltd. of South Waverly, Pennsylvania conducted the laboratory analyses. In AOC #4, a PCBs field-screening program was conducted using Envirogard® immunoassay kits to guide the selection of samples for laboratory analysis. One-third of the PCBs field screening samples were submitted for laboratory analysis to confirm the accuracy of the field-screening program and quantify the PCB content in the soil. A trip blank was shipped with the BTEX samples to control for cross contamination of volatile compounds.

AOC #1-Blowdown Stack at Gate Area 102

One surface soil sample (BGR-1-F005) was collected from Gate Area 102 where previous sampling had identified elevated TPH concentrations. Only one sample was collected because the previous sampling had defined the general extent of contamination using a combination of field test kit and laboratory sampling for TPH. This sample was collected to characterize the type and concentration of constituents of concern in the gate area to assess the need for active remediation. The sample was collected at a blowdown stack (see Figure 2). The sample was analyzed for benzene, toluene, ethylbenzene and total xylenes (BTEX) by EPA Method 8021a; semi-volatile organic compounds (SVOCs) by EPA Method 8270; polychlorinated biphenyls (PCBs) by EPA Method 8081 and total organic carbon (TOC) EPA Method 9060. The TOC was analyzed to provide a representative value of organic carbon in the area so that an alternative action goal could be established as appropriate for this area using the TAGM guidance.

AOC #2- Compressor Building Area

One surface soil sample was collected from beneath a valve at the southeast corner of the Compressor Building (BGR-2-F023) where previous sampling had identified elevated TPH concentrations. The location is shown on Figure 2. Only one sample was collected because previous sampling had essentially defined the extent of obvious contamination using a combination of field test kit and laboratory sampling for TPH. This sample was collected to characterize the type and concentration of constituents of concern at the compressor building area to assess the need for active remediation. The sample was submitted for laboratory analysis of BTEX, SVOCs, PCBs and TOC. The TOC was analyzed to provide a representative

value so that an alternative cleanup goal could be established for this area using the TAGM guidance if appropriate.

AOC #3-Former Liquid Pit

A total of five samples (BGR-3-001 through BGR-3-005) were collected on a 50 foot grid pattern downgradient of the test trenches in AOC #3 where previous soil and water sampling had identified impacts from TPH and volatile organic compounds. These samples were collected from depth (approximately 3 feet bgs), at the water table interface and within the identified wetland. The water table in this area was identified at between 3 and 4 feet bgs. These samples were used to assess whether the identified impacts from the Former Liquids Pit had migrated to the wetland area in any significant manner. Samples were submitted for laboratory analysis of BTEX, SVOCs and PCBs. One sample, BGR-3-002, was analyzed for TOC. The TOC was analyzed to provide a representative value so that an alternative cleanup goal could be established for this area using the TAGM guidance.

AOC #4- Drain Below Field Shop

One sample (BGR-001) collected by Dames & Moore from the 0-1 foot soil zone detected the PCB Aroclor 1254 at a concentration of 11 mg/kg, above the NYDEC TAGM action standard of 1 mg/kg. SET used Envirogard® (Strategic Diagnostics, Inc.) PCBs field sampling kits in a field screening program to assess the extent of this impact to shallow and deep soil around the drain outlet. The Envirogard® kits are an immunoassay analytical procedure accepted for completing PCB analysis by EPA SW846 Method 4020.

The area was delineated on a 10-foot by 10-foot grid pattern using the sampling kits to analyze surface soil and soil collected from the 2 to 3-foot depth interval. Field screening was conducted on March 31, 1999. Nine samples were field-analyzed from five locations in AOC #4. At four locations, samples were collected from 0 to 1 ft bgs and 2 to 3 ft bgs. At location BGR-4-001 (the location of the Dames & Moore surface soil sample) one sample was collected from 2 to 3 ft bgs. Field delineation of the area was performed until sample results were below 1 mg/kg total PCBs in surface soil and below 10 mg/kg in subsurface soil samples. To confirm field immunoassay analysis, three samples (BGR-4-001d, BGR-4-003s and BGR-4-005s) were submitted for laboratory analysis of PCBs.

3.2 Groundwater Sampling

Groundwater samples were collected from 10 temporary monitoring wells to assess the groundwater impacts caused by the suspected source areas. Results of this sampling were also used to assess groundwater flow and the need for permanent wells that might be required to conduct any groundwater remediation or to monitor any soil remediation in the AOCs.

The locations of the temporary wells are provided on Figure 2. Well TMW-1 was set upgradient of AOC #3 (Former Liquids Pit) to assess background groundwater conditions. Wells TMW-7 through TMW-10 were set in areas within and surrounding AOC #3, (Former Liquids Pit) to collect groundwater samples where the previous trenching activities identified a sheen on the groundwater. Wells TMW-4, -5, and -6 were set at progressively downgradient positions from

the suspected source area to provide hydraulic control and to determine whether constituents of concern had migrated. In addition, well TMW-4 was used to assess groundwater adjacent to, and upgradient of, a seep detected in the previous investigation where a minor concentration of toluene (0.0052 ug/L - Dames & Moore sample BGR-SW-01) had been detected. Wells TMW-2, and TMW-3 were set in areas where station personnel had suggested the Inactive Trash Pit might be found (near the loading dock and staging area) to assess potential impacts to groundwater and to provide hydraulic control. The final locations were selected in the field by SET with approval from the station manager so that the wetlands were not encroached upon and so that underground utilities such as high-pressure gas lines were avoided.

Drilling services were provided by Subsurface, Inc. of Charleston, West Virginia. Each boring was advanced to four feet below groundwater using a Geoprobe drill rig. Notes were made by SET identifying soil type, any staining, odors, or other obvious signs of contamination. Once a boring was completed, the temporary well was installed. Well construction consisted of five feet of one-inch diameter 10 slot PVC well screen intersecting the soil groundwater interface, attached to a one-inch diameter schedule 40 PVC riser. Each well was surveyed to a relative, 100 foot benchmark at completion.

Groundwater samples were collected from the 10 temporary monitoring wells after purging a minimum of three well volumes. Groundwater samples were referenced as BGR-TMW-1 through BGR-TMW-10 corresponding with temporary monitoring wells TMW-1 through TMW-10. Each sample was collected in laboratory provided containers and retained in chilled storage until delivery to the laboratory Eastern Laboratories, Inc., of South Waverly Pennsylvania conducted the analyses. Samples were analyzed for BTEX by method 8021a, SVOCs by method 8270 and PCBs by method 608.

Sampling activities included the collection of static water levels in the temporary monitoring wells, along with field measurement of pH and specific conductance. These data are presented in Table 1. Water levels were measured in each well before purging. Field measurements for pH and specific conductance were taken after purging. Field measurements for pH ranged from 6.44 units (TMW-3) to 7.77 units (TMW-6). Specific Conductance ranged from 118 umhos (TMW-2) to 387 umhos (TMW-4). Each of the temporary wells was removed after sampling was completed.

4.0 RESULTS

Results of the soil and groundwater sampling were compared to default NYDEC standards to assess to define AOCs for remedial planning. The final selected cleanup values for each AOC will be presented in a separate Remedial Action Plan that will be developed for the site. The action levels are outlined in the STARS Memo and the TAGM for the development of soil cleanup standards.

4.1 Soil

Soil samples results from each AOC are presented on Tables 2 and 3. These results were compared to the action levels presented in Table 5 to assess whether further remedial assessment is required for that AOC.

AOC #1-Blowdown Stack at Gate Area 102

Several constituents of concern were detected in sample BGR-1-F005. Total PCBs were measured at a concentration of 5.8 mg/kg from the 0-1' interval which exceeds the action level of 1 mg/kg total PCBs in surface soil. Benzene (29.1 ug/kg), ethylbenzene (40.6 ug/kg), and total xylenes (253.7 ug/kg) were below the standards of 200 ug/kg, 5,500 ug/kg, and 1,200 ug/kg, respectively. Detected SVOCs (4-methylphenol, phenanthrene, pyrene and bis(2-ethylhexyl)phthalate) were below their respective standards. Benzoic acid was measured at a concentration of 507 ug/kg. There is no specific action level for benzoic acid. However, a default value of 50,000 ug/kg was used which is consistent with a default value presented in the TAGM for an individual SVOC. Total SVOCs were 2,828 ug/kg, which is below the maximum soil action objective of 500,000 ug/kg presented in the TAGM.

TOC was measured at 89,714 mg/kg in the sample from this AOC.

AOC #2- Compressor Building Area

t 1

Certain SVOCs were detected in sample BGR-2-F023, collected from this AOC. Phenanthrene (146 ug/kg), fluoranthene (227 ug/kg), pyrene (222 ug/kg), benzo(a)anthracene (110 ug/kg), and chrysene (150 ug/kg) were detected at concentrations below their respective action standards. Bis(2-ethylhexyl)phthalate (19,140 ug/kg) and phthalate (251 ug/kg) were also detected, but are believed to be laboratory contaminants. The total SVOC concentration (including possible laboratory contaminants) was 20.356 mg/kg, which is still below the maximum soil cleanup objective of 500 mg/kg for total SVOCs.

PCBs and BTEX were not detected in the soil sample from this AOC. TOC was measured at 8776 mg/kg.

AOC #3-Former Liquid Pit

Five soil samples were collected from the identified wetland area downgradient of the Former Liquid Pit area to assess whether the petroleum products from this AOC had migrated to the wetland area. Benzo(a)pyrene (125 ug/kg) in sample BGR-3-001 was the only SVOC detected The concentration exceeds the action level of 61 ug/kg. Several phthalate compounds were reported, but were reported by the laboratory as a laboratory contaminant.

PCBs and BTEX were not detected in any soil sample from this AOC. TOC was detected at 1983 mg/kg.

AOC #4- Drain Below Field Shop

Field screening was used in this AOC to help delineate the extent of PCB-impacts from previous investigations. The field screening was used as a conservative screening tool to guide the delineation of this AOC. The results are presented in Table 3. PCBs were detected at a concentration between 1 mg/kg and 5 mg/kg in the surface soil samples BGR-4-005s, BGR-4-002s, BGR-4-002s and BGR-4-003s. PCBs in surface soil upgradient of the drain (BGR-4-004s) were measured in the field at less than 1 mg/kg. PCBs in the deeper soil zone were measured in the field between 1 mg/kg and 5 mg/kg in samples BGR-4-001d and BGR-4-003d.

Results of the laboratory analysis for BGR-4-001d (1.1 mg/kg), BGR-4-003s (0.09 mg/kg) and BGR-4-005s (0.25 mg/kg). These results strongly suggest that the concentration of PCBs in this area are below actionable concentrations (except for the original Dames & Moore sample) within their respective depth horizons, and suggests the field sampling kits are an appropriate conservative screening tool.

4.2 Groundwater

Groundwater sample results are summarized on Table 4 and were compared to selected action levels presented in Table 5. Groundwater elevations were used to create a groundwater flow map of the area (Figure 3). Groundwater elevation was highest at the background well TMW-1 (94.81) and lowest at TMW-8 (82.86). The vertical gradient was approximately 12 feet. The horizontal component of groundwater flow is locally variable, though flow is ultimately to Cascadilla Creek. Feeder streams and the wetlands create local discharge areas for groundwater flow and the fill material used to create access road may act to create a groundwater mound (evident along the Dirt Access Road - Figure 3). Flow near the Former Liquids Pit is essentially southwest to TMW-8, and the wetland and a local feeder stream. Flow on the east side of the access road, near AOC #5 is essentially southeast to another local stream.

One groundwater sample (BGR-TMW-3) exhibited constituents of concern at concentrations greater the selected action levels. Benzene (15.5 ug/L), toluene (30.8 ug/L), ethylbenzene (49.4 ug/L), total xylenes (148.1 ug/L), and naphthalene (37.4 ug/L) were each detected above their respective action levels. Several SVOCs were also detected, but were below the action levels. In addition, stained soils and a strong odor were noted from the soils at the groundwater interface. This sample was from a location downgradient of a former loading dock and the reported location of the Inactive Trash Pit. The location is identified as AOC #5 - Loading Dock Area.

Minor concentrations of ethylbenzene (1.2 ug/L), o-xylene (0.6 ug/L), and phenanthrene (2.3 ug/L) were detected in sample BGR-TMW-9 located within the Former Liquids Pit area. Minor staining was noted in the soil just above the groundwater table in this area but a sheen (as reported in previous sampling) was not noted. These concentrations all were below the selected action levels. Bis(2-ethylhexyl)phthalate was also detected in this sample, but was reported as a laboratory contaminant.

PCBs, BTEX or SVOCs were not detected in any of the remaining groundwater samples.

5.0 CONCLUSIONS

Results of the soil and groundwater sampling in this investigation were assessed in conjunction with the previous sampling results to define AOCs for a remedial action assessment using the relevant action levels presented in Table 5. These AOCs, the proposed cleanup standards and remedial actions will be presented in the RAP for this station as a separate document.

5.1 AOC #1 - Blowdown Stack at Gate Area 102

BTEX, certain SVOCs and PCBs were detecting the sample from this AOC. All the VOC and SVOC individual constituents were below the NYDEC action levels. In addition, both total VOCs 0.3234 mg/kg) and total SVOCs (1.598 mg/kg) are below the NYDEC action level of 10 mg/kg and 50 mg/kg, respectively. PCBs (5.8 mg/kg) were detected at a concentration greater than the action level of 1 mg/kg. Thus, remedial measures may be warranted for this AOC for PCBs and will be presented in the RAP.

5.2 AOC #2- Compressor Building Area

Only low concentrations of SVOCs were detected in this area, and all individual concentrations as well as the total SVOC concentrations were below NYDEC action levels in this AOC. VOCs and PCBs were not detected. SET believes the SVOC constituents characterize the TPH compounds detected in the previous investigation. When combined with the field screening results from the previous sampling, these data indicate remediation is not required under the TAGM guidelines. Therefore, this AOC will not be assessed for remedial measures in the RAP.

5.3 AOC #3-Former Liquid Pit

Previous and current sampling have identified impacts to soil and groundwater in the Former Liquid Pit area. This area has a NYDEC Spill Number (9806491) for identification. Volatile organic compounds and total petroleum hydrocarbons were detected within the former pit area during previous and current sampling and a sheen was noted on groundwater in the pit. Benzo(a)pyrene was the only constituent that exceeded the action level in SET sample BGR-3-001 from a location immediately below the AOC and in the wetland. The total SVOC concentration in this sample (0.125 mg/kg) was well below the 50 mg/kg action level proposed in the TAGM. Groundwater sampling for VOCs, SVOCs and PCBs by SET did not reveal constituents of concern above the NYDEC action levels.

Based on the current and previous sampling, an AOC has been delineated as approximately 100 by 150 feet in area and corresponds to a known former liquids disposal pit. Soil and groundwater sampling within, immediately adjacent and downgradient of this AOC indicates that the impacts are localized within soil and migration beyond the fringe of the wetland area is minimal. SET believes this AOC has been essentially delineated and remedial measures are warranted. The remedial measures will be presented in the RAP.

5.4 AOC #4- Drain Below Machine Shop

PCBs were detected in the shallow and deeper soil zones in this AOC. However, only one sample, BGR-001 from the previous Dames & Moore study, exhibited concentrations above the state action levels. Thus, SET believes this AOC has been delineated and remedial measures are warranted for PCBs in shallow soil below the outfall. This will be presented in the RAP.

5.5 AOC #5 - Loading Dock Area

Groundwater sampling from temporary monitoring well TMW-3 exhibited elevated concentrations of BTEX and naphthalene above the selected action levels. Discolored soil was

also noted at the soil and groundwater interface. This well is near a former loading dock and suspected inactive trash pit that may have contributed to the detected constituents. However, other sampling conducted in the immediate area did not detect any constituents of concern.

Groundwater samples upgradient of this area in wells TMW-2 and TMW-10 did not detect any constituents, and a sample from downgradient well TMW-4 also did not detect constituents. Further, previous test pit and trench investigations are found surrounding this sample location (Figures 2 and 3), and constituents of concern were not detected in samples from any of these locations. Based on the previous and current sampling programs, the area of impacted soil and groundwater appears limited. This AOC will be assessed for remedial measures within the limited area, for soil and groundwater impacts by VOCs and SVOCs, and will be presented in the RAP.

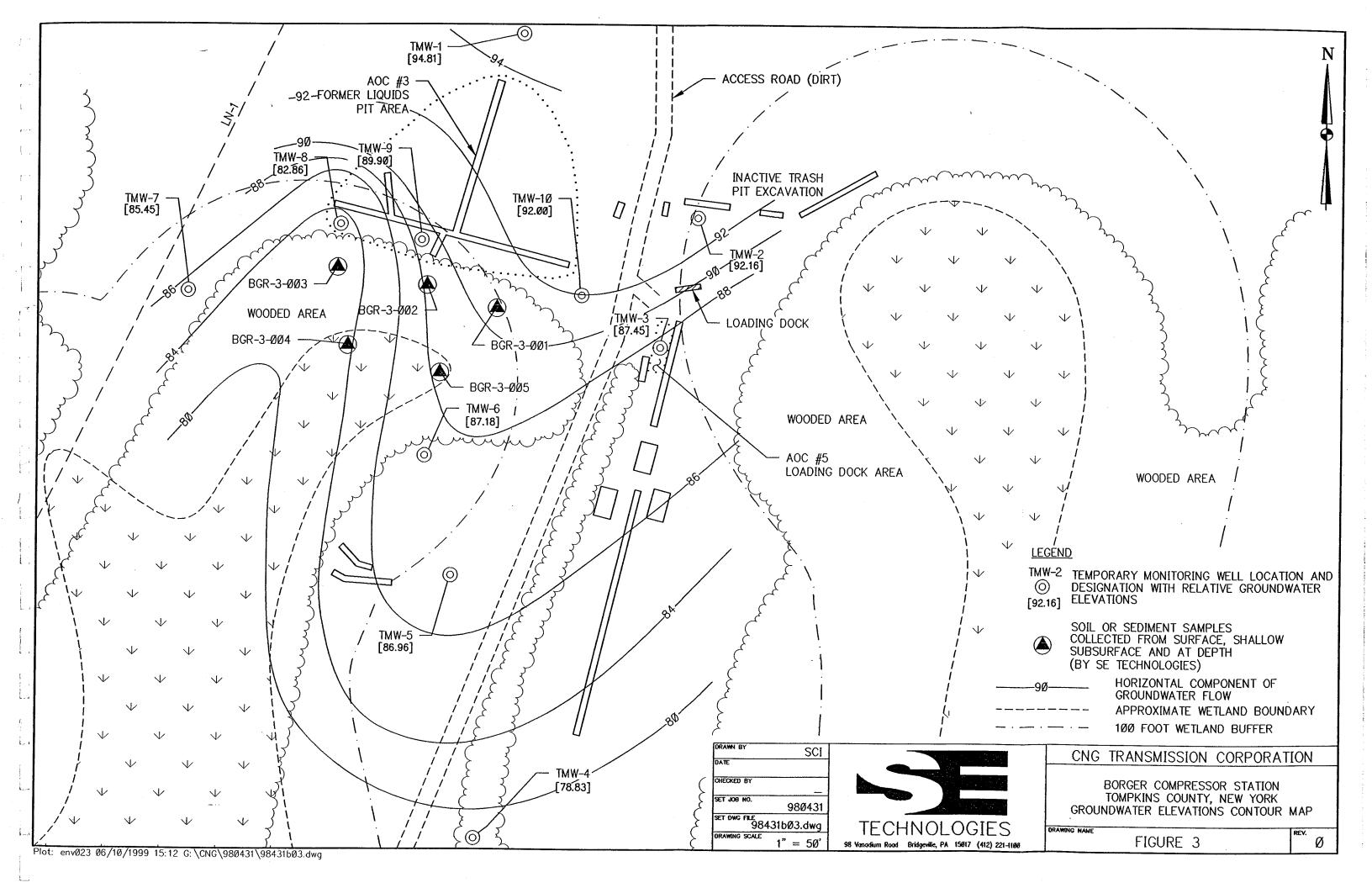


TABLE 3 ANALYTICAL DATA AOC #3 - EXCAVATION WATER REMEDIAL ACTION REPORT BORGER COMPRESSOR STATON TOMPKINS COUNTY, NEW YORK

SAMPLE IDENTIFICATION	CLEANUP	BGR-3W-001	BGR-3W-001						
DATE COLLECTED	LEVEL	10/01/99	10/08/99						
VOLATILE ORGANIC COMPOUNDS -	· ug/l								
Benzene	0.7	<2.0	<0.5						
Ethylbenzene	5	<2.0	19.0						
Toluene	5	<2.0	0.5						
Xylenes (Total)	5	<2.0	14.6						
Total Petroleum Hydrocarbons (mg/l)	NP	<mark>17</mark>	NA						
POLYNUCLEAR AROMATIC HYDROCARBONS - ug/l									
Acenaphthene	20	NA	<2.0						
Acenaphthylene	20	NA	<2.0						
Anthracene	50	NA	<2.0						
Benzo(a)anthracene	0.002	NA	<2.0						
Benzo(a)pyrene	0.002	NA	<2.0						
Benzo(b)fluoranthene	0.002	NA	<2.0						
Benzo(g,h,i)perylene	5	NA	<2.0						
Benzo(k)fluoranthene	0.002	NA	<2.0						
Chrysene	0.002	NA	<50.0						
Dibenzo[a,h]anthracene	50	NA	<2.0						
Fluoranthene	50	NA	<2.0						
Fluorene	50	NA	<2.0						
Indeno(1,2,3-cd)pyrene	0.002	NA	<2.0						
Naphthalene	10	NA	<2.0						
Phenanthrene	50	NA	<2.0						
Pyrene	50	NA	<2.0						

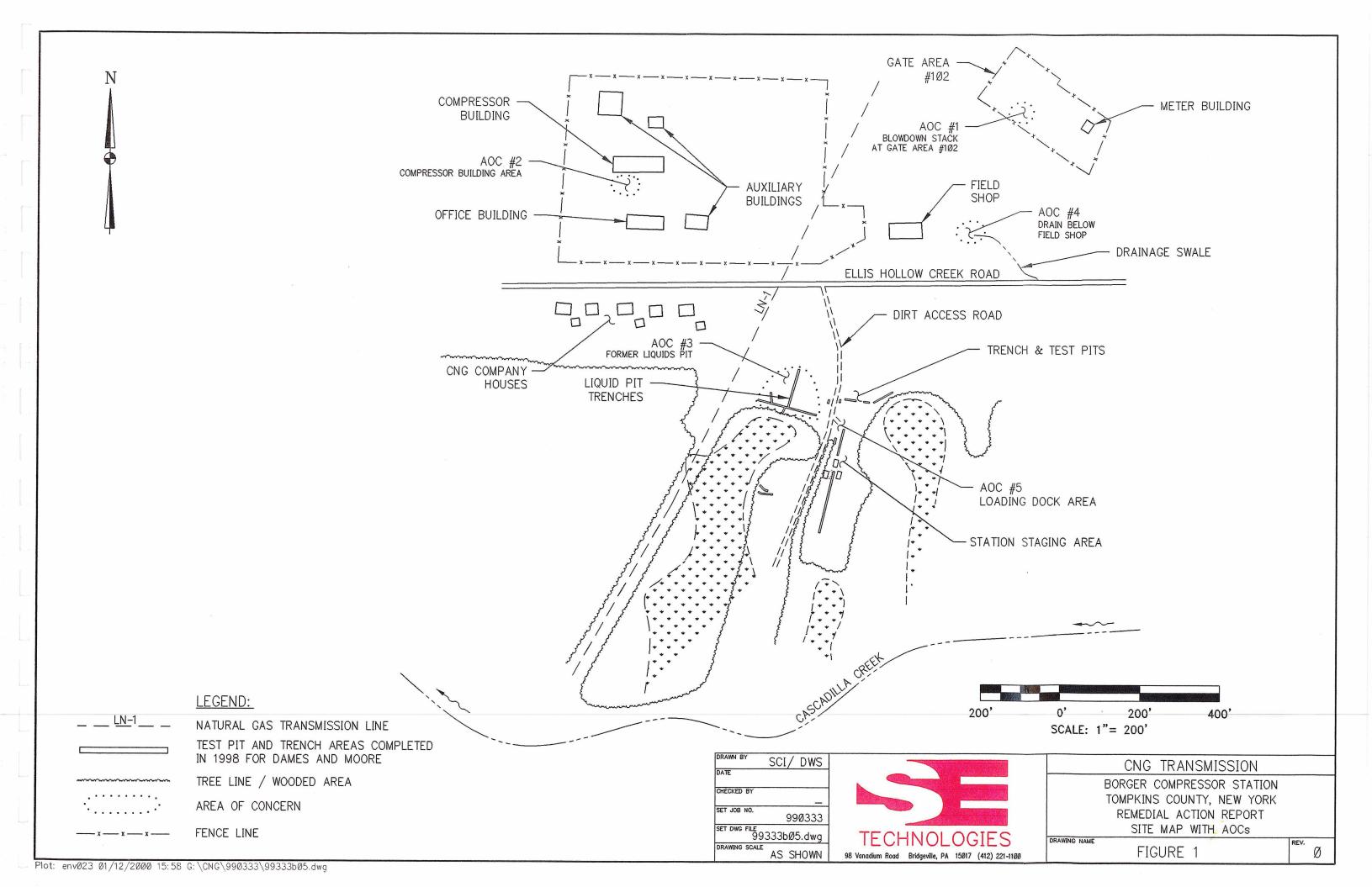
Notes:

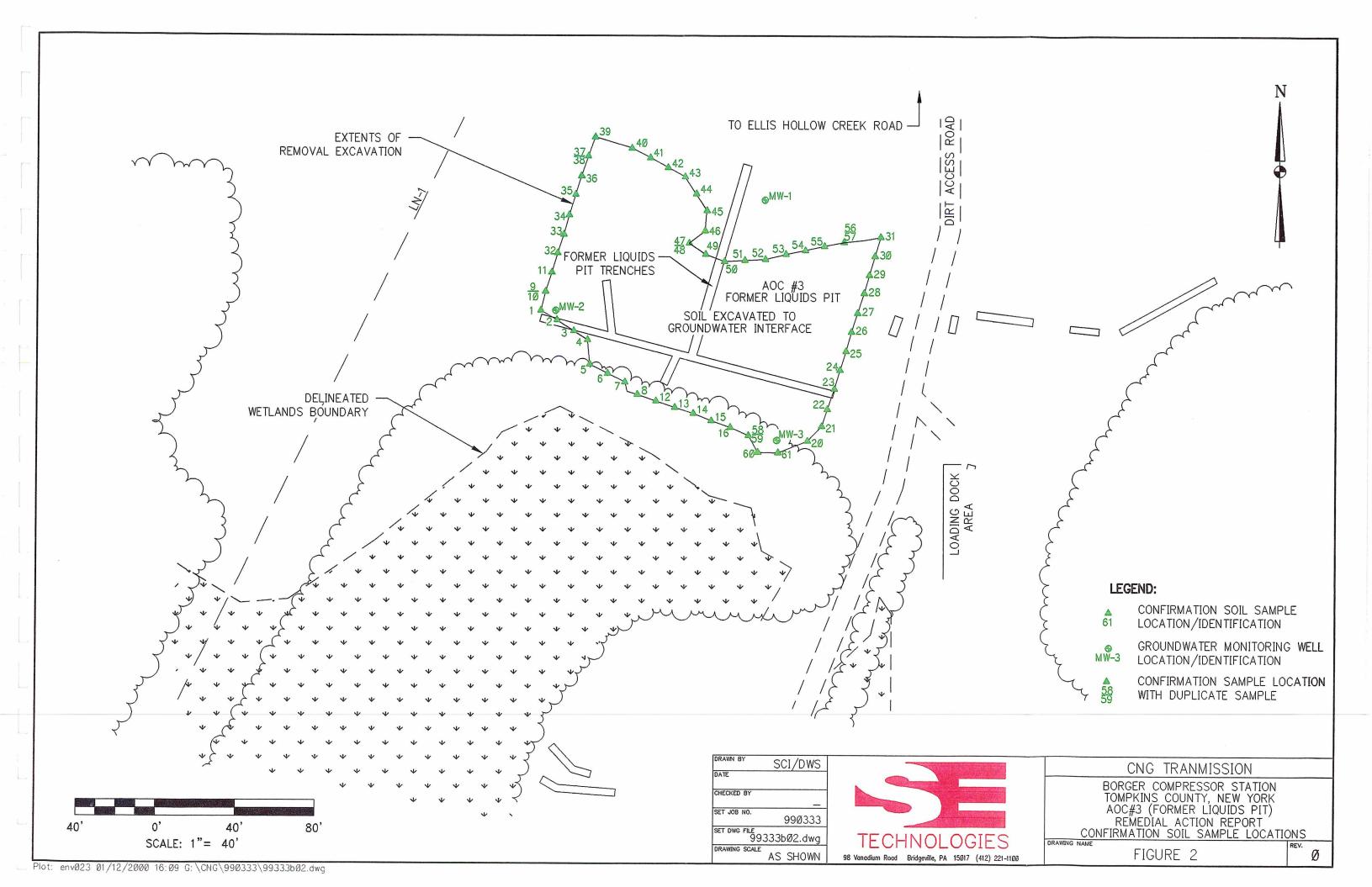
- 1. Cleanup levels established in Technical and Administrative Guidance Memorandum (TAGM). Determination of Soil Cleanup Objectives and Cleanup Levels, January 24, 1994.
- 2. Concentrations are in micrograms per liter (ug/l).
- 3. NA Not analyzed. NP Not published.
- 4. < denotes that an analyte was not detected at or above the listed laboratory method detection limit.
- 5. Shaded results indicate parameters that exceed the appropriate cleanup levels.

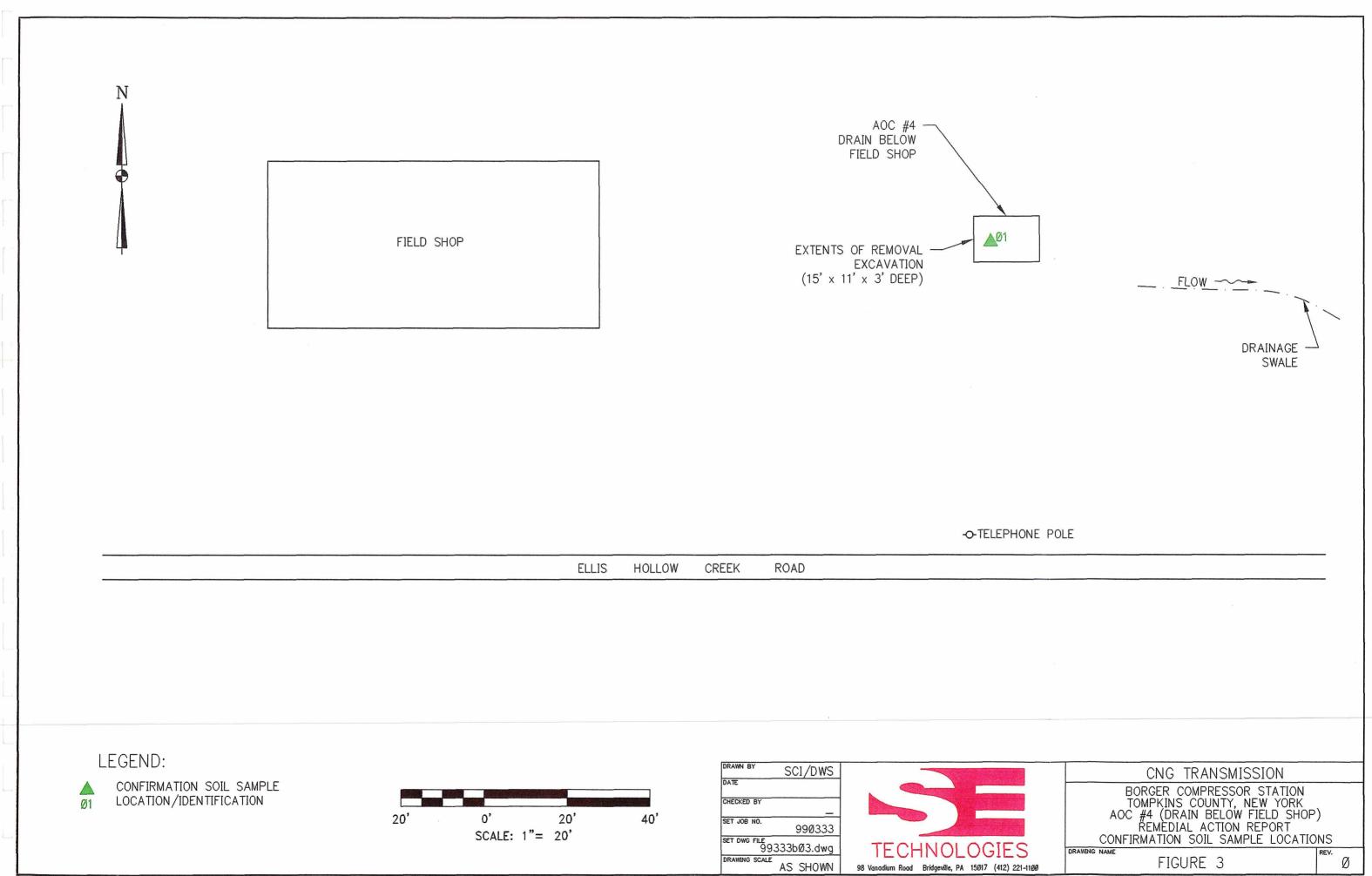
TABLE 6 SUMMARY OF SOIL ANALYTICAL DATA SEMIVOLATILE ORGANIC COMPOUNDS, TCLP METALS, AND PCBs AOC #5 - LOADING DOCK AREA REMEDIAL ACTION REPORT **BORGER COMPRESSOR STATION** TOMPKINS COUNTY, NEW YORK

Sample Identification	Cleanup	BGR-5-001	BGR-5-002	BGR-5-003	BGR-5-004	BGR-5-005	BGR-5-006	BGR-5-007	BGR-5-008	BGR-5-009
Date Collected	Level	10/07/99	10/07/99	10/07/99	10/12/99	10/12/1999	10/12/1999	10/20/1999	10/20/1999	10/20/1999
Depth Collected (ft-bgs)		3	3	3	3	3	3	3	3	3
SEMIVOLATILE ORGANIC C	OMPOUND	S - ug/kg				CONTRACTOR OF CHARLES AND A SEASON OF CO.				
Acenaphthene	400	3,930	1,530	<630	<134	6,950	406,120	NA	NA	NA .
Anthracene	1,000	3,780	1,720	<630	<134	10,350	600,510	NA	NA	NA
Benzo(a)anthracene	0.04	3,970	4 450	14 940	<134	16,320	646,090	NA	NA	NA
Benzo(a)pyrene	0.04	2,910	3,300	17,960	<134	8,280	590,480	NA	NA	NA
Benzo(b)fluoranthene	0.04	2,450	4,350	15,200	<134	15,620	625,680	NA	NA	NA
Benzo(g,h,i)perylene	0.04	867	1,690	<630	<134	3,920	154,250	NA	NA	NA
Benzo(k)fluoranthene	0.04	29,230	2,840	16,700	<134	5,850	521,600	NA	NA	NA
Carbazole	NP	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chrysene	0.04	3,120	3,480	13,690	<134	9,980	619,900	NA	NA	NA
Dibenzo[a,h]anthracene	1,000	3,720	972	<630	<134	1,720	108,160	NA	NA	NA
Dibenzofuran	62	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fluoranthene	1,000	11,640	8,830	18,960	<134	42,020	1 648 470	NA	NA	NA
Fluorene	1,000	3,320	1,070	<630	<134	6,810	488,260	NA	NA	NA
Indeno(1,2,3-cd)pyrene	0.04	1,030	1,820	<630	<134	4,140	184,520	NA	NA	NA
2-Methylnaphthalene	364	NA NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	200	6,810	12,970	<630	<134	14,870	290,310	NA	NA	NA
Phenanthrene	1,000	13,580	5,900	<630	<134	31,560	1,727,550	NA	NA	NA
Pyrene	1,000	8,140	5,700	17,330	<134	23,000	978,230	NA	NA	NA
TOXICITY CHARACTERISTIC	LEACHIN	G PROCEDI	JRE (TCLP)	METALS - r	ng/l					
Barium	100	0.1	12.7	0.5	0.5	0.6	0.8	NA	NA	NA
Lead	5	<0.5	0.7	<0.5	<0.5	<0.5	<0.5	NA	NA	NA
POLYCHLORINATED BIPHE	NYLS (PCB	s) - mg/kg								
Aroclor 1254	10	<7.2	<0.14	0.42	0.68	0.27	<0.08	<0.02	<0.07	0.33

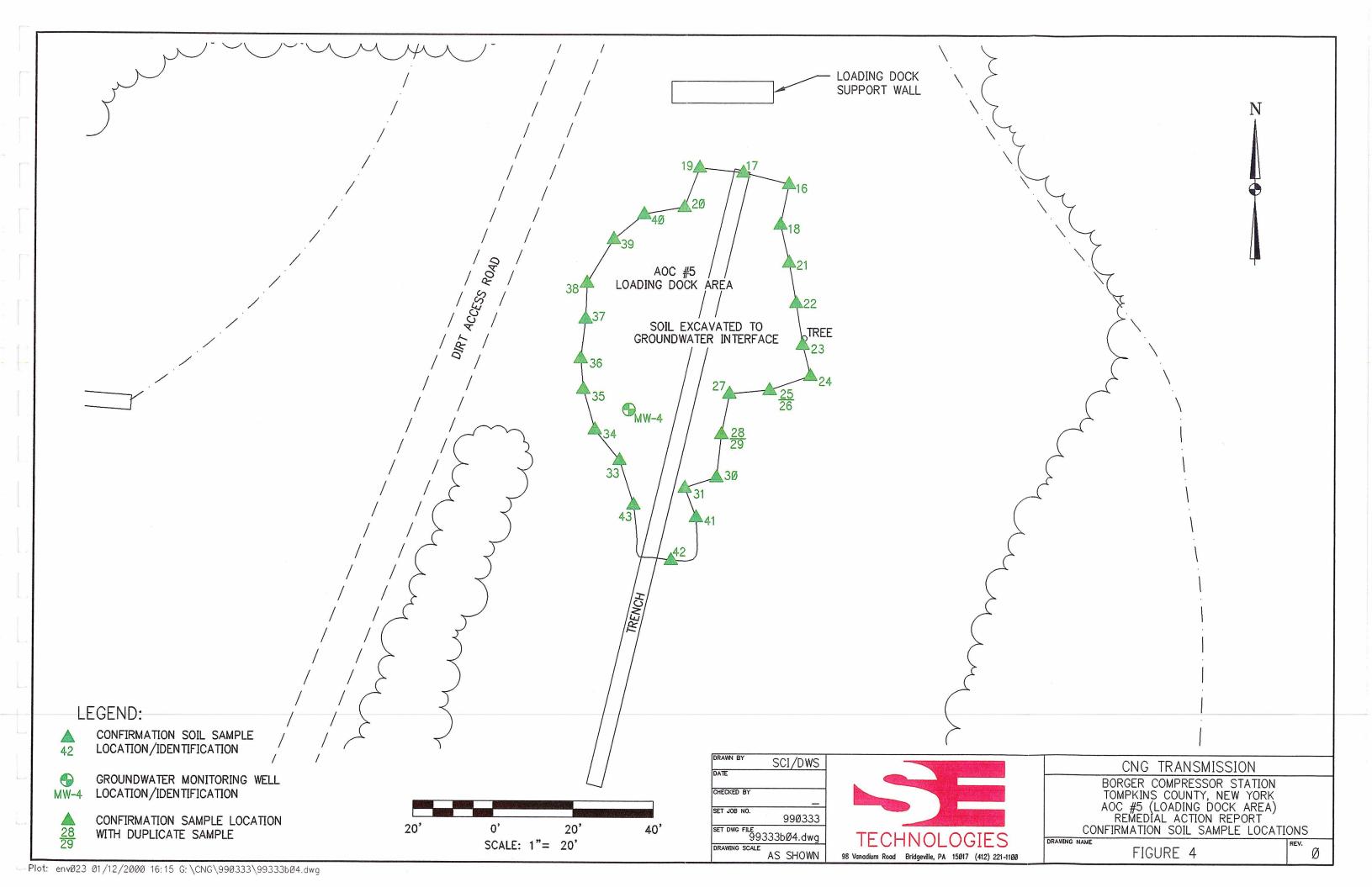
See Footnotes at End of Table.







Plot: env023 01/12/2000 16:16 G:\CNG\990333\99333b03.dwg

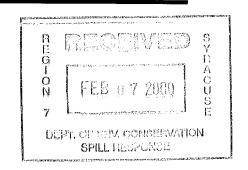


CNG Transmission

CNG Transmission RR3; Box 24 T; Westfield, PA 16950 Phone: (814) 628-6064 FAX: (814) 628-6002 email: John_D._Pastelock@cngt.cng.com

Friday, February 4, 2000

Mr. Richard J. Brazell, P. E.
Regional Spill Engineer
New York State Department of Environmental Conservation
Spill Prevention and Response, Region 7
615 Erie Blvd. West
Syracuse, New York, 13204-2400 RE: CNG



RE: CNG Transmission Corp. Borger Compressor Stn. Remedial Action Report Submittal Spill No. 98-06491

Dear Mr. Brazell:

Enclosed you will find two (2) copies of the Remedial Action Report for CNG Transmission Corporation's Borger Compressor Station. Remedial activities were initiated on September 30, 1999, and were completed by November 4, 1999. CNG Transmission Corp. employed Ryan Environmental, Inc. of Bridgeport, WV as the contractor, and SE Technologies, Inc. of Bridgeville, PA as the third party consultant. Documentation of the activities is provided in the Remedial Action Report and the two Appendix Volumes (Appendix Volume 1 and 2).

Remedial activities addressed three Areas of Concern (AOC's) at the facility: AOC #3 - the former liquids pit, AOC #4 - the drain below the field shop, and AOC #5 - the loading dock area. Excavation in AOC #5 encountered drum fragments and debris not originally found in the initial site investigation. DEC was notified of this find, and the material was re-characterized with approximately 151 tons of soil/ debris being disposed of as hazardous waste at Waste Management's Model City Landfill. The remaining soils (approximately 4978 tons) were characterized and disposed of at Seneca Meddows Landfill as a nonhazardous waste. The remedial activities also included installation of four (4) groundwater monitoring wells. Three wells were installed in the former liquid pits area (AOC #3 - one up and two down), and one well was installed in the former trash pit next to the loading dock (AOC #5 - in the down gradient direction). Monitoring commenced in the fourth quarter 1999, and will follow in a subsequent report. CNGT will monitor these wells quarterly for at least four quarters until concentrations of the constituents of concern are below the selected standards. SE Technologies, Inc. utilized soil and groundwater cleanup standards presented in the STARS Memo #1 (as outlined in the 1999

Stipulation Agreement), or the TAGM value if a STARS cleanup standard was not presented.

If you have any questions concerning this report, or any other concern, please feel free to contact me at (814) 628- 6064.

Sincerely,

John D. Pastelock

Environmental Engineer

Environmental Services