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July 26, 2004

Mr. Scott Bradley U.S. Army Corps of Engineers Engineering and Support Center, Huntsville Attn: CEHNC-FS-IS 4820 University Square Huntsville, AL 35816-1822

Subject: Seneca Army Depot Activity, Final Decision Document for the Inhibited Red-Fuming Nitric Acid (IRFNA) Disposal Site (SEAD-13)

Dear Mr. Bradley:

Parsons Engineering Science, Inc. (Parsons) is pleased to submit the Final Decision Document for the SEAD-13 Inhibited Red-Fuming Nitric Acid (IRFNA) Disposal Site at the Seneca Army Depot Activity (SEDA) located in Romulus, New York. This work was performed in accordance with the Scope of Work (SOW) for Delivery Order 0023 under Contract DACA87-95-D-0031.

Parsons appreciates the opportunity to provide the Army with this document. Should you have any questions, please do not hesitate to call me at (617) 457-7905 to discuss them.

Sincerely, HEIND, JUSTAN &

Todd Heino, P.E. / Program Manager

Enclosures

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cc: Mr. S. Absolom, SEDA Mr. T. Enroth, CENAN Mr. K. Hoddinott, USACHPPM (PROV) Mr. C. Boes, USAEC

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July 26, 2004

Mr. Julio Vazquez USEPA Region II Superfund Federal Facilities Section 290 Broadway, $18th$ Floor New York, NY 10007-1866

Mr. Joseph White New York State Department of Environmental Conservation (NYSDEC) Bureau of Eastern Remedial Action Division of Hazardous Waste Remediation 625 Broadway 11th Floor Albany, NY 12233-7015

Subject: Seneca Army Depot Activity, Final Decision Document for the Inhibited Red-Fuming Nitric Acid (IRFNA) Disposal Site (SEAD-13)

Dear Mr. Vazquez/Mr. White:

Parsons Engineering Science, Inc. (Parsons) is pleased to submit the Final Decision Document for the SEAD-13 Inhibited Red-Fuming Nitric Acid (IRFNA) Disposal Site at the Seneca Army Depot Activity (SEDA) located in Romulus, New York.

Should you have any questions, please do not hesitate to call me at (617) 457-7905 to discuss them.

Sincerely, Sincerely,
Yersis HEING
Todd Heino, P.E.

Todd Heino, P.E. Program Manage

Enclosures

cc: S. Absolom, SEDA T. Enroth, USACE E. Kashdan C. Bethoney, NYSDOH C. Boes,AEC K. Hoddinott, USACHPPM S. Bradley, USACE

US Army Engineering & Support Center Huntsville, AL

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JULY 2004

PARSONS

FINAL DECISION DOCUMENT MINI RISK ASSESSMENT SEAD-13, INHIBITED RED FUMING NITRIC ACID (IRFNA) DISPOSAL AREA

Prepared For:

SENECA ARMY DEPOT ACTIVITY ROMULUS, NEW YORK 14541 and US ARMY CORPS OF ENGINEERS HUNTSVILLE, ALABAMA 35816

Prepared By:

PARSONS

100 Summer St, 8^{th} Fl. **Boston, Massachusetts 02110**

Contract Number DACA87-95-D-0031 Delivery Order # 0023 736994-01002 July 2004

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1.0 INTRODUCTION

1.1 OBJECTIVE OF THIS DOCUMENT

On behalf of the United States Army (Army), Parsons is submitting this Decision Document for SEAD-13, located at the Seneca Army Depot Activity (SEDA or the Depot) in Romulus, New York. The goals of this decision document for the Inhibited Red Fuming Nitric Acid Disposal Site (IRFNA), SEAD-13, are to:

- 1. Assemble and summarize all of the currently known information about the site from the Expanded Site Investigation (ESI) in 1993/1994 and supplemental sampling conducted from 2000 to 2002;
- 2. Compare the available data and information with applicable guidance levels and standards and conduct a mini risk assessment in order to determine if there is an indication of potential threats to human health and the environment at the site;
- 3. Provide a recommendation that the area identified warrants no remedial action for soil, sediment, and surface water.

Additional information clarifying and substantiating recommendations pertinent to SEAD-13 is provided in the following sections of this Decision Document.

1.2 HISTORIC OVERVIEW

The SEDA lies between Cayuga and Seneca Lakes in New York's Finger Lake Region, near the communities of Romulus and Varick, NY. SEDA encompasses approximately 10,600 acres of land and contains more than 900 buildings that provide more than 4.4 million square feet of space, including approximately 1.3 million square feet of storage space. Since its inception in 1941, the mission of the SEDA was the management of various military items, including munitions. Management of these items required areas and facilities for storage, quality assurance testing, range testing, munitions washout, deactivation furnaces and other support areas such as ordnance detonation. In addition, administrative and plant operational facilities were also established in support of the depot mission. Waste management was integrated with the SEDA management mission.

Management waste materials produced from these operations has been in accordance with the requirements of the Resource Conservation Recovery Act (RCRA). As part of the requirements of RCRA, the Depot identified a total of 72 Solid Waste Management Units (SWMUs). In 1990, the Depot was included in the federal section of the National Priority List (NPL). As a federal facility listed on the NPL, provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA - 42 USC § 9620e) required that the US Army investigate the sites known to exist at SEDA and complete all necessary remedial investigations and actions at the facility. In accordance with this stipulation, the US Army, the US Environmental Protection Agency (EPA), and the New York State Department of Environmental Conservation (NYSDEC) negotiated and finalized a Federal Facility Agreement (FFA) that outlines the administrative process and the procedures that will be followed to comply with CERCLA.

In 1995, the SEDA was designated for closure under the Department of Defense's (DoD's) Base Realignment and Closure (BRAC) process. In accordance with the requirements of the BRAC process, the Seneca County Board of Supervisors established, in October 1995, the Seneca Army Depot Local Redevelopment Authority (LRA). The primary responsibility assigned to the LRA is to plan and oversee the redevelopment of the Depot. The Reuse Plan and Implementation Strategy for Seneca Army Depot was adopted by the LRA and approved by the Seneca County Board of Supervisors on October 22, 1996. Under this plan and subsequent amendment, areas within the Depot were classified according to their most likely future use. These areas currently include:

- housing;
- institutional;
- industrial;
- warehousing;
- conservation/recreational land;
- an area designated for a future prison;
- an area for an airfield, special events, institutional, and training; and
- an area to be transferred from one federal entity to another (i.e., an area for the existing navigational LORAN transmitter).

The future land use currently recommended for SEAD-13 is conservation/recreation land.

1.3 ENVIRONMENTAL SETTING

1.3.1 Geology

SEDA is located within one distinct unit of glacial till that covers the entire area between the western shore of Lake Cayuga and the eastern shore of Lake Seneca. The till is consistent across the entire depot although it ranges in thickness from less than 2 feet to as much as 15 feet with the average being only a few feet thick. This till is generally characterized by brown to gray-brown silt, clay and fine sand with few fine to coarse gravel-sized inclusions of weathered shale. Larger diameter weathered shale clasts (as large as 6-inches in diameter) are more prevalent in basal portions of the till and are probably rip-up clasts removed by the active glacier during the late Pleistocene era. The general Unified Soil Classification System (USCS) description of the till on-site is as follows: Clay-silt, brown; slightly plastic, small percentage of fine to medium sand, small percentage of fine to coarse gravel-sized gray shale clasts, dense and mostly dry in place, till, (ML) . Grain size analyses performed by Metcalf $\&$ Eddy (1989) on glacial till samples collected during the installation of monitoring wells at SEDA show a wide distribution of grain sizes. The glacial tills in this area have a high percentage of silt and clay with

trace amounts of fine gravel. A zone of gray weathered shale of variable thickness is present below the till in almost all locations at SEDA. This zone is characterized by fissile shale with a large amount of brown interstitial silt and clay.

This underlying bedrock below weathered shale is a member of the Ludlowville Formation of the Devonian age Hamilton Group. The Hamilton Group, 600 to 1,500 feet thick, is divided into four formations. They are, from oldest to youngest, the Marcellus, Skaneateles, Ludlowville, and Moscow formations. The western portion of SEDA is generally located in the Ludlowville Formation while the eastern portion is located in the younger Moscow Formation. The Ludlowville and Moscow formations are characterized by gray, calcareous shales, mudstones and thin limestones with numerous zones of abundant invertebrate fossils. The Ludlowville Formation is known to contain brachiopods, bivalves, trilobites, corals and bryozoans (Gray, 1991). In contrast, the lower two formations (Skaneateles and Marcellus) consist largely of black and dark gray sparsely fossiliferous shales (Brett *et al*., 1991). Locally, the shale is soft, gray, and fissile. **Figure 1-1** displays the stratigraphic section of Paleozoic rocks of Central New York. Three known predominant joint directions, N60°E, N30°W, and N20°E are present within this unit (Mozola, 1952).

1.3.2 Hydrogeology

Available geologic information reviewed indicates that the upper portions of the shale formation would be expected to yield small, yet adequate, supplies of water, for domestic use. Regionally, four distinct hydrologic water-bearing units have been identified (Mozola A.J., 1951). These include two distinct shale formations, a series of limestone units, and unconsolidated beds of Pleistocene glacial drift.

For mid-Devonian shales such as those of the Hamilton Group, the average yields (which are less than 15 gpm) are consistent with what would be expected for shales (LaSala, 1968). The deeper portions of the bedrock, (at depths greater than 235 feet) have provided yields of up to 150 gpm. At these depths, the high well yields may be attributed to the effect of solution on the Onondaga limestone that is at the base of the Hamilton Group. Based on well yield data, the degree of solution is affected by the type and thickness of overlying material (Mozola, 1951). Geologic cross-sections from Seneca Lake and Cayuga Lake have been constructed by the State of New York, (Mozola, 1951, and Crain, 1974). This information suggests that a groundwater divide trending north south exists approximately half way between the two Finger Lakes. SEDA is located on the western slope of this divide and therefore regional groundwater flow is expected to be primarily westward toward Seneca Lake.

Surface drainage from SEDA flows to four creeks. In the southern portion of the depot, the surface drainage flows through ditches and streams into Indian and Silver Creeks. These creeks then flow into Seneca Lake just south of the SEDA airfield. The central part and administration area of SEDA drain into Kendaia Creek. Kendaia Creek discharges into Seneca Lake near the Lake Housing Area. The majority of the northwestern and north-central portion of SEDA drains into Reeder Creek. The northeastern portion of the depot, which includes a marshy area called the Duck Ponds, drains into Kendaia Creek and then flows north into the Cayuga-Seneca Canal and to Cayuga Lake

Data from site quarterly groundwater monitoring program indicate that the saturated thickness of the till/weathered shale overburden aquifer is variable, ranging between 1 and 8.5 feet. However, the aquifer's thickness appears to be influenced by the hydrologic cycle and some monitoring wells dry up completely during portions of the year. Based upon a review of two years of data, the variations of the water table elevations are likely a seasonal phenomenon. The overburden aquifer is thickest during the spring recharge months and thinnest during the summer and early fall. During late fall and early winter, the saturated thickness increases. Depth to groundwater, which varies by season and location, ranges from 1 foot to 10 feet. Although rainfall is fairly consistent at SEDA, averaging approximately 3 inches per month, evapotranspiration is a likely reason for the large fluctuations observed in the saturated thickness of the over-burden aquifer.

Regional precipitation is derived principally from cyclonic storms that pass from the interior of the country through the St. Lawrence Valley. With local influence derived from lakes Seneca, Cayuga, and Ontario providing some lake effect snows, leading to a significant amount of the winter precipitation and a moderate the local climate. Wind velocities are moderate, but during the winter months, there are numerous days with sufficient winds to cause blowing and drifting snow. The most frequently occurring wind directions are to the south and to the northwest (**Figure 1-2**).

2.0 SUMMARY OF SITE INFORMATION AND FIELD INVESTIGATIONS AT SEAD-13

2.1 INTRODUCTION

This section provides a brief description, operational history, and results of field investigations for SEAD-13. Information for this section was acquired through a review of site records and the implementation of field investigations associated with an Expanded Site Inspection (ESI) and supplemental sampling conducted from January 2000 to April 2002. This information is presented to support recommendations provided in this document.

2.2 SITE DESCRIPTION

The Inhibited Red Fuming Nitric Acid (IRFNA) disposal site is located in the northeastern portion of SEDA (**Figure 2-1**). The site includes two IRFNA disposal areas, SEAD-13-East and SEAD-13-West, located on the eastern and western sides of the south end of the Duck Pond, respectively, near the entrance of its source tributary (**Figure 2-2**). The ground surface for both areas is less than two feet higher than the water level of the Duck Pond. SEAD-13-East is bound by mostly deciduous trees and East-West Baseline Road to the north, by deciduous trees and grassland to the east and south and by the Duck Pond to the west. SEAD-13-West is bound by grassland and low brush to the north, west and south and by the Duck Pond to the east. The extension of East-West Baseline Road is located approximately 100 feet north of the western area.

SEAD-13-East is comprised of six elongated disposal pits (possibly seven) that are visible on the ground surface immediately south of a dirt access road off of East-West Baseline Road. The pits, which are each generally 20 to 30 feet long, oriented east to west, are marked by sparse vegetation, crushed shale and 1-inch limestone pieces at the surface. Vertical water and shower pipes are located west of the pits. These pipes are discussed in greater detail in **Section 2.5.4**.

SEAD-13-West, which is located at the end of a dirt road off of East-West Baseline road, is comprised of a broad, low plain which extends to the shoreline of the Duck Pond. The area has no visible evidence of former IRFNA disposal pits at the surface, however, there is an area that is characterized by sparse vegetation and some crushed shale. The surface does not resemble the visible pits observed in SEAD-13-East. A vertical shower pipe and head is located in the eastern portion of this area, approximately 50 feet from the Duck Pond. These pipes are discussed in greater detail in **Section 2.5.4**.

Within SEDA, pedestrian and vehicular access to both of the disposal areas is not restricted, although it is more difficult to reach the western area.

2.3 HISTORIC OPERATIONS

The IRFNA Disposal Site (SEAD-13) was active during the early 1960s to dispose of quantities of unserviceable IRFNA. IRFNA is an oxidizer used in missile liquid propellant systems (Dept. of Sanitary Engineering Study No. 3642E4-60, 1960). Its composition is 81.3%-84.5% nitric acid (HNO₃), 13%-15% nitrogen dioxide (NO₂), 0.5%-0.7% hydrofluoric acid (HF) and 2.0%-3.0% water (H2O). The disposal areas at SEAD-13 involved shallow trenches partially filled with limestone or slaked lime. The SEAD-13 site consisted of six pits, which were 30 feet long, 8 feet wide and 4 feet deep, and they were suspected to be located in two separate areas, SEAD-13-East and SEAD-13-West. The pits were excavated to the native shale at a depth of approximately 4 feet below ground. Following excavation, limestone was placed in the bottom of the pits to a depth of approximately 2.5 feet below ground. The sides of the pits were also lined with limestone. Barrels of unserviceable IRFNA were stored on pallets near the west end of each of the pits. A stainless steel ejector, operated by water pressure, was fitted into a barrel with water flowing through the ejector. The ejector discharged a mixture of water and IRFNA through a long polyethylene hose under the water surface in the pit being used. During this period, the IRFNA was allowed to mix with the limestone in the pit to facilitate the neutralization of the acid. Five minutes were required to empty a barrel. Ten barrels were usually discharged into a single pit during a day's operation. At present, the site has been abandoned.

2.4 DESCRIPTION OF FIELD INVESTIGATIONS

An ESI was conducted from November 1993 to February 1994. The investigations included the following procedures:

- geophysical investigations;
- surface and subsurface soil sampling;
- monitoring well installation, development and sampling; and
- surface water and sediment sampling.

Additional sampling was conducted from September 2000 to April 2002 included sample collection from all media (i.e., surface and subsurface soil, groundwater, surface water, and sediment). The results of these investigations are provided in **Sections 2.4**, **2.5**, and **2.6**. Data from each media were compared to available New York State and Federal standards, guidelines, and criteria (SCG).

The soil criteria were obtained from the NYSDEC Technical and Administrative Guidance Memorandum (TAGM) titled "Determination of Soil Cleanup Objectives and Cleanup Levels" (HWR-92-4046) issued in November 1992 and revised in January 1994. This document provides criteria for soil clean-up levels. Although these criteria have not been promulgated, they are useful guidelines for comparing on-site soil concentrations to determine if site conditions warrant further actions.

For the metals in soil, the TAGM criteria are the greater of either a value or the SEDA background concentration. The site background values for metals in soil are the 95th percentile of a background data set that has been compiled from 55 soil samples collected over several years of investigations. The TAGM guidelines were used for the following metals: barium, cobalt, mercury, selenium, and vanadium. The SEDA background soil concentrations were used for the following metals: aluminum, antimony, arsenic, beryllium, cadmium, calcium, chromium, copper, iron, lead, magnesium, manganese, nickel, potassium, silver, sodium, thallium, and zinc.

TAGM criteria provide specific standards for individual VOCs, SVOCs, and pesticides, as well as guidelines for total VOCs, SVOCs, and pesticides.

Maximum Concentration

The groundwater results are compared to the NYSDEC Ambient Water Quality Class GA Standards and Guidelines.

The surface water criteria are the NYSDEC Ambient Water Quality Class C Standards and Guidelines. The surface water criteria for several metals are based on the hardness of the surface water. The average surface water hardness for SEDA (217 mg/L) was calculated using data from two upstream surface water samples: 232 mg/L at SW-801 from the Ash Landfill remedial investigation and 201 mg/L at SW0196 from the OB Grounds remedial investigation. The average hardness was used to calculate the NYSDEC surface water criteria for the following analytes: chromium, copper, lead, nickel, zinc, and fluoride.

Sediment criteria were guidance values from NYSDEC, Division of Fish and Wildlife. The most stringent of the sediment criteria for wildlife, human health, or for aquatic life were used as the criteria. For metals, the criteria were the more stringent of the criteria for aquatic life or the Limit of Tolerance (LOT) values (listed in the same document as the criteria).

2.4.1 Geophysics

Ground penetrating radar (GPR) and Electromagnetic-31 geophysical unit (EM-31) surveys were conducted in 1993/1994 to locate the six abandoned disposal pits and to evaluate the potential presence of IRFNA barrels in the subsurface. GPR was used to identify areas of disturbed soils that could be associated with the IRFNA pits. The EM-31 data was collected on profiles spaced at 10-foot intervals throughout the two areas where the pits are presumed to be located. EM-31 measurements were made at 5-foot spacing along each profile. A total of 12,180 linear feet of EM-31 surveys were conducted at SEAD-13. The GPR data were collected along profiles spaced at 20-foot intervals. Additional GPR data were collected in order to delineate the extent of the pits for a total of 7,495 linear feet of GPR surveys were conducted at SEAD-13.

In addition to GPR and EM-31 surveys, four 115-foot seismic refraction surveys were performed as part of the geophysical investigations at SEAD-13. These surveys were performed along two lines laid out perpendicular to each other on each side of the Duck Pond. Data from the surveys were used to determine the direction of groundwater flow, and to adjust the location of the monitoring wells so that one would be located upgradient and one downgradient of the disposal pits.

2.4.2 Soils

As part of the ESI in 1993, ten borings were drilled at SEAD-13. Five soil borings were advanced within each of the two disposal areas. Three samples were collected from each boring, including one surface soil sample (0-2 feet) and two subsurface samples (2-13 feet). Samples were analyzed for Target Compound List volatile organic compounds (TCL VOCs), semivolatile organic compounds (SVOCs), pesticides/polychlorinated biphenyls (PCBs), Target Analyte List (TAL) metals, cyanide, explosives, herbicides, nitrates, and fluoride.

Supplemental data were collected in August 2001. Four new soil borings were drilled (SB13-11, SB13-12, SB13-13, and SB13-14), and one subsurface sample (6-8 feet or 8-10 feet) was collected in each new boring. Surface soil (0-2 feet or 0-2 inches) samples were collected at eleven locations, four of which corresponded to the locations of the new soil borings. All sampling locations are shown on **Figure 2-3**. Soil samples were analyzed for TCL VOCs, SVOCs, Pesticides/PCBs, TAL metals, cyanide, explosives, herbicides, nitrates, and fluoride.

2.4.3 Groundwater

As part of the ESI, a total of seven monitoring wells were installed at SEAD-13: Four wells were installed on the east side of the Duck Pond, and three wells were installed on the west side of the pond. The three wells installed on the west side were positioned to investigate rumors that a disposal area was located on the west side. The Army investigated the assumed west disposal area due to the presence of the aboveground piping. It appears that the piping was installed in the event that it could be required at a later date.

On the east side of the Duck Pond, as part of the ESI, one monitoring well (MW13-1) was installed upgradient of the disposal area to obtain background water quality data; one well (MW13-2) was located within the disposal area; and two wells (MW13-3 and MW13-7) were installed near the downgradient edge of the east disposal area. The geophysical survey indicated that groundwater flows west on the east of the pond and east on the west side of the pond (i.e., groundwater discharges directly into the pond). As a result, the background wells were moved slightly to the north and the two downgradient wells were moved to the south of the proposed work plan locations. Additional discussion about groundwater flow directions is included in **Section 2.5.5**.

One monitoring well was constructed at each designated location and was screened over the entire thickness of the aquifer above competent bedrock. At MW13-3, an additional shallower well, MW13-7, was installed and screened between 5.0 and 7.0 feet below the ground surface. Both wells were dry. Following installation and development, one groundwater sample was collected from each of the five wells (two wells were dry), using a high-flow sampling method, and tested for VOCs, SVOCs, pesticides/PCBs, metals, cyanide, herbicides, nitrate/nitrite-nitrogen, and fluoride.

Additional groundwater sampling was conducted in 2001 and 2002 using a low-flow sampling method. Four additional monitoring wells were installed. MW13-11 was installed approximately 30-50 feet to the southwest of wells MW13-3 and MW13-7, at the downgradient edge of the high conductivity area, identified during the geophysical testing. MW13-11 was added to replace MW13-3 and MW13-7, which have been consistently dry. MW13-12 was installed in SEAD-13-West, and MW13-13 and MW13-14 were installed in the east disposal area. Since the new wells were installed, two rounds of groundwater sampling were conducted in 2001 and 2002. The recent sampling was conducted on the five existing wells (MW13-1, MW13-2, MW13-4, MW13-5, and MW13-6) and the four new wells (MW13-11, MW13-12, MW13-13, and MW13-14). Groundwater samples were analyzed for nitrates, metals, cyanide and SVOCs.

2.4.4 Surface Water and Sediment

To assess the potential impact of the IRFNA disposal pits on adjacent surface water bodies, three sediment and surface water sample sets were collected from within the Duck Pond in 1993. The surface water and sediment sampling locations are shown on **Figure 2-3**. One surface water and sediment sample set (SW13-3 and SD13-3) was used to obtain background surface water and sediment quality data. It was collected at a location near where a small stream enters the Duck Pond. The other two surface water samples were collected along the edges of the Duck Pond downgradient of SEAD-13-East and SEAD-13-West, at SW13-1 and SW13-2, respectively. The exact locations of the other two sample sets were determined based on an inspection of the site and our understanding of

groundwater discharge to the pond. The locations were also selected based on stressed vegetation and proximity to the pits. In 1993, the sediment and surface water sample sets were collected at these same locations and were tested for VOCs, SVOCs, explosives, pesticides/PCBs, herbicides, metals, cyanide, fluoride, and nitrate/nitrite-nitrogen.

Surface water samples collected in 1993 had unusually high aluminum concentrations. Consequently, confirmatory samples were collected in January 2000 at SW13-4, SW13-5, and SW13–6 to confirm the presence of aluminum. Three surface water samples were collected upgradient from SEAD-13 to find the possible source of aluminum. Two of these samples were collected from Kendig Creek: one downstream (SW13-7) and a sample and a duplicate upstream (SW13-8) of the location where a swale originating from the sewage treatment plant flows into Kendig Creek. One surface water sample was collected from the swale that originates from the sewage treatment plant (SW13-9). **Figure 2-4** presents the location of all of the surface water samples collected at or near SEAD-13. The samples collected in January 2000 were only analyzed for aluminum, pH, turbidity, and specific conductivity. No sediment samples were collected during this time.

In 2001, surface water samples were collected at five of the six surface sample locations adjacent to SEAD-13 (SW13-1, SW13-2, SW13-3, SW13-4, and SW13-5). Sediment samples were collocated with the surface water samples from all locations (SD13-1, SD13-2, SD13-3, SD13-4, SD13-5, and SD13-6). The surface water and sediment samples were analyzed for SVOCs, metals, cyanide, and nitrate/nitritenitrogen.

2.5 RESULTS OF FIELD INVESTIGATIONS

2.5.1 Seismic Survey

A total of seven seismic profiles were conducted at SEAD-13: four on the eastern side of the pond and three on the western. In all of the profiles the zero point for the survey was at the end of the profile closest to the center of the site. The profiles detected 7 to more than 20 feet of till (seismic velocities from 1,100 to 7,900 ft/s) overlying bedrock (9,500 to 11,700 ft/s). In particular, the till material included unsaturated till $(1,100 \text{ to } 2,100 \text{ ft/s})$, saturated till $(4,200 \text{ to } 6,300 \text{ ft/s})$, and dense glacial till (7,900 ft/s).

Although several of the seismic profiles were conducted on saturated ground, seismic velocities characteristic of saturated till were interpreted to be located at a depth of 3 to 6 feet along these profiles. It is common in swampy areas to encounter a low-velocity near-surface layer. This may be attributed to the effects of entrapped gas in swamp deposits and the inability of the seismic method to accurately resolve layers substantially thinner than the wavelength of the seismic energy. In spite of these limitations, results of seismic refraction survey suggest that groundwater flows to the west or

northwest at SEAD-13-East. The seismic survey conducted at SEAD-13-West shows groundwater at a uniform level; therefore, a flow direction could not be reliably determined.

Unusually low bedrock velocities (9,400 to 9,500 ft/s) were detected on the east side of the pond. These velocities are characteristic of weathered rock. The profiles near MW13-3 measured a basal velocity of only 7,900 ft/s, which is within the expected range of dense glacial till. Based on the seismic survey, it is likely that the depth to competent bedrock exceeds 20 feet beneath that profile. Monitoring well MW13-3, drilled on the eastern side of the pond, was augured to a depth of 23 feet without encountering refusal (i.e., competent shale).

2.5.2 Electromagnetic Survey

Figure 2-5 shows the EM-31 survey results for SEAD-13. SEAD-13-East shows a pronounced linear anomaly projecting from the western edge towards the center of the electromagnetic (EM) grid. This feature is attributed to a pipe, two inches in diameter that can be seen on the ground surface.

This pipe terminates at the vertical shower pipe located in the west-central portion of the grid. The other pronounced EM anomaly at SEAD-13-East is a zone of elevated conductivities in the central and northern portions of the grid. The high conductivities measured in the groundwater sample collected from MW13-2 suggest that this EM anomaly represents an area with impacted groundwater with a high concentration of dissolved ionic solids. It is likely that the groundwater contains dissolved salts, a by-product of the former activities at this site which involved the disposal and neutralization of acids. The suspected contaminated area originates in the vicinity of the former pits and extends towards the west-northwest presumably in the suspected direction of groundwater flow.

The apparent conductivity measured in the grid at SEAD-13-West also shows several anomalies, each attributed to pipes. The pronounced north-treading zone of elevated conductivities occurring in the western portion of the grid is caused by a pipe running parallel to the EM lines. A second pipe, trending east to west, is marked by a linear zone of low conductivities originating near the northern edge of the grid. Low conductivities are measured by the EM-31 directly over a pipe if the boom of the instrument is oriented perpendicular to the pipe.

The reverse is true if the pipe is parallel to the orientation of the boom. Alignment of EM anomalies suggests that this second pipe connects with the pipe located on the eastern side of the pond. The apparent conductivity anomaly in the eastern portion of the EM grid is caused by a third pipe running between a water valve seen protruding from the pond and the vertical shower head located in the eastern portion of the grid.

SEAD-13-East shows a generally featureless response. A weak signature from the pipe is evident on the western side of the grid. A small isolated anomaly is located directly south of the pipe. The circular in-phase anomaly along the southern edge of the grid is the effect of metallic debris lying on the surface. The in-phase response from the grid at SEAD-13-West is dominated by the north to south trending pipe running through the surveyed area.

2.5.3 GPR Survey

A ground penetrating radar (GPR) survey was conducted at both SEAD-13-East and SEAD-13-West to determine the location of the former IRFNA disposal pits. Data quality was degraded in certain areas due to standing water from recent rainfall. Penetration was limited to less than 30 nanoseconds (ns) or about 3 to 4 feet. Preparation for the geophysical surveys involved the cutting of tall grass, brush, and small trees throughout the area of investigation. At SEAD-13-East, seven or eight former pits were identified by visual inspection following the removal of vegetation. The pits were typically 10 to 15 feet wide by 40 to 50 feet long (according to the geophysical survey). The pits were located along a north to south line within the central portion of the geophysical grid. The pits are characterized by a disruption in the normal layering of the overburden. Without prior knowledge concerning the location of these pits, positive identification from the GPR records alone would have been difficult. The amplitude of the GPR reflections in the vicinity of the former pits was unusually weak. This is the effect of enhanced attenuation of the radar signal due to the higher ground conductivity in this area, as demonstrated by the EM survey.

No evidence of former IRFNA disposal pits was found at SEAD-13-West. There were no welldefined zones of sparse vegetation, no elongated depressions in the surface topography, no crushed limestone visible on the surface, and no geophysical response that would suggest the presence of former pits.

2.5.4 Abandoned Pipes

A set of vertical piping was identified at SEAD-13. A vertical shower pipe and head, approximately 2 inches in diameter, are located in both the eastern and western side of the site. In the 1960 Report of sanitary engineering study No. 364214-60 "Disposal of Inhibited Red Fuming Nitric Acid by Soil Absorption, Seneca Ordnance Depot;" the vertical piping at SEAD-13-East was identified as vertical water and shower piping, likely used during the IRFNA disposal project as an emergency shower; however, the uses of the piping observed in SEAD-13-West, though similar in structure to that observed in SEAD-13-East, remains unknown (Final SWMU Classification Report, Parsons Engineering-Science Inc., 1994). An abandoned water hydrant was observed southwest of the Duck Pond. Possibly, this water hydrant was used to supply water pressure to the stainless steel ejector. Also, a set of the aboveground piping was identified southeast of the Duck Pond and two sets of vertical piping were visible in the water southwest of the Duck Pond.

Based on the EM survey (**Figure 2-5**), the approximate location of the underground piping at SEAD-13 is presented in **Figure 2-6**. It appears that the underground piping originates from a pumping station south of SEAD-13-West. The piping runs north through the western portion of the site to the fire hydrant and water valve at the northern edge of SEAD-13-West. The EM survey suggests that the piping turns eastward and runs from the water valve through the location of the vertical piping, visible on the west side of the pond, underneath the Duck Ponds, and then connects to the visible vertical piping on the east side of the pond. This east-west pipe terminates at the vertical shower pipe located in the center of SEAD-13-East. In addition, there is a segment of piping at SEAD-13-West that runs from the vertical pipe on the northeast corner of SEAD-13-West to the location of the vertical shower pipe, to the south. There is little information about the previous usage of the pipes; however, the Army reports that all existing water lines in the IRFNA disposal area were capped and abandoned during installation of a new water distribution line in the mid-1980s. The piping at SEAD-13 is not connected to any water distribution system currently in operation at SEDA.

2.5.5 Groundwater Flow and Elevation

Based on groundwater elevations recorded during the April 2002 sampling event, groundwater flow direction is shown on **Figure 2-7**. The presumed direction of groundwater flow was to the west for SEAD-13-East. The geophysical survey indicated that groundwater flows west on the east of the pond and east on the west side of the pond (i.e., groundwater discharges directly into the pond).

At the presumed west disposal area, groundwater results show that the nitrate concentrations are not elevated in the assumed area of the west disposal area. The nitrate concentrations (up to 0.17 mg/L) are well below the Class GA standard of 10 mg/L. As a comparison, the nitrate concentrations are over 1,000 times higher in the east disposal area. Since there is no actual source material, upgradient and downgradient determinations cannot be made. As shown on **Figure 2-7**, based on the April 2002 sampling event, groundwater appears to flow in a northeasterly direction, towards the Duck Pond.

Depth to groundwater, which varies by season and location, ranges from 1 foot to 10 feet.

2.6 SUMMARY OF ANALYTICAL RESULTS

Results of the chemical analyses are summarized in **Appendix A** (**Tables A-1** through **A-4** for soil, groundwater, surface water, and sediment, respectively); and complete analytical results are provided in **Appendix C** (**Tables C-1** through **C-4)**.

2.6.1 Surface Soils

2.6.1.1 Volatile Organic Compounds
No VOCs were detected in the surface soils at SEAD-13, with the exception of acetone, chloroform, methyl ethyl ketone, and toluene, which were detected in one sample at low concentrations well below their respective TAGM values. The maximum detected concentration of acetone was 86 µg/Kg in the surface soil sample SB13-6-1 at SEAD-13-West. The VOCs acetone, methyl ethyl ketone, and toluene are considered to be common laboratory contaminants. Based on the low frequency of detection and the low concentrations detected, these compounds can potentially be attributed to the laboratory and not site conditions.

2.6.1.2 Semivolatile Organic Compounds

Semivolatile organic compounds were found at varying concentrations in the surface soil samples collected at SEAD-13. In general, the concentrations of SVOCs were low, with only concentrations of 4-methylphenol, benzo(a)pyrene, dibenz(a,h)anthracene, and phenol exceeding their TAGM values in one sample. The TAGM criteria for 4-methylphenol $(500 \mu g/Kg)$ and phenol $(30 \mu g/Kg)$ were exceeded in one surface soil sample, SB13-10-1, collected in SEAD-13-West. The duplicate collected at SB13-10 had trace amounts of these analytes that were below the detection limit. In the surface soil sample SS13-6 collected during the 2001 field investigation, the maximum concentration of dibenz(a,h)anthracene, 15 μ g/Kg, barely exceeded the TAGM value of 14 μ g/Kg. In the same surface soil sample, benzo(a)pyrene concentration (110 μ g/Kg) exceeded the TAGM value of 61 μ g/Kg. In the duplicate sample collected at SS13-6, the concentration of benzo(a)pyrene was significantly below the TAGM value, and dibenz(a,h)anthracene was not detected with a quantitation limit of 73 μ g/Kg. A few samples contained phthalates: bis(2-ethylhexyl)phthalate was detected five times at concentrations ranging from 27 J μ g/Kg to 1900 J μ g/Kg; di-n-butylphthalate was detected twice at concentrations of 8.6 J $\mu g/Kg$ and 140 $\mu g/Kg$; di-n-octylphthalate was detected twice at concentrations of 7.7 J μ g/Kg and 210 J μ g/Kg. All of the identified detections were less than their respective TAGM 4046 values. Phthalates are common laboratory contaminants, and their presence in these samples phthalates can potentially be attributed to the laboratory.

2.6.1.3 Pesticides and PCBs

Only one pesticide compound was detected in the 13 surface soil samples analyzed for pesticides at SEAD-13. The pesticide, 4,4'-DDE, which was found in only one sample, SB13-2-1 (SEAD-13-East), at an estimated concentration of 3.6 µg/Kg was below the TAGM value of $2,100 \mu$ g/ Kg .

2.6.1.4 Herbicides

No herbicide compounds were detected in the surface soil samples collected from SEAD-13.

2.6.1.5 Metals

Various surface soil samples were found to contain metals at concentrations that exceed the associated TAGM values. Of the 23 metals reported, 13 were found in one or more samples at concentrations above the TAGM values. A few metals (copper, lead, and nickel) were identified in more than 5 out of 30 samples at levels above the TAGM value.

Copper was detected at concentrations exceeding the TAGM value (33 mg/Kg) in nine of the surface soil samples. Most were only slightly above the TAGM value with a maximum copper concentration of 84.2 mg/Kg detected in the soil sample SB13-1 (SEAD-13-West).

Lead was detected at concentrations that exceeded the TAGM value of 24.8 mg/Kg in 9 of the 30 surface soil samples. Six of the nine samples were only slightly above the TAGM value. Lead was detected in surface soil samples SS13-1 and SS13-9 at concentrations of 65.7 mg/Kg and 64.9 mg/Kg, respectively. The maximum concentration of lead, 75.6 mg/Kg, was detected in sample SS13-6. It is noted that a duplicate sample was collected at SS13-6 with a lead concentration of 35.1 mg/Kg.

Nickel concentrations exceeded the TAGM value (49 mg/Kg) in eight of the surface soil samples. Most slightly exceeded the criteria, with a maximum concentration of 71.1 mg/Kg detected in soil sample SB13-13 (SEAD-13-East).

2.6.1.6 Nitroaromatics

No nitroaromatic compounds were detected in the surface soil samples collected at SEAD-13.

2.6.1.7 Indicator Compounds

The surface soil samples at the site were analyzed for nitrate/nitrite-nitrogen and fluoride, which were considered indicator compounds based on the types of materials disposed in the pits at SEAD-13. There are no TAGM values for either of these compounds. Nitrate/nitrite-nitrogen concentrations ranged from a low of 0.02 mg/Kg to a high of 27.9 mg/Kg, found in the surface soil sample SB13-13 (SEAD-13-East). Fluoride concentrations ranged from a low of 24 mg/Kg, to a high of 154 mg/Kg detected in surface soil sample SB13-7-1. Both of these borings are located in SEAD-13-East.

2.6.2 Subsurface Soils

2.6.2.1 Volatile Organic Compounds

Methylene chloride, carbon disulfide, and toluene were detected at low concentrations in at least one of the 20 subsurface soil samples analyzed; however, none of these concentrations exceeded their respective TAGM values. Methylene chloride was found in three subsurface soil samples at an estimated concentration of 4 μ g/Kg. Methylene chloride is considered to be a common laboratory contaminant, and given the number of samples in which it was detected, and the low concentrations, it can potentially be attributed to the laboratory and not to site conditions. Carbon disulfide was detected in one sample, SB13-1-4 (at SEAD-13-East), at an estimated concentration of $2 \mu g/Kg$. Toluene was found at an estimated concentration of $2 \mu g / Kg$ in one sample, SB13-5-5.

2.6.2.2 Semivolatile Organic Compounds

Several SVOCs (benzo(b)fluoranthene, benzo(g,h,i)perylene, bis(2-Ethylhexyl)phthalate, chrysene, di-n-octylphthalate, di-n-butylphthalate, fluoranthene, phenanthene, and pyrene) were detected in the subsurface soil samples. However, none of the SVOC concentrations exceeded the TAGMs.

2.6.2.3 Pesticides and PCBs

No pesticide or PCB compounds were detected in the subsurface soil samples.

2.6.2.4 Herbicides

No herbicide compounds were detected in the subsurface soil samples collected from SEAD-13.

2.6.2.5 Metals

Several samples were found to contain metals at concentrations that exceeded the associated TAGM values. Twelve metals were found in one or more samples at concentrations above the TAGM values. Six metals (chromium, iron, nickel, potassium, sodium, and thallium) were identified in at least 3 out of 25 samples at concentrations above their associated TAGM values.

Chromium was detected at concentrations slightly above the TAGM value (29.6 mg/Kg) in 3 of the subsurface soil samples collected. The highest concentration, 35.8 mg/Kg, was detected in the soil sample SB13-4-3 at SEAD-13-West. Other elevated concentrations were detected in samples SB13-8-2 (32.4 mg/Kg) and SB13-10-5 (30.8 mg/Kg), which are from SEAD-13-East and SEAD-13-West, respectively.

Iron was detected at concentrations slightly above the TAGM value (36,500 mg/Kg) in 4 of the subsurface soil samples collected. The maximum concentration, 42,500 mg/Kg, was detected in the soil sample SB13-4-3 at SEAD-13-West. Other elevated concentrations were detected in samples SB13-8-2 $(41,100 \text{ mg/Kg})$ and SB13-10-5 $(36,800 \text{ mg/Kg})$, which were from SEAD-13-East and SEAD-13-West, respectively.

Nickel concentrations slightly exceeded the TAGM value (49 mg/Kg) in 4 of the subsurface soil samples collected. A maximum concentration of 57.1 mg/Kg was detected in the soil sample SB13-10-4 (SEAD-13-West).

Thallium concentrations slightly exceeded the TAGM value of 0.7 mg/Kg in 4 subsurface soil samples. The highest was an estimated concentration of 0.78 mg/Kg in SB13-7-2 (SEAD-13-East).

2.6.2.6 Nitroaromatics

No nitroaromatic compounds were detected in the subsurface soil samples collected at SEAD-13.

2.6.2.7 Indicator Compounds

The subsurface soil samples were analyzed for nitrate/nitrite nitrogen and fluoride, which were considered indicator compounds based on the types of materials disposed in the pits at SEAD-13. Nitrate/nitrite-nitrogen concentrations ranged from 0.02 mg/Kg to 176 mg/Kg, with the highest concentration found in subsurface soil sample SB13-2.5 located in the central portion of SEAD-13-East. Fluoride concentrations ranged from 11.7 mg/Kg to a high of 193 mg/Kg, found in subsurface soil sample SB13-5.5, located in the central portion of SEAD-13-West.

2.6.3 Groundwater Sampling Summary

Groundwater concentrations of constituents were compared to the New York Ambient Water Quality Standards (NY AWQS) Class GA groundwater criteria. The summary of chemical analyses is presented in **Table A-2** in **Appendix A**. The following sections describe the nature and extent of groundwater contamination identified at SEAD-13.

2.6.3.1 Volatile Organic Compounds

No VOCs were detected in the 22 groundwater samples collected at SEAD-13.

2.6.3.2 Semivolatile Organic Compounds

Several SVOCs, 2-methylnaphthalene, bis(2-ethylhexyl)phthalate, butylbenzylphthalate, diethyl phthalate, and pyrene, were detected in four groundwater samples collected at SEAD-13; however, bis(2-ethylhexyl)phthalate was the only compound to exceed its criteria. A maximum concentration of bis(2-ethylhexyl)phthalate was 23 µg/L, which was found in the sample MW13-5. $Bis(2-ethylhexyl)$ phthalate concentrations were above the criteria value of $5 \mu g/L$, however, this phthalate is a common laboratory contaminant. Therefore, this compound can be potentially attributed to the laboratory and not to site conditions.

2.6.3.3 Pesticides and PCBs

No pesticides or PCBs were found in the six groundwater samples analyzed for pesticides and PCBs.

2.6.3.4 Herbicides

No herbicides were found in the six groundwater samples collected at SEAD-13 and analyzed for herbicides.

2.6.3.5 Metals

Eleven metals (aluminum, antimony, arsenic, chromium, iron, lead, magnesium, manganese, nickel, selenium, and sodium) were found in the groundwater samples at concentrations above the Class GA criteria. Magnesium was found in most of the monitoring wells at concentrations above the criteria value of 35,000 μ g/L. The maximum concentration for magnesium, 314,000 μ g/L, was found in the groundwater sample collected from monitoring well MW13-13 at SEAD-13-East during the 2002 sampling round. Iron exceeded the NYSDEC Class GA criteria in seven of the wells sampled (MW13-1, MW13-2, MW13-4, MW13-6, MW13-11, MW13-12, and MW13-13). The maximum concentration, 97,900 µg/L, was detected in the groundwater sample collected from monitoring well MW13-13, which is located in SEAD-13-East, during the sampling conducted in 2001.

Manganese was found in thirteen of the 22 samples at concentrations exceeding the NYSDEC Class GA groundwater standard of 300 μ g/L, with a maximum concentration of 3210 μ g/L found in the groundwater sample collected from monitoring well MW13-13 at SEAD-13-East in 2001. Chromium and lead were found in MW13-1 and MW13-13 at concentrations above their criteria values. The maximum concentrations of 109 μ g/L for chromium and 34.8 μ g/L for lead were found in MW13-13 in 2001and in MW13-1 in 1994, respectively.

Antimony was found in five of the 22 samples at concentrations exceeding the NYSDEC Class GA groundwater standard of 3 μ g/L. Detected concentrations of antimony ranged from 2.1 J μ g/L in MW13-13 to a maximum value of 52.7 μ g/L at MW13-6, which were detected during high flow sampling in 1994.

2.6.3.6 Indicator Compounds

The groundwater samples were analyzed for nitrate/nitrite-nitrogen and fluoride, which were considered indicator compounds based on the types of materials disposed in the pits at SEAD-13. Five of the ten groundwater samples had nitrate (expressed as nitrogen) concentrations above the criteria value of 10 mg/L. The maximum nitrate value detected was 731 mg/L in sample MW13-13, which is located downgradient from the former IRFNA pits in SEAD-13-East. **Figure 2-8** shows the nitrate and nitrite concentrations in the groundwater samples. **Figure 2-9** shows the delineation of the nitrate/nitrite plume. The nitrite (expressed as N) concentrations were all below the criteria value of 1 mg/L, except the concentrations at MW13-11 and MW13-14, which were detected at 2.1 mg/L and 1.1 mg/L, respectively. Fluoride was detected at concentrations ranging from 0.1 to 0.45 mg/L. All of the reported concentrations were below the Class GA Standard of 1.5 mg/L.

2.6.3.7 Turbidity and pH Results

Immediately prior to groundwater sampling, field parameters, including pH, were collected from each monitoring well sampled. As depicted on **Figure 2-10**, a review of groundwater sampling parameters shows that the pH of the groundwater at SEAD-13 is not lowered and is in the same range as the pH of groundwater at other background locations at SEDA. The pH levels measured at the site do not cause additional leaching of metals.

The elevated metals concentrations correlate with higher turbidity levels. The maximum concentrations of magnesium, iron, manganese, and chromium were all detected in the groundwater during the September 2001 sampling round at MW13-13, where the turbidity measurement was 999 NTUs as compared to a turbidity of 13.7 NTUs in April 2002. In general, the metals results were significantly lower where turbidity values were lower. For instance, the following table of results for MW13-13 demonstrates this.

There are metals concentrations that exceed Class GA Standards, however, there is no defined plume of high metals concentrations. As demonstrated above, the highest concentrations of metals were due to a sampling event where high turbidity groundwater was analyzed.

2.6.4 Surface Water Sampling Summary

The results of the surface water chemical analyses are presented in **Table A-3** in **Appendix A**. The following sections describe the nature and extent of surface water impacts identified at SEAD-13.

2.6.4.1 Volatile Organic Compounds

No VOCs were found in the three surface water samples collected at SEAD-13 and analyzed for VOCs.

2.6.4.2 Semivolatile Organic Compounds

The only SVOCs detected in the surface water samples at SEAD-13 were 4-methylphenol, isophorone, and phenol. 4-methylphenol and isophorone were detected below the Class C Standard. The one detection of phenol, 9.3 μ g/L, was at a concentration slightly above the Class C Standard of $5 \mu g/L$.

2.6.4.3 Pesticides and PCBs

No pesticide or PCB compounds were found in the surface water samples collected at SEAD-13.

2.6.4.4 Herbicides

No herbicide compounds were found in the surface water samples collected at SEAD-13.

2.6.4.5 Metals

Several metals were detected; however, only aluminum and iron concentrations were detected above the NYSDEC AWQC criteria. The highest concentration of aluminum $(3,830\mu g/L)$ and the highest concentration of iron $(5,870 \,\mu\text{g/L})$ were found in the samples SW13-1 and SW13-3, respectively, which were collected on the east side of the pond. The elevated aluminum and iron concentrations were likely associated with the turbidity. Turbidity measurements of samples collected in January 2000 were low, ranging from 3 Nephelometric Turbidity Units (NTUs) to 5.7 NTUs; and, for the samples collected in 2000, the aluminum concentrations were generally low, as well. Samples collected in 1993 and 2001, which had higher concentrations of aluminum and iron than the samples collected in 2000, were noted in the field records to appear very turbid. Actual turbidity measurements are not available for the 1993 and 2001 surface water data. Nonetheless, all the available data were used in the risk assessment. Available turbidity data for surface water samples are included in **Table A-3**.

2.6.4.6 Nitroaromatics

No nitroaromatic compounds were found in the surface water samples collected at SEAD-13.

2.6.4.7 Indicator Compounds

The surface water samples were analyzed for nitrate/nitrite-nitrogen and fluoride, which were considered indicator compounds based on the types of materials disposed in the pits at SEAD-13. Nitrate/nitrite-nitrogen was detected in six out of nine of the surface water samples at SEAD-13, with concentrations ranging from 0.02 mg/L to 0.11 mg/L. The maximum concentration, 0.11 J mg/L, was found in sample SW13-5, near the point of groundwater discharge to the pond. Fluoride was also detected in the surface water samples. The reported concentrations ranged from 0.27 to 0.39 mg/L. There are no surface water standards for nitrate/nitrite-nitrogen or fluoride.

2.6.5 Sediment Sampling Summary

A summary of the chemical analyses for sediment is presented in **Table A-4** in **Appendix A**. The sediment samples were collected in the same locations as the surface water samples described above. The following sections describe the nature and extent of contaminant concentrations in sediment identified at SEAD-13.

2.6.5.1 Volatile Organic Compounds

Two VOCs were identified in the three sediment samples collected at SEAD-13. These compounds, acetone and methyl ethyl ketone, are common laboratory contaminants and therefore, they can be potentially attributed to the laboratory and not site conditions. The maximum concentrations for both compounds were identified in sample SD13-1, which was collected at the water's edge on the east side of the pond.

2.6.5.2 Semivolatile Organic Compounds

Several SVOCs (2-methylnaphthalene, 4-methylphenol, acenaphthylene, anthracene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(ghi)perylene, chrysene, di-n-octylphthalate, dibenz(a,h)anthracene, dibenzofuran, fluoranthene, fluorene, indeno(1,2,3-cd)pyrene, naphthalene, phenanthrene, and pyrene) were identified in the sediment samples collected at SEAD-13. None of the SVOC concentrations exceeded the NYS Sediment Criteria for Benthic Aquatic Life Chronic Toxicity, with the exception of 4-methylphenol at SD13-4.

2.6.5.3 Pesticides and PCBs

No pesticide or PCB compounds were detected in the sediment samples collected at SEAD-13.

2.6.5.4 Herbicides

No herbicide compounds were found in the sediment samples collected at SEAD-13.

2.6.5.5 Metals

A number of metals were detected in the sediment samples collected at SEAD-13. Of these, cadmium, chromium, copper, iron, manganese, nickel, and sodium were detected in excess of the NYSDEC Sediment Lowest Effect Level guidance values. Cadmium exceeded the criteria (0.6 mg/Kg) in five samples, with a maximum detection estimated at 0.96 mg/Kg in SD13-4. Nickel was detected in all ten sediment samples at concentrations that exceeded the criteria level of 16 mg/Kg, with a maximum concentration of nickel of 35.4 mg/Kg in sample SD13-4. Sodium was detected at concentrations that exceeded the criteria (1 mg/Kg) in four samples. The maximum concentration estimated at 326 mg/Kg was found at sample SD13-4. The manganese criterion of 460 mg/Kg was exceeded in three samples. The maximum concentration of manganese, 778 mg/Kg , was detected in sample SD13-3. The chromium criteria, 26 mg/Kg, was slightly exceeded in three sediment samples. The maximum concentration of chromium, 27.7 mg/Kg, was detected in SD13-4. The copper criteria of 16 mg/Kg was exceeded in all ten samples, with the maximum concentration of 20.7 mg/Kg detected in SD13-4. The iron criteria of 20,000 mg/Kg was exceeded by nine of the ten sediment samples collected, with the maximum concentration of 29,400 mg/Kg detected in sample SD13-4.

2.6.5.6 Nitroaromatics

One nitroaromatic compound, Tetryl, was found in the sediment sample SD13-2 near SEAD-13-West at an estimated concentration of 200 µg/Kg.

2.6.5.7 Indicator Compounds

The sediment samples were analyzed for nitrate/nitrite-nitrogen and fluoride, which were considered indicator compounds based on the types of materials disposed in the pits at SEAD-13. Nitrate/nitrite-nitrogen was detected in seven of the ten sediment samples analyzed. The maximum concentration detected was 6.4 mg/Kg in sample SD13-6. Fluoride was detected in all four of the sediment samples analyzed for fluoride. The reported concentrations ranged from 188 to 270 mg/Kg.

3.0 HUMAN HEALTH MINI RISK ASSESSMENTS

This section of the Decision Document presents the human health mini risk assessment for SEAD-13. This risk assessment provides an understanding of the potential risk that this site may pose to human health. The results of these evaluations are used to support decisions regarding site disposition. Procedures for conducting a mini risk assessment were presented to EPA and NYSDEC in the Decision Criteria Document dated March 1998.

The mini risk assessment is a conservative, screening level risk assessment tool. The intent of this mini risk assessment process is to expediently distinguish sites with a potential for human health or ecological risks from those that clearly pose no significant risk. Due to the conservative nature of the mini risk assessment, it is likely that the risks may be overestimated.

The methods used to conduct the mini risk assessment are the same as those used in the baseline risk assessments at several of the other sites at SEDA, with the exception that the maximum concentration of a component was used instead of the Upper $95th$ Confidence Limit (UCL) of the mean. The existing database is small; therefore using the maximum detected value will provide an added degree of conservatism. Biased sampling has been performed, and the data represent "worst case" conditions.

The objectives of the mini risk assessment are to:

- quantify the risk that a site may pose to human health;
- help determine whether a remedial investigation is necessary;
- provide a basis for determining if a removal action will eliminate the risk; and
- help support selection of the "No Action" remedial alternative, where appropriate.

To meet these objectives, the *Risk Assessment Guidance for Superfund* (RAGS) (EPA, 1989a) was followed when possible and applicable. Technical judgment, consultation with EPA staff, and recent publications were used in the development of the mini risk assessment.

The mini risk assessment was performed based on conservation/recreation as the future land use of SEAD-13.

The site is shown in **Figure 1-2**.

3.1 METHODOLOGY AND ORGANIZATION OF DOCUMENT

The methodology used for this risk assessment follows EPA RAGS guidance. This section contains several major subsections, as follows:

- **Identification of Chemicals of Concern**
- Exposure Assessment
- Toxicity Assessment
- Risk Characterization

Identification of Chemicals of Concern (Section 3.2)

This section provides site-related data along with background chemical data. Detailed summaries and statistical analyses of these data are provided in this section. All chemicals with validated detections in the applicable environmental media were evaluated in the risk assessment. The relevant exposure pathway risks were calculated for each detected chemical. Relevant background data are presented and, where appropriate, statistical analyses were performed to compare on-site chemical concentrations with background concentrations. Based on these analyses, chemicals whose presence at a site is attributable to background were not further evaluated in the mini risk assessments.

Exposure Assessment (Section 3.3)

This section includes derivation and presentation of the applicable exposure point concentrations (EPCs) used in the human health risk assessment. EPCs for the baseline risk assessment are based on analytical data and modeling results. The EPCs provided are used for the future onsite land-use scenario, and correspond to the applicable exposure pathways for the baseline risk assessment.

The future land-use scenario for the site is Conservation and Recreation. Associated with the land use scenario is a specific set of plausible receptors and exposure pathways. In all scenarios, the calculated risk values apply to a hypothetical reasonable maximum exposure (RME) individual working on or visiting the site, and the risk values are dictated by the environmental sampling data used in the risk assessment as exposure point concentrations for the applicable media.

The three primary exposure routes considered in these risk assessments are ingestion, inhalation, and dermal contact. Chemical intake values for future land use are calculated based on exposure pathways, specific exposure values, and assumptions. Equations used to calculate intakes for all applicable exposure pathways are presented in this section.

Toxicity Assessment (Section 3.4)

This section presents oral, inhalation, and dermal toxicity values used in the human health risk calculations. Appropriate data sources (i.e. IRIS, HEAST and EPA Risk Assessment Issue papers) are provided to support the toxicity values.

Risk Characterization (Section 3.5)

This section presents the risk calculations for all human health exposure pathways for the expected future land use. Non-carcinogenic and carcinogenic risk estimates are summarized for each receptor and exposure pathway.

3.2 IDENTIFICATION OF CHEMICALS OF POTENTIAL CONCERN

The data used in the mini risk assessment were collected during the Expanded Site Investigations (ESIs) at the Three Moderate Priority Areas of Concern (AOC)s from November 1993 to April 1994 and during supplemental sampling performed in 2000, 2001, and 2002. The data for detected compounds are summarized in **Appendix A** (**Tables A-1** through **A-4**) and all data are presented in **Appendix C** (**Tables C-1** through **C-4**). **Table 3.2-1** summarizes the total number of samples from each media collected at SEAD-13. The figures showing these sample locations are **Figure 2-3** and **Figure 2-4**.

Table 3.2-1 SUMMARY OF SAMPLES COLLECTED Decision Document-Mini Risk Assessment Seneca Army Depot Activity

The following sections describe the processes by which the data were analyzed, examined, and reduced to arrive at a list of analytes, for each exposure pathway, that were quantified for use in the human health mini risk assessment.

3.2.1 Site-Specific Data Evaluation Considerations

The data usability criteria for documentation, analytical methods, data validation, precision, accuracy, representativeness, comparability, and completeness are discussed in *Final Expanded Site Inspection Three Moderate Priority SWMUs SEAD 11, 13, and 57* (Parsons, 1995).

The maximum detected concentration of a component in the database was used as the EPC in the mini risk assessment.

3.2.1.1 QA/QC Methods

QA/QC samples were analyzed for the purpose of assessing the quality of the sampling effort and the analytical data. The QA/QC samples included splits, replicates, field equipment blanks, trip blanks, and matrix spike/matrix spike duplicates (MS/MSD). Split samples were analyzed by an EPA contract laboratory and the Corps of Engineers Missouri River Division (MRD) to assess the quality of the analytical data. One replicate sample was collected per batch of 20 or fewer samples per matrix. One field equipment blank was collected per batch of 20 or fewer samples per matrix in order to detect possible sources of contamination introduced from field sampling equipment or from carry over from one sample to the next. One trip blank was collected per day of water sampling for VOCs and was analyzed for VOCs to determine if samples were contaminated during transit or sample collection. For each group of 20 or less samples per matrix, additional sample volume was collected (for water samples) or an individual sample was selected and was used for matrix spike and matrix spike duplicate analyses. The use of matrix spikes gives insight to the analytical proficiency and efficiency of the analytical methods and indicates if the sample matrix may be attenuating or augmenting the reported analytical results.

3.2.1.2 Analytical Methods

NYSDEC Contract Laboratory Program (CLP) Statement of Work methods was used for the analysis of organic and inorganic constituents in soil, sediment, groundwater, and surface water. These methods provide data suitable for the mini risk assessment.

3.2.1.3 Data Validation

The data validation was performed under the guidelines set forth in the "USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review", 1999; "USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review", 1994; "Region 2 RCRA and CERCLA Data Validation Standard Operating Procedures", and NYSDEC Contract Laboratory Program Analytical Services Protocol. The data evaluation included performance of a completeness audit and a review of the following parameters, if applicable: holding times, sample

preservations, percentage of solids, quality control (QC) results of calibration, equipment/rinsate blanks, trip blanks, method blanks, matrix spike/matrix spike duplicate (MS/MSD) analyses, laboratory control sample performances, lab and field duplicates, ICP serial dilution, and surrogate recoveries.

3.2.2 Identification of Chemicals of Potential Concern (COPCs)

Table 3.2-2 presents the identified chemicals of potential concern (COPCs) for all the media. For inorganics, each site dataset was compared against the SEDA background dataset to determine if the site dataset is statistically different from the background dataset. This background comparison was performed for two media: soil and groundwater. The following method recommended by EPA Region 2 was used for these comparisons: For each inorganic constituent, the average concentration for the site was compared to 2 times the average background concentration. If the site average concentration for a constituent was less than 2 times the background average concentration, the constituent was considered to be present due to background conditions, and it was eliminated from further consideration in the risk assessment. Removing analytes from further consideration is consistent with RAGS (EPA 1989a). The background comparison was only conducted for soil and groundwater.

An average concentration was calculated based on the following protocols: (1) multiple rounds of samples (i.e., collected from the same location at different time periods) were considered as separate samples; (2) duplicate samples were considered as one sample and the average of the duplicate results was used as the concentration for this sample; (3) half the detection limit was used for samples with non-detected concentrations.

Only inorganic constituents were compared to background. Organic compounds were eliminated from further consideration only if they were detected infrequently (i.e. <5% of at least 20 samples) and the detected concentrations were relatively low (i.e., lower than the practical quantitation limit). This has produced a more conservative risk assessment since all organic constituents have been assumed to be present due to previous site activities. The COPC refining and identification is conducted in accordance with the EPA RAGS (EPA, 1989). Background data sets and the locations from which the data were collected are provided in **Appendix B**.

All detected compounds in surface water and sediment were conservatively retained for the risk assessment.

A detailed discussion of COPC identification for each medium is presented below.

Soil

As shown in **Table A-5**, the metal concentrations at the site are consistent with background. Therefore, no metals were identified as COPCs for surface soil or subsurface soil. Since no background data are available for nitrate/nitrite and fluoride, both were identified as COPCs for surface soil and subsurface soil.

Chloroform was detected in only 1 out of 13 surface soil samples, and the detected concentration $(2 J \mu g/Kg$ at SB13-7) was lower than the practical quantitation limit for the VOCs (i.e., 12 $\mu g/Kg$ for other VOCs in the sample). Upon further review of the sample data and QA/QC data, it was determined that the detection of chloroform at a value of 2 J μ g/Kg was the result of a lab error, and is not considered a reliable data value. This detection is below the quantitation level and is not considered part of the data set. Therefore, chloroform was not retained as a COPC for surface soil.

Similarly, although 1,4-dichlorobenzene, 2,4,5-trichlorophenol, 2,6-dinitrotoluene, 2-chlorona-phthalene, 4-chlorophenyl phenyl ether, bis(2-chloroethoxyl)methane, diethyl phthalate were detected, the frequency of detection is 3% (i.e., 1 out of 30 samples) for all the above compounds. In addition, the detected concentrations were lower than or close to the respective practical quantitation limits for the SVOCs. Therefore, none of the above chemicals were retained as a COPC for surface soil.

All the VOCs and SVOCs detected in subsurface soil were identified as COPCs. In addition, all the COPCs identified in surface soil were also regarded as COPCs for subsurface soil.

Groundwater

As shown in **Table A-6**, aluminum, calcium, cyanide, magnesium, manganese, and potassium concentrations in groundwater were above the background groundwater concentrations. Calcium, magnesium, and potassium are considered nutrients and are only toxic at very high doses (i.e., concentrations that are much higher than those associated with contact at SEAD-13). Therefore, these compounds were not considered COPCs. As a result, aluminum, cyanide, and manganese were identified as COPCs for groundwater.

Although 2-methylnaphthalene and pyrene were detected in groundwater, the detection frequency is only 5% (i.e., 1 out of 22 samples) and the detected concentration was relatively low (lower than the practical quantitation limit for the SVOCs in the respective detected samples). Therefore, 2-methylnaphthalene and pyrene were not retained as COPCs for groundwater.

Inorganic compounds such as nitrate/nitrite-nitrogen and fluoride were identified as COPCs in groundwater.

Sediment

All compounds detected in sediment were retained as COPCs for the risk assessment.

Surface Water

All compounds detected in surface water were retained as COPCs for the risk assessment. It should be noted that the results of the surface water samples collected from Kendig Creek (SW13-7, SW13-8, and SW13-9) were not included in the risk assessment. The aluminum concentrations detected in the above samples were much lower than the maximum aluminum concentration detected at the site of SEAD-13.

After eliminating inorganic analytes present at background levels from the risk assessment, EPCs were selected as the maximum detected value for each constituent of concern. When the maximum value occurred in a sample that had a duplicate sample, the maximum value was used in the risk assessment: the samples were not averaged.

Table 3.2-2 lists the COPCs for the mini risk assessment for SEAD-13 in soils, groundwater, surface water, and sediment.

3.3 EXPOSURE ASSESSMENT

3.3.1 Overview and Characterization of Exposure Setting

The objective of the exposure assessment was to estimate the type and magnitude of exposures to the Chemicals of Potential Concern (COPC) that are present at, or migrating from, the site. This component of the risk assessment can be performed either qualitatively or quantitatively. Quantitative assessment is preferred when toxicity factors necessary to characterize a compound of concern are available.

The exposure assessment consists of three steps (EPA, 1989a):

- Characterize Exposure Setting
- **Identify Exposure Pathways**
- Quantify Exposure

Characterize Exposure Setting

In this step, information on the physical characteristics of the site that may influence exposure is considered. The physical setting involves climate, vegetation, soil characteristics, and surface and groundwater hydrology. All potentially exposed populations and subpopulations therein (receptors)

are assessed relative to their potential for exposure. Additionally, locations relative to the site along with the current and potential future land use of the site are considered. This step is a qualitative one aimed at providing a general site perspective and offering insight on the surrounding population.

Identify Exposure Pathways

All exposure pathways, ways in which receptors can be exposed to contaminants that originate from the source, are reviewed in this step. Chemical sources and mechanisms for release along with subsequent fate and transport are investigated. Exposure points of human contact and exposure routes are discussed before quantifying the exposure pathways in step 3.

Quantify Exposure

In this final step, the exposure levels (COPC intakes or doses) are calculated for each exposure pathway and receptor. These calculations typically follow EPA guidance for assumptions of intake variables or exposure factors for each exposure pathway and EPA-recommended calculation methods.

Figure 3-1 illustrates the exposure assessment process.

3.3.2 Physical Setting and Characteristics

The physical setting and characteristics of the site are described in **Section 2.0** of this document.

3.3.3 Land Use and Potentially Exposed Populations

3.3.3.1 Current Land Use

There is no current land use for the area under consideration; the site is abandoned. Perimeter chain link fencing restricts access to SEAD-13. The site has no actual site workers but is occasionally patrolled by site security personnel. There are no drinking water supply wells at SEAD-13; the closest well to the SEAD-13 site is 4000 ft away to the east.

3.3.3.2 Potential Future Land Use

EPA guidance for determining future land uses recommends, if available, master plans, which include future land uses, Bureau of Census projections and established land use trends in the general area should be utilized to establish future land use trends.

In July 1995, the Base Realignment and Closure Act (BRAC) Commission voted to recommend closure of SEDA. Congress approved the recommendation, which became public law on October 1, 1995. According to BRAC regulations, future uses of the site will be determined by the Army.

In accordance with BRAC regulations, the Army will notify all appropriate regulatory agencies and will perform any additional investigations and remedial actions to assure that any changes in the intended use of the site is protective of human health and the environment in accordance with CERCLA. Also, Army regulations (Regulation 200-1, paragraph 12-5, Real Property Transactions), require that the Army perform an Environmental Baseline Study (EBS) prior to a transfer of Army property. The EBS is an inventory and a comprehensive evaluation of the existing environmental conditions and consists of scope definition, survey, sampling, investigative and risk assessment.

As part of the 1995 BRAC process, a Land Redevelopment Authority (LRA) comprised of representatives of the local public was established. This group commissioned a study to recommend future uses of the Seneca Army Depot. The Land Reuse Plan produced by the LRA designated various uses for different parcels of SEDA. This Land Reuse Plan is the basis for future land use assumption—Conservation/Recreation Land—in this risk assessment.

3.3.3.3 Potentially Exposed Populations

Potentially exposed populations that are relevant to each future land use are evaluated in this risk assessment. Since current exposure is infrequent and limited, only future receptors under the future land use scenarios are considered in this mini risk assessment. These receptors are:

- Park Worker
- Recreational Visitor (Child)
- Construction Worker

A resident adult and a resident child were evaluated, as well, in **Appendix B**.

3.3.4 Identification of Exposure Pathways

Exposures are estimated only for plausible completed exposure pathways. A completed exposure pathway has the following four elements:

- a source and mechanism for chemical release,
- an environmental transport medium,
- an exposure point, and
- a human receptor and a feasible route of exposure at the exposure point.

A pathway cannot be completed unless each of these elements is present. **Figure 3-2** illustrates the completed exposure pathways for the SEAD-13 site.

3.3.4.1 Sources and Receiving Media

The suspected potential source(s) are soils within and adjacent to the IRFNA pits. These soils are contaminated with metals and nitrates/nitrites. The primary release mechanisms from the site are surface water runoff and infiltration of precipitation. If infiltration of precipitation occurs then groundwater would be a secondary source. At the SEAD-13 site, both surface water and groundwater drain into the Duck Pond. Soil, surface water, and sediment are also secondary sources. Wind is also a release mechanism, as dust from impacted soil may be introduced into the breathing zone, although this is not expected to be significant as the site is vegetated.

3.3.4.2 Fate and Transport

The environmental fate associated with the general classes of COPCs found at SEAD-13 is discussed briefly below.

Volatile Organics

A relatively small number of VOCs were detected in soil and sediment at SEAD-13. VOCs were detected infrequently and in low concentrations. Because of this low prevalence and concentrations, direct volatilization of VOCs was not considered significant in this assessment.

Semivolatile Organics

The principal SVOCs found in soil or sediment at SEAD-13 are PAHs, phenols, and phthalates. Generally, these constituents are relatively persistent and immobile in the environment. A pesticide, 4,4'-DDE, was also found in one soil sample and tetryl, a nitroaromatic, was detected in one sediment sample. Herbicides were not found in soil, groundwater, surface water, or sediment samples.

Metals

The behavior of metals in soil is unlike organic compounds in many aspects. For example, volatilization of metals from soil is not considered a realistic mechanism for pollutant migration and was not considered. However, leaching and sorption are considered potential mechanisms for transport. Leaching of metals from soil is controlled by numerous factors. Most importantly is its chemical form (base metal or cation) in the soil. The leaching of metals from soils is substantial if the metal exists as a soluble salt. Upon contact with surface water or precipitation, the metals, either as metal oxides or metal salts, can be solubilized, eventually leaching to the groundwater. Although metals were detected in the soils, the levels were consistent with background values, and, therefore, were not considered COPCs. Two metals (aluminum and manganese) and cyanide were considered COPCs in groundwater. Multiple metals were found in the sediment and surface water at SEAD-13.

3.3.4.3 Summary of Exposure Pathways to be Quantified

The pathways presented reflect the projected future use of SEAD-13. This section presents the rationale for including these exposure pathways in this mini risk assessment:

- Inhalation of Particulate Matter in Ambient Air
- Incidental Ingestion and Dermal Contact to On-Site Surface Soils
- Incidental Ingestion and Dermal Contact to On-Site Surface and Subsurface Soils
- Ingestion of Groundwater
- Inhalation and Dermal Contact with Groundwater while Showering
- Incidental Dermal Contact with Surface Water and Sediment

Inhalation of Particulate Matter in Ambient Air

Surface soil particles may become airborne via wind erosion, which in turn may be inhaled by individuals at the site. Construction workers may also be exposed to subsurface soil particles. Therefore, inhalation exposure to soil particulates in ambient air was assessed for all future receptors.

Incidental Ingestion and Dermal Contact to On-Site Surface Soils

During the course of daily activities, workers and visitors (children) could come into contact with site surface soils (0-2 ft bgs) and involuntarily ingest and/or have their skin exposed to them. Therefore, exposure via dermal contact and soil ingestion was assessed for all future receptors.

Incidental Ingestion and Dermal Contact to On-Site Surface and Subsurface Soils

The laboratory analyses of all surface and subsurface soils show the presence of VOCs, SVOCs, pesticides, and metals. During the course of daily activities, an on-site construction worker will come into contact with these surface and subsurface soils during intrusive activities and may involuntarily ingest and have his/her skin exposed to them. Therefore, exposure via both dermal contact and soil ingestion was assessed for the future construction worker.

Ingestion of Groundwater

There is no current use of groundwater as a potable water source at the Depot. The future plan for all areas of SEDA is to obtain potable water from the existing water supply line. Potable water is supplied to the Depot from a water supply line that passes through the Town of Varick. Varick's water is obtained from the water treatment plant at the Town of Waterloo. The source of this water is Lake Seneca. It is unlikely that a groundwater well would be installed for future drinking water use since a potable water pipeline exists. The shallow groundwater aquifer at the site is inadequate for both yield and quality. Nonetheless, since this use is not prevented via an institutional control such as a deed restriction, it was assumed that wells would be installed on-site for potable water at any site where COPCs were detected at levels exceeding background concentrations. Therefore, this is considered a complete pathway for the park worker and recreational visitor.

Inhalation and Dermal Contact with Groundwater while Showering

Recreational visitors (campers at the conservation area) may come into contact with groundwater while taking daily showers. These receptors may be exposed to all chemicals contained in groundwater during showering by dermal contact and volatile chemicals that partition into the air via inhalation. Therefore, this is considered a complete pathway and data from the on-site wells are used to calculate exposure concentrations.

Incidental Dermal Contact with Surface Water and Sediment

Park workers and recreational visitors may involuntarily contact and have their skin exposed to surface water or sediment. The permanent body of water in the future conservation area is the Duck Pond. This surface water and the associated wet soil, or sediment, may contain chemicals found in the surface soils, since it will collect runoff and soil eroded by the rainfall. While intentional adult contact with this surface water and sediment is unlikely, a park worker or child recreational visitor could potentially wade in the Duck Pond. Therefore, exposure via dermal contact was assessed for these receptors in the conservation area.

3.3.5 Quantification of Exposure

In this section, each receptor's potential exposures to chemical COPCs are quantified for each of the exposure pathways described above. In each case, the exposures are calculated following methods recommended in EPA guidance documents, such as the Risk Assessment Guidance for Superfund (EPA 1989) and the Supplemental Guidance for Dermal Risk Assessment (EPA 2001). These calculations generally involve two steps. First, representative chemical concentrations in the environment, or EPCs, are determined for each pathway and receptor. From these EPC values, the amount of chemical that an exposed person may take into his/her body is then calculated. This value is referred to as either the Human Intake or the Absorbed Dose, depending on the exposure route.

This section describes the exposure scenarios, exposure assumptions, and exposure calculation methods used in this risk assessment. All calculations are shown in the tables included in **Appendices A** and **B** for conservation/recreation use scenario and residential use scenario, respectively.

Risk assessment as a whole, and the exposure assessment step in particular, are designed to be health protective. The exposure calculations require estimates and assumptions about certain human exposure parameters, such as inhalation rates, ingestion rates, *etc*. Generally, values are selected which tend to be health protective. EPA (1993) recommends that two types of exposure estimates be used for Superfund risk assessments: a reasonable maximum exposure (RME) and central tendency exposure (CT). The RME is defined as the highest exposure that could reasonably be expected to occur for a given exposure pathway at a site, and it is intended to account for both uncertainty in the contaminant concentration and variability in the exposure parameters (such as exposure frequency or averaging time). The CT also may be evaluated for comparison purposes and is generally based on mean exposure parameters. Only RME scenarios have been evaluated in this mini risk assessment.

Superfund risk assessments consider chronic exposures unless specific conditions warrant a short-term or an acute assessment. In this evaluation, long-term exposure to relatively low chemical concentrations is the greatest concern.

EPCs were estimated for all pathways selected for quantitative evaluation. These concentrations are based on the highest measured values (for soil and groundwater) or on calculated estimates (for ambient air and showering). Steady-state conditions were assumed. Therefore, current and future chemical concentrations were assumed to be identical. This assumption may tend to overestimate long-term exposure concentrations because chemical concentrations are likely to decrease over time from natural processes such as dispersion, attenuation, degradation and dilution.

Estimates of pathway-specific human intakes or absorbed doses for each chemical involve assumptions about patterns of human exposure to contaminated media. These assumptions are integrated with EPCs to calculate intakes. Intakes or doses are normally expressed as the amount of chemical at the environment-human receptor exchange boundary in milligrams per kilogram of body weight per day (mg/Kg-day), which represents an exposure normalized for body weight over time. The total exposure is divided by the time period of interest to obtain an average exposure. The averaging time is a function of the toxic endpoint: for non-carcinogenic effects, it is the exposure time (specific to the scenario being assessed) and for carcinogenic effects, it is lifetime (70 years).

3.3.5.1 Exposure Assumptions

An important aspect of exposure assessment is the determination of assumptions regarding how receptors may be exposed to contaminants. EPA guidance on exposure factors is extensive and was followed throughout this exposure assessment. Standard scenarios and EPA-recommended default assumptions were used where appropriate.

The exposure scenarios in this assessment involve the following future receptors:

- park worker
- construction worker
- recreational visitor (child)

Residential exposure scenarios are assessed in **Appendix B**.

The exposure assumptions for these scenarios are intended to approximate the frequency, duration, and manner in which receptors are exposed to environmental media. For example, the worker scenarios are intended to approximate the exposure potential of individuals employed at the site.

Details of the exposure assumptions and parameters for each exposure scenario are shown in **Table 3.3-1.**

The primary sources for the RME exposure factors are as follows:

- EPA, 1988: Superfund Exposure Assessment Manual
- EPA, 1989a: Risk Assessment Guidance for Superfund, Volume I (RAGS)
- EPA, 1991a: Supplemental Guidance, Standard Default Exposure Factors
- EPA, 1992: Dermal Exposure Assessment, Principles and Applications
- EPA, 1993a: Superfund's Standard Default Exposure for the Central Tendency and Reasonable Maximum Exposure
- EPA, 1997: Exposure Factors Handbook
- EPA, 2001: Risk Assessment Guidance for Superfund Volume 1: Human Health Evaluation Manual (Part E, Supplemental Guidance for Dermal Risk Assessment)

In the following sections, the methods used to calculate exposures by each pathway are explained. Tables that show the human intake or absorbed dose values calculated for each exposure scenario are contained in **Appendix A**. These intakes and doses are used to assess overall carcinogenic and non-carcinogenic risk, as discussed later in the risk characterization section (**Section 3.5**).

3.3.5.2 Exposure Scenarios

For the conservation/recreation future use scenario, the following receptors are evaluated in this assessment, and their respective exposure scenarios are described in this section:

- Construction Worker
- Parker Worker
- Recreational Visitor (Child)

Construction Worker

Future construction workers are assumed to spend one year working at the site, which is a typical duration for a significant construction project. These workers spend each working day at the site. During this time, this worker inhales the ambient air at the sites and may ingest or come in dermal contact with the soil there. Since the construction worker may be digging onsite, the soil ingestion or dermal contact with both surface and subsurface soils was assumed.

Park Worker

The park worker's work schedule differs from the construction worker discussed above. The park worker is assumed to work onsite for only 8 months (35 weeks) per year from Spring through Autumn, when the conservation area would be used by recreational visitors. The workday is assumed to be 8 hours/day and the occupational exposure duration is 25 years. The park worker inhales the ambient air, ingests groundwater, and ingests and dermally contacts surface soil. In addition, the park worker may occasionally dermally contact surface water and sediment in the conservation area.

Recreational Visitor (Child)

While both adults and children may visit the conservation area, potential risks would be expected to be higher for children, due to their higher soil ingestion rates and lower body weights. To be conservative, a child recreational visitor receptor is assessed. The recreational visitor is assumed to reside at the conservation area, such as in a campground, for a consecutive two-week period (24 hours/day, 14 days/year) each year for 5 years. During each visit, the child inhales the ambient air, ingests groundwater, inhales and dermally contacts groundwater during showering and ingests and dermally contacts surface soil. In addition, the child recreational visitor may occasionally dermally contact surface water and sediment in the conservation area.

Complete exposure assumptions (exposure factors) for all receptors and exposure scenarios are summarized in **Table 3.3-1.** This table corresponds with the conservation/recreation future land use for SEAD-13. Most exposure factors used in the exposure assessment were obtained from EPA guidance documents. Other exposure factors were based on conservative professional judgment where no data are available from EPA or other sources.

3.3.5.3 Inhalation of Particulate Matter in Ambient Air

This pathway consists of particulate matter (PM) being released from soils to the air and then being inhaled by future receptors. Ambient PM concentrations for a construction worker were estimated using an emission and dispersion model. PM concentrations for the park workers and recreational visitors were based on existing site air measurements shown in **Table 3.3-2.**

Construction Worker

During construction activities, construction workers may be exposed to chemicals in site soils via inhalation. Construction activities, such as excavation, have the potential to create dust, or suspended particulate matter (PM), originating from the soils being removed. This dust would contain the chemicals present in the soil. Construction workers in the construction area would breathe this PM in the ambient air.

Air concentrations of site chemicals of concern were estimated for this exposure pathway using excavation models recommended in the EPA's "Models for Estimating Air Emission Rates from Superfund Remedial Actions" (EPA 451/R-93-001). Particulate emissions from soil excavation and loading into trucks are estimated with the following equation:

$$
E = \frac{k (0.0016) (M) [U/2.2]^{1.3}}{[X/2]^{1.4}}
$$

where:

The construction worker receptor is assumed to work at the site for a one-year period. To conservatively estimate potential particulate emissions from construction activities during this period, it was assumed that the entire area of SEAD-13, 136,200 ft² (12, 800 m²), is excavated to a depth of two meters over the course of one year as part of the campground construction. This results in the following mass of soil removed:

Mass = Area x Depth x Soil Bulk Density

- $=$ 12,800 square meters x 2 meters x 1.5 g/cm³ x 10⁶ cm³/m³
- $=$ 3.84 x 10¹⁰ grams
- $=$ 3.84 x 10^7 Kg

Other parameter values for the model are as follows:

With these values for M, k, U and X, the emission rate (E) from excavation activities is calculated 5,500 grams of PM_{10} over the course of a year. This emission rate would be representative if all soil excavated at SEAD-13 site was contaminated, and if local climatic factors did not suppress emissions. For example, precipitation, snow cover and frozen soil in the winter will minimize emissions. To account for these climatic/seasonal factors, it was assumed that emissions occur only half of the construction time. This results in a representative emission rate (E) of 2,750 grams/year. This is equivalent to an average emission rate of 11 g/day, 0.46 g/hr, or 0.13 mg/sec, assuming emission occur only during workdays: 250 days/yr, 8 hr/day.

Much greater short-term emissions are estimated for site grading with a bulldozer or tractor. This type of activity is assumed to occur for 90 workdays (8-hour day) over the course of a year. The model equation for grading emissions is:

where:

Assuming the EPA-recommended default values of 8% for s, and 10% for X, the emission rate (E) from grading is calculated as 0.085 g/sec. Averaged over the course of a year with 90 8-hour days of grading emissions, this is 38.1 g/hr or 10.6 mg/sec of PM_{10} emissions, assuming all emissions occur during working hours.

Total annual average emissions from excavation and grading are estimated as 0.13 mg/sec + 10.6 mg/sec $= 10.7$ mg/sec.

Localized exposure concentrations for construction workers are estimated with a simple box model. The model treats a defined surface area as a uniform emission source over the time period of interest. The box, or mixing volume, is defined by this surface area and an assumed mixing height. The emitted PM_{10} is assumed to mix uniformly throughout the box, with dilution from surface winds.

The general model equation is:

$$
C = \frac{E}{(U)(W)(H)}
$$

where:

E and U are the same as defined or calculated above. The mixing area is based upon the assumption that the construction activity causing worker exposure is being performed within a 100 square meter area. This area is assumed to be square, and W is the square root of 100 m^2 , or 10 meters. H is assumed to be the height of the breathing zone, or 1.75 meters.

With these values, the PM_{10} exposure concentration for a construction worker is calculated as 0.139 mg/m³. All of this PM_{10} was assumed to be airborne soil released from each site as represented by total soils (surface and subsurface).

The concentration of particulate-associated chemicals in ambient air, then, is:

$CA = CS \times PM_{10} \times CF$

where:

These calculated CA values are the inhalation EPCs for the dust inhalation scenarios. **Table A-8** in **Appendix A** shows the inhalation EPCs for the future construction workers.

Other Receptors (Park Workers and Child Receptors)

Ambient air normally contains particulate matter derived from various natural and anthropogenic sources, including soil erosion, fuel burning, automobiles, *etc*. The concentrations of airborne particulate matter were measured at SEDA over a four-month period (April-July) in 1995. A summary of the data collected in this air sampling program is shown in **Table 3.3-2**. Both Total Suspended Particulate Matter (TSP) and particulate matter less than 10µm aerodynamic diameter (PM_{10}) were measured. TSP includes all particles that can remain suspended in air, while PM_{10} includes only smaller particles that can be inhaled (particles larger than 10µm diameter typically cannot enter the narrow airways in the lung).

For this assessment, the highest 4-month average PM_{10} concentration measured at any of the four monitoring stations was assumed to represent ambient air at SEAD-13. The entire particulate loading was assumed to be airborne soil released from the site as represented by the surface soil EPCs for each site.

The concentration of particulate-associated chemicals in ambient air (CA) was calculated with the same equation $[CA = CS \times PM_{10} \times CF]$ used for the construction worker, above.

The ambient air EPCs used in the intake calculations are shown in **Table A-8** in **Appendix A.**

The equation for intake is as follows (EPA, 1989a):

Intake (mg/Kg/day) = $CA \times IR \times EF \times ED$ **BW x AT**

where:

The results of these calculations are shown in **Table A-9** in **Appendix A**.

3.3.5.4 Incidental Ingestion of Soil

The soil data collected from each site were compiled and the EPCs were selected for each compound. For the park worker and recreational visitor receptors only surface soil data collected from the 0 to 2 foot interval were used in this analysis. For the construction worker exposure, all soil data were used as it is assumed that the construction worker will engage in intrusive activities.

The equation for intake is as follows (EPA 1989a):

Intake $(mg/Kg-day) = CS \times IR \times CF \times FI \times EF \times ED$ **BW x AT**

Where:

The results of these calculations are shown in **Table A-10** in **Appendix A**.

3.3.5.5 Dermal Contact with Soils

The same receptors considered to have the potential to ingest soil may also contact the same soils dermally.

As with the soil ingestion scenarios, the chemical concentrations in the soils taken from the 0 to 2 foot depth were used as the EPCs for the park worker and recreational visitor receptors. The chemical concentrations in all soils were used as the EPCs for the construction worker scenario.

The equation for the absorbed dose from dermal exposure is as follows, based on guidance in EPA 2001:

Absorbed Dose (mg/Kg-day) = CS x CF x AF x ABS x SA x EF x ED x EV BW x AT

Where:

The product of the terms CS, AF, and ABS represents the dermal absorbed dose per event as defined in the EPA 2001 guidance.

The exposure calculations are summarized in **Tables A-11** in **Appendix A**.

Dermal exposure involves several unique exposure factors discussed briefly here. Specifically, the dermal exposure calculation considers the amount of exposed skin, the amount of soil that adheres to the skin and the degree to which a chemical may be adsorbed through the skin.

The surface area of exposed skin depends on the size of an individual (especially adult vs. child), clothing worn, and the specific parts of the body, which may directly contact the medium of concern (e.g., soil or groundwater during showering). EPA recommendations were followed to select exposed skin surface areas for each scenario in this assessment.

The following assumptions were made regarding skin surface areas for dermal exposure, according to EPA 1992 and EPA 2001:

Park Worker (Soil) The park worker was assumed to wear a short-sleeved shirt, long pants, and shoes. Therefore, the exposed skin surface was limited to the face, hands, and forearms. The EPA (2001) recommended RME value for the industrial scenario, 3300 cm², was used in the risk assessment.

Park Worker (Surface Water and Sediment) The hands and forearms may be exposed. EPA (1992) recommends a surface area value of 1980 cm² for the RME as representative of these parts of the adult body.

Recreational Visitor (Child) (Soil/Sediment/Surface Water) The child recreational visitor was assumed to wear a short-sleeved shirt and shorts (no shoes); therefore, the exposed skin is limited to the head, hands, forearms, lower legs, and feet. The EPA (2001) recommended RME value for a residential child, 2800 cm^2 , was used in the risk assessment.

Recreational Visitor (Child) (Groundwater) The entire body surface may be exposed during showering. EPA (2001) recommends a surface area value of 6600 cm² for the RME as representative of the entire child body.

The potential magnitude of exposure depends on the amount of soil that adheres to the exposed skin. Again, EPA (2001) recommended soil-to-skin adherence factors were used in this assessment.

Certain chemicals may be readily absorbed through the skin while others penetrate much more slowly or not at all. In the case of soil, some chemicals may be strongly bound to the matrix, which reduces their ability to absorb through the skin. Chemical-specific absorption factors, provided by EPA (2001), were used in this assessment.

3.3.5.6 Groundwater Ingestion

All future receptors may drink groundwater. The groundwater data collected from each site were compiled and the EPCs were selected for each compound.

The equation for intake is as follows (EPA, 1989a):

Intake $(mg/Kg-day) = CW \times IR \times EF \times ED$ **BW x AT**

Where:

The results of these calculations are shown in **Table A-13** in **Appendix A**.

3.3.5.7 Dermal Contact to Groundwater while Showering/Bathing

The recreational visitor may be exposed to groundwater while showering. The EPCs developed for ingestion of groundwater are also used for this exposure route. The equation for the absorbed dose, according to EPA (2001) is as follows:

Absorbed Dose (mg/Kg-day) = DA x SA x EF x ED x EV BW x AT

Where:

The absorbed dose per event (DA) was calculated as described in EPA's "Supplemental Guidance for Dermal Risk Assessment," (EPA, 2001).

For organics, a parameter, B was first calculated. This value attempts to characterize the relative contribution of each compound's specific permeability coefficient (K_P value) in the stratum corneum and the viable epidermis.

$$
B=K_p\frac{\sqrt{MW}}{2.6}
$$

where: K_p = Dermal permeability coefficient in water (cm/hr) $MW = Molecular weight (g/mole)$

Once calculated, the B value is used to calculate time conditions associated with estimates of compound breakthrough time. In accordance with the work of Cleek and Bunge, if the exposure time per event (ET) is less than the breakthrough time $(t*)$ of steady-state conditions specific to each compound, then the absorbed dose is calculated as follows:

$$
DA = FA x 2 Kp x CW x CF \sqrt{\frac{6 \times \tau \times ET}{\pi}}
$$

If the exposure time is longer than t*, then the absorbed dose is calculated using:

$$
\mathbf{DA}_{\text{event}} = \mathbf{FA} \times \mathbf{K}_{\mathbf{p}} \times \mathbf{CW} \times \mathbf{CF} \left[\frac{ET}{1+B} + 2\tau \left(\frac{1+3B+3B^2}{(1+B)^2} \right) \right]
$$

where for both equations:

The exposure times for showering are assumed to be 1 hr/event for the child recreational user, as recommended in the Supplemental Guidance for Dermal Risk Assessment, EPA, 2001. The entire body surface may be exposed during showering. EPA 2001 recommends a surface area value of 6600 cm² for the RME as representative of the entire body of a child. For the wading scenario, skin contact surface was assumed to be 2800 cm^2 .

The lag time (τ) , is defined as the time it takes a chemical to penetrate to reach a steady-state condition during a dermal exposure in aqueous media. By properly defining the lag time, the permeability coefficient (K_P) can be more properly used in the risk calculation further reducing uncertainty. Lag times and breakthrough times (t^*) for each organic compound were taken from a list in Exhibit B.2 of the Supplemental Guidance for Dermal Risk Assessment, EPA, 2001, or calculated per EPA guidance (2001). All chemicals not having lag times were derived using the following equation:

$$
\tau = \frac{l_{sc}^2}{6D_{sc}}
$$

where:

 $l_{\rm sc}$ = thickness of the stratum corneum, assume (0.001) (cm) $D_{\rm sc}$ = Stratum corneum diffusion coefficient (cm²/hr)

For inorganics, DA was calculated by:

$$
DA = K_p x CW x ET x CF
$$

EPA, in the Supplemental Guidance for Dermal Risk Assessment (EPA 2001), recommends Dermal Permeability Coefficients (K_p) for a number of organic and inorganic chemicals. These recommended values were used in these exposure calculations. When no organic K_p value was available, a value was calculated using the following equation:

$$
Log K_p = -2.80 + 0.66 (log K_{ow}) - 0.0056 (MW)
$$

Many inorganic compounds do not have specified recommended K_p values. In this case, K_p was assumed to be 1 x 10^{-3} as the default value recommended by EPA (EPA, 2001).

The dermal exposure calculations are summarized in **Table A-14** in **Appendix A.**

3.3.5.8 Inhalation of Groundwater while Showering/Bathing

The same groundwater concentrations that were used in the groundwater ingestion scenario were used in this scenario. These groundwater concentrations were converted to air concentrations inside the shower using a model developed by Andelman (Andelman, J.B. 1984, Andelman, J.B., 1985a, Andelman, J.B., 1985b). This model assumes that the concentration of the air inside the shower is in equilibrium between the rate of release from the shower water and the rate of air exchange between the shower and the bathroom. The empirical constants in the model were obtained from the observed efficiency of volatilization for TCE in model showers and from several homes with contaminated water where measurements have been made. The efficiency of release for chemicals other than TCE is obtained as the product of the ratio of the Henry's Law constant for that compound to the Henry's Law constant for TCE and the efficiency factor for TCE.

The average concentration of a volatile organic in the shower air over a period of t_s minutes is:

$$
\mathbf{C_S} = C_{\text{inf}} \left[1 + \left(\frac{1}{kt_s} \right) \times \left(e^{(-kts)^{-1}} \right) \right]
$$

for $t_s > 0$

The calculated average concentrations in the air in the shower are presented in **Tables A-12a.**

The equation for the intake, taken from RAGS (EPA, 1989a) is as follows:

Intake (mg/Kg-day) = $CA \times IR \times EF \times ED$ **BW x AT**

Where:

The exposure calculations are summarized in **Tables A-12**, and supporting calculations are presented in **Table A-12A**.

The chemical concentrations in the air were developed using the model described previously. The inhalation rate of $0.3 \text{ m}^3/\text{hr}$ was used as the RME value, recommended in the Exposure Factors Handbook (EPA 1997) as representative of sedentary children.

3.3.5.9 Dermal Exposure to Surface Water

The park worker and recreational visitor may occasionally come into contact with surface water or sediment at the Duck Pond. The park worker may occasionally put his hands and arms in water as part of his work. A child recreational visitor may be exposed to surface water during a wading event.

Therefore, surface water was analyzed at SEAD-13 and the site was assessed for dermal exposure to surface water.

The equations used to calculate dermally-absorbed doses from surface water are the same as those used for dermal contact with groundwater during showering. See **Section 3.3.5.7**, above, for a complete discussion of this methodology.

The exposure time for contact with surface water is assumed to be one hour per day for each receptor. The dermal exposure calculations for surface water at SEAD-13 are summarized in **Table A-15** in **Appendix A**.

3.3.5.10 Dermal Exposure to Sediment

The same receptors in the Conservation/Recreation area considered to have the potential for dermal contact with surface water may also have dermal contact with sediment. These receptors are the park worker and child recreational visitor.

The absorbed chemical dose from dermal contact with sediment is calculated by the same method used for soils except that CS is the chemical concentration in sediment (mg/Kg -sediment), rather than soil, and the sediment to skin adherence factor (AF) was assumed to be 1 mg/cm^2 -event. See **Section 3.3.5.5**, above, for a complete discussion of this methodology.

Similar to soil, the sediment dermal exposure calculation considers the amount of exposed skin, the amount of soil that adheres to the skin and the degree to which a chemical may be adsorbed through the skin. As with soil, this assessment followed EPA guidance regarding the values assigned to each of these exposure parameters.

The dermal exposure calculations for sediment are summarized in **Tables A-16** in **Appendix A**.

3.4 TOXICITY ASSESSMENT

The objective of the toxicity assessment is to weigh available evidence regarding the potential of the chemicals to cause adverse effects in exposed individuals, and to provide, where possible, an estimate of the relationship between the extent of exposure to a chemical and the increased likelihood and/or severity of adverse effects. The types of toxicity information considered in this assessment include the reference dose (RfD) and reference concentration (RfC) used to evaluate non-carcinogenic effects, and the slope factor and unit risk to evaluate carcinogenic potential. Most toxicity information used in this evaluation was obtained from the Integrated Risk Information System (IRIS). If values were not available from IRIS, the *Health Effects Assessment Summary Tables* (HEAST) (EPA, 1997) were consulted. Finally, the EPA Region II was consulted to provide any additional values not included in
these two sources. The toxicity factors used in this evaluation are summarized in **Table 3.4-1** for both non-carcinogenic and carcinogenic effects.

3.4.1 Non-carcinogenic Effects

For chemicals that exhibit non-carcinogenic (i.e., systemic) effects, authorities consider organisms to have repair and detoxification capabilities that must be exceeded by some critical concentration (threshold) before the health effect is manifested. For example, an organ can have a large number of cells performing the same or similar functions that must be significantly depleted before the effect on the organ is seen. This threshold view holds that a range of exposures from just above zero to some finite value can be tolerated by the organism without an appreciable risk of adverse effects.

Health criteria for chemicals exhibiting non-carcinogenic effects for use in risk assessment are generally developed using EPA RfDs and RfCs developed by the RfD/RfC Work Group and included in the IRIS. In general, the RfD/RfC is an estimate of an average daily exposure to an individual (including sensitive individuals) below which there will not be an appreciable risk of adverse health effects. The RfD/RfC is derived using uncertainty factors (e.g., to adjust from animals to humans and to protect sensitive subpopulations) to ensure that it is unlikely to underestimate the potential for adverse non-carcinogenic effects to occur. The purpose of the RfD/RfC is to provide a benchmark against which an intake (or an absorbed dose in the case of dermal contact) from human exposure to various environmental conditions might be compared. Intakes of doses that are significantly higher that the RfD/RfC may indicate that an inadequate margin of safety could exist for exposure to that substance and that an adverse health effect could occur.

3.4.1.1 References Doses for Oral and Inhalation Exposure

The types of toxicity values used to evaluate the non-carcinogenic effects of chemicals include RfDs for oral exposure and RfCs for inhalation exposure. RfDs and RfCs represent thresholds for toxicity. They are derived such that human lifetime exposure to a given chemical via a given route at levels at or below the RfD or RfC, as appropriate, should not result in adverse health effects, even for the most sensitive members of the population. The chronic RfD or RfC for a chemical is ideally based on studies where either animal or human populations were exposed to a given chemical by a given route of exposure for the major portion of the life span (referred to as a chronic study). Various effect levels may be determined in a study; however, the preferred effect level for calculating noncarcinogenic toxicity values is the no-observed-adverse-effect level, or NOAEL. Second to the NOAEL is the lowest-observed-adverse-effect level, or LOAEL.

The oral RfD is derived by determining dose-specific effect levels from all the available quantitative studies, and applying uncertainty factors and/or a modifying factor to the most appropriate effect level. Uncertainty factors are intended to account for 1) the variation in sensitivity among members

of the human population, 2) the uncertainty in extrapolating animal data to humans, 3) the uncertainty in extrapolating from data obtained in a study that is less than lifetime exposure, 4) the uncertainty in using LOAEL data rather than NOAEL data, and 5) the uncertainty resulting from inadequacies in the data base. The modifying factor may be used to account for other uncertainties such as inadequacy of the number of animals in the critical study. Usually each of these uncertainty factors is set equal to 10, while the modifying factor varies between one and 10. RfDs are reported as doses in milligrams of chemical per kilogram body weight per day (mg/Kg-day).

The inhalation RfC is derived by determining concentration-specific effect levels from all of the available literature and transforming the most appropriate concentration to a human RfC. Transformation usually entails converting the concentration and exposure duration used in the study to an equivalent continuous 24-hour exposure, transforming the exposure-adjusted value to account for differences in animal and human inhalation, and then applying uncertainty factors and/or a modifying factor to the adjusted human exposure concentration to arrive at an RfC. The uncertainty factors potentially used are the same ones used to arrive at an RfD (see above). RfCs are reported as concentrations in milligrams of chemical per cubic meter of air $(mg/m³)$. To use the RfCs in calculating risks, they were converted to inhalation reference doses in units of milligrams of chemical per kilogram of body weight per day $(mg/Kg/day)$. This conversion was made by assuming an inhalation rate of 20 m³/day and an adult body weight of 70 Kg. Thus:

Inhalation Reference Dose (mg/Kg/day) =
$$
RfC\left(\frac{mg}{m^3}\right)x\left(\frac{20m^3}{day}\right)x\left(\frac{1}{70kg}\right)
$$

3.4.1.2 Reference Doses for Dermal Exposure

EPA has not derived toxicity values for all routes of exposure. Most of the available toxicity values are for oral exposure. Many inhalation values are also available. No values are currently available for dermal exposure. This is due to the lack of scientific studies available to quantify dermal toxicity and carcinogenic potential for the vast majority of priority pollutants. In addition, until recently, scientists have assumed that the hazards due to dermal exposures were minimal in comparison with those due to oral exposure. However, it appears that in many instances the hazards due to dermal exposure may be as great or greater.

At this time, chemical specific dermal toxicity factors are not available. This risk assessment evaluated risks from dermal contact with contaminants according to the most recent EPA guidance on dermal risk assessment (EPA, 2001). The guidance provides an approach which accounts for the fact that most oral RfDs are expressed as the amount of substance administered per unit time and body weight, whereas exposure estimates for the dermal pathway are expressed as absorbed dose. Primarily, a dermal RfD was estimated from the oral RfD by adjusting for the gastrointestinal absorption efficiency. For compounds recommended by Exhibit 4-1 of the guidance for adjustment of toxicity factors, the GI absorption efficiency values in the table were used to calculate the dermal RfD. For all other compounds, oral RfDs were used to evaluate dermal exposure risks, i.e., a GI absorption efficiency value of 1 was used. Oral absorption factors and the calculated dermal RfDs are shown in **Table 3.4-1**.

3.4.1.3 Exposure Periods

As mentioned earlier, chronic RfDs and RfCs are intended to be set at levels such that human lifetime exposure at or below these levels should not result in adverse health effects, even for the most sensitive members of the population. These values are ideally based on chronic exposure studies in humans or animals. Chronic exposure for humans is considered to be exposure of roughly seven years or more, based on exposure of rodents for one year or more in animal toxicity studies. For recreational visitors and construction workers, chronic RfDs and RfCs were used to conservatively assess risks for shorter exposure periods.

3.4.2 Carcinogenic Effects

For chemicals that exhibit carcinogenic effects, most authorities recognize that one or more molecular events can evoke changes in a single cell or a small number of cells that can lead to tumor formation. This is the non-threshold theory of carcinogenesis, which purports that any level of exposure to a carcinogen can result in some finite possibility of generating the disease. Generally, regulatory agencies assume the non-threshold hypothesis for carcinogens in the absence of information concerning the mechanisms of action for the chemical of concern.

EPA's Carcinogen Risk Assessment Verification Endeavor (CRAVE) has developed slope factors and unit risks (i.e., dose-response values) for estimating excess lifetime cancer risks associated with various levels of lifetime exposure to potential human carcinogens. The carcinogenic slope factors can be used to estimate the lifetime excess cancer risk associated with exposure to a potential carcinogen. Risks estimated using slope factors are considered unlikely to underestimate actual risks, but they may overestimate actual risks. Excess lifetime cancer risks are generally expressed in scientific notation. An excess lifetime cancer risk of 1 x 10^{-6} (one in a million), for example, represents the probability of an individual developing cancer over a lifetime as a result of exposure to the specific carcinogenic chemical. EPA considers total excess lifetime cancer risks within the range of 10^{-4} (one in ten thousand) to 10^{-6} (EPA 1989a) to be acceptable when developing remedial alternatives for cleanup of Superfund Sites.

In practice, slope factors are derived from the results of human epidemiology studies or chronic animal bioassays. The data from the animals studies are fitted to the linearized, multistage model and a dose-response curve is obtained. The upper limit of the 95th percentile confidence-interval slope of the dose-response curve is subjected to various adjustments, and an interspecies scaling factor is applied to conservatively derive the slope factor for humans. This linearized multistage procedure leads to a plausible upper limit of the risk that is consistent with some proposed mechanisms of carcinogenesis. Thus, the actual risks associated with exposure to a potential carcinogen are not likely to exceed the risks estimated using these slope factors, but they may be much lower. Dose-response data derived from human epidemiological studies are fitted to dose-time-response curves on an ad-hoc basis. These models provide rough but plausible estimates of the upper limits on lifetime risk. Slope factors based on human epidemiological data are also derived using very conservative assumptions and, as such, are considered unlikely to underestimate risks. In summary, while the actual risks associated with exposures to potential carcinogens are unlikely to be higher than the risks calculated using a slope factor, they could be considerably lower.

In addition, there are varying degrees of confidence in the weight of evidence for carcinogenicity of a given chemical. The EPA system involves characterizing the overall weight of evidence for a chemical's carcinogenicity based on availability of animal, human, and other supportive data. The weight-of-evidence classification is an attempt to determine the likelihood that the agent is a human carcinogen, and thus qualitatively affects the estimation of potential health risks. Three major factors are considered in characterizing the overall weight of evidence for carcinogenicity: (1) the quality of evidence from human studies, (2) the quality of evidence from animal studies, which are combined into a characterization of the overall weight of evidence for human carcinogenicity; and (3) other supportive information which is assessed to determine whether the overall weight of evidence should be modified. EPA's final classification of the overall weight of evidence includes the following five categories:

Group A - Human Carcinogen - There is sufficient evidence from epidemiological studies to support a causal association between an agent and cancer.

Group B - Probable Human Carcinogen - There is at least limited evidence from epidemiological studies of carcinogenicity to humans (Group B1) or that, in the absence of adequate data on humans, there is sufficient evidence of carcinogenicity in animals (Group B2).

Group C - Possible Human Carcinogen - There is limited evidence of carcinogenicity in animals in the absence of data on humans.

Group D - Not Classified - The evidence for carcinogenicity in animals is inadequate.

Group E - No Evidence of Carcinogenicity to Humans - There is no evidence for carcinogenicity in at least two adequate animal tests in different species, or in both epidemiological and animal studies.

Slope factors and unit risks are developed by the EPA based on epidemiological or animal bioassay data for a specific route of exposure, either oral or inhalation. For some chemicals, sufficient data are available to develop route-specific slope factors for inhalation and ingestion. For chemicals with only one route-specific slope factor but for which carcinogenic effects may also occur via another route, the available slope factor may be used by the EPA to evaluate risks associated with several potential routes of exposure (EPA, 1989b).

A number of the chemicals of potential concern have been classified as carcinogens or potential carcinogens by EPA, and each of these has also been assigned a carcinogenicity weight-of-evidence category, as shown in **Table 3.4-1**. These chemicals at SEAD-13 are:

Group A - Human Carcinogens

Arsenic Chromium VI

Group B - Probable Human Carcinogens

Methylene Chloride 2,4-Dinitrotoluene 2,4,6-trichlorophenol Benzo(a)anthracene Benzo(a)pyrene Benzo(b)fluoranthene Benzo(k)fluoranthene Bis(2-Ethylhexyl)phthalate Carbazole Chrysene Dibenz(a,h)anthracene Hexachlorobenzene Indeno(1,2,3-cd)pyrene DDE, 4,4'- Antimony Beryllium Cadmium Lead

Group C - Possible Human Carcinogens

4-Methylphenol

Butylbenzylphthalate Naphthalene

All remaining chemicals of concern are either not found to have weight of evidence rankings or are Group D or E. Group D classification means that the data are insufficient to make a determination regarding carcinogenic potential while Group E compounds have been conclusively found to be noncarcinogenic. Chemicals of potential concern found at SEAD-13 with potential carcinogenic effects are shown in **Table 3.4-1** along with their cancer slope factors.

3.4.2.1 Cancer Slope Factors for Oral and Inhalation Exposure

The types of toxicity values used to evaluate the carcinogenic effects of chemicals include slope factors (SFs) for oral exposure, and unit risk factors (URFs) for inhalation exposure. Oral slope factors are reported as risk per dose $(mg/Kg-day)^{-1}$. Inhalation unit risk factors are reported in units of risk per concentration $(mg/m³)⁻¹$. To make use of the unit risk factors in calculating risks they first had to be converted to inhalation slope factors in units of $(mg/Kg-day)^{-1}$. This conversion was made by assuming an inhalation rate of 20 m³/day and an adult bodyweight of 70 Kg. Thus:

Inhalation slope factor (mg/Kg-day)⁻¹ = *UnitRisk*
$$
\left(\frac{ug}{m^3}\right)^{-1} \times \frac{day}{20m^3} \times 70kg \times \frac{1000ug}{mg}
$$

3.4.2.2 Cancer Slope Factors for Dermal Exposure

As discussed above, EPA has not derived toxicity values for the dermal route of exposure. In the absence of dermal reference toxicity values, EPA has suggested (EPA, 2001) that, in some cases, it is appropriate to modify an oral slope factor so it can be used to estimate the risk incurred by dermal exposure. The oral slope factors were converted to dermal slope factors by dividing by the oral absorption efficiency recommended by EPA. The same values presented in **Section 3.4.1.2** were used; however, if chemical specific modification factors were unavailable, oral values were used without adjustment. As discussed previously any valuation of the contribution of dermal exposure to the overall risk needs to be viewed as highly tentative at best. This is particularly true for PAHs which are carcinogens at the point of contact, i.e., to skin.

3.5 RISK CHARACTERIZATION

3.5.1 Introduction

To characterize risk, toxicity and exposure assessments were summarized and integrated into quantitative and qualitative expressions of risk. To characterize potential non-carcinogenic effects, comparisons were made between projected intakes of substances and toxicity values. To characterize potential carcinogenic effects, probabilities that an individual will develop cancer over a lifetime of exposure are estimated from projected intakes and chemical-specific dose-response information. Major assumptions, scientific judgments, and, to the extent possible, estimates of the uncertainties embodied in the assessment are also presented.

3.5.1.1 Non-carcinogenic Effects

The potential for non-carcinogenic effects is evaluated by comparing an exposure level over a specified time period with an RfD derived for a similar exposure period. This ratio of exposure to toxicity is called a hazard quotient according to the following equation:

Noncancer Hazard Quotient = E/RfD

Where:

The noncancer hazard quotient assumes that there is a level of exposure (i.e., an RfD) below which it is unlikely for even sensitive populations to experience adverse health effects. If the exposure level (E) exceeds the threshold (i.e., If E/RfD exceeds unity) there may be concern for potential noncancer effects.

To assess the overall potential for non-carcinogenic effects posed by more than one chemical, a hazard index (HI) approach has been developed by the EPA. This approach assumes that simultaneous sub-threshold exposures to several chemicals could result in an adverse health effect. It also assumes that the magnitude of the adverse effect will be proportional to the sum of the ratios of the subthreshold exposures to respective acceptable exposures.

This is expressed as:

$$
HI = E_I / RfD_I + E_2 / RfD_2 + ... + E_i / RfD_i
$$

Where:

 E_i = the exposure level or intake of the I toxicant, and RfD_i = reference dose for the ith toxicant.

While any single chemical with an exposure level greater that the toxicity value will cause the HI to exceed unity, for multiple chemical exposures, the HI can also exceed unity even if no single chemical exposure exceeds its RfD. The assumption of dose additivity reflected in the HI is best applied to compounds that induce the same effects by the same mechanisms. Applying the HI to

cases where the known compounds do not induce the same effect may overestimate the potential for effects. To assess the overall potential for non-carcinogenic effects posed by several exposure pathways, the total HI for chronic exposure is the sum of the HI's for each pathway, for each receptor.

3.5.1.2 Carcinogenic Effects

For carcinogens, risks are estimated as the incremental probability of an individual developing cancer over a lifetime as a result of exposure to the potential carcinogen (i.e., excess individual lifetime cancer risk). The slope factor converts estimated daily intakes averaged over a lifetime of exposure directly to incremental risk of an individual developing cancer. It can generally be assumed that the dose-response relationship will be linear in the low-dose portion of the multistage model dose-response curve. Under this assumption, the slope factor is a constant, and risk will be directly related to intake. Thus, the following linear low-dose equation was used in this assessment:

$$
Risk = CDI \times SF
$$

Where:

 Risk = A unitless probability of an individual developing cancer, CDI = Chronic Daily Intake over 70 years (mg/Kg-day), and $SF = Slope Factor (mg/Kg-day)^{-1}$

Because the slope factor is often an upper 95th-percentile confidence limit of the probability of a response and is based on animal data used in the multistage model, the carcinogenic risk will generally be an upper-bound estimate. This means that the "true risk" is not likely to exceed the risk estimate derived through this model and is likely to be less than predicted.

For simultaneous exposure to several carcinogens, the EPA assumes that the risks are additive. That is to say:

$Risk_T = Risk1 + Risk2 + ... + Risk_i$

Where:

 $Risk_T$ = Total cancer risk, expressed as a unitless probability, and $Risk_i$ = Risk estimate for the ith substance.

Addition of the carcinogenic risks is valid when the following assumptions are met:

- doses are low,
- no synergistic or antagonistic interactions occur, and
- similar endpoints are evaluated.

According to guidance in the National Contingency Plan, the target overall lifetime carcinogenic risks from exposures for determining clean-up levels should range from 10^{-4} to 10^{-6} .

3.5.2 Risk Summary

Human health risks were calculated for site-specific future exposure scenarios at SEAD-13. The receptors and exposure scenarios were based on the expected future land use of the site: Conservation\Recreation.

Cancer and non-cancer risks were calculated for all applicable exposure routes and are presented in **Table 3.5-1**. This table also serves as a summary of the tables in **Appendix A,** which show risk calculations for each exposure route.

Human health risks were calculated for the following three exposure scenarios at SEAD-13:

- Park worker
- Recreational visitor (child)
- Construction worker

The potential exposure pathways associated with each receptor are summarized in **Figure 3-2**.

Table 3.5-1 summarizes the calculated cancer and non-cancer risks for all receptors and exposure routes considered in this risk assessment. The total cancer risk from all exposure routes is below the EPA target range for all three receptors. The total non-cancer hazard index (HI) from all exposure routes is less than one for the construction worker, but exceeds one for the park worker (HI=4) and the recreational visitor (child) $(HI=2.)$ The elevated hazard index for both receptors is due solely to ingestion of groundwater, with nitrate/nitrite-nitrogen, aluminum, and manganese being the significant risk contributors.

3.5.3 Uncertainty Assessment

All risk assessments involve the use of assumptions, judgments, and imperfect data to varying degrees. This results in uncertainty in the final estimates of risk. There are uncertainties associated with each component of the risk assessment from data collection through risk characterization. For example, there is uncertainty in the initial selection of substances used to characterize exposures and risk on the basis of the sampling data and available toxicity information. Other sources of uncertainty are inherent in the toxicity values for each substance and the exposure assessments used to characterize risk. Finally, additional uncertainties are incorporated into the risk assessment when exposures to several substances across multiple pathways are summed. Areas of uncertainty in each risk assessment step are discussed below.

3.5.3.1 Uncertainty in Data Collection and Evaluation

Uncertainties in the data collection/evaluation step of the risk assessment focus on determining whether enough samples were collected to adequately characterize the risk, and if sample analyses were conducted in a qualified manner to maximize the confidence in the results. Results of the sample analyses were used to develop a database that includes a complete list of the chemicals by media and their representative concentrations used in the risk assessment. The sampling and analysis addressed various objectives in addition to the risk assessment. Therefore, the samples were not collected randomly but were collected from areas of the site with the greatest likelihood to be contaminated. This type of non-random sampling biases the data collected toward overestimating chemical concentrations from the site.

All chemicals detected that were potentially site-related were retained in this assessment. Chemicals that were never detected were eliminated from the assessment. This practice may slightly underestimate risks due to low levels (i.e., below the sample quantitation limit) of eliminated chemicals. Since samples were collected at areas where concentrations were expected to be high and the maximum concentrations were used for the assessment, it is very unlikely that any chemicals were present at the site at health-significant levels and not detected in at least one sample. However, if this did occur, this assumption will underestimate risk. The maximum concentrations were used to calculate site-related risks. Since that assumption implies chronic exposure to the maximum concentration, this assumption is likely to result in an overestimation of site risk.

3.5.3.2 Uncertainty in Exposure Assessment

There are inherent uncertainties in predicting future land uses and future chemical concentrations. Future land use scenarios were based on the Land Reuse Plan developed by the LRA.

A large part of the risk assessment is the estimation of risks for a broad set of exposure scenarios and pathways. If exposure does not occur, no risks are present. This assessment does not factor in the probability of the exposure occurring. For certain pathways, exposure may be extremely unlikely. For example, the future receptors are assumed to drink groundwater. It is unlikely that this will occur, since there is a current acceptable water supply, and the aquifer beneath the site is not believed to be productive enough to supply the needs of the future land uses. This assumption yields an overestimation of risk for this scenario. Further, even in the unlikely event that groundwater were to be used as a source of drinking water, it would come from an aquifer below the unconfined aquifer where the contamination was detected (NYSDOH indicates that any private well should be developed from a water bearing formation at a depth greater than 20 feet below the ground surface. The approximate top of the bedrock unit is located at a depth of approximately 20 feet at SEDA. Water wells in the areas surrounding SEDA are screened in the bedrock at depths of 200 feet or more below

ground surface.). Based on the vertical connection tests performed in six wells at the Ash Landfill and in six wells at SEAD-25 (RI Draft Final Report at the Ash Landfill Site, 1994 and RI Final Report at SEAD-25 and SEAD-26, 1998), the till/weathered shale aquifer is not significantly connected to the underlying bedrock aquifer. Considering that SEAD-13 is located approximately 9,000 feet from SEAD-25 and 15,000 feet from the Ash Landfill, and that SEAD-13 has similar site geology as these two sites, it is reasonable to conclude that the till/weathered shale and bedrock aquifers are not significantly connected at SEAD-13. Therefore, the human health risks from ingestion of groundwater may be overestimated even though groundwater was used as a drinking water source.

Once pathways are identified, EPCs must be estimated. There is always some doubt as to how well an exposure model approximates the actual conditions receptors will be exposed to at a given site. Key assumptions in estimating EPCs and exposure assumptions and their potential impact on the assessment are described in the following paragraphs.

As summarized in **Tables 3.3-1,** there are many factors that determine the level of exposure for each exposure pathway. These factors include inhalation rates, ingestion rates, exposure frequencies, exposure durations, body weight, etc. The values for these exposure factors must be selected by the risk assessor to represent each receptor. For the scenarios in this risk assessment, upper bound values were selected for each exposure factor. In the calculations of exposure, these multiple upper-bound exposure factor estimates compound to yield intakes and absorbed doses that overestimate likely exposure levels.

Uncertainty associated with exposure estimation will result in potential underestimation or overestimation of risks for potential receptors. As an example, the recreational visitor is assumed to reside at the site during a camping event and the camping event is assumed to last two consecutive weeks (24 hours/day, 14 days/year) each year for 5 years. If the recreational visitor is exposed24 hours/day for four weeks each year for 5 years, the cancer risk and the hazard index would double (i.e., cancer risk of 6E-7 and hazard index of 3.3 with groundwater exposure and cancer risk of 4E-7 and hazard index of 0.02 without groundwater exposure). With the exposure pathway to groundwater inaccessible, the risks are within the EPA risk limits. As presented in **Appendix B**, when exposure to groundwater is prevented, the total cancer risks and hazard indices for residential receptors, who are exposed to COCs at the site 350 days/year, are within the EPA risk limits. Therefore, although more conservative exposure scenarios (such as the example offered by EPA, exposure for more than two weeks a year for five years for a recreational visitor) are not evaluated for this mini risk assessment, they are not expected to result in unacceptable risk based on the risk evaluation for residential scenario.

Similarly, although youth recreational users and adult recreational users were not evaluated, risks for residential receptors can be used as conservative surrogates. Since risks for residential receptors are within the EPA limits with a restriction on groundwater use placed at the site, it is concluded that

risks for adult recreational users would be within the EPA limits with exposure to groundwater prevented.

The EPCs (i.e., maximum concentrations) derived from the measured chemical concentrations are assumed to persist without change for the entire duration of each exposure scenario. It is likely that some degradation would occur over time, particularly for some of the organic compounds, which would reduce the current concentrations. Therefore, this steady state assumption tends to overestimate exposure levels.

3.5.3.3 Uncertainty in Toxicity Assessment

Of the chemicals of potential concern, a number had no reference dose or slope factors. The absence of toxicity values for these chemicals tends to underestimate risks.

There is considerable uncertainty inherent in the toxicity values for both carcinogens and non-carcinogens. Many of the studies are based on animals and extrapolated to humans, and, in some cases, subchronic studies must be used to assess chronic effects. Most cancer slope factors are calculated using a model that extrapolates low dose effects from high dose animal studies. Because toxicity constants are generally based on the upper limit of the 95th-percentile confidence interval or incorporate safety factors to compensate for uncertainty, chemical-specific risks may be overestimated.

Toxicity information was not available for dermal exposure; hence, several assumptions had to be made which may tend to over- or underestimate risk. Oral toxicity values were used without adjustment for chemicals with relatively high oral absorption to calculate risks from dermal exposure in accordance with the EPA recommendation (2001). However, values found in the literature (Owen, 1990) indicate that the uncertainty associated with using oral absorption to estimate dermal absorption is likely less than one order of magnitude.

The inhalation of groundwater during showering was quantitatively evaluated for the recreational visitor. However, risk from inhalation of chemicals without inhalation toxicity values was not quantitatively evaluated, which may cause underestimation of risks from this exposure route.

3.5.3.4 Uncertainty in Risk Characterization

Uncertainties in the toxicity assessment are compounded under the assumption of dose additivity for multiple substance exposure. That assumption ignores possible synergisms and antagonisms among chemicals, and assumes similarity in mechanisms of action and metabolism. Overall, these assumptions would tend to overestimate risk. Similarly, risks summed for chemicals having various weight-of-evidence classifications as well as different target organs may also tend to overestimate risk.

As preceding sections of this report have indicated, the existing site-specific database of chemical and physical information was developed to characterize the types, locations, and concentrations of chemicals in soil, sediment, surface water, and groundwater. Calculations in this mini risk assessment are conservatively based on the maximum concentrations of each chemical detected in each medium of potential concern to human health (soil, groundwater, sediment, and surface water).

3.5.4 Risk Characterization for Residential Land Use

A residential scenario has been evaluated at SEAD-13 to provide a comprehensive and conservative baseline for the site even though residential development at this site is unlikely. Risk calculations for both an adult resident and a child resident for SEAD-13 can be found in **Appendix B**. A summary of the results is provided below.

Table B-2.8 summarizes the calculated cancer and non-cancer risks for all exposure routes considered at SEAD-13. The total cancer risk from all exposure routes is within the EPA target range for both receptors. The total non-cancer hazard index (HI) from all exposure routes exceeds one for the adult resident (HI=20) and the child resident (HI=40). The elevated hazard index for both receptors is due mostly to ingestion of groundwater with nitrate/nitrite-nitrogen, aluminum, and manganese being the significant risk contributors.

Based on the current data, it would be necessary to place a restriction on groundwater use at this site. With exposure to groundwater prevented (via a land use restriction), the non-cancer Hazard Indices would be less than 1 for both child and adult residential receptors.

4.0 ECOLOGICAL RISK ASSESSMENT (ERA)

4.1 OBJECTIVES AND OVERVIEW

In addition to the evaluation of human health, this mini risk assessment considers the risk posed by the site to its ecological communities. The screening-level ecological risk assessment (SLERA) presented in this section is intended to evaluate the likelihood that adverse ecological effects are occurring or may occur as a result of exposure to chemicals associated with the site based on a weight-of-evidence approach. An ecological risk does not exist unless a given contaminant has the ability to cause one or more adverse effects, and it is contacted by an ecological receptor for a sufficient length of time, or at a sufficient intensity to elicit the identified adverse effect(s) (EPA, 1994b).

A screening-level ERA was performed according to EPA's Ecological Risk Assessment Guidance for Superfund: Process for Designing and Conducting Ecological Risk Assessments (1997). Ecological risk presented in terms of a hazard quotient (HQ), which is defined as the ratio of the estimated exposure point concentration (EPC) to an appropriate toxicity reference value (TRV). Separate HQs are calculated for each contaminant/receptor pair. Conservative (i.e., health protective) assumptions were used in this screening-level ERA in accordance with the EPA guidance.

Although an ecological field survey was not conducted at SEAD-13, other areas of SEDA have been studied to characterize the ecological communities at SEDA in general and at specific SEADs (*e.g.* SEADs-16, 17, 25, 26, and the Open Burning Grounds). Field surveys during the Remedial Investigations (RIs) of these SEADs produced an understanding of the habitat, vegetative communities and wildlife species present at the site. The ecological setting of SEAD-13 is similar to SEADs-16, 17, 25, 26, and the Open Burning Grounds. Therefore, the existing ecological characterizations for the other Seneca sites are considered to be applicable to SEAD-13. As a result, this mini ERA is based upon the findings of the prior field surveys at SEADs-16, 17, 25, 26, and the Open Burning Grounds.

The SLERA addresses potentially significant risks to the following biological groups and specialinterest resources associated with the site: vascular vegetation, wildlife, aquatic life, endangered and threatened species, and wetlands. The focus of the SLERA lies in the evaluation of the potential toxicity of each constituent of potential concern (COPC) in soil and defines toxicity benchmark values that will be used to calculate the ecological risk quotient.

As preceding sections of this report have indicated, the existing site-specific database of chemical and physical information was developed to characterize the types, locations, and concentrations of chemicals in soil, sediment, surface water, and groundwater. Calculations in this mini ERA are conservatively based on the maximum concentrations of each chemical detected in each medium of potential concern to ecological receptors (soil, sediment, and surface water).

4.2 PROBLEM FORMULATION

The screening-level problem formulation establishes the goals, breadth, and focus of the ERA through addressing the following five issues:

- Environmental setting and contaminants known or suspected to exist at the site
- Contaminant fate and transport mechanisms that might exist at the site
- The mechanisms of ecotoxicity associated with contaminants and likely categories of receptors that could be affected
- What complete exposure pathways might exist at the site (a complete exposure pathway is one in which the chemical can be traced or expected to travel from the source to a receptor that can be affected by the chemical)
- Selection of endpoints to screen for ecological risk

Each of these steps is described in the following sections.

4.2.1 Environmental Setting and Contaminants at the Site

To begin the screening-level problem formulation, there must be at least a rudimentary knowledge of the potential environmental setting and chemical contamination at the site. In addition to the site information presented in the previous sections, the following key aspects of characterizations of environmental setting and contaminants at the site are presented here:

- Site habitat characterization
- Identification of ecological constituents of potential concern

Site Habitat Characterization

The ecological setting of SEAD-13 is similar to SEADs-16, 17, 25, 26, and the Open Burning Grounds based on the following factors:

- (1) SEAD-13 is located in Seneca Army Depot, within 3 miles of SEADs-16, 17, 25, 26, and the Open Burning Grounds. The Seneca sites share the same regional climate;
- (2) These sites are generally abandoned;
- (3) The vegetative cover at these sites consists of old fields, shrublands, and deciduous forest;
- (4) The shallow soil surface is similar to all sites, consisting mainly of crushed shales and limestone pieces;
- (5) Surface water, wetlands or drainage swales are present at these sites.

Therefore, characterizations of site habitat and ecological communities developed as part of the RIs for SEADs-16, 17, 25, 26, and the Open Burning (OB) Grounds were assumed to be representative of the sites included in this mini ERA. Key aspects of these characterizations relevant to this mini risk assessment are presented here.

Ecological site characterizations were based on compilation of existing ecological information and on-site reconnaissance activities. The methods used to characterize the ecological resources included site walkovers for the evaluation of existing wildlife and vegetative communities; interviews with local, state, and SEDA resource personnel; and review of environmental data obtained from previous Army reports. SEDA has a strong wildlife management program that is reviewed and approved by the New York State Bureau of Fish and Wildlife Management. The Depot manages an annual whitetailed deer (Odocoileus virginiana) harvest and has constructed a large wetland called the "Duck Pond" in the northeastern portion of the facility to provide a habitat for migrating waterfowl.

The NYSDEC Natural Heritage Program Biological and Conservation Data System identifies no known occurrences of federal- or state-designated threatened or endangered plant or animal species within a 2-mile radius of the site. No species of special concern are documented within the Depot property.

The only significant terrestrial resource known to occur at SEDA is the population of white-pelaged white-tailed deer (Odocoileus virginiana), which inhabits the fenced Depot area. Annual deer counting at the Depot indicate that the herd size is approximately 600 animals, approximately onethird (200) are white-pelaged. Since the Depot is totally enclosed, the white-pelaged deer is thought to occur as a result of inbreeding within the herd. To prevent overgrazing and starvation of the deer, the Depot maintains the herd through an annual hunting season on the Depot, and between 250-300 animals are harvested each fall. The management plan of the herd is conducted by the New York State DFW. The normal brown-pelaged deer are also common. White-tailed deer are not listed as a rare or endangered species.

In the vicinity of SEDA, agricultural crops and deciduous forests comprise the vegetative resources used by humans. Although no crops are grown on the Depot, farmland is the predominant land use in the surrounding private lands. Crops, including corn, wheat, oats, beans, and hay mixtures, are grown primarily for livestock feed. Deciduous forestland on the Depot and surrounding private lands is under active forest management. Timber and firewood are harvested from private woodlots.

In the vicinity of SEDA, there are several wildlife species that are hunted and trapped on private lands. Game species hunted include the eastern cottontail, white-tailed deer, ruffed grouse, ringnecked pheasant and various waterfowl. Gray squirrel and wild turkey are hunted to a lesser extent. Fur bearing species trapped in this study area include red and gray fox and raccoon. Muskrat and beaver are trapped to a lesser extent (Woodruff 1992). At the Depot, deer, waterfowl and small game hunting is allowed, although the designated waterfowl hunting area is outside the site. Trapping is also permitted (SEDA 1992).

Animals that may inhabit areas of SEDA include squirrels, eastern cottontails, red foxes, and ringnecked pheasants (although pheasant populations on the Depot are low). Raccoon and deer mice can be found in various habitats at the site. Muskrats and beavers may occur in the wetlands and creek habitats. Although deer have an average home range of a square mile, the other species have more localized or smaller home ranges.

Both SEAD-13-West and SEAD-13-East are characterized by sparse vegetation. At SEAD-13-East, sparse vegetation marks the IRFNA disposal pits.

Identification of Ecological Constituents of Potential Concern

All the COPCs identified in Section 3.2 for the human health risk assessment were considered as ecological COPCs. The highest concentration for each COPC measured at each of the sites was used as the exposure point concentration (EPC) in the calculations presented later in this section.

4.2.2 Contaminant Fate and Transport

The primary sources of contaminants at SEAD-13 are the residues that may be present in the soil and sediment from prior activities at the site. Contamination, if present, can migrate due to bioturbation or excavation. VOCs can move through the soils. Infiltrating rainwater can leach contaminants and transport them into groundwater, and surface water runoff can also carry contaminants onto adjacent soils, drainage ditches, or the Duck Pond.

Chemicals may migrate further in the environment by a variety of pathways following secondary release from surface soil and deeper soil. The following pathways result from these secondary release mechanisms:

- Suspension and dispersal by the wind of particulate contaminants or contaminants adsorbed to surface soil particles
- Direct volatilization of volatile organic compounds from surface soil to air
- Uptake of soil contaminants by terrestrial organisms
- Transport of chemicals to surface water and sediment by surface runoff of water and soil particles

4.2.3 Ecotoxicity and Potential Receptors

Understanding the toxic mechanism of a contaminant helps to evaluate the importance of potential exposure pathways and to focus the selection of assessment endpoints. For the constituents that are present at the site (**Appendix A**), the extent and magnitude of contamination is presented in **Section 2.0.** The toxicological information for nitrate/nitrite is presented as follows. The toxicological information for all the other COPCs can be found in Toxicological Profile Information Sheet provided by Agency for Toxic Substances and Disease Registry (ATSDR).

The indicator compounds at the site is nitrate/nitrite nitrogen. Methemoglobinemia, which can lead to anoxia and death in extreme cases, is the primary acute toxic effect of oral exposure to inorganic nitrates in all animals tested. Ruminant animals are most susceptible. This effect is extremely variable since it depends on a number of factors including the conversion of nitrates to nitrites; the ability of the various animals to enzymatically reduce methemoglobin; the amount of vitamins A, C, D, and E in the diet; and the nutritional state of the animal. Since nitrate is soluble, the screening ecological risk assessment should include potential exposure pathways for receptors to nitrate in water.

4.2.4 Complete Exposure Pathways

Evaluating potential exposure pathways is one of the primary tasks of the screening-level ecological characterization of the site. A complete exposure pathway consists of the following four elements:

- A source and mechanism of contaminant release to the environment
- An environmental transport mechanism for the released contaminants
- A point of contact with the contaminated medium
- A route of contaminant entry into the receptor at the exposure point

If any of these elements is missing, the pathway is incomplete and is not considered further in the ERA. A pathway is complete when all four elements are present and permit potential exposure of a receptor to a source of contamination. Quantification of some potentially complete pathways may not be warranted because of minimal risk contribution relative to other major pathways. The dominant pathways from sources and exposure media through the food web to ecological receptors potentially exposed to ecological COPCs at the site are presented in **Figure 4-1**. **Figure 4-1** will serve as a conceptual hypothesis for the exposure characterization, the objective of which is to gather information from in order to determine the pathways and media through which ecological receptors may be exposed to COPCs.

As shown in **Figure 4-1**, there are five media through which ecological receptors could be exposed to site-related contaminants: air (dust and vapor), soil, surface water, sediment, and organisms in the food chain. An exposure point is a location where a receptor could potentially come into contact with a contaminated medium. An exposure route is the means by which a receptor comes into contact with a contaminated medium at an exposure point. Exposure to COPCs may occur through the routes of ingestion, inhalation, and dermal contact.

Probable exposure routes (i.e., potentially complete pathways) were identified for each medium based on the physical characteristics of the site and the potential ecological receptors that may occur there. Exposure routes were also identified for ecological receptors. Principal pathways for which analytical data were available for quantitative evaluation of soil COPCs include: ingestion of soil and ingestion of other animals and plants that have accumulated contaminants. Although ingestion is the principal soil exposure route, dermal contact also may be important, particularly for burrowing species. However, the limited dermal permeability database available for ecological receptors and surrogate species precluded quantitative evaluation of the dermal exposure pathway. For sediment and surface water, principal pathways include direct contact with surface water and sediment, ingestion of surface water and sediment, and ingestion of other organisms that have accumulated contaminants.

Ecological receptors could potentially be exposed to site-related contaminants via the air medium. Contaminants in air may be in the form of vapor from VOCs, or in particulate form (as dusts or adsorbed to soil particles) suspended by wind. In either form, ecological receptors could be exposed to contaminants through inhalation. However, the lack of applicable inhalation toxicity data for ecological receptors or similar species precluded quantitative evaluation of potential risks.

Terrestrial animals could potentially be directly exposed to soil contaminants through ingestion of, dermal contact with, and/or inhalation of site soils. For species such as deer, raccoon, opossum, rabbits, rodents, and birds, such exposures would likely be associated with foraging activities. Burrowing species, such as rabbits, mice, moles, and shrews, would probably receive the greatest exposures among vertebrates. Invertebrates living on and within the soil also may experience significant exposures.

Plants may be considered ecological receptors as well as a pathway or medium through which wildlife receptors can be exposed to contaminants. Plants may absorb site-related contaminants from soil through their roots. Contaminants absorbed by plants may then be transferred to wildlife when the plants are ingested for food. This exposure pathway was addressed by use of chemical-specific soil-to-plant uptake factors (obtained from the scientific literature) in the animal receptor exposure calculations. Plants on the site showed visible signs of stress during the field reconnaissance.

Under the future land use scenario for the SEAD-13 site, it is assumed that contaminated soils may be excavated during construction and distributed on the ground surface. As under current conditions, ecological receptors could potentially be exposed to chemicals in soil through ingestion and dermal contact. Other exposure pathways were also assumed to remain essentially the same as under current conditions, except that possible inhalation exposures are likely to be reduced by paving and vegetation (e.g., lawns). The abundance and diversity of some ecological receptors on the site may likely be reduced due to the development.

4.2.5 Assessment and Measurement Endpoints

To assess whether significant adverse ecological effects have occurred or may occur at the sites as a result of ecological receptors' exposure to COPCs, ecological endpoints were selected. EPA's Ecological Risk Assessment Guidance for Superfund: Process for Designing and Conducting Ecological Risk Assessments (EPA, 1997) states that assessment endpoints are any adverse effects on ecological receptors, where receptors are plant and animal populations and communities, habitats, and sensitive environments. Adverse effects on populations can be inferred from measures related to impaired reproduction, growth, and survival. Adverse effects on habitats can be inferred from changes in community structure or function. Adverse effects on habitats can be inferred from changes in composition and characteristics that reduce the habitats' ability to support plant and animal populations and communities. Unlike the human health risk assessment process, which focuses on individual receptors, the ERA focuses on populations or groups of interbreeding nonhuman, non-domesticated receptors. In the ERA process, risks to individuals are assessed only if they are protected under the Endangered Species Act, as well as species that are candidates for protection or are considered rare.

The Depot does not provide habitat for any threatened or endangered species; therefore, the assessment endpoint of no reduction in numbers of any threatened/endangered species is met. However, the available field surveys indicate that the site is likely to be used by avian and mammal populations. Accordingly, the assessment endpoint that has been selected to represent the policy goal of protection of terrestrial populations and ecosystems is "no substantial adverse effect on survival, growth, and reproduction of resident mouse, shrew, and American robin populations."

Receptors selected for ERA included: terrestrial receptors and aquatic receptors.

Terrestrial Receptors

Site-specific receptors were selected to represent assessment endpoints based principally on their importance in the community food web; their susceptibility (through exposure and sensitivity) to the site-related constituents, the amount of available data describing their potential for exposure and the toxicological effects that may result from exposure; and the extent to which they represent management goals. The native mouse species inhabiting areas of SEDA are the most appropriate receptor species for soil, and the relevant assessment endpoint was defined as "no substantial adverse effect on resident mouse populations." Given the predominately herbaceous nature of the site, the deer mouse (*Peromyscus maniculatus*) was selected as the species with the niche best met by conditions present at the site. These are the vertebrate receptors most likely to be maximally exposed to contaminants in soil at the site. They also represent a significant component of the food chain, feeding on seeds and berries and soil invertebrates and providing prey for predators. Therefore, the deer mouse was selected as the receptor species at this site and measures of effects (measurement endpoints) were selected that could be extrapolated to predict effects on the assessment endpoints.

Databases and available literature were searched for toxicity data for deer mice or other native rodent species. In the absence of site-specific data, laboratory-derived data on mortality or reproductive effects were used as measurement endpoints. In the absence of data on native species, data for laboratory rodents such as laboratory mice (*Mus musculus*) and laboratory rats (*Rattus norvegicus*) were used.

A second terrestrial receptor, the short-tail shrew, was also evaluated. The shrew was selected because more of its diet is derived from soil invertebrates than the deer mouse. Therefore, the shrew may be more susceptible than the mouse to the effects of COPCs that bioaccumulate in soil biota. The shrew is a more conservative receptor than the mouse for COPCs that may bioaccumulate. A raptor, such as a red-tailed hawk, was initially considered as a potential receptor for this ERA. However, the home range of a hawk, approximately 1800 acres or more (EPA 1993, Wildlife Exposure Factors Handbook), is much greater than the area of any of the sites considered in this assessment. Therefore, it is unlikely that a hawk would derive a significant portion of its diet from prey at any one of the sites evaluated. As a result, the raptor was not further evaluated in this ERA.

A foraging bird species, the American robin, was selected because, although the home ranges of birds are typically much greater than small mammals, birds can be much more sensitive to some chemicals than mammals.

Aquatic Receptors

The assessment endpoint selected for evaluation of ecological risk associated with potential surface water contamination in the Duck Pond was the maintenance of benthic, aquatic, or amphibian populations that may occur in it. Aquatic organisms such as fish and macroinvertebrates and aquatic plants may be exposed to sediment through dermal contact and ingestion of sediments. Indirect exposure pathways for sediment include exposure to contaminants dissolved from sediment into interstitial pore water, and, consumption by other consumers in the food chain of plants or animals in which contaminants have bioaccumulated. Chemical bioavailability of many nonpolar organic compounds, including PCBs and pesticides, decreases with increasing concentration of total organic carbon (TOC) in the sediment. Surface water represents a potential transport medium for the constituents of concern (COCs). The potential source for contaminated surface water is contaminated soil with the release mechanism being surface runoff. Aquatic wildlife may be exposed to contaminants in surface water through contact with affected surface waters or through ingestion.

The measurement endpoints used for these assessment endpoints were NYS Benthic Aquatic Life Chronic Toxicity Levels, lowest effect levels, and NYS Wildlife bioaccumulation criteria for sediments and NYS. Class C Surface Water Quality Standards in the Duck Pond surface waters.

The surface water RME concentrations and NYS Class C criteria AWQS comparisons are presented in **Table A-19**. The sediment RME concentrations and Benthic Aquatic Life Chronic Toxicity

Levels, lowest effect levels, and NYS Wildlife bioaccumulation criteria for sediments value comparisons are presented in **Table A-20**.

Table 4.2-1 shows the policy goals, ecological assessment and measurement endpoints, and decision rules.

4.3 EXPOSURE ASSESSMENT

The exposure assessment evaluates potential exposure of ecological receptors to site-related constituents through evaluation of the following:

- Description of the spatial distribution of COPCs
- Description of spatial and temporal distribution of ecological receptors
- Quantification of exposure that may result from overlap of these distributions

Each of these components is discussed below.

4.3.1 Constituent Distribution

The extent of measured chemical contamination at the site is restricted to the areas sampled within SEAD-13. The total combined area of the SEAD-13-East and SEAD-13-West is 3 acres, less than 1 percent of the 10,000 acre Depot property. Soil located outside the Depot is presumed to be relatively clean.

The magnitude of constituent exposures that may be experienced by ecological receptors is affected by the degree of their spatial and temporal associations with the site, as discussed in the following sections.

4.3.2 Receptor Distribution

A variety of factors may affect the extent and significance of potential exposures. Receptor exposures are affected by the degree of spatial and temporal association with the site. For example, the receptors' mobility may significantly affect their potential exposures to site-related contaminants. Many species may only inhabit the study area during seasonal periods (e.g., breeding season, nonmigratory periods). Non-migratory species may remain in the vicinity throughout the year. These species, particularly those with longer life spans (and usually larger home ranges), have the greatest potential duration of exposure. However, species with small home range sizes have the greatest potential frequency of exposure. Other factors affecting exposures include habitat preference, behavior (e.g., burrowing, rooting, foraging), individual home range size (larger home ranges correspond to far less frequent use of study area), and diet. Diet is of particular importance in exposure as related to (1) food source availability (a larger amount of preferred food sources equals a

greater potential for receptor usage) and (2) bioaccumulative contaminants. Contaminants that bioaccumulate may also tend to biomagnify in the food chain. This is discussed in more detail in **Section 4.3.3**. As a result, predatory species at higher trophic levels may receive their most significant exposures through their prey. However, the possibility of a population of an upper trophic-level predator, or even an individual predator, utilizing SEAD-13 as a primary source of food is considered extremely remote.

The deer mouse and short-tailed shrew each have a typical home range of approximately $0.02{\sim}0.25$ and 1 acres (Sample et al., 1994). The American robin has a typical home range of 1 acre (Sample et al., 1994). The area of SEAD-13 is larger than this (3 acres), hence this area could constitute 100 percent of the home range of a deer mouse, shrew, or American robin.

4.3.3 Quantification of Exposure

Table 4.3-1 presents a summary of exposure assumptions used for the terrestrial receptors.

Evaluation of the degree to which contaminant and receptor distributions (described in the previous two sections) coincide at the site indicated that the deer mouse, short-tailed shrew, or American robin are the receptors likely to have the greatest potential exposures to COPCs in soil.

To quantify exposures of terrestrial receptors to each COPC, a daily intake of each constituent was calculated. Conversion of the environmental concentration of each COPC to an estimated daily intake for a receptor at the site was necessary prior to evaluation of potentially toxic effects. For terrestrial animal receptors, calculation of exposure intake rates relied upon determination of an organism's exposure to COPCs found in soil. Exposure rates for the deer mouse, short-tailed-shrew, and American robin receptors were based upon ingestion of contaminants from this medium and also from consumption of other organisms. The SLERA did not attempt to measure potential risk from dermal and/or inhalation exposure pathways given the insignificance of these pathways relative to the major exposure pathways (e.g., ingestion) and due to the scarcity of data available for these pathways.

The first step in measuring exposure rates for terrestrial wildlife was the calculation of food ingestion rates for the deer mouse, short-tailed shrew, and American robin. The EPA's *Wildlife Exposure Factors Handbook* (EPA, 1993c) includes a variety of exposure information for a number of avian, reptile, and mammalian species, including the deer mouse. Data are directly available for body weight, ingestion rate, and dietary composition for the deer mouse. For short-tailed shrew and American robin, the EPA (1999; 2000) recommended values were adopted for the SLERA.

To provide conservative exposure rate calculations for the deer mouse, the mean body weight of 0.02 kg for the female deer mouse and the highest reported mean food ingestion rate of 0.22 g/g -day (0.0044 kg/day) for a non-lactating mouse were used (EPA, 1993c). The *Wildlife Exposure Factors Handbook* (EPA, 1993c) also presents average values for intake of animal matter and plant matter for

the deer mouse, as well as incidental soil ingestion. Soil ingestion has been measured at less than 2 percent of diet (Beyer *et al*., 1994). As might be expected based on the opportunistic habits of mice, the proportion of animal to plant matter in the diet varies from around 65 percent animal: 35 percent plant to 25 percent animal: 75 percent plant, depending on season and region of the country. For this SLERA, an approximate average of 50 percent animal: 50 percent plant was used, after subtracting the 2 percent for incidental soil ingestion. The dietary intakes calculated for this assessment are as follows:

The short-tailed shrew is primarily carnivorous, with its diet consisting largely of insects and other invertebrates found in the soil. Based on information provided in EPA 1993, 5.3 percent of the shrew's diet is vegetative, with most of the remainder comprised of soil invertebrates. It was assumed that 100% percent of the shrew's intake is animal matter (small insects, *etc*.) in accordance with the EPA (2000) recommendation. The other exposure assumptions adopted by EPA (1999; 2000) were used for the short-tailed shrew. Accordingly, the shrew's dietary intakes calculated for this assessment are as follows:

The American Robin's diet includes ground dwelling invertebrates, foliage dwelling insects and fruits. The robin's diet varies significantly throughout the year, exhibiting a high insect and invertebrate intake in the spring and a high plant material intake characteristic in the fall. Averaging the dietary characteristics over these three seasons results in an average invertebrate intake of 44% and an average plant material intake of 56%. For this ERA, a diet was assumed to consist of 50 percent invertebrate and 50 percent plant in accordance with the EPA recommendation (1999). The other exposure assumptions adopted by EPA (1999) were used for the American robin. The dietary intakes calculated for this assessment are as follows:

A site-specific exposure dose of each COPC was calculated using a food chain uptake model consistent with EPA Region IV guidance (EPA, 1995). This algorithm accounts for exposure via incidental ingestion of contaminated soil, ingestion of plants grown in contaminated soil, and ingestion of lower trophic level animals associated with contamination. The exposure equation for soil is as follows:

 $ED_{soil} = [(C_s \times SP \times CF \times I_p) + (C_s \times BAF \times I_a) + (C_s \times I_s)] \times SFF / BW$

where:

In evaluating the potential for a contaminant to pose ecological risk, it is important to consider its propensity for bioaccumulation even though its concentration in an environmental medium may be below toxic levels. Therefore, all COPCs were evaluated with regard to their ecological persistence and tendency to bioaccumulate.

Bioaccumulation is the process of absorption and retention of a substance by an organism due to both uptake from water (or other surrounding media) and uptake from ingested residues in food, soil, and/or sediment. It is quantified by the calculation of a bioaccumulation factor (BAF). Bioconcentration is a component of bioaccumulation, accounting only for the process of uptake from the surrounding medium (usually water). It is quantified by the calculation of a bioconcentration factor (BCF). Both BAFs and BCFs are proportionality constants relating the concentration of a contaminant in the tissues of an organism to the concentration in the surrounding environment.

Bioaccumulation and bioconcentration may be a significant component of exposure to COPCs for the terrestrial receptors. For the deer mouse, short-tailed shrew, and American robin, bioaccumulation was evaluated by means of contaminant-specific soil-to-plant uptake factors and BAFs. The soil-to-plant uptake factors were obtained from NRC (1992) for metals and for organic compounds by using a regression equation from Travis and Arms (1988). The latter is based on the contaminant-specific octanol/water partition coefficient (log K_{ow}). BAFs were obtained from the

scientific literature. Factors reflecting accumulation of COPCs in earthworms were preferentially selected, based on the feeding habits of the deer mouse, shrew, and the American robin. **Table 4.3-2** shows values for soil-to-plant uptake factors and BAFs. A site foraging factor (SFF) of 1 was assumed for the mammals (i.e., deer mouse and short-tailed shrew) in accordance with the EPA guidance (1997). A site foraging factor of 0.5 was assumed for the American robin based on the fact that the American robin migrates south during winter.

Table A-17 in **Appendix A** shows the calculation of daily intakes for the receptors.

4.3.4 Effects Assessment

The effects assessment defines and evaluates the potential ecological response to ecological COPCs in terms of the selected assessment and measurement endpoints. The effects assessment for soil exposure includes the derivation of toxicity reference values (TRVs) that are the basis of the comparison. **Section 4.4** uses the results of the toxicity assessment to identify ecological COCs and characterize ecological risk.

For soil, the methodology for assessing the potentially toxic effects of COPCs was based on the derivation of a TRV for each COPC. The TRVs were derived to represent reasonable estimates of the constituent concentrations that, if exceeded, may produce toxicity effects in ecological receptors exposed to soil. Ideally, TRV values would be based on site-specific toxicity data. However, in the absence of site-specific data, toxicity data from the literature were used by establishing data selection criteria such that TRVs would be as relevant as possible to assessment endpoints for this site. Furthermore, the conservativeness of the TRVs was reinforced by using the lowest available appropriate toxicity values and modifying them by uncertainty factors, when necessary. The derivation of TRVs for soil is shown in **Tables 4.3-3A** and **4.3-3B.**

The toxicity benchmarks used as effects thresholds for the evaluation of the assessment endpoint (maintenance of healthy populations of small mammals) are based on NOAELs for test organisms (Sample *et al*., 1996). The NOAEL (no observed adverse effect level) is the highest exposure concentration at which no harmful effects were observed. Use of the NOAEL as the toxicity benchmark is more conservative than use of the LOAEL (lowest observed adverse effect level). Exposure of receptors to the LOAEL has been predicted to translate into less than 20 percent reduction in population size (Suter *et al*., 1994) or Lowest Observed Effects Concentrations.

For the terrestrial receptor, the order of taxonomic preference when choosing TRVs was data from studies using (1) native small mammal species potentially present at the site, or (2) proxy species, such as commonly studied laboratory species. The preferred toxicity test endpoint was the NOAEL from an appropriate chronic study for non-lethal or reproductive effects. When NOAEL values were not available, LOAELs were used, as available. Values based on chronic studies were preferred. Studies were considered to provide chronic toxicity data if conducted for a minimum duration of 1 year in mammals. Studies longer than acute but shorter than chronic are considered subchronic. Studies shorter than 90 days in mammals were considered acute. Studies on developmental effects were considered chronic if conducted during a critical gestation period.

The toxicity values selected by this approach were modified through the application of uncertainty factors, as applicable, to derive a TRV for each COPC. The TRVs represent NOAELs with uncertainty factors incorporated for toxicity information derived from studies other than chronic studies and studies on species other than the receptors selected for this risk assessment. When only a LOAEL was available, an uncertainty factor of 10 was applied, as recommended by EPA Region II, to represent a surrogate NOAEL. In addition, when toxicity information for a surrogate contaminant was used, an uncertainty factor of 10 was applied. Uncertainty factors were applied by dividing the initial toxicity value by the product of the necessary uncertainty factors. Uncertainty factors are listed in **Tables 4.3-3A** and **4.3-3B** with the TRVs developed for soil COPCs.

4.4 Risk Characterization

Risk characterization integrates exposure(s) and effect(s) on receptors using hazard quotients (HQs) (ratios of exposure and effect concentrations). The resulting data are used to define the magnitude of risk from ecological COPCs at the site and to assess the risk to ecological receptors. Risk characterization uses the results of the exposure and effects assessments to calculate an HQ for each COPC. The HQs are based on relevant measurement endpoints and are indicative of the COPC's potential to pose ecological risk to receptors. Any COPCs for a given exposure group and medium that were identified as likely to pose significant risk to receptors based on their HQs were classified as ecological COCs. Risk assessment related uncertainties are also analyzed and discussed.

Estimation of a COPC's potential to pose significant risk to receptors is based on the magnitude of the HQ value calculated for each constituent, as well as other factors such as the bioaccumulation/biomagnification potential, mechanism of toxicity, physicochemical characteristics, environmental fate, and ecological relevance of each contaminant. The HQ is a ratio of the estimated exposure dose (for terrestrial receptors) of a constituent to the TRV. Generally, the greater this ratio or quotient, the greater the likelihood of an effect. Typically, a quotient of 1 is considered the threshold level at which effects may occur. The TRVs on which the HQs were based were derived to be conservative and representative of chronic exposures, as described previously in **Section 4.3.4**.

The calculated HQs were used to assess the potential that toxicological effects will occur among the site's receptors. The likelihood that a population of deer mice, short-tailed shrews, or American robins could be significantly impacted by the toxicological effect(s) produced by a given COPC was a major factor in the subsequent determination (in **Section 4.4.2**) of whether that contaminant should be classified as an ecological COC.

Ecological risk from COPCs was characterized for the potential future land use of SEAD-13. Risks from constituents found in soil available to terrestrial and aquatic receptors were assessed quantitatively. Complete exposure and hazard quotient calculations are included in **Appendix A**. The hazard quotients calculated are also summarized in **Table 4.4-1** and **Table 4.4-2**. Significant findings are summarized in the sections below.

4.4.1 Surface Soil (0 - 2 ft)

The HQs for all COPCs identified in soil were less than one, with the exception of 4-methylnaphthalene, bis(2-ethylhexyl)phthalate, di-n-butylphthalate, and hexachlorobenzene. Hazard quotients for the receptors exposed to hexachlorobenzene in soil were 24, 13, and 23 for the deer mouse, shrew, and American robin, respectively.

4.4.2 Surface Water

Table 4.4-2 summarizes HQs for all COPCs in surface water at SEAD-13. The calculation was presented in **Table A-19** in **Appendix A**. The HQs for all COPCs identified in surface water were less than one with the exception of phenol, aluminum, and iron. HQs for aquatic receptors were 2, 38, and 20 for phenol, aluminum, and iron, respectively.

4.4.3 Sediment

Table 4.4-2 summarizes HQs for all COPCs in sediment at SEAD-13. The calculation was presented in **Table A-20** in **Appendix A**. HQs for 4-methylphenol, cadmium, chromium, copper, iron, lead, manganese, nickel, and silver were greater than 1 (3.0, 1.6, 1.1, 1.3, 1.5, 1.1, 1.7, 2.2, and 3.2, respectively).

4.4.4 Uncertainty

Uncertainty is inherent in each step of the ecological risk assessment process. Major factors contributing to uncertainty in this risk assessment are discussed qualitatively in the following sections.

4.4.4.1 Chemicals of Potential Concern

The sampling data may not represent the actual overall distribution of contamination at the site, which could result in underestimation or overestimation of potential risk from identified chemicals. However, the use of maximum concentrations provided conservative exposure estimates and it is, therefore, unlikely that the potential for deleterious levels of contaminants has been underestimated.

4.4.4.2 Exposure Assessment

While the potential receptor species selected for the site are inevitably a limited subset of the total list of species that may utilize the site, the potential exposure of the species evaluated in this assessment is considered likely to be representative of the nature and magnitude of the exposures experienced by those species not discussed.

Risk associated with intake of contaminants through the terrestrial food chain was addressed by modeling food chain transfer of chemical residues through plants and earthworms. The degree of uncertainty in the results of the analysis increases with the increasing distance of the receptor from the base of the food chain. Intakes from dermal contact with and inhalation of contaminants were not quantifiable for ecological receptors. However, this does not significantly increase the uncertainty of the estimated intakes because for most receptors, intakes via these routes are likely to be minimal relative to intakes via ingestion.

4.4.4.3 Toxicity Assessment

There is uncertainty associated with the TRVs calculated for this risk characterization because the toxicity data were not site-specific. However, the TRVs used were conservative and were modified by uncertainty factors, when necessary, to increase the applicability of the data to the assessment. The HQs calculated from these conservative TRVs and maximum concentrations provide confidence that the risk assessment yielded reasonably conservative estimates of the potential risk of adverse ecological effects on the assessment endpoint.

Each COPC was assumed to be highly bioavailable. However, for most chemicals in most media, this is an overestimation (Dixon *et al*., 1993) that may result in an overestimation of the potential for ecological risk. Empirical information on bioavailability of the COPCs was not available. No leachability tests in soil or sediment were conducted. No analysis for acid-volatile sulfide/simultaneously extracted metals was conducted as a measure of bioavailability in sediment. It is possible that some of the contaminants, particularly the metals, may be bound to soil or sediment particles and not available for uptake by receptors. This would tend to overestimate risk.

The soil-to-plant uptake equations and the BAFs include a bioavailability factor; however, these data, taken from the scientific literature, are not specific to this site and may under- or overestimate exposure. For several metals, no quantitative bioavailability data could be found, other than an indication from the literature that the constituent does not significantly bioaccumulate. For these metals, a bioaccumulation factor of 1.0 was used in the exposure equation. This is likely to overestimate the actual value.

The potential for toxic effects to be produced in receptor organisms as a result of exposure to multiple chemicals in a single medium or in multiple media was not evaluated. Therefore, the potential toxic

effects in a receptor as a result of exposure to a given medium could be higher or lower than estimated, depending on toxicological interactions. Exposure of a receptor to multiple contaminated media is likely to increase the risk of toxic effects.

4.4.4.4 Risk Characterization

The methodology, conservative assumptions, and toxicity benchmarks used in the risk estimation portion of the risk characterization are expected to overestimate, rather than underestimate, the potential for COPCs to pose risk to the ecological assessment endpoint. Maximum environmental concentrations were used, concentrations were assumed to remain constant over time, and the toxicity benchmarks used were the NOAEL values (levels where no toxic effects are expected) or conservative surrogates based on LOAEL values for non-lethal or reproductive effects appropriate for extrapolation to effects on the assessment endpoint.

4.5 FURTHER REFINEMENT OF CONTAMINANTS OF CONCERN

For the screening level ERA, NOAEL toxicity values and default exposure assumptions were used to calculate screening level HQs. Due to the conservative nature of these assumptions, additional evaluation is required to refine the contaminants of concern. This streamlines the overall ERA process to determine if further evaluation is warranted. This section presents the results of further refinement of contaminants of concern conducted in accordance with EPA's ERAGS supplemental guidance (EPA, 2001).

Alternative toxicity values and maximum exposures based on maximum concentrations were considered for determining potential contaminants of concern (COCs). The use of maximum concentrations provided for conservative estimates so that risk would not be understated. The receptor is likely to range over the entire site and not be continuously exposed to the maximum concentration at all times. This additional risk characterization performed as part of the ERA Step 3 is discussed in **Sections 4.5.2** through **4.5.4** for each medium and can be used to refine the COCs and support a decision for either additional evaluation or no further evaluation of environmental risk.

4.5.1 Overall Conservative Evaluation of Ecological Risks in Steps 1 and 2

Using ERAGS, this SLERA was conducted using highly conservative assumptions. Therefore, the SLERA in general leads to an overestimation of the risks to the ecosystem. This section discusses three major parameters for which conservative estimations were used: the relative bioavailability, the foraging factor, and the NOAEL/LOAEL multiplier.

Relative Bioavailability

Although the relative bioavailability of contaminants at the site was assumed to be 100 percent for the SLERA, contaminants in environmental media are generally less available to biological organisms compared with the same contaminants in the experimental medium (i.e., diet, water, etc.). Extensive scientific data now exist to support the concepts that the longer the chemicals remain in soil, (1) the less readily they are removed by solvents, including water, (2) the less available they become to microorganisms, (3) the less toxic they become to organisms such as earthworms, and (4) the less they are ingested by organisms such as earthworms. This reduction in availability of the chemicals reduces the risk associated with their presence in the soil (GRI, 1997, as cited in Nakles et al., 2002). For example, the toxicity of DDT declined by 25~80% for animals (including fruit flies, houseflies, and cockroaches) after 90 days of aging (Nakles, et al., 2002). Based on the above discussion, the overall conservative assumptions (100% bioavailability) tend to overestimate the risks.

Chemical-specific bioavailability factors are discussed in the following sections, where appropriate, on a case-by-case basis.

NOAEL/LOAEL Multiplier

A NOAEL is preferred to a LOAEL as a screening ecotoxicity value to ensure that risk is not underestimated (EPA, 1997a). However, currently NOAELs are not available for many groups of organisms and many chemicals. When a LOAEL value, but not a NOAEL value, is available from the literature, a standard practice is to multiply the LOAEL by a NOAEL/LOAEL multiplier, 0.1, and to use the product as the NOAEL for the screening evaluation. Although a NOAEL/LOAEL multiplier of 0.1 was used, the true NOAEL may be only slightly lower than the experimental LOAEL, particularly if the observed effect is of low severity (Sample et al., 1996). The data review referred to in the ERAGS that is used to support the use of 0.1 as the NOAEL/LOAEL multiplier indicates that 96% of chemicals included in the review had a NOAEL/LOAEL multiplier no less than 0.2. Therefore, using a default NOAEL/LOAEL multiplier of 0.1 may result in an overestimation of the HQs.

4.5.2 Identification of Soil COCs

This section presents further evaluation of the soil COPCs identified in the initial screening level ERA. Based on the calculated risk estimates for the initial screening level ERA, several SVOCs had HQs greater than 1: 4-methylphenol, bis(2-ethylhexyl)phthalate, di-n-butylphthalate, and hexachlorobenzene (see **Table 4.4-1**). Further evaluation presented in this section resulted in no COCs and the rationales are discussed below.

For 4-methylphenol, only the HQ associated with the maximum concentration for the American robin was above 1 (7.8). 4-methylphenol was detected in 6 out of 30 surface soil (0-2 ft bgs) samples and the second highest concentration was 0.032 mg/kg, much lower than the maximum concentration used for the SLERA (9.2 mg/kg) . The SVOC quantitation limit for the sample where the maximum concentration of 4-methylphenol was detected was elevated (more than ten times of the SVOC quantitation limits of the other soil samples) and the detected 4-methylphenol concentration was less than 3 times of the elevated quantitation limit (i.e., 9.2 mg/kg vs. 3.9 mg/kg). In addition, 4-methylphenol was not detected in another surface soil sample colleted from the same location (i.e., SB13-10) and the quantitation limit was 0.37 mg/kg. Therefore, the maximum detected 4-methylphenol concentration is not representative of the concentrations in surface soil at SEAD-13. The alternative HQ based on the second highest concentration of 4-methylphenol for the American robin is $7.8 \times 0.032/9.2 = 0.03$, which is much lower than 1. Based upon the above discussion, 4-methylphenol is not expected to have any significant impacts on ecological receptors at this site and was not identified as a COC.

For bis(2-ethylhexyl)phthalate, only the HQ associated with the maximum concentration for the American robin was slightly above 1 (2.2). Bis(2-ethylhexyl)phthalate is a common laboratory contaminant. It was detected in 5 out of 30 surface soil (0-2 ft bgs) samples and the second highest concentration was 0.1 mg/kg, much lower than the maximum concentration used for the SLERA (1.9 mg/kg). Similar to 4-methylphenol, the SVOC quantitation limit for the sample where the maximum concentration of bis(2-ethylhexyl)phthalate was detected was elevated (more than ten times of the SVOC quantitation limits of the other soil samples) and the detected bis(2-ethylhexyl)phthalate concentration was less than the elevated quantitation limit (i.e., 1.9 mg/kg vs. 3.9 mg/kg). In addition, bis(2-ethylhexyl)phthalate was not detected in another surface soil sample colleted from the same location (i.e., SB13-10) and the quantitation limit was 0.37 mg/kg. Therefore, the maximum detected bis(2-ethylhexyl)phthalate concentration is not representative of the concentrations in surface soil at SEAD-13. The alternative HQ based on the second highest concentration of bis(2-ethylhexyl)phthalate for the American robin is $2.2 \times 0.1/1.9 = 0.4$, which is lower than 1. Based upon the above discussion, bis(2-ethylhexyl)phthalate is not expected to have any significant impacts on ecological receptors at this site and was not identified as a COC.

For di-n-butylphthalate, only the HQ associated with the maximum concentration for the American robin was slightly above 1 (1.6). Di-n-butylphthalate is a common laboratory contaminant. Therefore, the detected concentration might not be related to the historical site activities. It was detected in only 2 out of 30 surface soil (0-2 ft bgs) samples and the second highest concentration was 0.0086 mg/kg, much lower than the maximum concentration used for the SLERA (0.14 mg/kg). Therefore, the maximum detected di-n-butylphthalate concentration is not representative of the concentrations in surface soil at SEAD-13. Based upon the above discussion, di-n-butylphthalate is not expected to have any significant impacts on ecological receptors at this site and was not identified as a COC.

For hexachlorobenzene, the HQs associated with the maximum concentration for all the evaluated receptors exceeded 1 (24, 13, and 23 respectively for deer mouse, short-tailed shrew, and American

robin). Hexachlorobenzene was detected in only 2 out of 30 surface soil (0-2 ft bgs) samples and the detected concentrations were lower than the EPA Contract Required Quantitation Limits for the Contract Laboratory Program (CLP) (39~210 ug/kg vs. 330 ug/kg). In addition, hexachlorobenzene was not detected in any of the other media at SEAD-13. Based upon the above discussion, hexachlorobenzene is not expected to have any significant impacts on ecological receptors at this site and was not identified as a COC.

4.5.3 Identification of Surface Water COCs

Although HQs for phenol, aluminum, and iron exceeded 1 for aquatic receptors using the NYSDEC AWQS (Class C) as the screening values, no COCs were identified for surface water.

The HQ for phenol only slightly exceeded 1 (1.86) based on the maximum detected phenol concentration at the site. Phenol was detected in 2 out of 9 surface water samples. Multiple rounds of sampling were conducted at the locations where phenol was detected and all the other rounds indicated that phenol was not detected. In addition, phenol was not found in any soil, groundwater, or sediment samples. Therefore, there is no evidence that the site has been impacted by phenol. Based on the above discussion, phenol was not considered a COC in surface water.

Aluminum and iron occur naturally and the elevated concentrations in the surface water samples might be caused by the high turbidity during the sampling process. For example, the turbidity values were low for all the surface water samples collected in 2000 (1.7~5.7 NTU). The aluminum concentrations in all the 2000 samples had aluminum levels below the NYSDEC AWQS (Class C). That is, the HQs were below 1 using the 2000 concentrations to represent the surface water concentrations at the site. In addition, aluminum and iron concentrations in soil are consistent with background. Iron concentrations in groundwater are consistent with background and aluminum concentrations in groundwater only slightly exceeded 2 times of the average background level. Based on the above information, aluminum and iron were not considered COCs for surface water.

4.5.4 Identification of Sediment COCs

The maximum 4-methylphenol concentration detected at SD13-4 was lower than the sample quantitation limit for SVOCs (58 μ g/kg vs. 130 μ g/kg). All the other sample concentrations were below the sediment screening value identified for this SLERA. Therefore, 4-methylphenol was not considered a COC for sediment.

Although several metals (cadmium, chromium, copper, iron, lead, manganese, nickel, and silver) have HQs slightly exceed 1, none was identified as a COC. Metals in sediment are frequently bound to particles or complexed with other elements, making them less available to biological organisms. These tendencies would tend to limit the bioavailability of metal to ecological receptors.

- Metal toxicity is generally associated with the soluble fraction.
- Soluble metal and not total metal is associated with the uptake and bioaccumulation of metal from soil into plants.
- The oral toxicity of metal compounds in soil is dependant upon the chemical form. Insoluble compounds are considerably less toxic compared to the soluble forms. The sediment pH at the site favors formation of insoluble fractions.
- Although bioaccumulation has been observed for some metals (e.g., Cd, Pb, etc.), biomagnification is not reported for these metals.

Based on the slight exceedances of 1 for HQs and the conservative estimate of the bioavailability, the above metals are not considered to present a significant potential for adverse aquatic effects and are not considered as COCs at this site.

4.6 ECOLOGICAL RISK SUMMARY

COPCs in soil, sediment, and surface water were quantitatively assessed for ecological risk for future conditions. Exposure to these COPCs in soil by representative terrestrial receptors (deer mouse, short-tailed shrew, and American robin) was further evaluated to determine if any COPCs have a high likelihood of being a significant risk to the receptor population analyzed for this risk assessment or the ecological community that encompasses the site. COPCs in surface water and sediment were compared to NYS surface water and sediment criteria.

A hierarchy of assessment endpoints was selected to assess both proximate and ultimate risks that might be associated with site-related chemicals. The proximate assessment endpoint was chosen to provide protection of the population levels of vertebrate species that utilize the sites to a significant extent and that are important as indicators of potential effects on the health of the community. Deer mice, short-tailed shrews, and American robins represent terrestrial vertebrate populations at the sites. Although toxic effects that reduce this assessment endpoint population or the populations they represent in the immediate vicinity of the site are significant to the populations themselves, they are not necessarily significant to the ultimate, more important, assessment endpoint: the community of species that occupies the area surrounding and including the site.

It is this ultimate assessment endpoint, maintenance of the health and diversity of the natural community in the area, that is the most important ecological component to be protected with regard to this site. Therefore, any COCs estimated to pose a potential for adverse effects to proximate assessment endpoints would subsequently be evaluated with regard to the risk they may pose to the ultimate assessment endpoint.

The ecological setting of SEAD-13 is not unique or significant, as described in **Section 4.2.2**. There are no endangered, threatened, or special concern species in the vicinity that are likely to be dependent on or affected by the habitat at the site. The species that inhabit the sites are not rare in the region and are not generally considered to be of special societal value.

In soils available to terrestrial receptors (0-2-ft bgs) representative of future conditions at the site, the HQs calculated for all COPCs were less than 1 with the exception of 4-methylphenol, bis(2-ethylhexyl)phthalate, and di-n-butylphthalate for the American robin, and hexachlorobenzene for all terrestrial receptors. However, biased soil sampling and the use of maximum values and NOAELs in the risk calculations result in highly conservative numerical hazard quotient estimates. Therefore, none of these SVOCs are considered COCs for terrestrial receptors.

In surface water available to aquatic receptors that are representative of future conditions at the site, the HQs calculated for all COPCs were less than 1 with the exception of phenol, aluminum, and iron; however, none of these compounds are considered COCs. Considering the results of multiple rounds of sampling, there is no evidence that the site has been impacted by phenol. The high hazard quotients for aluminum and iron, which are naturally occurring metals, are likely a result of high turbidity in the surface water samples. Therefore, there are no COCs for aquatic receptors in the surface water.

For sediment available to aquatic receptors, the HQs for 4-methylphenol and eight metals slightly exceeded 1. None of these constituents are considered COCs since the HQs are based on conservative assumptions of the bioavailability of the metals to aquatic receptors. Therefore, the results of the SLERA demonstrate that there are no COCs at SEAD-13 that pose a threat to terrestrial or aquatic receptors in the surface soil, surface water, or sediment.

5.0 RECOMMENDATIONS

This section presents the recommendations of the Army and supporting data for the Inhibited Red-Fuming Nitric Acid Disposal Site (SEAD-13). The Army recommends the following:

- Remedial action for soil, sediment, and surface water is not required;
- Groundwater use restriction to prevent the ingestion of groundwater is required until contaminant concentrations meet NYSDEC Class GA groundwater standards and EPA MCL_s;
- An annual groundwater program will be developed and implemented; and
- Five-year reviews will be performed, in accordance with Section 121(c) of the CERCLA, until data shows that they are no longer required.

The groundwater use restriction would eliminate contact with groundwater as an exposure pathway for human health risk, thereby reducing risk to within acceptable levels for potential human receptors. With the exception of groundwater ingestion, there are no other unacceptable risks at SEAD-13. The land use restriction could involve a restriction on the deed, local building code modification, etc., to prohibit the use of the groundwater for drinking purposes. A restriction on the use of groundwater for drinking purposes together with a groundwater monitoring program is recommended due to the presence of elevated levels of nitrate/nitrite-nitrogen in the groundwater at SEAD-13-East. In accordance with Section 121(c) of the CERCLA, the monitoring program will be reviewed after five years.

The Army's decision to place a land use restriction on SEAD-13 and no further action for the other media is based on the results of the Expanded Site Investigation (ESI) in 1993/1994 and supplemental sampling, conducted from 2000 to 2002, summarized in **Section 2.0**, and the mini risk assessment conducted in **Sections 3.0** and **4.0** of this report. Conclusions of the field investigation and risk assessment supporting the Army's recommendation are as follows:

- Results of field investigations associated with the ESI and supplemental sampling identified four wells at SEAD-13-East with nitrate/nitrite-nitrogen concentrations above the NYS Ambient Water Quality Standard (AWQS) for groundwater classified as GA. The Army recommends annual groundwater monitoring, which would include five-year reviews (see **Section 5.1** below).
- The results of the surface water investigation indicated that nitrate/nitrite-nitrogen is below criteria established for nitrate in drinking water sources in New York State (10 mg/L) (see **Section 5.1** below).
- Total carcinogenic risk from all exposure routes is within the EPA target range for all receptors at SEAD-13 (see **Section 5.2** below).
- If groundwater use is prevented, total non-carcinogenic risks to receptors due to the SEAD-13 site are reduced to within acceptable limits. (see **Section 5.2** below).
- Assumptions used for the estimation of risks for SEAD-13 were conservative due to the use of maximum concentration of a constituent as the exposure point concentration (EPC) instead of the Upper $95th$ Confidence Limit (UCL) of the mean; therefore, the risk is likely overstated (see **Section 5.2** below).
- Ecological risk assessment results showed that there are no COCs in surface soil, surface water, or sediment that could pose a risk to receptors at SEAD-13 (see **Section 5.2** below).

5.1 EXPANDED SITE INVESTIGATION RESULTS SUPPORTING THE RECOMMENDED ACTION

Results from the Expanded Site Investigation and supplemental investigation that support the Army's recommendation outlined above are provided in this section.

Results of field investigations associated with the ESI and supplemental sampling identified four wells at SEAD-13-East with Nitrate/Nitrite concentrations above the NYS GA standard

During the field investigations at SEAD-13, samples from four groundwater wells (MW13-2, MW13-11, MW13-13, and MW13-14) had nitrate/nitrite-nitrogen concentrations above the NYS AWQS Class GA Standard of 10 mg/L. During the ESI, the concentration of nitrate/nitrite-nitrogen in the groundwater sample collected from MW13-2 on the east side of the Duck Pond (SEAD-13-East) was 460 mg/L. Nitrate/nitrite-nitrogen was not detected in the well upgradient of this location (MW13-1), and levels of nitrate/nitrite-nitrogen in wells downgradient of MW13-2 (MW13-3 and MW13-7 located between MW13-2 and the Duck Pond), could not be measured since they were dry. Monitoring wells on the west side of the Duck Pond had nitrate/nitrite concentrations meeting the NYS AWQS Class GA Standards (10 mg/L).

During the supplemental groundwater sampling in 2001 and 2002, three additional wells (MW13-11, MW13-13, and MW13-14) were installed at SEAD-13-East. In the most recent sampling round, April 2002, the groundwater samples collected from each well (except MW13-1) at SEAD-13-East had nitrate levels that exceeded the NYS criteria (445 mg/L, 119 mg/L, 731 mg/L, and 139 mg/L from MW13-2, MW13-11, MW13-13, and MW13-14, respectively). Therefore, the Army recommends annual groundwater monitoring and five-year reviews. The details of the groundwater monitoring program will be provided in a Remedial Design Plan.

The results of the surface water investigation indicated that nitrate/nitrite-nitrogen is below the NYS AWQS Standard of 10 mg/L for nitrate in drinking water.

Water level measurements and EM-31 results indicated that groundwater flows west on the east of the pond and east on the west side of the pond; i.e., groundwater discharges directly into the pond. Although groundwater flows towards the pond, nitrate/nitrite-nitrogen concentrations in samples collected from the Duck Pond were very low (0.02-0.11 mg/L). The only NYS AWQS standard that exists for surface waters is 10 mg/L for drinking water sources. As the Duck Pond is not a drinking water source, this standard does not apply. However, levels measured within the pond were well below this standard. This indicates that if any discharge into the pond occurs, it is not significantly impacting the nitrate/nitrite-nitrogen levels within the pond.

The potential for impacts to existing drinking water sources is remote.

The potential for the nitrate/nitrite-nitrogen levels observed in four wells (MW13-2, MW13-11, MW13-13, and MW13-14) at SEAD-13-East to affect existing drinking water sources was evaluated, and the following is concluded. Drinking water wells on the east of the site will not be affected since they are 4,000 feet upgradient of MW 13-2. Drinking water wells located downgradient of the site will most likely not be affected as well, since the closest well is 7,000 feet away from the site and the Duck Pond lies between SEAD-13 and this downgradient drinking water well. As stated above, the pond appears to be unaffected by the presence of nitrate/nitrite-nitrogen levels detected in the groundwater wells in SEAD-13-East. Therefore, it is unlikely a well downgradient of the pond would be affected.

5.2 MINI RISK ASSESSMENT RESULTS SUPPORTING THE RECOMMENDED ACTION

Results from the mini risk assessment that support the Army's recommendation outlined above are provided in this section.

Total carcinogenic risk from all exposure routes is within the EPA target range for all receptors at SEAD-13.

The mini risk assessment conducted at SEAD-13 concluded that the total carcinogenic risk from all exposure routes is within the EPA target range of $10⁻⁴$ and $10⁻⁶$ for all receptors of both future land use scenarios considered, and, therefore, the site does not pose a cancer risk to any receptor. These future land uses were conservation/recreation and residential.

If groundwater use is prevented, total non-carcinogenic risks to receptors due to constituents present at the SEAD-13 site are reduced to within acceptable limits.

The mini risk assessment conducted at SEAD-13 concluded that the total non-cancer hazard index (HI) from all exposure routes is less than 1 for the construction worker, but exceeds 1 for the park worker (HI=4) and the recreational visitor (HI=2). The elevated HI for both receptors is due to ingestion of groundwater, with nitrate/nitrite-nitrogen, aluminum, and manganese in groundwater as the largest contributors of risk for both land uses. When the groundwater pathway is eliminated, the total hazard indices for these receptors are 0.008 and 0.006, meeting the EPA hazard index criteria of less than 1.

Assumptions used for the estimation of risks for SEAD-13 were conservative.

Two possible land uses were considered for the mini risk assessment at SEAD-13: conservation/recreation land use and residential development land use. Conservation/recreation land use is the land use recommended by the Local Redevelopment Authority (LRA) for the SEAD-13 site. Residential land use, which resulted in higher non-carcinogenic risks, was considered to provide a conservative baseline for the site even though residential development at this site is unlikely. Therefore, it is unlikely that the risk calculated under the residential scenario would be exhibited, since such land use is improbable.

Another example of conservative assumptions used in the mini risk assessment was the use of maximum concentration of a constituent as the EPC instead of the Upper 95th Confidence Limit (UCL) of the mean. The maximum value was used due to the limited number of samples collected during the field investigations. The use of the maximum concentrations implies chronic exposure to the maximum concentration, which would likely overestimate the level of risk at the site.

Ecological risk assessment results showed negligible risks to receptors at SEAD-13.

Ecological risk assessment results showed negligible ecological risk to receptors in surface soil, surface water, and sediment. The only constituents exhibiting a hazard quotient greater than 1 in the soil were 4-methyphonol, bis(2-ethylhexyl)phthalate, di-n-butylphthalate, and hexachlorobenzene. However, biased soil sampling and the use of maximum values and NOAELs in the risk calculations result in highly conservative numerical hazard quotient estimates. Therefore, none of these SVOCs are considered to pose a risk to terrestrial receptors. For surface water, the SLERA calculated HQs greater than 1 for phenol, aluminum, and iron. None of these COPCs are considered to pose a threat to aquatic receptors, sine there is no evidence that the site is impacted by phenol, and since the samples of aluminum and iron, which occur naturally at SEDA, were characterized as turbid. In sediment, HQs calculated for 4-methylphenol and eight metals were greater than 1; however, this risk is overstated since conservative assumptions were used regarding the bioavailability of the metals to aquatic receptors. For these reasons, there is no ecological risk posed by constituents at SEAD-13.

TABLE 3.2-2 CHEMICALS OF POTENTIAL CONCERN - SEAD-13 Decision Document- Mini Risk Assessment Seneca Army Depot Activity

NOTES:

1. Although site concentrations exceeded background, calcium, magnesium, potassium, and sodium are considered nutrients and are only toxic at very high
doses (i.e., concentrations that are much higher than those associated

TABLE 3.3-2SUSPENDED PARTICULATE CONCENTRATIONS MEASURED AT SEDA

Decision Document - Mini Risk Assessment

Seneca Army Depot Activity

tive Summary for April 1, 1995 through July 31, 1995

TABLE 3.4-1 TOXICITY VALUES Decision Document - Mini Risk Assessment Seneca Army Depot Activity

o = Value for Chlordane.

p = Two RIDs are available for cadmium and the most conservative is presented.

q = Values for Chronium VI.

q = Values for Chronium VI.

r = For managenese, for dietary intake, a RID of 0.14 mg/

NA = Not Available
P:\PIT\Projects\SENECA\SEAD 13\S13-nfa\Final_October_2,4- and dinitrotoluene, 2,6- were analyzed as both nitroaromatics and semivolatiles.
Page 1 of 1 Page 1 of 1 Page 1 of 1 Page 1 of 1 Page 1 of 1 Page

TABLE 3.5-1 CALCULATION OF TOTAL NONCARCINOGENIC AND CARCINOGENIC RISKS REASONABLE MAXIMUM EXPOSURE (RME) - SEAD-13 Decision Document - Mini Risk Assessment Seneca Army Depot Activity

NQ= Not Quantified due to lack of toxicity data.

TABLE 4.2-1POLICY GOALS, ECOLOGICAL ASSESSMENT AND MEASUREMENT ENDPOINTS, AND DECISION RULES

Decision Document - Mini Risk Assessment Seneca Army Depot Activity

COPC = constituent of potential concern.

TES = threatened and endangered species.

NOAEL = no observed adverse effect level.

LOAEL = lowest observed adverse effect level.

HQ = hazard quotient.

TABLE 4.3-1WILDLIFE INTAKE RATESDecision Document - Mini Risk Assessment - Other SitesSeneca Army Depot Activity

Receptor Body Trophic Foraging Home Dietary Breakdown(4) Weight (kg) (1) Level(2) Factor(3) Range (Hectares) Plant (wet- kg/day) Animal (wet- kg/day) Soil (dry- kg/day) Deer Mouse 0.020 3 1 0.01-0.1 0.00216 0.00216 0.000088Short-tailed Shrew 0.018 3 1 0.39 0.00000 0.0011 0.00011American Robin 0.080 3 0.5 0.42 0.017 0.017 0.0011I I

Notes:

(1) Body weight of deer mouse based on mean body weight for female deer mouse.

Body weight of short-tailed shrew from USEPA Ecological Soil Screening Level Guidance (Draft, 2000).

(2) Trophic level: organisms are assigned to trophic levels of 1 (producer), 2 (herbivore), 3 (1st order carnivore), and 4 (top carnivore) within the food web.

(3) Foraging factor: adjustment factor (from 0 to 1) based upon an organism's total time of exposure to unit-based contaminants. For this risk assessment, foraging factors were assumed to be 1 for the deer mouse and short-tailed shrew. A foraging factor of 0.5 was used for the American Robin, since they migrate south for the winter.

(4) Source: Deer Mouse: Wildlife Exposure Factors Handbook, USEPA 1993 and USEPA 1997. Assumes 50% plant and 50% invertibrates. Short-tailed Shrew: USEPA Ecological Soil Screening Level Guidance (Draft, 2000). Animal intake rate (0.62 kg wet/kg BW-day) from USEPA, 1999. Home Range from Sample et al., 1994.

American Robin: USEPA, 1999. Home range from Sample et al., 1994.

TABLE 4.3-2 ENVIRONMENTAL FATE AND TRANSPORT PROPERTIES FOR CHEMICALS OF POTENTIAL CONCERN Decision Document - Mini Risk Assessment Seneca Army Depot Activity

(1) Logarithmic value of octonol-water partition coefficient. LogKow source: Montgomery, J.H. and L.M. Welkom, *Groundwater Chemicals Desk Reference*,1989.
/ooil to plant uptake factor. For organic chemicals without report

(4) BAF = Bioaccumulation factor.

(5) For chemicals without reported SP or BAF values, surrogate or default values were assigned based on best professional judgement.

TABLE 4.3-3ANOAEL TOXICITY REFERENCE VALUES - MAMMALS Decision Document - Mini Risk Assessment Seneca Army Depot Activity

TABLE 4.3-3ANOAEL TOXICITY REFERENCE VALUES - MAMMALSDecision Document - Mini Risk AssessmentSeneca Army Depot Activity

Notes:

(1) CF = conversion factor. Conversion factors - endpoint (non-NOAEL = 10) and study duration (non-chronic = 10)

(2) The toxicity reference value was derived by dividing the effect dose by the total conversion factor.

(3) This table includes TRV factor information available from Parsons ES-Tampa current database (8/99).

(4) V = Volatile (MW<200, H>1E-05); SV = Semi-Volatile; PAH = Polynuclear Aromatic Hydrocarbon; PES = Pesticide; PCB = Polychlorinated Biphenyl; ING = Inorganic

(5) Mammals: acute = <90days, subchronic = 90days - 1yr, chronic = >1yr. Birds: acute = <18days, subchronic = 18days - 10wks, chronic = >10wks. Source: Sample et al. 1996

If the study is during a critical life stage (gestation or development), the study may be considered a chronic exposure.

(6) The product of the appropriate uncertainty factors from each uncertainty category becomes the total uncertainty factor applied to develop the constituent-specific TRV.

(7) Value for Nitrate is used.

TABLE 4.3-3B NOAEL TOXICITY REFERENCE VALUES - BIRDSDecision Document - Mini Risk Assessment Seneca Army Depot Activity

TABLE 4.3-3B NOAEL TOXICITY REFERENCE VALUES - BIRDSDecision Document - Mini Risk Assessment Seneca Army Depot Activity

1 CF = conversion factor.

2 The toxicity reference value was derived by dividing the effect dose by the total conversion factor.

TABLE 4.4-1 HAZARD QUOTIENT SUMMARY - TERRESTRIAL RECEPTORS Decision Document - Mini Risk Assessment Seneca Army Depot Activity

1. Bold Hazard Quotients indicate that the HQ is greater than 1.

TABLE 4.4-2 HAZARD QUOTIENT SUMMARY - AQUATIC RECEPTORS Decision Document - Mini Risk Assessment Seneca Army Depot Activity

1) Bold hazard quotients indicate that HQ is greater than 1.

R:\PROJECT_GRAPHICS\SENECA\GEOXSEC.CDR(CVM)

R:\PROJECT_GRAPHICS\SENECA\WINDROSE.CDR(CVM)

P:\PIT\Projects\SENECA\SEAD 13\S13-nfa\Final_July2004\figures\exp4.cdr

APPENDIX A

Laboratory Analyses Results – SEAD-13 Risk Calculation Tables for Conservation/Recreational Land Use

- [Table A-1a: Surface Soil Analysis Results](#page-144-0)
- Table A-1b: Subsurface Soil Analysis Results
- Table A-2: Groundwater Analysis Results
- Table A-3: Surface Water Analysis Results
- [Table A-4: Sediment Analysis Results](#page-164-0)
- Table A-5: Inorganics Analysis of Soil
- Table A-6: Inorganics Analysis of Groundwater
- Table A-7: Exposure Point Concentrations for Chemicals of Potential Concern
- Table A-8: Ambient Air Exposure Point Concentrations
- [Table A-9: Calculation of Intake and Risk from the Inhalation of Dust in Ambient Air](#page-169-0)
- Table A-10: Calculation of Intake and Risk from the Ingestion of Soil
- Table A-11: Calculation of Absorbed Dose and Risk from Dermal Contact to Soil
- Table A-12: Calculation of Intake and Risk from Inhalation of Groundwater (While Showering)
- Table A-12a: Calculation of Air Concentration in Shower from Volatilization of Groundwater (Daily)
- [Table A-13: Calculation of Intake and Risk from the Ingestion of Groundwater](#page-174-0)
- Table A-14: Calculation of Intake and Risk from Dermal Contact to Groundwater (While Showering)
- Table A-15: Calculation of Adsorbed Dose and Risk from Dermal Contact to Surface Water
- Table A-16: Calculation of Adsorbed Dose and Risk from Dermal Contact to Sediment
- Table A-17: Calculated Soil Receptor Exposure
- [Table A-18a: Calculation of Soil Hazard Quotients Mammals](#page-179-0)
- Table A-18b: Calculation of Soil Hazard Quotients Birds
- Table A-19: Calculated Hazard Quotients, Current Aquatic Receptors, Surface Water
- Table A-20: Calculated Hazard Quotients, Current Aquatic Receptors, Sediment

NOTES:

 $U =$ compound was not detected

J = reported value is an estimated concentration

 $R =$ data was rejected during the data validation process

 $UJ =$ compound was not detected, the associated reporting limit is approximate

(1) Only compounds that were detected were included in this list of parameters.

(2) NYSDEC Technical and Administrative Guidance Memorandum (TAGM) HWR-94-4046, Revised January 24, 1994.

NOTES:

 $U =$ compound was not detected

 $J =$ reported value is an estimated concentration

 $R =$ data was rejected during the data validation process

UJ = compound was not detected, the associated reporting limit is approximate

(1) Only compounds that were detected were included in this list of parameters.

(2) NYSDEC Technical and Administrative Guidance Memorandum (TAGM) HWR-94-4046, Revised January 24, 1994.

NOTES:

 $U =$ compound was not detected

 $J =$ reported value is an estimated concentration

 $R =$ data was rejected during the data validation process

UJ = compound was not detected, the associated reporting limit is approximate

(1) Only compounds that were detected were included in this list of parameters.

(2) NYSDEC Technical and Administrative Guidance Memorandum (TAGM) HWR-94-4046, Revised January 24, 1994.

NOTES:

 $U =$ compound was not detected

 $J =$ reported value is an estimated concentration

 $R =$ data was rejected during the data validation process

UJ = compound was not detected, the associated reporting limit is approximate

(1) Only compounds that were detected were included in this list of parameters.

(2) NYSDEC Technical and Administrative Guidance Memorandum (TAGM) HWR-94-4046, Revised January 24, 1994.

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Blank cells indicate that the sample was not analyzed for that specific parameter.
(1) Only compounds that were detected were included in this l

NOTES:

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J = reported value is an estimated concentration R = data was rejected during the data validation process

UJ = compound was not detected, the associated reporting limit is approximate
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(1) Only compounds that were detected were included in this l

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NOTES:

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UJ = compound was not detected, the as

NOTES:

 $U =$ compound was not detected

 $J =$ reported value is an estimated concentration

 $R =$ data was rejected during the data validation process

UJ = compound was not detected, the associated reporting limit is approximate

Blank cells indicate that the sample was not analyzed for that specific parameter.

(1) Only compounds that were detected were included in this list of parameters.

(2) NY State Class GA Groundwater Standard (TOGS 1.1.1, June 1998), except as noted below.

 a) US EPA Secondary Drinking Water Regulation, non-enforceable (EPA 822-B-00-001, Summer 2000) b) US EPA Maximum Contaminant Limit announced 10/31/01. Source http://www.epa.gov/safewater/arsenic.html c) US EPA National Primary Drinking Water Standards, EPA 816-F-01-007 March 2001

NOTES:

 $U =$ compound was not detected

 $J =$ reported value is an estimated concentration

 $R =$ data was rejected during the data validation process

UJ = compound was not detected, the associated reporting limit is approximate

Blank cells indicate that the sample was not analyzed for that specific parameter.

(1) Only compounds that were detected were included in this list of parameters.

(2) NY State Class GA Groundwater Standard (TOGS 1.1.1, June 1998), except as noted below.

a) US EPA Secondary Drinking Water Regulation, non-enforceable (EPA 822-B-00-001, Summer 2000)

b) US EPA Maximum Contaminant Limit announced 10/31/01. Source http://www.epa.gov/safewater/arsenic.html

c) US EPA National Primary Drinking Water Standards, EPA 816-F-01-007 March 2001

NOTES:

U = compound was not detected

J = reported value is an estimated concentration

 $R =$ data was rejected during the data validation process

UJ = compound was not detected, the associated reporting limit is approximate

Blank cells indicate that the sample was not analyzed for that specific parameter.

(1) Only compounds that were detected were included in this list of parameters.

(2) NY State Class GA Groundwater Standard (TOGS 1.1.1, June 1998), except as noted below.

a) US EPA Secondary Drinking Water Regulation, non-enforceable (EPA 822-B-00-001, Summer 2000)

b) US EPA Maximum Contaminant Limit announced 10/31/01. Source http://www.epa.gov/safewater/arsenic.html

c) US EPA National Primary Drinking Water Standards, EPA 816-F-01-007 March 2001

NOTES:

 $U =$ compound was not detected

 $J =$ reported value is an estimated concentration

 $R =$ data was rejected during the data validation process

UJ = compound was not detected, the associated reporting limit is approximate

Blank cells indicate that the sample was not analyzed for that specific parameter.

(1) Only compounds that were detected were included in this list of parameters.

NOTES:

 $U =$ compound was not detected

 $J =$ reported value is an estimated concentration

 $R =$ data was rejected during the data validation process

UJ = compound was not detected, the associated reporting limit is approximate

Blank cells indicate that the sample was not analyzed for that specific parameter.

(1) Only compounds that were detected were included in this list of parameters.

NOTES:

 $U =$ compound was not detected

 $J =$ reported value is an estimated concentration

 $R =$ data was rejected during the data validation process

UJ = compound was not detected, the associated reporting limit is approximate

Blank cells indicate that the sample was not analyzed for that specific parameter.

(1) Only compounds that were detected were included in this list of parameters.

NOTES:

U = compound was not detected

J = reported value is an estimated concentration
R = data was rejected during the data validation process
UJ = compound was not detected, the associated reporting limit is approximate
UJ = compound was not detected, the as

TABLE A-5 INORGANICS ANALYSIS OF SOIL - SEAD-13 Decision Document - Mini Risk Assessment Seneca Army Depot Activity

Notes:

1. Seneca site soil background data is presented in Table B-3.1

2. The average value is calculated for all soil from the data presented in Tables A-1a and A-1b. In order to calculate the average, duplicates are averaged, rejected data are not included, and half the detection limit is used for the samples with non-detected values.

3. A "Yes" value indicates that site metal levels are higher than background levels and metal will be retained for risk assessment. A "No" value indicates that levels are considered to be similar to background levels and metal will not be retained for risk assessment.

TABLE A-6 INORGANICS ANALYSIS OF GROUNDWATER - SEAD-13

Decision Document - Mini Risk Assessment Seneca Army Depot Activity

Notes:

1. Seneca site groundwater background data is presented in Table B-3.2

2. The average value is calculated for all soil from the data presented in Tables A-1a and A-1b. In order to calculate the average, duplicates are averaged, rejected data is not included, and half the detection limit is used for non-detected values.

3. The background average concentration for this compound was calculated using the data presented in Table B-3.2, even though all samples were non-detect.

4. A "Yes" value indicates that site metal levels are higher than background levels and metal will be retained for risk assessment. A "No" value indicates that levels are considered to be similar to background levels and metal will not be retained for risk

5. Although site concentrations exceeded background, these compounds are considered nutrients and are only toxic at very high doses (i.e., concentrations that are much higher than those associated with contact at SEAD-13). As a result, these compounds were not considered COCs.

TABLE A-7 EXPOSURE POINT CONCENTRATIONS FOR CHEMICALS OF POTENTIAL CONCERN - SEAD-13 Decision Document- Mini Risk Assessment Seneca Army Depot Activity

NOTES:
1. All EPCs are the maximum value detected for that compound in that media.
2. For groundwater, EPCs for nitrate and nitrite were used to characterize risk. For all other mediums, nitrate/nitrite-nitrogen concent

TABLE A-8 AMBIENT AIR EXPOSURE POINT CONCENTRATIONS - SEAD-13 Decision Document - Mini Risk Assessment

Seneca Army Depot Activity

ND = Compound was not detected.

TABLE A-9 CALCULATION OF INTAKE AND RISK FROM INHALATION OF DUST IN AMBIENT AIR REASONABLE MAXIMUM EXPOSURE (RME) - SEAD-13 Decision Document - Mini Risk Assessment

Seneca Army Depot Activity

Note: Cells in this table were intentionally left blank due to a lack of toxicity data.

* See Table A-8 for calculation of Air EPC.

NA= Information not available.

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TABLE A-10
CALCULATION OF INTAKE AND RISK FROM THE INGESTION OF SOIL
REASONABLE MAXIMUM EXPOSURE (RME) - SEAD-13 Decision Document - Mini Risk Assessment Seneca Army Depot Activity

|
Note: Cells in this table were intentionally left blank due to a lack of toxicity data.
NA= Information not available.
ND=Compound not detected

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TABLE A-11

 $\label{eq:2.1} \frac{1}{\sqrt{2}}\int_{\mathbb{R}^{2}}\left|\frac{d\mathbf{x}}{d\mathbf{x}}\right|^{2}d\mathbf{x}^{2}d\mathbf{x}^{2}d\mathbf{x}^{2}d\mathbf{x}^{2}d\mathbf{x}^{2}d\mathbf{x}^{2}d\mathbf{x}^{2}d\mathbf{x}^{2}d\mathbf{x}^{2}d\mathbf{x}^{2}d\mathbf{x}^{2}d\mathbf{x}^{2}d\mathbf{x}^{2}d\mathbf{x}^{2}d\mathbf{x}^{2}d\mathbf{x}^{2}d\mathbf{x}^{2}d\mathbf{x}^{2}d\math$

CALCULATION OF ABSORBED DOSE AND RISK FROM DERMAL CONTACT TO SOIL

REASONABLE MAXIMUM EXPOSURE (RME) - SEAD-13

Decision Document - Minl Risk Assessment

Seneca Army Depot Activity

NA- Information not available.

Recommended dermal absorption factor by EPA Dermal Risk Assessment Guidance (1999).

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TABLE A-12 CALCULATION OF INTAKE AND RISK FROM INHALATION OF GROUNDWATER (WHILE SHOWERING) **REASONABLE MAXIMUM EXPOSURE (RME) - SEAD-13**

Decision Document - Mini Risk Assessment

Seneca Army Depot Activity

Note: Cells in this table were intentionally left blank due to a lack of toxicity data.

NA= Information not available.

* EPC air is the concentration of chemical available for inhalation after accounting for partitioning between the air and water in the shower. The calculation of the EPC air is shown in Table A-12A.

TABLEA-l2A CALCULATION OF AIR CONCENTRATION IN SHOWER FROM VOLATILIZATION OF GROUNDWATER (DAILY) REASONABLE MAXIMUM EXPOSURE (RME) - SEAD-13

Decision Document - Mini Risk Assessment

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Henry's Constant source: Soil Screening Guidance, EPA, 1996.

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TABLE A-13 CALCULATION OF INTAKE AND RISK FROM THE INGESTION OF GROUNDWATER **REASONABLE MAXIMUM EXPOSURE (RME) - SEAD-13**

Decision Document - Mini Risk Assessment

Seneca Army Depot Activity

 $AT (Nc) =$
AT $(Car) =$

 $25,550$ days

 $AT(Nc) =$
AT (Car) = Note: Cells in this table were intentionally left blank due to a lack of toxicity data.

NA= Information not available.

 $ED =$

TABLE A-14 CALCULATION OF INTAKE AND RISK FROM DERMAL CONTACT TO GROUNDWATER (WHILE SHOWERING) **REASONABLE MAXIMUM EXPOSURE (RME) - SEAD-13** Decision Document - Mini Risk Assessment

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 $_{\star}$

Note: Cells in this table were intentionally left blank due to a lack of toxicity data.
NA= Information not available.

TABLE A-15 CALCULATION OF ABSORBED DOSE AND RISK FROM DERMAL CONTACT TO SURFACE WATER REASONABLE MAXIMUM EXPOSURE (RME) - SEAD-13 Decision Document - Mini Risk Assessment

Note: Cells in this table were intentionally left blank due to a lack of toxicity data.
NA= Information not available.

 \blacksquare

TABLE A-16 **CALCULATION OF ABSORBED DOSE AND RISK FROM DERMAL CONTACT TO SEDIMENT** REASONABLE MAXIMUM EXPOSURE (RME) - SEAD-13 **Decision Document - Mini Risk Assessment** Seneca Army Depot Activity

Note: Cells in this table were intentionally left blank due to a lack of toxicity data.

NA= laformation not available.
* USEPA Region 2 recomments quantifying demal exposure noty for estanium, anenic, PCBA diversivations and pentachhomphenol, since absorption factors are not available for other chemicals of c

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TABLE A-17 CALCULATED SOIL RECEPTOR EXPOSURE - SEAD-13 Decision Document - Mini Risk Assessment Seneca Army Depot Activity

(1) SP: soil-to-plant uptake factor. (2) BAF: bioaccumulation factor.

(3) Receptor exposure calculated as

ED = [(Cs * SP * CF * Ip) + (Cs * BAF * Ia) + (Cs * Is)] * SFF / BW

- Where, $ED = exposure dose$
	- Cs = RME conc in soil (mg/kg)

CF = plant dry-to-wet-weight conversion factor

(0.2 for all)

SP = soil-to-plant uptake factor

Ip = plant-matter intake rate (0.00216 kg/day for mouse, 0.0 kg/day for shrew, 0.017 kg/day for robin) BAF = bioaccumulation factor (unitless)

Ia = animal-matter intake rate (0.00216 kg/day for mouse, 0.011 kg/day for shrew, 0.017 kg/day for robin)

Is = incidental soil intake rate (0.000088 kg/day for mouse, 0.00011 for shrew, 0.0011 for robin)

SFF = Site foraging factor (1 for mouse, shrew, and 0.5 for robin)

BW = body weight (0.02 kg for mouse, 0.018 kg for shrew, 0.077 kg for robin) (4) Source: Travis and Arms, 1988; USEPA, 1999.

(5) Since there is no SP value available for this compound, the exposure value was calculated not including the soil-to-plant uptake term.

NOTE: Soil samples used in ecological risk assessment were taken from a depth of 0-2 ft below ground surface

TABLE A-18a CALCULATION OF SOIL HAZARD QUOTIENTS - SEAD-13 - MAMMALS Decision Document - Mini Risk Assessment Seneca Army Depot Activity

(2) Toxicity reference value from Table 3.6-4.

 (3) Hazard quotient calculated as HQ = exposure rate / toxicity reference value

with HQ < 1, no effects expected

1 < HQ =< 10, small potential for effects

10 < HQ =< 100, potential for greater exposure to result in effects, and

HQ > 100, highest potential for effects.
TABLE A-18b CALCULATION OF SOIL HAZARD QUOTIENTS - SEAD-13 - BIRDS Decision Document - Mini Risk Assessment Seneca Army Depot Activity

(2) Toxicity reference value from Table 3.6-4.

(3) Hazard quotient calculated as HQ = exposure rate / toxicity reference value

with HQ < 1, no effects expected

1 < HQ =< 10, small potential for effects

10 < HQ =< 100, potential for greater exposure to result in effects, and

HQ > 100, highest potential for effects.

Table A-19 CALCULATED ECOLOGICAL QUOTIENTS CURRENT AQUATIC RECEPTORS SURFACE WATER - SEAD-13 Decision Document - Mini Risk Assessment Seneca Army Depot Activity

Notes:

1) RME concentrations are the maximum concentrations detected for each analyte

2) New York State Water Quality Criteria Standard for Class C Stream (October 1998). Hardness depen assumes a hardness of 217 mg/l.

NA = Not Available

Table A-20 CALCULATED ECOLOGICAL QUOTIENTS CURRENT AQUATIC RECEPTORS SEDIMENT - SEAD-13 Decision Document - Mini Risk Assessment Seneca Army Depot Activity

NOTES:

1) RME concentrations are the maximum concentrations detected for each analyte

2) From Technical Guidance for Screening Contaminated Sediments, NYSDEC Division of Fish, Wildlife and Marine Resources, january, 1999, Table 1 used for SVOC's: Benthic Aquatic Life Chronic Toxicity (BALCT). For metals, the lowest value from Table 2 was used.

3) NA = Not Applicable

APPENDIX B Risk Calculation Tables For Residential Scenario Background Data

- [Table B-1.1: Exposure Factor Assumptions for Residential Scenario](#page-184-0)
- Table B-2.1: Ambient Air Exposure Point Concentrations SEAD-13
- Table B-2.2: Calculation of Intake from Inhalation of Dust in Ambient Air
- Table B-2.3: Calculation of Intake and Risk from the Ingestion of Soil
- [Table B-2.4: Calculation of Absorbed Dose and Risk form Dermal Contact to Soil](#page-189-0)
- Table B-2.5: Calculation of Intake and Risk from Inhalation of Groundwater (While Showering)
- Table B-2.6: Calculation of Intake and Risk from the Ingestion of Groundwater
- Table B-2.7: Calculation of Intake and Risk from Dermal Contact to Groundwater (While Showering)
- Table B-2.8: Calculation of Total Noncarcinogenic and Carcinogenic Risks
- [Table B-3.1: Background Soil Data](#page-194-0)
- Table B-3.2: Background Groundwater Data

TABLE B-1.1 EXPOSURE FACTOR ASSUMPTIONS FOR RESIDENTIAL SCENARIODecision Document - Mini Risk Assessment Seneca Army Depot Activity

TABLE B-1.1 EXPOSURE FACTOR ASSUMPTIONS FOR RESIDENTIAL SCENARIODecision Document - Mini Risk Assessment Seneca Army Depot Activity

TABLE B-2.1 AMBIENT AIR EXPOSURE POINT CONCENTRATIONS - SEAD-13 Decision Document - Mini Risk Assessment Seneca Army Depot Activity

Equation for Air EPC from Surface Soil (mg/m³) CSsurf x PM10 x CF

Variables:

CSsurf = Chemical Concentration in Surface Soil, from EPC data (mg/kg)

 $PM10 = Average Measured PM10$ Concentration = 17 ug/m³

 $CF =$ Conversion Factor = 1E-9 kg/ug

ND = Compound was not detected.

TABLEB-2.2 CALCULATION OF INTAKE AND RISK FROM INHALATION OF DUST IN AMBIENT AIR REASONABLE MAXIMUM EXPOSURE (RME)- SEAD-13 Decision Document - Mini Risk Assessment Seneca Army Depot Activity

Equation for Intake (mg/kg-day) = A X IK X EF X ED BW x AT Equation for Hazard Quotient = Chronic Daily Intake (Nc)/Reference Dose Variables (Assumptions for Each Receptor are Listed at the Bottom): ED = Exposure Duralion Equation for Contribution to Lifetime Cancer Risk = Chronic Daily Intake (Car) x Slope Fact CA = Chemical Concentration in Air, Calculated from Air EPC Data R = Inhalation Rate BW = Bodyweight Equation for Total Lifetime Cancer Risk= Adult Contribution+ Child Contribution $EF = Exposure Frequency$ AT = Avcraging Time Inhalation Carc. Slope Air EPC* from
RfD Inhalation Surface Soil .,.•,,,Ci.\i *.,(* ,.,, **·;R\iiiid~ill** ;':''< Analyte **RID** Inhalation Surface Soil **Contribution (mg/kg-day) Quotient** to Lifetime **(mg/kg-day) Quotient** to Lifetime Lifetime
 (Car) Car) Card Cancer Risk Cancer Risk Cancer Risk Lifetime (mg/kg-day) **Jmg/kg-doy)-1** (mg/m3) **(Ne) (Car) Cancer Risk (Ne) (Car)** Volatile Organics
Acctone Acetone **NA NA** 1.46E-009 Carbon Disulfide 2.00E-001 NA **ND**

Mcthylene Chloride 8.57E-001 1.65E-003 ND ND. Methylene Chloride **8.57E-001** 1.65E-003 **ND**
Methyl ethyl ketone 2.86E-001 **NA** 4.42E-010 1.2IE-OIO 4E-OIO 2.46E-OIO 9E-0I0 Methyl ethyl ketone 2.86E-001 **NA** 2.79E-011 | 2E-010 | 5.67E-011 | 5E-010 Toluene 1.14E-OOI **NA** I.02E-0I0 Semivolatile Organics 2,4,6-Triehlorophenol **NA** l.09E-002 l.70E-0I0 1.60E-011 | 2E-013 | 8.IOE-012 | 9E-014 | 3E-013 $2,4$ -Dinitrotoluenc 2-Methylnaphthalene **NA NA** 7.14E-010
4-Methylphenol **NA NA** 1.56E-007 4-Met11ylphenol **NA NA** 1.56E-007 Acenaphthene **NA** NA **1.11E-008**
Acenaphthylene **NA** NA 2.72E-010 Acenaphthylene **NA** NA 2.72E-010
Anthracene NA NA 2.72E-010 $\overline{}$ Anthraccnc Benzo(a)anthracenc**ie and the NA CONS**
Benzo(a)pyrene **NA NA L.20E-009**
NA NA L.87E-009 Benzo(a)pyrene Benzo(b)fluoranthene | NA | NA | 1.51E-009 Benzo(ghi)perylene **NA** NA **1.46E-009** Benzo(k)fluorantliene **NA** NA 1.26E-009 bis(2-Ethylhexyl)phthalate **NA NA 3.23E-008**
Carbazolc **NA NA 3.06E-009** 3.06E-009 **Chrysene NA NA** 3.23E-009

Di-n-butylohthalate **NA** NA 2.38E-009 Di-n-butylphthalate **NA NA** 2.38E-009 Di-n-oetylphthalate **NA NA** 3.57E-009 $Dibenz(a,h)$ anthraccne Dibenzofuran **NA** NA NA 5.78E-009 Fluoranthene **NA** NA 136E-008 Fluorcne **NA NA 3.06E-010** Hexachlorobcnzene **NA** l.61E+O00 3.57E-009 8E-010 3.35E-OIO lE-010 l.70E-OIO JE-010 **8E-OIO** Indeno(1,2,3-cd)pyrene **NA** NA 9.01E-010
Naphthalene 8.60E-004 NA 8.67E-009 Naphthalene 2.38E-009 3E-006 4.82E-009 6E-006 Phenanthrene **NA** NA NA 2,38E-008 Phenol **NA NA 2.38E-007 Pyrene 1 NA NA 9.18E-009** Pesticides/PCB 4.4'-DDE **NA NA** 6.12E-0I I Other Analytcs Nitrate/Nitrite Nitrogen **NA NA** 4.74£-007 **Fluoride 1 NA NA 2.62E-006** Total Hazard Quotient and Cancer Risk: **JE-006 SE-010 6E-006 JE-010 8E-010** $\boxed{\text{CA} = \text{145} \cdot \text{145} \cdot \text{145} \cdot \text{145}} \cdot \text{C} \cdot \text{145} \cdot \text{145}$ Assumptions for Resident (Child)
EPC Surface Only $BW =$ 70 kg BW = 15 kg IR= 20 m3/dny **IR=** 8.7 m3/day 350 days/year $EF = 24$ years $ED =$ $E_D 24 \text{ years}$ 24 years 6 years $AT (Nc) =$ 8,760 days $AT (Nc) =$ 2,190 days $AT (Car) =$ 25,550 days $AT (Car) =$ 25,550 days $AT(Car) = 25,550 \text{ days}$ $AT(Car) =$

Note: Cells in this table were intentionally left blank due to a lack of toxicity data.

• Sec Table B-1 for calculation of Air EPC. NA= Information not available.

ND=Compound not detected

TABLE B-2.3 CALCULATION OF INTAKE AND **RISK** FROM THE INGESTION OF SOIL REASONABLE MAXIMUM EXPOSURE (RME) • SEAD-13 Decision Document - Mini Risk Assessment

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Note: Cells in this table were intentionally left blank due to a lack of toxicity data.
NA= Information not available.
ND=Compound not detected

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TABLE B-2.4 CALCULATION OF ABSORBED DOSE AND RISK FROM DERMAL CONTACT TOSOIL REASONABLE MAXIMUM EXPOSURE (RME) - SEAD-13 Decision Document - Mini Risk Assessment

Senecu Army Depot Activity

NA= Information not available.

* Recommended dermal absorption factor by EPA Dermal Risk Assessment Guidance (1999).

TABLE B-2.5 CALCULATION OF INT AKE AND RISK FROM INHALATION OF GROUNDWATER (WHILE SHOWERING) REASONABLE MAXIMUM EXPOSURE (RME)- SEAD-13

Decision Document - **Mini Risk Assessment**

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Note: Cells in this table were intentionally left blank due to a lack of toxicity data.

NA= Information not available.

* EPC air is the concentration of chemical available for inhalation after accounting for partitioning between the air and water in the shower. The calculation of the EPC air is shown in Table A-l 2A.

TABLE B-2.6 CALCULATION OF INTAKE AND RISK FROM THE INGESTION OF GROUNDWATER REASONABLE MAXIMUM EXPOSURE (RME)- SEAD-13

Decision Document - **Mini Risk Assessment**

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Note: Cells in this table were intentionally left blank due to a lack of toxicity data.

NA= Information not available.

TABLE B-2.7 CALCULATION OF INTAKE AND RISK FROM DERMAL CONTACT TO GROUNDWATER (WHILE SHOWERING) REASONABLE MAXIMUM EXPOSURE (RME)- SEAD-13

Decision Document - **Mini Risk Assessment**

Seneca Army Depot Activity

Note: Cells in this table were intentionally left blank due to a lack of toxicity data.

NA= Information not available.

TABLE B-2.8 CALCULATION OF TOTAL NONCARCINOGENIC AND CARCINOGENIC RISKS -RESIDENTIAL SCENARIO REASONABLE MAXIMUM EXPOSURE (RME) - SEAD-13 Decision Document - Mini Risk Assessment Seneca Army Depot Activity

NQ= Not Quantified due to lack of toxicity data.

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TABLE B-3.1 BACKGROUND SOIL DATASEAD-13

 Decision Document - Mini Risk Assessment Seneca Army Depot Activity

LOC ID:								SB24-5	MW25-1	MW25-1	MW25-6
QC CODE:								SA	SA	SA	SA
STUDY ID:								ESI	ESI	ESI	RI ROUND1
TOP:								-1	0	2	0
BOTTOM:								-1	$\overline{2}$	4	0.17
MATRIX:								SOIL	SOIL	SOIL	SOIL
SAMPLE DATE:			FREQUENCY		NUMBER	NUMBER	NUMBER	12/02/93	12/3/1993	12/3/1993	9/25/1995
SAMP ID:			OF		ABOVE	OF	OF	SB24-5-5	SB25-6-01	SB25-6-02	SB25-7-00
COMPOUND METALS			UNIT MAXIMUM DETECTION	TAGM	TAGM	DETECTS	ANALYSES	VALUE Q	VALUE Q	VALUE Q	VALUE Ω
Aluminum	MG/KG	21000	100%	19520	3	57	57	13700	10600	7070	12500
Antimony	MG/KG	6.8	18%	6	$\overline{2}$	10	57	11.3 UJ	4.2 U	3 U	0.4
Arsenic	MG/KG	21.5	95%	8.9	$\overline{2}$	54	57	5	8.3	4.8	4.3
Barium	MG/KG	159	100%	300	0	57	57	67.2	59.1	35	71.3
Beryllium	MG/KG	1.4	100%	1.13	$\overline{2}$	57	57	0.62 J	0.48 J	0.35 J	0.56
Cadmium	MG/KG	2.9	35%	2.46	$\overline{2}$	20	57	0.7U	0.41 U	0.29U	0.05U
Calcium	MG/KG	293000	100%	125300	$\overline{2}$	57	57	49000	82500	122000	47400 J
Chromium	MG/KG	32.7	100%	30	$\overline{2}$	57	57	23.1	16.9	11.3	16.9 J
Cobalt	MG/KG	29.1	100%	30	$\mathbf 0$	57	57	12	11.2	6.6J	8
Copper	MG/KG	62.8	100%	33	3	57	57	22.2	20.2J	12J	15.7
Cyanide	MG/KG	$\mathbf 0$	0%	0.35	0	$\mathbf 0$	51	0.57 U	0.58 U	0.64 U	0.44U
Iron	MG/KG	38600	100%	37410	$\overline{2}$	57	57	26700	21400	15800	20500
Lead	MG/KG	266	95%	24.4	3	54	57	7.9 J	9.5	13.8	11.1
Magnesium	MG/KG	29100	100%	21700	$\overline{2}$	54	54	11400	19600	22800	11700
Manganese	MG/KG	2380	95%	1100	$\overline{2}$	54	57	450	722 J	610 J	452
Mercury	MG/KG	0.13	72%	0.1	$\overline{2}$	41	57	0.04 JR	0.03 J	0.04 U	0.03
Nickel	MG/KG	62.3	98%	50	$\overline{2}$	56	57	35.2	26.8	18	22.3
Potassium	MG/KG	3160	100%	2623	$\overline{2}$	57	57	1660	1480	1060	1110
Selenium	MG/KG	1.7	40%	$\overline{2}$	$\mathbf 0$	23	57	0.22 UJ	0.97J	0.63 J	0.63 U
Silver	MG/KG	0.87	4%	0.8	$\overline{1}$	$\overline{2}$	54	1.4 U	0.82U	0.59U	0.89U
Sodium	MG/KG	269	82%	188	$\overline{2}$	47	57	139 J	269 J	186 J	59.9
Thallium	MG/KG	1.2	17%	0.855	3	9	54	0.24 U	0.24 UJ	0.21 UJ	1.2
Vanadium	MG/KG	32.7	100%	150	0	57	57	19.5	18.5	12	21
Zinc	MG/KG	126	95%	115	$\overline{2}$	54	57	63.2	71.6 J	40.6 J	54.1

TABLE B-3.1 BACKGROUND SOIL DATASEAD-13

 Decision Document - Mini Risk Assessment Seneca Army Depot Activity

LOC_ID:								MW64B-1	MW64B-1		MW64B-1		MW64B-1	MW67-2	MW67-2
QC CODE:								SA	SA		SA		SA	SA	SA
STUDY ID:								ESI	ESI		ESI		ESI	ESI	ESI
TOP:								0		4		6	6	$^{\circ}$	2
BOTTOM:								0.2		6		8	8	0.2	
MATRIX:								SOIL	SOIL		SOIL		SOIL	SOIL	SOIL
SAMPLE DATE:			FREQUENCY		NUMBER	NUMBER	NUMBER	5/13/1994	5/13/1994		5/13/1994		13-May-94	3/30/1994	3/30/1994
SAMP ID:			OF		ABOVE	OF	OF	MW64B-1-1	MW64B-1-2		MW64B-1-3		MW64B-1-04	MW67-2-1	MW67-2-2
COMPOUND METALS			UNIT MAXIMUM DETECTION	TAGM	TAGM	DETECTS	ANALYSES VALUE	Q	VALUE	Q	VALUE	Q	VALUE Q	VALUE Q	VALUE Q
Aluminum	MG/KG	21000	100%	19520	3	57	57	13400		8870	7620		7620	16700	14900
Antimony	MG/KG	6.8	18%	6	2	10	57	0.3J		0.15 UJ		0.15 UJ	0.15 UJ	0.27 J	0.22J
Arsenic	MG/KG	21.5	95%	8.9	$\overline{2}$	54	57	5.5		4.3	5.5		5.5	4.4	4.5
Barium	MG/KG	159	100%	300	$\mathbf 0$	57	57	75.5		70.8	76.7		76.7	114	105
Beryllium	MG/KG	1.4	100%	1.13	$\overline{2}$	57	57	0.56 J		0.43J	0.37 J		0.37J	0.67 J	0.61 J
Cadmium	MG/KG	2.9	35%	2.46	2	20	57	0.63 J		0.64 J	0.54 J		0.54 J	0.2J	0.11 J
Calcium	MG/KG	293000	100%	125300	$\overline{2}$	57	57	5530		70000	75900		75900	3580	79000
Chromium	MG/KG	32.7	100%	30	$\overline{2}$	57	57	17.5		14.1	13.5		13.5	19.5	22.5
Cobalt	MG/KG	29.1	100%	30	Ω	57	57	7.2 J		10		7.4J	7.4 J	7.5J	10.4 J
Copper	MG/KG	62.8	100%	33	3	57	57	18.9		20.2	17.6		17.6	16.5	20.3
Cyanide	MG/KG	$\mathbf 0$	0%	0.35	$\mathbf 0$	$\mathbf 0$	51	0.6U		0.5U	0.48 U		0.48 U	0.64 U	0.5U
Iron	MG/KG	38600	100%	37410	$\overline{2}$	57	57	20900		18400	17100		17100	20500	24400
Lead	MG/KG	266	95%	24.4	3	54	57	21.4		8.8	8.3		8.3	17.5	9.3
Magnesium	MG/KG	29100	100%	21700	$\overline{2}$	54	54	3720		18900	21500		21500		
Manganese	MG/KG	2380	95%	1100	2	54	57	207		434	389		389	438	528
Mercury	MG/KG	0.13	72%	0.1	$\overline{2}$	41	57	0.05 J		0.02 J	0.01 U		0.01 U	0.04	0.01 J
Nickel	MG/KG	62.3	98%	50	$\overline{2}$	56	57	19.8		28.2	22.6		22.6	18.7	32.3
Potassium	MG/KG	3160	100%	2623	2	57	57	1700		1630	1650		1650	1780 J	3160 J
Selenium	MG/KG	1.7	40%	$\overline{2}$	$\mathbf 0$	23	57	0.99J		0.26 U	0.57 J		0.57 J	0.81	0.36 U
Silver	MG/KG	0.87	4%	0.8		$\overline{2}$	54	0.16 UJ		0.11 UJ		0.11 UJ	0.11 UJ	0.11 U	0.15 U
Sodium	MG/KG	269	82%	188	$\overline{2}$	47	57	35.9 U		96.8 J	79.6 J		79.6 J	25.1 U	112 J
Thallium	MG/KG	1.2	17%	0.855	3	9	54	0.41 J		0.24 U	0.24 U		0.24 U	0.48 J	0.34 U
Vanadium	MG/KG	32.7	100%	150	Ω	57	57	23.3		14.8	14.2		14.2	28.2	24.8
Zinc	MG/KG	126	95%	115	$\overline{2}$	54	57	72.2		59	45.6		45.600	64.8	62

TABLE B-3.1 BACKGROUND SOIL DATASEAD-13Decision Document - Mini Risk Assessment

Seneca Army Depot Activity

LOC_ID:								MW67-2	MW70-1	MW70-1	MW70-1	SB11-3	SB11-3
QC CODE:								SA	SA	SA	SA	SA	SA
STUDY ID:								ESI	ESI	ESI	ESI	ESI	ESI
TOP:								4	0	$\overline{2}$	$\overline{4}$	0	2
BOTTOM:								5	0.2	4	6	$\overline{2}$	
MATRIX:								SOIL	SOIL	SOIL	SOIL	SOIL	SOIL
SAMPLE DATE:			FREQUENCY		NUMBER	NUMBER	NUMBER	3/30/1994	5/11/1994	5/11/1994	5/11/1994	11/2/1993	11/2/1993
SAMP ID:			OF		ABOVE	OF	OF	MW67-2-3	MW70-1-1	MW70-1-2	MW70-1-3	SB11-3-1	SB11-3-2
COMPOUND METALS			UNIT MAXIMUM DETECTION	TAGM	TAGM	DETECTS	ANALYSES VALUE	Q	VALUE Q	VALUE Q	VALUE Q	VALUE Q	VALUE Q
Aluminum	MG/KG	21000	100%	19520	3	57	57	9460	12200	9480	11000	17600	6330
Antimony	MG/KG	6.8	18%	6	$\overline{2}$	10	57	0.2 UJ	0.23 UJ	0.21 UJ	0.19 UJ	10.8 UJ	8 UJ
Arsenic	MG/KG	21.5	95%	8.9	$\overline{2}$	54	57	4.2	5.4	4.1	5.7	5.6	$\mathbf 0$
Barium	MG/KG	159	100%	300	$\mathbf 0$	57	57	80.8	67.5	56.6	79.9	113	57.4
Beryllium	MG/KG	1.4	100%	1.13	$\overline{2}$	57	57	0.4J	0.44J	0.41 J	0.54 J	0.85 J	0.34J
Cadmium	MG/KG	2.9	35%	2.46	$\overline{2}$	20	57	0.12 J	0.57 J	0.43J	0.8J	0.67 U	0.5U
Calcium	MG/KG	293000	100%	125300	2	57	57	77800	3600	51600	48600	4950	91300
Chromium	MG/KG	32.7	100%	30	$\overline{2}$	57	57	14.8	13.7	14.7	17.8	24	11.1
Cobalt	MG/KG	29.1	100%	30	$\mathbf 0$	57	57	9.7J	5.5J	7.1 J	21	11.3	6.5J
Copper	MG/KG	62.8	100%	33	3	57	57	20.5	12.4	19.7	33.5	20	12.2
Cyanide	MG/KG	$\mathbf 0$	0%	0.35	$\mathbf 0$	$\mathbf 0$	51	0.54 U				0.57U	0.47U
Iron	MG/KG	38600	100%	37410	$\overline{2}$	57	57	18700	17700	16000	26400	27200	13200
Lead	MG/KG	266	95%	24.4	3	54	57	8.5	20.7	9.1	13.6	27.9	11.4
Magnesium	MG/KG	29100	100%	21700	$\overline{2}$	54	54		2830	13600	7980	4160	12900
Manganese	MG/KG	2380	95%	1100	$\overline{2}$	54	57	411	233	470	1040	674	356
Mercury	MG/KG	0.13	72%	0.1	$\overline{2}$	41	57	0.02 J	0.1 J	0.03 J	0.02 J	0.05 J	0.04 U
Nickel	MG/KG	62.3	98%	50	$\overline{2}$	56	57	25.9	12.3	17.6	52.4	28.3	16.7
Potassium	MG/KG	3160	100%	2623	$\overline{2}$	57	57	1970 J	982 J	1590	1350	2110	1110
Selenium	MG/KG	1.7	40%	$\overline{2}$	$\mathbf 0$	23	57	0.34 U	1J	0.64 J	0.32 U	0.24 J	0.13 UJ
Silver	MG/KG	0.87	4%	0.8	$\mathbf{1}$	$\overline{2}$	54	0.14U				1.4 UJ	1 UJ
Sodium	MG/KG	269	82%	188	$\overline{2}$	47	57	107 J	36.4 U	126 J	165 J	66.3 J	136 J
Thallium	MG/KG	1.2	17%	0.855	3	9	54	0.32 U				0.19 U	1.5U
Vanadium	MG/KG	32.7	100%	150	$\mathbf 0$	57	57	16.5	23.3	17.2	17.6	31.8	13.3
Zinc	MG/KG	126	95%	115	$\overline{2}$	54	57	60.1	55.4	42.4	116	83.2	$\mathbf 0$

TABLE B-3.1 BACKGROUND SOIL DATASEAD-13Decision Document - Mini Risk Assessment

Seneca Army Depot Activity

LOC ID:								SB11-3	SB13-1	SB13-1	SB13-1	MW13-6	MW13-6
QC CODE:								SA	SA	SA	SA	SA	SA
STUDY ID:								ESI	ESI	ESI	ESI	ESI	ESI
TOP:								10	0		6	$\overline{0}$	
BOTTOM:								12	$\overline{2}$		8	$\overline{2}$	
MATRIX:								SOIL	SOIL	SOIL	SOIL	SOIL	SOIL
SAMPLE DATE:			FREQUENCY		NUMBER	NUMBER	NUMBER	11/3/1993	12/8/1993		12/8/1993	15-Dec-93	15-Dec-93
SAMP ID:			OF		ABOVE	OF	OF	SB11-3-6	SB13-1-1	SB13-1-2	SB13-1-3	SB13-6-1	SB13-6-3
COMPOUND METALS	UNIT		MAXIMUM DETECTION	TAGM	TAGM	DETECTS	ANALYSES VALUE	Q	VALUE Q	VALUE Q	VALUE Q	VALUE Q	VALUE Q
Aluminum	MG/KG	21000	100%	19520	3	57	57	10900	18300	8250	11700	16000	13500
Antimony	MG/KG	6.8	18%	6	$\overline{2}$	10	57	7.6 UJ	5.1J	3.7 UJ	2.8 UJ	3.2 UJ	2.5 UJ
Arsenic	MG/KG	21.5	95%	8.9	$\overline{2}$	54	57	Ω	7	6.2	5.7	4.6	2.7
Barium	MG/KG	159	100%	300	Ω	57	57	62.7	106	88.1	33.9	103	60.4
Beryllium	MG/KG	1.4	100%	1.13	$\overline{2}$	57	57	0.47 J	0.92 J	0.42 J	0.54 J	0.92	0.71
Cadmium	MG/KG	2.9	35%	2.46	$\overline{2}$	20	57	0.48 U	0.45 U	0.36 U	0.27U	0.31 U	0.25 U
Calcium	MG/KG	293000	100%	125300	$\overline{2}$	57	57	48600	3570	87700	50300	5140	31800
Chromium	MG/KG	32.7	100%	30	$\overline{2}$	57	57	18.6	29.4	13.3	19.6	21.5	23.5
Cobalt	MG/KG	29.1	100%	30	Ω	57	57	10.1	12	7.2 J	11.1	10.6	15
Copper	MG/KG	62.8	100%	33	3	57	57	21.7	11.6	18.4	17.6	16	27.4
Cyanide	MG/KG	$\mathbf 0$	0%	0.35	Ω	0	51	0.53U	0.61 U	0.5U	0.53U	0.6U	0.53U
Iron	MG/KG	38600	100%	37410	$\overline{2}$	57	57	28300	32500	17400	24700	25300	26900
Lead	MG/KG	266	95%	24.4	3	54	57	10.1	15	$\mathbf 0$	Ω	13.8	11.6
Magnesium	MG/KG	29100	100%	21700	$\overline{2}$	54	54	10100	5890	20800	12600	3750	6640
Manganese	MG/KG	2380	95%	1100	$\overline{2}$	54	57	434	451	517	404	934	508
Mercury	MG/KG	0.13	72%	0.1	$\overline{2}$	41	57	0.03 U	0.03 J	0.07 J	0.02 U	0.03 J	0.01 U
Nickel	MG/KG	62.3	98%	50	$\overline{2}$	56	57	29.5	34.9	24	33.1	22.7	41.9
Potassium	MG/KG	3160	100%	2623	$\overline{2}$	57	57	1230	2190	1390	1270	1330	1120
Selenium	MG/KG	1.7	40%	$\overline{2}$	Ω	23	57	0.21 UJ	0.26 J	0.56J	0.51 J	1.2	0.11 J
Silver	MG/KG	0.87	4%	0.8	$\mathbf{1}$	2	54	0.97 UJ	0.9 U	0.71 U	0.54 U	0.62 U	0.49U
Sodium	MG/KG	269	82%	188	$\overline{2}$	47	57	146 J	80.6 J	155 J	134 J	61.9 J	116 J
Thallium	MG/KG	1.2	17%	0.855	3	9	54	0.23U	0.43J	0.43J	0.64 J	0.18 U	0.14 U
Vanadium	MG/KG	32.7	100%	150	Ω	57	57	17	32.7	13.3	16.3	29.9	18.5
Zinc	MG/KG	126	95%	115	$\overline{2}$	54	57	$\mathbf 0$	81.9	56.2	45.8	62.5	64.7

TABLE B-3.1 BACKGROUND SOIL DATASEAD-13

 Decision Document - Mini Risk Assessment Seneca Army Depot Activity

LOC ID:								MW13-6	SB17-1		SB17-1		SB17-1		SB26-1		SB26-1
QC CODE:								SA	SA		SA		SA		SA		SA
STUDY ID:								ESI	ESI		ESI		ESI		ESI		ESI
TOP:								6		0		$\overline{2}$				0	$\overline{2}$
BOTTOM:								8		$\overline{2}$				6		$\overline{2}$	
MATRIX:								SOIL	SOIL		SOIL		SOIL		SOIL		SOIL
SAMPLE DATE:			FREQUENCY		NUMBER	NUMBER	NUMBER	15-Dec-93	12/1/1993		12/1/1993		12/1/1993		11/17/1993		11/17/1993
SAMP ID:			OF		ABOVE	OF	OF	SB13-6-4	SB17-1-1		SB17-1-2		SB17-1-3		SB26-1-1		SB26-1-2
COMPOUND METALS	UNIT		MAXIMUM DETECTION	TAGM	TAGM	DETECTS	ANALYSES	VALUE Q	VALUE	Q	VALUE	Q	VALUE	Q	VALUE	Q	VALUE Q
Aluminum	MG/KG	21000	100%	19520	3	57	57	10200	13700		18100		8700			5560	9040
Antimony	MG/KG	6.8	18%	6	2	10	57	2.9 UJ		11.7 UJ		11.8 UJ		9 UJ		7.3 UJ	6.7 UJ
Arsenic	MG/KG	21.5	95%	8.9	2	54	57	2.3	4.3		5.2			3.4		3.2	5.3
Barium	MG/KG	159	100%	300	0	57	57	56.8	107		114		59.4			73.2	43.7
Beryllium	MG/KG	1.4	100%	1.13	$\overline{2}$	57	57	0.58 J		0.7J		0.9J		0.42 J		0.35 J	0.41 J
Cadmium	MG/KG	2.9	35%	2.46	2	20	57	0.28 U		0.73U		0.74U		0.56U		0.46U	0.42 U
Calcium	MG/KG	293000	100%	125300	$\overline{2}$	57	57	45200	2870		20900		72800		293000		47300
Chromium	MG/KG	32.7	100%	30	2	57	57	17.8	17.6		25.1		13.9			10.3	15.7
Cobalt	MG/KG	29.1	100%	30	$\mathbf 0$	57	57	11.3		9.9J	13.3			8.8		5.9J	9.5
Copper	MG/KG	62.8	100%	33	3	57	57	14.5	46.4		26.9			20		9.7	14.3
Cyanide	MG/KG	$\mathbf 0$	0%	0.35	Ω	0	51	0.51 U		0 _{NA}		0 NA		0 NA		0.48 U	0.57 U
Iron	MG/KG	38600	100%	37410	$\overline{2}$	57	57	20700	25100		29900		18800			8770	19100
Lead	MG/KG	266	95%	24.4	3	54	57	11.7		266	11.4 J			7.5J		6.33	8.5
Magnesium	MG/KG	29100	100%	21700	$\overline{2}$	54	54	5220	3330		8490		18100			29100	9160
Manganese	MG/KG	2380	95%	1100	$\overline{2}$	54	57	556	547		487			391		309	551
Mercury	MG/KG	0.13	72%	0.1	2	41	57	0.01 U		0.05 J	0.06 J			0.03 UJ		0.02 U	0.02 U
Nickel	MG/KG	62.3	98%	50	$\overline{2}$	56	57	33	19.1			42	25.2			31.6 R	23.9
Potassium	MG/KG	3160	100%	2623	2	57	57	1000		628 J	1560		1090			1710	901
Selenium	MG/KG	1.7	40%	$\overline{2}$	Ω	23	57	0.24 J		0.25 UJ		0.24 UJ		0.14 UJ		0.13 UJ	0.26 J
Silver	MG/KG	0.87	4%	0.8		$\overline{2}$	54	0.56U		1.5U		1.5 U		1.1 U		0.92 UJ	0.85 UJ
Sodium	MG/KG	269	82%	188	2	47	57	141 J		46.2 J	74.6 J			137 J		192 J	108 J
Thallium	MG/KG	1.2	17%	0.855	3	9	54	0.23U		0.28 UJ		0.26 UJ		0.15 UJ		0.73U	0.17 U
Vanadium	MG/KG	32.7	100%	150	0	57	57	13.8	23.1		27		13.9			12.7	14.4
Zinc	MG/KG	126	95%	115	$\overline{2}$	54	57	39.3	93.4		80.2		57.1			283 R	90.6

TABLE B-3.1 BACKGROUND SOIL DATASEAD-13Decision Document - Mini Risk Assessment

Seneca Army Depot Activity

LOC_ID:								SB4-1	SB4-1		SB4-1	SB4-1	TP57-11
QC CODE:								SA	DU	SA		SA	SA
STUDY ID:								ESI	ESI	ESI		ESI	ESI
TOP:								$\mathbf 0$		0		8	3
BOTTOM:								$\overline{2}$		$\overline{2}$	6	10	3
MATRIX:								SOIL	SOIL		SOIL	SOIL	SOIL
SAMPLE DATE:			FREQUENCY		NUMBER	NUMBER	NUMBER	12/6/1993	12/6/1993		12/6/1993	12/6/1993	11/8/1993
SAMP ID:			OF		ABOVE	OF	OF	SB4-1-1	SB4-1-10		SB4-1-2	SB4-1-3	TP57-11
COMPOUND METALS	UNIT		MAXIMUM DETECTION	TAGM	TAGM	DETECTS	ANALYSES VALUE	Q	VALUE	Q	VALUE Q	VALUE	VALUE Q Q
Aluminum	MG/KG	21000	100%	19520	3	57	57	14800	21000		15300	19200	14600
Antimony	MG/KG	6.8	18%	6	2	10	57	4.8 UJ		3.8 UJ	5 UJ	2.8 UJ	11.3 UJ
Arsenic	MG/KG	21.5	95%	8.9	$\overline{2}$	54	57	6.2	4.2		3.9	21.5	5.9
Barium	MG/KG	159	100%	300	Ω	57	57	72	97.7		40.4 J	81.2	120
Beryllium	MG/KG	1.4	100%	1.13	$\overline{2}$	57	57	0.73J	0.64 J		0.74J		0.81 J
Cadmium	MG/KG	2.9	35%	2.46	$\overline{2}$	20	57	0.47U	0.37U		0.49U	0.27U	0.71 U
Calcium	MG/KG	293000	100%	125300	$\overline{2}$	57	57	4280	2460		30900	14400	22300
Chromium	MG/KG	32.7	100%	30	$\overline{2}$	57	57	23.2	27.9		27.6	32.7	20.1
Cobalt	MG/KG	29.1	100%	30	$\mathbf 0$	57	57	11.3		5.9J	16.5	29.1	8.8J
Copper	MG/KG	62.8	100%	33	3	57	57	14.1	15.1		62.8	21.6	21.7
Cyanide	MG/KG	0	0%	0.35	0	$\mathbf 0$	51	0.52U	0.53U		0.53U	0.47U	0.54U
Iron	MG/KG	38600	100%	37410	$\overline{2}$	57	57	27500	19500		34300	37900	24900
Lead	MG/KG	266	95%	24.4	3	54	57	0J		9.8J	7.5J	9.1J	11.3
Magnesium	MG/KG	29100	100%	21700	$\overline{2}$	54	54	4270	4460		7130	8040	5360
Manganese	MG/KG	2380	95%	1100	$\overline{2}$	54	57	615 J		0J	0	$\mathbf 0$	329
Mercury	MG/KG	0.13	72%	0.1	$\overline{2}$	41	57	0.05 J	0.04 J		0.04 J	0.04 J	0.04 J
Nickel	MG/KG	62.3	98%	50	$\overline{2}$	56	57	27.8	25.1		47.6	62.3	25.7
Potassium	MG/KG	3160	100%	2623	$\overline{2}$	57	57	1250	2490		1300	2030	1430
Selenium	MG/KG	1.7	40%	$\overline{2}$	0	23	57	0.4J	0.23 J		0.09 U	0.14 U	0.46J
Silver	MG/KG	0.87	4%	0.8		$\overline{2}$	54	0.93U	0.74U		0.98U	0.64 J	1.4 UJ
Sodium	MG/KG	269	82%	188	$\overline{2}$	47	57	43.8 U	39.2 J		105 J	91.6 J	93 J
Thallium	MG/KG	1.2	17%	0.855	3	9	54	0.23U		0.23U	0.16U	0.24 U	0.17U
Vanadium	MG/KG	32.7	100%	150	Ω	57	57	28.6	31		22.2	29.3	27.8
Zinc	MG/KG	126	95%	115	$\overline{2}$	54	57	79.6	72.1		102	115	57.9

APPENDIX C

Laboratory Analyses Results for All Compounds – SEAD-13

- [Table C-1a: Surface Soil Analysis Results](#page-209-0)
- Table C-1b: Subsurface Soil Analysis Results
- Table C-2: Groundwater Analysis Results
- [Table C-3: Surface Water Analysis Results](#page-249-0)
- Table C-4: Sediment Analysis Results

Nitrate/Nitrite Nitrogen MG/KG WC Percent Solids % WC

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Note:

 (1) This table was generated solely from data contained in the Seneca database. It is noted that a duplicate was collected at MW13-4 (Sample ID MW13-8) on 2/04/94, however it is not included in this table since only fluoride data was reported, which is not stored in the database. The data from sample MW13-8 is included in Table A-2.

TABLE C-3 SURFACE WATER ANALYSES RESULTS-SEAD-13 Decision Document-Mini Risk Assessment Seneca Army Depot Activity

TABLE C-3 SURFACE WATER ANALYSES RESULTS-SEAD-13 Decision Document-Mini Risk Assessment Seneca Army Depot Activity

TABLE C-3 SURFACE WATER ANALYSES RESULTS-SEAD-13 Decision Document-Mini Risk Assessment Seneca Army Depot Activity

 1 U 1.1 U

1 U 1.1 U

 $\begin{array}{ccccc} 1 & \text{U} & & & & 1.1 \text{ U} \\ 1 & \text{U} & & & & 1.1 \text{ U} \end{array}$

 $\begin{array}{ccccc} 1 & \text{U} & & & & 1.1 \text{ U} \\ 1 & \text{U} & & & & 1.1 \text{ U} \end{array}$

 1 U 1.1 U

1 U 1.1 U

1 U 1.1 U

 1 U 1.1 U

 $\begin{array}{lll} 1 \text{ U} & & & 1.1 \text{ U} \\ 1 \text{ U} & & & 1.1 \text{ U} \end{array}$

2.6 UJ 2.7 U 2.6 U

2.6 U 2.7 U 2.6 U

1 U 1.1 U 1 U

 $1.1\,$ U $\,$

 1.1 U

 $1.1 \,$ U $\,$

 $\begin{smallmatrix}1&U\\1&U\end{smallmatrix}$

 1^U

1

 $1 U$

 $1\,\mathrm{U}$

 $1\,\mathrm{U}$

 $1 U$

 $1\,$ U

1

 $1\,\mathrm{U}$

1

 $2.6~\mathrm{U}$

PARAMETER 2-Nitroaniline 2-Nitrophenol 3,3'-Dichlorobenzidine 3-Nitroaniline

4-Chloro-3-methylphenol 4-Chloroaniline

Bis(2-Chloroethyl)ether

Butylbenzylphthalate Carbazole Chrysene Di-n-butylphthalate Di-n-octylphthalate $Dibenz(a,h)$ anthracene Dibenzofuran Diethyl phthalate Dimethylphthalate Fluoranthene Fluorene Hexachlorobenzene Hexachlorobutadiene

Hexachloroethane $Indeno(1,2,3-cd)pyrene$ Isophorone N-Nitrosodiphenylamine N-Nitrosodipropylamine Naphthalene Nitrobenzene Pentachlorophenol Phenanthrene

Pyrene

4-Methylphenol 4-Nitroaniline 4-Nitrophenol Acenaphthene Acenaphthylene Anthracene $Benzo(a)$ anthracene Benzo(a)pyrene Benzo(b)fluoranthene Benzo(ghi)perylene $Benzo(k)fluoranhene$

34.4 U

19.8 J 36.7 J 933 1040 35.7 J 86.2 J

Aluminum UG/L M NYS AWQS CLASS C (AQUATIC) 100

 $2,4,5-T$

 $2,4-D$ $2,4-\text{DB}$ Dalapon Dicamba

Dinoseb $MCPA$ $MCPP$

 HMX RDX Tetryl
4,4'-DDD

 $SW13-9$

 N/A

 ${\bf N}$

131003 $\overline{}$

PARAMETER Antimony
Arsenic

Barium Beryllium
Cadmium

Calcium Chromium
Cobalt

 $\rm Magnesium$ Manganese
Mercury

Potassium

Sodium

Vanadium
Zinc

Nitrate/Nitrite Nitrogen

APPENDIX D

Results for NYSDEC Surface Soil Sampling – June 2004

Please Print legibly in ink: INVE STIGATION
SUPPORT NYS DEPARTMENT OF ENVIRONMENTAL CONSERVATION Proj Manager: (O H T F SECTION Site Name: *S*eneca Hemy Depol DIVISION OF ENVIRONMENTAL REMEDIATION Site Code: **850006** Region: **8** ...
TA Code: **A4.75** Bureau/ Region: ϵ_1 CHAIN OF CUSTODY RECORD Phone Number: $402 - 9620$ Bottles Released by **Big Glutz** Date (Time) $\frac{1}{2}$ BNA; PEST, PCBs (1 LITER) METALS (preserved 500 ML/ 1 LITER) $\begin{array}{|l|l|}\n\hline\n\end{array}$ SOIL JARS $\begin{array}{|l|l|}\n\hline\n\end{array}$ VOA (40 ML) Bottles Released by(Sets BNAs P/PCBs Metals VOAs P/PCBs P/PCBs
Plus Trip Blank BNAs Metals Recoived by: (Signature, Date/Time)
Sampler completes items 1 thru 8, one sample per line. Check analyses requested. $\mathbf{\hat{a}}$ ¹**BNAs PJPCBs** : **Metals VOAs PJPCBs** Sets **BNAs** / **Metals** ed by: (Signature, Date/Time) Plus Trip Blank I (1)FIELD ID $\qquad \qquad \big|(2)$ MATRIX * $\big|$ (3)DATE $\qquad \big|(4)$ VOA $\big|(5)$ BNA $\big|(6)$ PEST $\big|(7)$ METALS $\big|$ (8)COMMENTS $\qquad \qquad \big|$ LAB SAMPLE ID (8)COMMENTS ! COLLECTED PCB (or SPECIAL ANALYSIS) Lab use only $C/3$ $501 - 6 - 17 - 04$ -77 ::.9 *~1 -# 6.,~* $\frac{1}{4}$;lf'7 • Please categorize the sample matrix as one of the following: Shipping Address: DER LAB, Room D201 **GW** • Groundwater LEACH • Leachate COLLECTED BY: (Signature.date/time) objecter SW - Surface water WASTE - Specify 1 University Place SOIL - Soil **OTHER - Specify** Rensselaer, **NY** 12144 SED - Sediment TB - Trip Blank ATT: Brian Policastro RELINQUISHED BY: (Signature,date/time) **Butor** θ_{max} *(a-/8-04)* Phone: 518-525-2766 Fright Sta-925-2766
If you have any questions please call Fred Woodward at 518-457-9280 (office) or 518-525-2766 (lab).
LABORATORY ACCESSION BY: (Signature,date/time) 21 (2005)

Case Narrative

Site Name: Seneca Army Depot Date received: 06/18/04

For sample delivery group(s): 170-02

The calibration verification that these samples were run under had several of the target analytes exceeding the calibration verification criteria that is associated with this method. However, since the initial calibration that these samples were quantitated against was valid, any reported values for these analytes should be considered valid. None of the analytes that exceeded the calibration verification criteria were found in the samples.

For samples Lab ID 804-170-005, 006, and 007 there were low recoveries for the Base/Neutral Surrogates. This was probably due to a matrix interference. If Base/Neutral analytes were detected in any of these three samples the reported value may be lower than the actual value and should be qualified with an 'E'.

All other QA/QC associated with this sample delivery group were within acceptable method criteria.

DIVISION OF ENVIRONMENTAL REMEDIATON

LABORATORY ANALYTICAL REPORT

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

FIELD SAMPLE ID

C13-#1

 Γ

DIVISION OF ENVIRONMENTAL REMEDIATON

LABORATORY ANALYTICAL REPORT

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

FIELD SAMPLE ID

C13-#2

 Γ

DIVISION OF ENVIRONMENTAL REMEDIATON

LABORATORY ANALYTICAL REPORT

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

FIELD SAMPLE ID

C13-#3

 Γ

DIVISION OF ENVIRONMENTAL REMEDIATON

LABORATORY ANALYTICAL REPORT

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

FIELD SAMPLE ID

C13-#4

 Γ

DIVISION OF ENVIRONMENTAL REMEDIATON

LABORATORY ANALYTICAL REPORT

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

FIELD SAMPLE ID

C13-#5

 Γ

DIVISION OF ENVIRONMENTAL REMEDIATON

LABORATORY ANALYTICAL REPORT

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

FIELD SAMPLE ID

C13-#6

 Γ

DIVISION OF ENVIRONMENTAL REMEDIATON

LABORATORY ANALYTICAL REPORT

SEMIVOLATILE ORGANICS ANALYSIS DATA SHEET

FIELD SAMPLE ID

C13-#7

 Γ

APPENDIX E Toxicological Profiles for Selected COCs
ALUMINUM

CAS NUMBER

7429-90-5

COMMON SYNONYMS

None.

ANALYTICAL CLASSIFICATION

Inorganic.

PHYSICAL AND CHEMICAL DATA

Water Solubility: insoluble [1] Vapor Pressure: insignificant at 25°C [1] Henry's Law Constant: Not Applicable Specific Gravity: 2.70 [1] Organic Carbon Partition Coefficient: NR

BACKGROUND CONCENTRATIONS

Aluminum is a naturally-occurring element. The concentration of aluminum in minimally disturbed soils varies. A collection of 1,247 soil samples from across the conterminous U.S. determined that 79 percent were less than 70,000 ppm, with a geometric mean of 47,000 ppm and a maximum value of 100,000 ppm [2]. In water, aluminum concentrations are dependent upon the pH of the water: significant concentrations occur only when the pH is less than 5. In waters with a high humic-derived acid content, aluminum may be present even at a more neutral pH [1]. In surface water, aluminum was detected at concentrations ranging from 0.001 to 2.760 mg/L with a mean concentration of 0.074 mg/L in 456/1577 samples [1].

FATE AND TRANSPORT

The mobility of aluminum in the environment will be dependent upon the solubility of the aluminum compound and upon the pH of the environmental medium. Soluble compounds will tend to be more mobile in the environment and a lowering of the pH of the soil generally results in an increase in mobility for monomeric forms of aluminum. Consequently, acid rain may

mobilize aluminum in the environment. Terrestrial plants take up aluminum, but it is not likely to bioconcentrate [1].

HUMAN TOXICITY

General. Aluminum is a major component of the earth's crust. People may be exposed to aluminum through its use in cooking utensils, antacids and antiperspirants. Aluminum in these forms has not been reported to be harmful, although excess exposure to aluminum is not beneficial and may be harmful to some people. Excess aluminum has been associated with neurodegenerative diseases, although the link between the two is tenuous. The primary targets of aluminum toxicity are the central nervous system, skeletal system, respiratory system and the developing fetus [1]. Aluminum is not known to cause cancer in humans or animals, and has not been placed in a USEPA weight-of-evidence cancer group [3].

Oral Exposure. A chronic oral RfD is not available for aluminum [3,4]. Oral LD_{50} values of 261 mg Al/mg body weight in rats (nitrate form) and 770 mg Al/kg in mice (chloride form) have been reported. In humans, aluminum has been associated with neurodegenerative diseases, such as Alzheimer's disease. A causal relationship, however, has not been shown between aluminum exposure and the progression of neurodegenerative disease. Neurodegenerative diseases have also developed in individuals who have been on renal dialysis for a number of years. Aluminum is present in the dialysis fluid and is given to control hyperphosphatemia. A softening of the bones, resulting in increased spontaneous fractures and pain, has been reported in dialysis patients. In infants given renal dialysis containing aluminum, aluminum accumulation and encephalopathy has been noted. The effects of aluminum on the developing fetus of animals have been controversial: a decrease in pup growth and neurological development have been observed in some studies, but not others [1].

Inhalation Exposure. An inhalation RfC is not available for aluminum [3,4]. Inhalation of aluminum results in irritive effects on the respiratory system, including asthma, cough, lung fibrosis and decreased pulmonary function [1].

Dermal Exposure. Dermal exposure to aluminum is primarily the result of the use of aluminumcontaining antiperspirants. In sensitive individuals, aluminum may cause a skin rash [1].

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MANGANESE

CAS NUMBER

7439-96-5

COMMON SYNONYMS

None.

ANALYTICAL CLASSIFICATION

Inorganic.

PHYSICAL AND CHEMICAL DATA

Water Solubility: decomposes [1]

Vapor Pressure: insignificant at 25°C [1] Henry's Law Constant: Not Applicable [1] Specific Gravity: 7.20 at 20/4 °C [1] Organic Carbon Partition Coefficient: Not Applicable [1]

BACKGROUND CONCENTRATIONS

Manganese is a naturally-occurring element. The concentration of manganese in minimally disturbed soils varies tremendously. A collection of 1,317 soil samples from across the conterminous U.S. determined that 89 percent were less than or equal to 700 ppm, with a geometric mean of 330 ppm, but with a maximum value as high as 7,000 ppm. Of fifteen samples collected around Ohio, 80 percent were found to contain manganese at concentrations less than or equal to 700 ppm, with a maximum value between 1,000 and 7,000 ppm [2].

FATE AND TRANSPORT

Environmental fate processes may transform one manganese compound to another; however, manganese itself is not degraded. Elemental manganese and inorganic manganese compounds may exist in air as suspended particulate matter. Such particles are removed from the atmosphere primarily by dry deposition, and, to a lesser extent, by washout. In water, the metal may exist in any of four oxidation states $(2+, 3+, 4+, \text{ or } 7+)$. Mn(+2) predominates in most waters, and usually combines with carbonate to form a compound of low solubility. In extremely reduced water, poorly soluble sulfides are formed. Manganese is often transported in rivers as suspended sediments. Manganese in water may be significantly bioconcentrated at lower trophic levels.

Bioconcentration may not be significant in predatory fish; thus biomagnification may not be significant [1].

Adsorption of manganese to soils may be highly variable, increasing with higher organic content and anion-exchange capacity. At low concentrations, manganese may be "fixed" by clays, and will not be readily released into solution. At higher concentrations, it may be desorbed by ion exchange. For example, the discharge of waste water into estuarine environments resulted in the mobilization of manganese from the bottom sediments. Also, microorganisms may increase the mobility of manganese under some circumstances [1].

HUMAN TOXICITY

General. The only adverse health effect identified following exposure to high levels of manganese is a condition known as "manganism," which results in psychomotor disturbances. Manganese in small amounts is believed to be an essential nutrient for humans [1]. The USEPA has placed manganese in weight-of-evidence Group D; that is, it is not classifiable as to human carcinogenicity [3].

Oral Exposure. The chronic RfD for the manganese ranges from 0.005 mg/kg/day for the ingestion of manganese in water to 0.14 mg/kg/day for the ingestion of manganese in food [3]. Both RfDs are based on a NOAEL for central nervous system effects determined from human chronic ingestion data [3]. The amount of manganese absorbed from the gastrointestinal tract typically averages 3 to 5%. Most animal studies indicate that manganese compounds have low acute oral toxicity. A NOAEL of 2,300 mg/kg/day in food for 6 months was determined for mice. On the other hand, single doses of highly concentrated solutions of various manganese compounds delivered to rats by gavage produced LD_{50} values ranging from 410 to 820 mg manganese/kg/day. Thus it was concluded that high doses delivered by gavage did not yield a model relevant for normal environmental exposure. Evidence for the onset of manganism in humans following oral exposure is inconclusive. In animals, changes in the brain have been observed following very high oral exposure [1].

Inhalation Exposure. An RfC of 0.00005 mg/m³ is based on a LOAEL of 0.15 mg/m³ for impairment of neurobehavioral function in occupationally exposed workers [3]. The rate and extent of absorption of manganese following inhalation is unknown. A significant fraction of inhaled manganese-containing particles are carried via mucociliary transport to the gastrointestinal tract. Exposure of humans to high levels of manganese dust in air for a prolonged period of time (1 month to several years) may cause mental and emotional disturbances, and the impairment of locomotion and dexterity, a condition known as manganism. However, this condition has only been documented for workers in mines and foundries. Manganism occurs because excessive manganese injures a part of the brain that helps control body movements. Some of the symptoms of manganism can be reduced by medical treatment, but the brain injury is permanent [1].

Dermal Exposure. No information was located on the dermal absorption of manganese or adverse health effects resulting therefrom. It is reasonable to assume that intake via this pathway under normal circumstances is minimal.

ECOLOGICAL TOXICITY

General. Manganese is an essential trace element or micronutrient for plants and animals. Manganese does not occur naturally as a metal, but is found in various salts and minerals, frequently in association with iron compounds [4]. Manganese readily bioaccumulates in plants and animals, but does not biomagnify in food chains.

Vegetation. At pH values of 5.0 or less, manganese is rendered very soluble and excessive accumulation in plants can result. At pH values of 8.0 or above, precipitation results in the removal of bioavailable manganese from the soil [5].

Wetland plants, such as cattails, tend to maintain higher tissue concentrations of manganese than upland plants, probably because of greater availability of soluble manganese in wet soils or sediments [6]. Cattails can take up 779 mg/kg dry weight without injury [4]. Plants having more than 400 to 3,000 mg/kg of manganese (dry weight) in their tissues may exhibit toxic symptoms depending on the plant species [6]. Manganese toxicity in young plants is indicated by brown spotting on leaves [5]. Vegetation phytotoxic concentrations in soils and sediments are species specific and range widely.

Aquatic Life. Manganese ions are rarely found at concentrations above 1 mg/L, so manganese is not considered to be a problem in freshwater [7]. Manganese is toxic to fish in concentrations ranging from 1.5 to 1000 mg/L. Most toxic thresholds for fish are probably less than 50 mg/L [4]. Toxicity of manganese increases with decreasing pH [8]. Manganese has been shown to bioaccumulate in freshwater invertebrates [4]. There are no USEPA or OEPA aquatic life water quality standards [9,10].

Wildlife. The divalent form of manganese has a low order of toxicity to biota, especially to vertebrate animals. The hexavalent form is highly toxic, but does not occur in nature. Toxic concentrations of divalent manganese is reported in the diets of the following species: birds, 4,800 ppm; rats greater than 2,000 ppm; and rabbits 1,250 to 6,000 ppm. Toxic levels of manganese in mammals can cause decreased feed intake, decrease growth, reduced hemoglobin, and even death [11]. Growing rats have had dietary intake as high as 1,000 to 2,000 mg/kg with no apparent ill effects [6]. Maximum tolerable levels of manganese recommended by the National Academy of Sciences was 15 mg/kg body weight for sheep and cattle, 16 mg/kg body weight for swine, and 250 mg/kg body weight for poultry [11].

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Nitrate $(NO₃)$

CAS NUMBER

014797-55-8

COMMON SYNONYMS

None.

ANALYTICAL CLASSIFICATION

Inorganic.

PHYSICAL AND CHEMICAL DATA

Water Solubility: soluble [1].

NATURAL SOURCES

Nitrates are produced by natural biological and physical oxidations and therefore are ubiquitous in the Environment [2].

ARTIFICIAL SOURCES

Most of the excess nitrates in the environment originate from inorganic chemicals manufactured for agriculture.

FATE AND TRANSPORT

Plants may absorb excessive amounts of nitrate nitrogen from soil. Under the reducing conditions of fermentation, nitrate in ensilage may be reduced to toxic $NO₂$ gas, which can accumulate to high levels in enclosed soils. Nitrite can be formed under aerobic conditions from ammonia by autotrophohic nitrifying bacteria. The nitrites are oxidized by the *Nitrobacter* group of nitrifying bacteria. Under anaerobic conditions nitrates are reduced to nitrites by a process called denitrification, and then reduction of nitrites occurs [3].

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HUMAN TOXICITY

Non-Carcinogenic Health Effects

General. The primary toxic effect of inorganic nitrates is the oxidation of the iron in hemoglobin by excess nitrites forming methemoglobin. Infants less than 6 months old comprise the most sensitive population [4,5]. A secondary target for inorganic nitrate toxicity is the cardiovascular system. Nitrate intake can also result in a vasodilatory effect, which can complicate the anoxia resulting from methemoglobinemia [2]. The chronic administration of organic nitrates results in the development of tolerance to the cardiovascular effects of these compounds. This effect is independent of entry route and creates limitations in the treatment of angina symptoms and potentially serious problems for workers in munitions and dynamite industries [6,7,8].

Oral Exposure. A Reference Dose (RfD) of 1.60 mg/kg/day (nitrate nitrogen) for chronic oral exposure was calculated from a NOAEL of 10 mg/L and a LOAEL of 11-20 mg/L in drinking water, based on clinical signs of methemoglobinemia in 0-3-month-old infants [9,10]. It is important to note, however, that the effect was documented in the most sensitive human population so no uncertainty or modifying factors were used [11]. Toxic health hazards in humans, except for methemoglobinemia, as a result of chronic high inorganic nitrate exposure are undocumented [12].

Inhalation Exposure. Information on developmental and reproductive toxicity in humans resulting from inhalation exposure to nitrates was not available.

Carcinogenic Health Effects

General. The possibility of inorganic or organic nitrate functioning as a carcinogen depends on its conversion to nitrite and the subsequent reaction of nitrite with other molecules, specifically secondary amines, amides, and carbamates, to form carcinogenic N-nitroso compounds [5, 13]. Human population studies have yielded conflicting results.

Oral Exposure. Human population studies have yielded conflicting results. It is currently under review [11] for classification of carcinogenicity.

ECOLOGICAL TOXICITY

General. Methemoglobinemia, which can lead to anoxia and death in extreme cases, is the primary acute toxic effect of oral exposure to inorganic nitrates in all animals tested. Ruminant animals are most susceptible. This effect is extremely variable since it depends on a number of factors including the conversion of nitrates to nitrites; the ability of the various animals to enzymatically reduce methemoglobin; the amount of vitamins A, C, D, and E in the diet; and the nutritional state of the animal.

Animals. Acute nitrate toxicity in cattle has been reported following the ingestion of water containing 500 ppm or more nitrate or feed containing 5000 ppm or more nitrate. Methemoglobinemia is caused by the conversion of the nitrates to nitrites [2]. Dogs have sustained a plasma level of 24 mEq nitrate/L (336 mg nitrate-nitrogen/L) following gavage with sodium nitrate in water with no evidence of methemoglobinemia. Slight increases in glomerular filtration rates and renal plasma flow were observed, and hyperexcretion of chloride leading to hypochloremia, alkalosis, and digestive disturbances were reported. Dogs have also been given 20,000 ppm nitrate in their diet without any apparent adverse effects [2]. Rats have shown no effects after a dietary nitrate concentration of 10,000 ppm [14]. Pigs are even more resistant to nitrate poisoning but have developed methemoglobinemia after ingesting food or drinking water containing nitrites converted from nitrates by microflora in the food or water before ingestion (toxic dose listed as 88 mg nitrite/kg body weight) [2]. Potassium nitrate oral LD50 values of 3750 mg/kg for rats and 1901 mg/kg for rabbits and sodium nitrate oral LD50 values of 2680 mg/kg for rabbits have been reported [15].

Male rats given 3000 mg sodium nitrite/L in drinking water for 2 years had no significant differences in mortality, growth, or development. Rats given 100 mg sodium nitrite/kg/day (20 mg nitrite-nitrogen/kg/day) in a lifetime drinking water study had elevated methemoglobin, but no other treatment-related hematologic or histologic effects were observed [16].

Rats given both nitrite and heptamethyleneimine in drinking water, which can react in vivo to form a nitrosamine, were shown to have an increased incidence of tumors when compared to controls missing either component [17].

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APPENDIX F Response to Comments

Response to (Emailed) Comments from the United States Environmental Protection Agency

Subject: Response to Comments on Draft Final Decision Document for the Inhibited Red-Fuming Nitric Acid (IRFNA) Disposal Sites (SEAD-13) Seneca Army Depot Romulus, New York

Comments Dated: July 3, 2003

Date of Comment Response: July 23, 2004

General Comments:

Comment 1: Response to Comment #2: Comment 2 originally questioned the method of background comparison used to eliminate inorganic chemicals as COPCs. The response quoted a 1997 letter from EPA recommending the method of comparing a site average concentration to twice the average background concentration. EPA, however, has now issued final guidance regarding background comparison methodology (EPA, 2002b.) This final guidance supercedes previous and outdated guidance including the method of comparison to twice the average background concentration. The final guidance provides specific protocols for background comparison using statistical tools that are now readily available and user-friendly.

Current guidance for background comparison must be used for future risk assessment. A listing of some of this guidance is noted above.

Response 2: The Army acknowledges that the 2002 EPA document is the most current guidance, and it will be used for future risk assessments. Since the beginning of the SEAD-13 project predates this 2002 EPA guidance, the EPA guidance provided at that time (i.e., the EPA letter dated 1997) is used as the basis of the risk assessment.

Specific Comments:

Comment 1: Response to Comment #2: This is regarding your response to our Comment 2: Page 3-16.

The Army's response should be expanded, and included in the uncertainty section of the risk characterization as a potential underestimation or overestimation of risk. For example, the response may be expanded to say that a recreational visitor might have exposure for 2 weeks per year for 10 years, which would double the risk/hazard estimated." This result could then be compared to the risk range to see how it would fall within that range.

Response to USEPA Comments on Draft Final Decision Document for SEAD-13 Comments Dated July 3, 2003 Page 2 of 2

Response 2: Acknowledged. The response to Comment #2 has been added to Section 3.5.3.2. In addition, risk uncertainty associated with exposure assumptions will be addressed in the uncertainty section. The additional text is included below:

Uncertainty associated with exposure estimation will result in potential underestimation or overestimation of risks for potential receptors. As an example, the recreational visitor is assumed to reside at the site during a camping event and the camping event is assumed to last two consecutive weeks (24 hours/day, 14 days/year) each year for 5 years. If the recreational visitor is exposed24 hours/day for four weeks each year for 5 years, the cancer risk and the hazard index would double (i.e., cancer risk of 6E-7 and hazard index of 3.3 with groundwater exposure and cancer risk of 4E-7 and hazard index of 0.02 without groundwater exposure). With the exposure pathway to groundwater inaccessible, the risks are within the EPA risk limits. As presented in **Appendix B**, when exposure to groundwater is prevented, the total cancer risks and hazard indices for residential receptors, who are exposed to COCs at the site 350 days/year, are within the EPA risk limits. Therefore, although more conservative exposure scenarios (such as the example offered by EPA, exposure for more than two weeks a year for five years for a recreational visitor) are not evaluated for this mini risk assessment, they are not expected to result in unacceptable risk based on the risk evaluation for residential scenario.

Similarly, although youth recreational users and adult recreational users were not evaluated, risks for residential receptors can be used as conservative surrogates. Since risks for residential receptors are within the EPA limits with a restriction on groundwater use placed at the site, it is concluded that risks for adult recreational users would be within the EPA limits with exposure to groundwater prevented.

Response to the Comments from the United States Environmental Protection Agency

Subject: Draft Final Decision Document for SEAD-13 Seneca Army Depot Romulus, New York

Comments Dated: January 30, 2003

Date of Comment Response: March 28, 2003

7/19/04: Post submittal note: Since these responses were submitted, minor revisions have been made to the responses in order to accurately reflect corrections made to the text of the Decision Document.

General Comments - Human Health:

All general comments relating to the human health risk assessment were adequately addressed.

New Comments:

Comment 1: Residential receptors are assessed in Appendix B. These receptors are also briefly discussed in Section 3.6. While it is clear that the Army considers these receptors to represent an unlikely scenario, they should be integrated into the overall risk assessment. In some instances, the risk assessment is misleading in that the evaluation of the residential receptors is not even identified (e.g., see the bulleted lists in Section 3.3.5.1 and Section 3.3.5.2).

Response 1: Agreed. Discussion on the residential receptor has been integrated throughout Section 3.0. The tables of risk calculations remain in Appendix B.

Comment 2: The method of background comparison is not very conservative. Comparing the site average to twice the average background value for inorganics allows potential hotspots to be overlooked. Please reference the specific guidance that was used in establishing this comparison technique. At a minimum, Tables A-5 and A-6 should list maximum detected values.

Response 2: In a letter dated November 25, 1997, EPA recommended that the Army compare the site average to twice the average background value for inorganics. EPA proposed this method as a more practical and sufficient method of assessing the data, instead of using Wilcoxon Rank Sum, or other more complex statistics. The comment from EPA is quoted below:

USEPA Region II typically recommends using a much simpler technique for comparing site data to background data than the Wilcoxon Rank Sum test: selecting as chemicals of potential concern those inorganic chemicals detected in site samples with an average concentration (of the detected values) greater than two times the average concentration (of the detected values) in the background samples. It appears that using this technique would have achieved essentially the same results as the statistical treatments conducted here, without the uncertainty of the validity of the statistical treatments used.

Response to USEPA Comments on Draft Final Decision Document for SEAD-13 Comments Dated January 30, 2003 Page 2 of 4

The Army followed this recommendation.

Agreed. The maximum detected values have been added to Tables A-5 and A-6.

Specific Comments - Human Health:

All specific comments relating to the human health risk assessment were adequately addressed.

New Comments:

Comment 1: Page 3-6, Section 3.2.2, Identification of Chemicals of Potential Concern (COPCs): The second paragraph under the heading "Soil" indicates that chloroform was not retained as a COPC for surface soil because it was detected at levels below the PQL in 1 out of 13 samples. The frequency of detection (FOD) is greater than 5% and, as such, eliminating this chemical is in conflict with the last paragraph on Page 3-5 which indicates that organics will be eliminated only if the FOD is less than 5%. Revise to address this apparent inconsistency.

Response 1: Upon review of the data, it was determined that the detection of chloroform at a value of 2 J was the result of a lab error, and is not considered a reliable data value. The table has been revised to reflect that the concentration of chloroform in sample SB13-7-1 is 12 U μ g/kg. This detection is below the quantitation level and is not considered part of the data set. Therefore, chloroform will not be added as a COPC. This explanation has been added to the text for clarification.

Comment 2: Page 3-16, Section 3.3.5.2, Exposure Scenarios: The paragraph under the "Recreational Visitor" scenario indicates that the assumed exposure for this receptor is two weeks a year for five years. This exposure scenario is not conservative enough. If the area potentially will be used as a recreational facility, it is possible that a nearby resident could visit on a regular basis. Additionally, it would be appropriate and more conservative to evaluate the youth recreational users and adult recreational users in addition to child recreational users. Not only would these analyses result in risk estimates for these receptors, but it would also allow for the calculation of the lifetime cancer risk for the recreational user.

Response 2: The recreational visitor is assumed to reside at the site during a camping event and the camping event is assumed to last two consecutive weeks (24 hours/day, 14 days/year) each year for 5 years. As presented in Appendix B, with exposure to groundwater prevented, the total cancer risks and hazard indices for residential receptors, who are exposed to COCs at the site 350 days/year, are within the EPA risk limits. Therefore, although more conservative exposure scenarios (i.e., exposure more than two weeks a year for five years) are not evaluated for this mini risk assessment, they are not expected to result in unacceptable risk based on the risk evaluation for residential scenario.

Similarly, although youth recreational users and adult recreational users were not evaluated, risks for residential receptors can be used as conservative surrogates. Since risks for residential receptors are within the EPA limits with a restriction on groundwater use placed at the site, it is concluded that risks for adult recreational users would be within the EPA limits with exposure to groundwater prevented.

General Comments – Ecological Risk Assessment:

Comment 1: The response provided adequately addresses the concerns presented in the comment. As the response states, the Process Document was followed correctly during the compilation of the SLERA, and the conclusions of the ERA portion of the mini risk assessment correspond with the Process Document requirements for the conclusion of a SLERA. However, common practice is to compare maximum concentrations of detected contaminants in each media to predetermined screening values as a way of determining those contaminants that should be considered COPCs in the ERA.

Response 1: Comment noted. A screening-level ecological effects evaluation (i.e., Step 1.3) was not performed for this mini-ERA to reduce the list of COPCs. This is a conservative approach as all compounds detected were retained as COPCs, and, therefore, this approach will not affect the risk assessment results.

Specific Comments – Ecological Risk Assessment:

All specific comments relating to the ecological risk assessment were adequately addressed.

Specific Comments – Nonrisk Related:

New Comments:

Comment 1: Figure 1-2, Wind Rose Syracuse, New York: The predominant wind directions differ substantially between the wind rose charts presented in the April 2000 Draft Decision Document and the October 2002 Draft Final Decision Document. Revise accordingly.

Response 1: Acknowledged. The Wind Rose Figure included in the October 2002 Draft Final Decision Document reflects the most current conditions at SEDA. The figure provided in the April 2000 document is outdated.

Comment 2: Page 2-5, Section 2.4.3, Groundwater: This paragraph indicates that for SEAD-13-West, monitoring well 13-(1)2 is upgradient and monitoring well 13-6 is a downgradient well. The paragraph also indicates that the presumed direction of groundwater flow was to the northeast for SEAD-13-West. Based on Figure 2-3, the presumed groundwater flow is in conflict with the upgradient and downgradient designations for the wells. Revise accordingly.

Response 2: The Army believes that based on historic knowledge and groundwater monitoring results that the west disposal pits do not exist. A 1960s report on the disposal of IRFNA discussed the "disposal site" and the construction of 6 pits (east disposal area). The location marked on an old map appears to be in an area that was east of the future Duck Pond. It should be noted that the Army investigated the assumed west disposal area due to the presence of the aboveground piping. It appears that the piping was installed in the event that it was required at a later date. Groundwater results show that the nitrate concentrations are not elevated in the assumed area of the west disposal area. The nitrate concentrations (up to 0.17 ppm) are well below the Class GA standard of 10 mg/l. As a comparison, the nitrate concentrations are over 1,000 times higher in the east disposal area.

Since there is no actual source material, upgradient and downgradient determinations cannot be made. The text will be revised accordingly.

The presumed groundwater flow is now discussed in new Section 2.5.5 and shown on Figure 2-6.

Comment 3: Page 3-4, Section 3.2.1.1, QA/QC Methods: The fifth sentence in this section uses the phrase "field equipment decontamination event." Revise text for clarity.

Response 3: Agreed. One field equipment blank was collected per batch of 20 or fewer samples per matrix in order to detect possible sources of contamination introduced from field sampling equipment or from carry over from one sample to the next. The text has been revised.

Comment 4: Page 3-5, Section 3.2.1.3, Data Validation: The second sentence of this section uses the term "sample reservations." Please correct this text.

Response 4: Agreed. The text should read "sample preservations". The text has been revised.

Comment 5: Page 3-11, Section 3.3.4.2, Fate and Transport: The second to last sentence under the "Metals" heading refers to cyanide as a metal. Revise text for clarity.

Response 5: Agreed. The sentence has been rephrased as follows: "Two metals, aluminum and manganese, and cyanide were considered COPCs in groundwater.

Response to the Comments from New York State Department of Environmental Conservation

Subject: Draft Final Decision Document – Mini Risk Assessment for the Inhibited Red Fuming Nitric Acid (IRFNA) Disposal Site (SEAD-13) Seneca Army Depot Romulus, New York

Comments Dated: December 12, 2002

Date of Comment Response: March 28, 2003

7/19/04: Post submittal note: Since these responses were submitted, minor revisions have been made to the responses in order to accurately reflect corrections made to the text of the Decision Document.

Army's Response to NYSDEC Comments:

Comment 1: In NYSDEC's Specific Comment #1, the Department requested that "(S)urface and subsurface soil samples should be taken from within the IRFNA pits themselves (0-2 inches, plus others)." However, the Army only took one additional surface soil sample from within the IRFNA pits as indicated in Figure 2-3. One surface soil sample appears inadequate to characterize the extent of surface and subsurface contamination of IRFNA pits that are described in this report as "six elongated disposal pits (possibly seven)" that are "30 feet long, 8 feet wide and 4 feet deep." Also, for the one soil sample that was collected from the disposal pits, what type of surface soil was tested? The site description states that the pits are covered with crushed gravel and limestone fragments. Please explain the surface soil sampling methodology used.

Response 1: Disagreed. The Army submitted an initial work plan to NYSDEC and EPA for the supplemental fieldwork on January 11, 2001. A revised work plan was submitted on July 31, 2001 and this plan modified well locations slightly from the January 11, 2001 work plan. No locations were moved from the pits themselves. Both plans proposed one surface soil sampling point and no subsurface sampling points within the pits. The Army did not receive agency comments regarding the soil sample locations or the notice to proceed with sampling. The Army believed that NYSDEC considered the Army's proposed scope and sampling locations to be acceptable prior to beginning the work.

The surface soil sample collected in the disposal pit (SS13-9) was composed of shale fragments and limestone gravel. This description confirms that the sample was collected from the IRFNA pit contents. The sample was a grab sample and was collected using a spade.

The Army does not intend on performing additional surface or subsurface sampling within the disposal pits or in any other location at SEAD 13.

Comment 2: In the Army's response to NYSDEC's Specific Comment #2, the Army states that the "nitrate/nitrite concentrations in the groundwater in the IRFNA pit area have been generally consistent over time." However, the Army has not adequately defined the source of this contamination. If there is no source, then why haven't the groundwater concentrations decreased with time? The consistent levels of nitrate/nitrite contamination may be indicative of a continuing source of groundwater contamination that may require further investigation. Please address.

Response 2: Disagreed. The source of the groundwater plume is the east disposal pit area. The plume extends in the directions of groundwater flow away from the east disposal pit area towards the Duck Pond. The Army contends that the nitrate plume has been adequately characterized by a combination of the nitrate groundwater results (Figure 2-9) and the geophysical survey results (Figure 2-5). The highest areas of conductivity as identified by the geophysical survey correspond well to the areas of high nitrate concentrations. Further, the two wells (MW13-3 and MW13-7) where the wells are consistently dry show as areas of low conductivity. Therefore, although the wells do not necessarily bracket the outside edge of the plume, the geophysical results show that the high conductivity dissipates outside of monitoring wells MW13-11, MW13-13 and MW-13-14.

The Army recognizes that the disposal pits were the source of groundwater contamination. However, further investigation of the source is not necessary as discussed above. The Army understands that a groundwater use restriction will be required to prevent ingestion of groundwater. Ingestion of groundwater was the only risk identified for SEAD 13.

General Comments:

Comment 3: This document recommends institutional controls in the form of "a restriction on the use of groundwater for drinking water purposes together with a groundwater monitoring program is recommended due to the presence of elevated levels of nitrate/nitrite-nitrogen in the groundwater at SEAD-13 East." However, the Army does not present how this remedial action would achieve ARARs. The document simply recommends "five-year reviews will be performed until data shows that they are no longer required." The Army needs to thoroughly demonstrate how institutional controls would be protective of human health and the environment, in addition to compliance with ARARs.

Response 3: Agreed. Groundwater monitoring and land use restriction for groundwater will be implemented at the site until contaminant concentrations meet Class GA groundwater standards and EPA MCLs. The restriction on groundwater use at the site would eliminate contact with groundwater as an exposure pathway for human health risk, thereby reducing risk to within acceptable levels for potential human receptors. With the exception of groundwater use, there are no other unacceptable risks at this site. This clarification has been added to the text.

Comment 4: Although one of the Army's goal for this decision document is to provide a recommendation that the area warrants no remedial action for soil, sediment, and surface water by providing, in the Army's opinion, adequate site information to warrant this recommendation, the State believes that the Army has overlooked the actual source area, i.e., the disposal pits. Since the proposed future use of SEAD-13 is conservation/recreation, there is the potential for human contact, either by a construction worker, park worker or recreational visitor. Because the source was not addressed, and this exposure scenario was not addressed in the mini-risk assessment, the NYSDOH considers the risk assessment incomplete. At a minimum, a source area management plan is needed until the requested disposal pit information, as described below, is evaluated.

Response 4: Disagreed. The Army believes that the source of contamination has been sufficiently delineated. See Response No. 1. The Army disagrees that the source area was not evaluated in the mini-risk assessment. There was one surface soil sample (SS13-9) that was collected from the source materials. The risk assessment did not show unacceptable risk for contact with surface soil.

Comment 5: Clarification is sought as to why soil boring samples were not collected within the disposal pits. It is unclear how much soil, if any, is actually in the pits or if the disposal pits are even considered soil. The analysis of the waste for contaminants of concern (i.e., degradation products of IRFNA) and the physical parameter of pH would allow for a more complete evaluation of the potential for future exposures and additional migration of contaminants to surrounding soil and groundwater. In addition, the pH of the soil and groundwater adjacent to the pit area was not examined. As stated above, this information is necessary to evaluate the potential of (disposal pit related) decreased pH of soil or groundwater to leach "site background" inorganics not related to the disposal of IRFNA from surrounding soils into groundwater and subsequently the Duck Pond. In the document discussion of groundwater contamination, the Army states that some of the elevated inorganics, decreased pH and background leaching may also be the cause. Without turbidity data or dissolved inorganic/pH data, these two scenarios cannot be separated as to which may be the cause of the elevated inorganics.

Response 5: See Response No. 1 for rationale behind the subsurface exploration program. As stated above, the Army believes that the source has been sufficiently delineated, based on geophysical and groundwater data.

As shown on Figure 2-10, a review of groundwater sampling parameters shows that the pH of the groundwater at SEAD-13 is not lowered and is in the same range as the pH of groundwater at other background locations at SEDA. The pH levels measured at the site does not cause additional leaching of metals.

The elevated metals concentrations correlate with higher turbidity levels. The maximum concentrations of magnesium, iron, manganese and chromium were all detected in the September 2001 sampling round in MW13-13 where the turbidity measurement was 999 NTUs as compared to a turbidity of 13.7 NTUs in April 2002. In general, the metals results were significantly lower where turbidity values were lower. For instance, the following table of results for MW13-13 demonstrates this.

The Army does not dispute that there are metals concentrations that are exceeding Class GA Standards, however, there is no defined plume of high metals concentrations. As demonstrated above, the highest concentrations of metals were due to a sampling event where high turbidity groundwater was analyzed.

A new Section 2.6.3.7 has been added to summarize the turbidity and pH data.

Comment 6: Has the groundwater contamination been sufficiently delineated? If so, please provide a plume sketch, depicting both nitrate/nitrite and metals contamination.

Response 6: The groundwater contamination has been sufficiently delineated. Figure 2-9 provides a plume sketch, as well as nitrate/nitrite data.

As discussed in Response No. 5, there is no metals plume map to present.

Comment 7: There should be a conclusions section, preceding the Army's recommendations. In this conclusions section, the Army should indicate that SEAD-13 failed a residential risk assessment.

Response 7: The conclusions are presented in Section 3 and 4 and reiterated in Section 5. An additional section is not required. The results of the residential risk assessment are presented in Section 3.5.4 (formerly numbered Section 3.6). In the same manner that risk is not an issue for a recreation/conservation land use scenario, risk is not a threat to human health under a residential scenario. The risk assessment showed that the cancer risk to a future resident (child and/or adult) is within EPA's acceptable range. The non-cancer risks for the resident adult and resident child are elevated (HI=20 and HI=40, respectively). These high HIs are solely due to ingestion and dermal contact to groundwater. If the groundwater pathway is eliminated, the total hazard indices for all residents become less than 1. The Army acknowledges that a land use restriction will be implemented to prevent the use of groundwater by future site users.

Comment 8: Although discussed in the text, there should be a figure denoting the direction of groundwater flow.

Response 8: Agreed. The direction of groundwater flow has been added to Figure 2-7.

Specific Comments:

Comment 9: Page 1-4, Section 1.3.2. Hydrology: The depth to groundwater should be indicated in this section.

Response 9: Agreed. Depth to groundwater, which varies by season and location, ranges from 1 foot to 10 feet. A new section 2.5.5 has been added to present groundwater elevation and groundwater flow information.

Comment 10: Page 2-10, Section 2.6.1.2 Semivolatile Organic Compounds: If the Army is attributing phthlates as laboratory contaminants, then the detection levels and frequency of detection should be discussed more thoroughly. This should be applied to other areas of the document where laboratory contamination is suspected as well.

Response 10: Agreed. The statement has been rephrased. "A few samples contained phthalates: bis(2-ethylhexyl)phthalate was detected five times at concentrations ranging from $27 \text{ J} \mu g/kg$ to 1900 J µg/kg; di-n-butylphthalate was detected twice at concentrations of 8.6 J µg/kg and 140 μ g/kg; di-n-octylphthalate was detected twice at concentrations of 7.7 J μ g/kg and 210 J μ g/kg. All of the identified detections were less than their respective TAGM 4046 values.

Comment 11: Page 2-14, Section 2.6.3.5, Metals: As stated in this section, eleven metals were found in the groundwater to exceed ARARs. Given that nitric acid was disposed at this site, there should be a discussion on pH levels detected and whether there is any correlation between pH and metals concentrations in the groundwater. If applicable, turbidity levels should be discussed as well.

Response 11: See Response No. 5.

Comment 12: Page 2-16, Section 2.6.4.5, Metals: If the Army is attributing higher levels of aluminum and iron to turbidity, then the actual turbidity levels should be presented in the text.

Response 12: Agreed. See Response No. 5. The turbidity data is included in the tables in Appendix A (Table A-3). The text has been revised to add turbidity data.

Comment 13: Page 5-2, Section 5.1, Expanded Investigation Results Supporting the Recommended Action: The Army should denote which document "the details of the groundwater monitoring program will be provided in."

Response 13: Agreed. The details will be provided in a Remedial Design Plan.

Comment 14: Figures 2-1 through 2-7: On these figures it is unclear where the suspected IRFNA pits are on the west side of the site. Therefore it is difficult to support the Army's location of monitoring wells and sampling points on the west portion of the site. Also, groundwater direction should be indicated where appropriate.

Response 14: The Army believes that based on historic knowledge and groundwater monitoring results that the west disposal pits do not exist. A 1960s Army report on the disposal of IRFNA discussed the "disposal site" and the construction of 6 pits (east disposal area). The location marked on an old map appears to be in an area that was east of the future Duck Pond. It should be noted that the Army investigated the assumed west disposal area due to the presence of the aboveground piping. It appears that the piping was installed in the event that it was required at a later date. Groundwater results show that the nitrate concentrations are not elevated in the assumed area of the west disposal area. The nitrate concentrations (up to 0.17 ppm) are well below the Class GA standard of 10 mg/l. As a comparison, the nitrate concentrations are over 1,000 times higher in the east disposal area.

The direction of groundwater flow has been added to a new Figure 2-7. In general, groundwater flows toward the Duck Pond.

Comment 15: Page 3-42, Section 3.6, Risk Characterization for Residential Land Use: The risk assessment section should be made more consistent by including this section as a sub-section under Section 3.5, Risk Characterization.

Response 15: Agreed. The section *Risk Characterization for Residential Land Use* has been renumbered Section 3.5.4.

Response to the Comments from United States Environmental Protection Agency Region 2

Subject: Draft Decision Document-Mini Risk Assessment for SEAD-13, Inhibited Red-Fuming Nitric Acid Disposal (IRFNA) Site Seneca Army Depot Romulus, New York

Comments Dated: July 14, 2000

Date of Comment Response: October 30, 2002

General Comments – Human Health:

Comment 1: Section 3.2.1 indicates that the data were generated using NYSDEC CLP Statement of Work methods and that these methods provide data suitable for a risk assessment. However, there is no indication that the data were validated according to EPA guidelines. Please include information regarding the data validation procedures and levels that were done for this data.

Response 1: Agreed. The samples were collected by Parsons, analyzed by NYSDEC CLPapproved laboratory, and validated by Parsons data validation personnel. The QA/QC measures during the data collection period and the data evaluation for suitability of use in the risk assessment complied with the RAGS (EPA, 1989). The data usability criteria for documentation, analytical methods, data validation, precision, accuracy, representativeness, comparability, and completeness are discussed in *Final Expanded Site Inspection Three Moderate Priority SWMU's SEAD 11, 13, and 57* (Parsons, 1995).

Specifically, the data validation was performed under the guidelines set forth in the "USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review", 1999, "USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review", 1994; "Region 2 RCRA and CERCLA Data Validation Standard Operating Procedures"; and NYSDEC Contract Laboratory Program Analytical Services Protocol. The data validation included a completeness audit and a review of the following parameters, if applicable: holding times, sample reservations, percentage of solids, quality control (QC) results of calibration, equipment/rinsate blanks, trip blanks, method blanks, matrix spike/matrix spike duplicate (MS/MSD) analyses, laboratory control sample performances, lab and field duplicates, ICP serial dilution, and surrogate recoveries.

The above information regarding the data validation has been included in Section 3.2.

Comment 2: The soil to skin adherence factor (AF) is listed as 1.0 for all chemicals in all scenarios. However, more recent guidance suggests an AF of 0.08 mg/cm² for adults and 0.3 mg/cm² for children. (Kissel, et al.) While an AF of 1 is more conservative, using this value has the potential to overestimate risks from the dermal pathway. This potential overestimation of risk should be discussed in the Uncertainty Section of the risk assessment.

Response 2: Acknowledged. The dermal risk assessment (including assessment of risks associated with soil, sediment, groundwater, and surface water dermal exposures) has been updated according to the USEPA *Supplemental Guidance for Dermal Risk Assessment* (2001), which represents the current knowledge of dermal risk assessment. The major changes are summarized as follows:

(1) A quantitative evaluation of risks associated with soil and sediment dermal exposure has been added to the risk assessment.

(2) The evaluation of dermal exposure to COCs in water has been updated according to the USEPA 2001 guidance. The relevant tables and text (Section 3.3.5.7 and 3.3.5.9) have been updated to reflect the change.

(3) The exposure parameters associated with the dermal exposure pathways, such as soil adherence factor, exposed skin surface area, permeability coefficient, lag time per event (τ), dermal RfD and cancer slope factor, and dermal absorption factor have been updated according to the USEPA 2001 guidance. The relevant tables and text have been updated to reflect the changes.

It should be noted that the sediment to skin adherence factor was retained as 1 mg/cm^2 , the upper bound soil to skin adherence factor. As stated in the USEPA 2001 guidance: "*The adherence factor is perhaps, the most uncertain parameter to estimate for sediment exposures".* As a conservative approach, the sediment to skin adherence factor of 1 mg/cm² was retained and used for risk characterization. The uncertainty associated with the soil/sediment adherence factor has been discussed in Section 3.5.3.

Comment 3: Section 3.5.3.2 discusses the Uncertainties in the Exposure Assessment portion of the risk assessment. Two exposure pathways were not quantitatively evaluated due to lack of absorption factor information (ABS values). Dermal contact with soil was not quantitatively evaluated for any receptor and dermal contact with sediment was not quantitatively evaluated due to lack of exposure factor (the ABS values), potential underestimation of risks should be discussed in this section.

Response 3: Acknowledged. As discussed in the response to the preceding comment, the assessment of risks via soil, sediment, groundwater, and surface water dermal exposure has been updated according to the USEPA *Supplemental Guidance for Dermal Risk Assessment* (2001), which represents the current knowledge of dermal risk assessment. A quantitative evaluation of risks associated with soil and sediment dermal exposure has been added to the risk assessment. ABS values are not available for several COCs (including VOCs and several metals). The associated potential underestimation of risks has been discussed in Section 3.5.3.

Comment 4: Section 3.5.3.3 discusses the Uncertainties in the Toxicity Assessment. The inhalation of groundwater during showering was not quantitatively evaluated for the recreational visitor due to lack of inhalation toxicity information. Potential underestimations of risk from not quantitatively evaluating this pathway should be included in this section.

Response 4: Acknowledged. A quantitative evaluation of risk via inhalation of groundwater during showering has been included in the report. Discussion of potential underestimation of risk due to the lack of inhalation toxicity information for some COCs has been included in Section 3.5.3.3.

Comment 5: There were no toxicological profiles provided for the COCs selected. Although references for the toxicological profiles were provided, the document would be more complete if toxicological profiles were included as an appendix to the document.

Response 5: Acknowledged. Although no toxicological profiles were provided for the identified COCs, profiles for most of the COCs can be found at the USEPA Integrated Risk Information System (http://www.epa.gov/iris/) and/or Toxicological Profile web page published by Agency for Toxic Substances and Disease Registry (http://www.atsdr.cdc.gov/toxpro2.html). Toxicological profiles for the selected compounds with significant contributions to the risks posed to human health or the environment have been included in Appendix D in the Decision Document – Mini Risk Assessment.

Comment 6: During the field investigations a set of pipes was identified at both SEAD-13 East and West. Please provide historical information about the pipes, their use, their abandonment and whether they have been plugged to prevent possible backflows into some other areas within the Depot. Please explain the significance of the pipes relative to possible exposures and risks.

Response 6: A set of vertical pipes was identified at SEAD-13. A vertical shower pipe and head is located in both the eastern and western side of the site. In the 1960 Report of sanitary engineering study No. 364214-60 "Disposal of Inhibited Red Fuming Nitric Acid by Soil Absorption, Seneca Ordnance Depot;" the vertical piping at SEAD-13-East was identified as vertical water and shower piping, likely used during the IRFNA disposal project as an emergency shower; however, the uses of the piping observed in SEAD-13-West, though similar in structure to that observed in SEAD-13-East, remains unknown (Final SWMU Classification Report, Parsons Engineering-Science Inc., 1994). An abandoned water hydrant was observed southwest of the Duck Pond. Possibly, this water hydrant was used to supply water pressure to the stainless steel ejector. Also, a set of the aboveground pipes was identified southeast of the Duck Pond and two sets of vertical piping were visible in the water southwest of the Duck Pond. The above information about the pipes has been included in Section 2.5.4, and Figure 2-6 has been added, which displays the approximate alignment of the underground piping at SEAD-13, based on the electromagnetic (EM) survey (Figure 2-5). There is little information about the previous usage of the piping.

According to the mini risk assessment, ingestion of groundwater with nitrate, aluminum, and manganese is the only exposure route that may cause significant risk. Since there is no exposure to the groundwater through the pipes, the risk related to the piping is negligible. In addition, the Army reports that all existing water line in the IRFNA disposal area were capped and abandoned during installation of a new water distribution line in the mid-1980s. The piping at SEAD-13 is not connected to any water distribution system currently in operation at SEDA.

Specific Comments – Human Health:

Comment 1: The Risk Characterization for Residential Land Use section is numbered as Section 3.6. However, Section 3.6 is the Ecological Risk Assessment section. The Residential Land Use section should be renumbered as 3.7 in the document and Table of Contents.

Response 1: Acknowledged. The Risk Characterization for Residential Land Use remains labeled as Section 3.6, and the Ecological Risk Assessment section has been renumbered as 4.0 in the document and Table of Contents.

Comment 2: Table A-14 in Appendix A. The Assumptions block lists the receptor as a "Recreational Worker." This should be changed to read "Recreational Visitor."

Response 2: Agreed. The "Recreational Worker" in Table A-14 has been changed to "Recreational Visitor".

General Comments– Ecological Risk Assessment:

Comment 1: It is unclear why a screening level ecological risk assessment (SLERA) was not performed as part of this ecological risk assessment (ERA). Performing a SLERA (Steps 1 and 2 as presented in *Ecological Risk Assessment Guidance for Superfund: Process for Designing and Conducting Ecological Risk Assessments, USEPA 1997* [Process Document]) could help to reduce the number of COPCs therefore potentially reducing the amount of effort needed for further analysis.

Response 1: It should be noted that the ecological risk assessment conducted for SEAD-13 in this mini risk assessment is the SLERA (Steps 1 and 2 as presented in USEPA *Ecological Risk Assessment Guidance for Superfund: Process for Designing and Conducting Ecological Risk Assessments,* 1997). According to the guidance, the following information should have been compiled at the conclusion of SLERA (Steps 1 and 2): (1) Exposure estimates based on conservative assumptions and maximum concentrations; (2) Hazard quotients indicating which, if any, contaminants and exposure pathways might pose ecological threats. All the above information has been compiled in the mini risk assessment report. The results of the SLERA indicate that no pathways would pose ecological risk at SEAD-13 and therefore the ecological risk assessment is complete at this step (i.e., SLERA) with a finding of negligible ecological risks. It should be noted that a screening-level ecological effects evaluation (i.e., Step 1.3) was not performed for this mini-ERA to reduce the list of COPCs. The ecological risk assessment Section (Section 4) has been revised to reflect the above discussion.

Comment 2: Assessment Endpoint 2 is stated in Table 3.6-1 as "No substantial adverse effect on populations of small mammals." It is unclear why foraging birds are not included in this assessment endpoint. Although the home ranges of birds are typically much larger than small mammals, birds can be much more sensitive to some chemicals (such as pesticides) than mammals. As a result, some toxicity reference values (TRVs) may be much lower for birds than for mammals resulting in potentially higher hazard quotients (HQs). It is recommended that Assessment Endpoint 2 be revised to include "no substantial adverse effect on populations of foraging birds." It is also recommended that a foraging bird species, such as the American robin, be included in the food chain modeling performed in the ERA.

Response 2: Agreed. A foraging bird species, the American robin, has been included in the food chain modeling performed in the ERA. Assessment Endpoint 2 in Table 4-1 has been revised to include "no substantial adverse effect on populations of small mammals (i.e., deer mouse, shorttailed shrew) and foraging birds (i.e., American robin)."

Comment 3: The food chain modeling was performed using only the most conservative parameters available such as maximum concentrations, NOAELs, and a site foraging factor (SFF) of one for both species being modeled. If HQs of greater than one were calculated, the uncertainties involved in using only the most conservative parameters in the food chain model were discussed along with how the use of less conservative, more realistic parameters would most likely result in lower HQ values. It would be much more useful if additional food chain modeling was performed to quantitatively show if the use of less conservative parameters would result in lower HQs. Simply speculating that HQ values would be below one if less conservative food chain modeling parameters were used does not provide adequate justification for excluding constituents from consideration as COCs. It is recommended that Section 3.6.4.1 be revised to include calculated HQ values using average concentrations, NOAELs, and more realistic species specific SFFs where appropriate.

Response 3: Acknowledged. Additional food chain modeling was performed to quantitatively show that the use of less conservative parameters would result in HQs lower than 1. This section has been revised to include more realistic species specific SFFs. The Army concurs that average concentrations would be more conservative; however, maximum concentrations have been used in the calculation of HQs in order to ensure that the ecological risk is not understated. It should be noted that Section 3.6 has been renamed as Section 4.0 and all the subsections have been renamed accordingly.

Comment 4: The analysis performed in the ERA for aquatic receptors should be considered only a screening analysis (Steps 1 and 2 of the ERA process). Since the aquatic receptors analysis consists of a comparison of maximum detected concentrations in surface water and sediment to screening criteria, any reference to Step 3 activities should be removed. For example, activities such as determining assessment and measurement endpoints for aquatic receptors and including aquatic receptors in the conceptual site model (CSM) are not necessary. The only Step 3 activity that is recommended for aquatic media is that surface water and sediment preliminary COPCs (constituents with preliminary HQs great than one) be refined (e.g. comparison to background frequency of detection, discussing bio-availability, etc.) so that the lack of food chain modeling for aquatic receptors can be justified.

Response 4: Agreed. The analysis performed in the ERA for aquatic receptors is a screening analysis (Steps 1 and 2 of the ERA process). Reference to Step 3 activities (*i.e.,* determining assessment and measurement endpoints) has been removed.

Discussion of why no chemicals are considered as COCs at this site in surface water and sediment has been included in Sections 4.4.2 and 4.4.3.

Specific Comments– Ecological Risk Assessment:

Comment 1: *Section 3.6.2, Page 3-49* – This section discusses the problem formulation step of the ERA process. Five bulleted items are presented as the key elements of the problem formulation process. According to the Process Document, fate and transport and the ecological effects of contaminants are also part of the problem formulation process. These two additional items should be discussed in Section 3.6.2.

Response 1: Agreed. Five bulleted items and the section have been revised according to the Process Document. Fate and transport and the ecological effects of contaminants have been included in the problem formulation process. It should be noted that Section 3.6 has been renamed as Section 4.0 and all the subsections have been renamed accordingly.

Comment 2: *Section 3.6.2.2, Page 3-49.* This section provides a characterization of the habitat at the site. The first sentence of this section states that characterizations of site habitat and ecological communities developed as part of the RIs for SEADs-16, 17, 25, and 26 and the Open Burning Grounds were assumed to be representative of SEAD-13. This assumption is not explained further. More detail should be provided discussing the way that SEAD-13 is ecologically similar enough to SEADs-16, 17, 25, and 26 and the Open Burning Grounds to justify this assumption.

Response 2: Agreed. The ecological setting of SEAD-13 is similar to SEADs-16, 17, 25, 26, and the Open Burning Grounds according to the following information:

- (1) SEAD-13 is located in Seneca Army Depot, within 3 miles of SEADs-16, 17, 25, 26, and the Open Burning Grounds. The Seneca sites share the same regional climate;
- (2) These sites are generally abandoned;
- (3) The vegetative cover at these sites consists of old fields, shrublands, and deciduous forest;
- (4) The shallow soil surface is similar to all sites, consisting mainly of crushed shales and limestone pieces;
- (5) Surface water, wetlands or drainage swales are present at these sites.

The above discussion has been included in the section. It should be noted that Section 3.6 has been renamed as Section 4.0 and all the subsections have been renamed accordingly.

Comment 3: *Section 3.6.2.3, Page 3-51-* This section discusses ecological assessment endpoints. The 1994 version of the Process Document is cited in the first sentence of this section. It is unclear why the most recent version (June 1997) of the Process Document was not used in developing this ERA. An effort should be made to use the most recent version of all documents used in the development of this ERA.

Response 3: Agreed. The ERA has been revised to use the June 1997 version of the Process Document as guidance. It should be noted that Section 3.6 has been renamed as Section 4.0 and all the subsections have been renamed accordingly.

Comment 4: *Section 3.6.2.3, Page 3-52.* Three criteria are presented on page 3-52 to be considered in the selection of assessment endpoints. The criteria are, ecological relevance, susceptibility to the contaminant(s), and representation of management goals. According to the Process Document, mechanisms of toxicity and potential for complete exposure pathways should also be considered when selecting assessment endpoints. A brief discussion of these two additional topics should be presented in this section.

Response 4: The above criteria are involved in selection of assessment endpoints in Step 3. As discussed in response to General Comment 1, the ecological assessment presented in this report has completed the SLERA (Steps 1 and 2 – screening level ecological risk assessment). Discussion of assessment and measurement endpoints has been revised to comply with the Process Document. It should be noted that Section 3.6 has been renamed as Section 4.0 and all the subsections have been renamed accordingly.

Comment 5: *Table 3.6-1 –* Table 3.6-1 presents the policy goals, ecological assessment and measurement endpoints and decision rules developed for this ERA. It appears that the end of the sentence in the "Decision rule for Assessment Endpoint 2" cell is cut off. This editorial error should be corrected.

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Response 5: Agreed. The editorial error has been corrected. It should be noted that Section 3.6 has been renamed as Section 4.0 and all the subsections (including the tables) have been renamed accordingly.

Comment 6: *Figure 3-3 –* Figure 3-3 presents the ecological conceptual site model (CSM) for the Seneca Army Depot Activity. Ingestion of surface soil is the only terrestrial pathway marked for quantitative evaluation. Since ingestion of biota is included in the food chain model as a potential route of exposure, it should also be marked in the CSM as a principal pathway for quantitative evaluation. Figure 3-7 should be revised accordingly.

Response 6: Agreed. Ingestion of biota was included in the food chain model to evaluate exposure. The figure has been revised to include ingestion of biota by terrestrial receptors as a principal pathway for quantitative evaluation. It should be noted that Figure 3-3 has been renamed as Figure 4-1.

The reference to Figure 3-7 was unclear. Please provide additional information on this comment.

Comment 7: *Section 3.6.2.4, Page 3-59 -* This section discusses the analysis plan for the ERA. The first sentence of this section states that the analysis plan is the final state of problem formulation. According to the Process Document, the analysis plan is not part of problem formulation (Step 3) but is part of Step 4, Study Design and Data Quality Objectives Process. Section 3.6.2.4 should be revised to state that the analysis plan is part of the study design process, not problem formulation.

Response 7: Agreed. Since the ecological assessment presented in this report was completed at the screening-level (Steps 1 and 2), the report has been revised to only include information for Steps 1 and 2. It should be noted that Section 3.6 has been renamed as Section 4.0 and all the subsections have been renamed accordingly.

Comment 8: *Table 3.6-2 –* Table 3.6-2 presents the wildlife intake rates used in the food chain modeling. Two problems were noted with this table:

- a. It is unclear why a surface water ingestion rate is provided for the short-tailed shrew if surface water ingestion is not part of the food chain model. The surface water column should be removed from Table 3.6-2.
- b. It is unclear why a soil ingestion rate is not provided for the short-tailed shrew. Since incidental soil ingestion is part of the food chain model, a soil ingestion rate should be provided for the short-tailed shrew.

Response 8: Agreed. The surface water column has been removed from the table.

Agreed. A soil ingestion rate of 0.00011 kg dw/day was assumed for the short-tailed shrew. The selected soil ingestion rate is from USEPA *Ecological Soil Screening Level Guidance* (2000) and is based upon the assumption that the soil ingestion rate is 3% of the food ingestion rate (i.e., 0.20 kg dw/kg BW day for the short-tailed shrew) and that the body weight of the short-tailed shrew is 0.018 kg. It should be noted that both the body weight and dietary breakdown have been revised in accordance with the USEPA guidance (2000) and USEPA Screening Level Ecological Risk Assessment Protocol for Hazardous Waste Combustion Facilities (1999).

It should be noted that Section 3.6 has been renamed as Section 4.0 and all the subsections (including the tables) have been renamed accordingly.

Comment 9: *Section 3.6.4.2, Page 3-72 –* This section discusses the results of the surface water screening. It is stated in the second sentence of this section that the HQ for nitrate/nitrite-nitrogen is greater than one (5.0). However, according to Tables 3.6-6 and A-19, the HQ for nitrate/nitrogen is 5.0E-03, which is below one. This discrepancy should be addressed.

Response 9: Agreed. The section has been revised to be consistent with the tables. It should be noted that Section 3.6 has been renamed as Section 4.0 and all the subsections (including the tables) have been renamed accordingly. The results of the surface water screening are presented in Table 4.4-2. There is no HQ for nitrate/nitrite-nitrogen, since, according to NYS TOGS 1.1.1 (1998), a chemical specific screening value for aquatic life for nitrate/nitrite-nitrogen is not available.

SECTION 4 – Recommendations

Comment 1: *Section 4.0, Page 4-1 –* Please include the groundwater monitoring program as mentioned on Section 1.1, page 1-2 and the five-year review requirements within your recommendations. A map showing approximate plume contours and recommended monitoring wells should also be included within this section.

Response 1: Agreed. The proposed groundwater monitoring program and the five-year review requirements has been included in the section presenting recommendations for the site, Section 5.0. In general, the groundwater monitoring program will consist of annual sampling of the existing groundwater monitoring network. The details of the monitoring program will be specified in a future document. The monitoring program will continue until the applicable standards have been achieved.

A figure (Figure 2–7) showing the nitrate/nitrite groundwater concentrations has been included in Section 2.0. It should be noted that Section 4.0 has been renamed as Section 5.0.

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Comment 2: *Section 4.0, 4th bullet, Page 4-1 –* What is the Army's plan to address the high concentration of iron at MW13-1? Please provide recommendations.

Response 2: The iron concentrations in groundwater are consistent with background. In addition, iron in groundwater is not expected to pose any significant risk to human health and the environment. The above recommendation is based on the following factors:

(1) Although the concentration detected at MW13-1 in 1994 was elevated (i.e., at 69.4 mg/L), the concentrations detected in 2001 and 2002 were much lower (i.e., 0.46 mg/L and undetected with the detection limit of 0.017 mg/L, respectively). Although iron concentrations detected at 1994 and 2001 exceeded the NY State Class GA Groundwater Standard, the concentration detected at 2002 was below the standard (i.e., 300 mg/L). The elevated concentrations detected in the previous sampling events might be associated with the high turbidity of the samples. In addition, the sum of the iron and manganese concentrations detected at MW13-1 in 2001 and 2002 were lower than the NY State Class GA Groundwater Standard for the sum of iron and manganese.

(2) Iron concentrations detected in groundwater were consistent with background. As a result, iron was not considered a COC for the mini risk assessment of this draft final decision document.

(3) Iron occurs naturally and is an essential human nutrient. The mini risk assessment conducted for the draft decision document indicates that even if iron were considered a COC for groundwater, there would be no unacceptable human health risk or ecological risk related to iron in groundwater at the site.

It should be noted that elevated iron concentrations (57.3 mg/L and 97.9 mg/L) were detected at MW13-13 in 2001. However, the elevated concentrations might be related to the elevated turbidity in the samples (i.e., turbidity of 999 NTU). In addition, the iron concentration detected in 2002 in a sample collected from the same well but with much lower turbidity (13.7 NTU) was 0.0592 mg/L, which was below the NY State Groundwater Standard for iron (i.e., 0.3 mg/L). The high iron levels are proportional to high turbidity, and they are not associated with dissolved contaminants.

Based on the above discussion, it is concluded that iron concentrations in groundwater are not expected to pose any significant risk to human health and the environment. Therefore, the section has been updated to reflect that iron is not a COC. It should be noted that Section 4.0 has been renamed Section 5.0 and all the subsections have been renamed accordingly.

Response to the Comments from New York State Department of Environmental Conservation

Subject: Draft Decision Document-Mini Risk Assessment for SEAD-13, Inhibited Red-Fuming Nitric Acid Disposal (IRFNA) Site Seneca Army Depot Romulus, New York

Comments Dated: July 26, 2000

Date of Comment Response: October 30, 2002

General Comments:

The result of a project review by the New York State Department of Environmental Conservation, is that this agency cannot concur with a no further action designation for SEAD-13 at this time. Most of the data submitted in the document is outdated (1993-1994), and not characteristic of present site condition. It is certain, had this agency received a sampling plan for the most recent round of surface water sampling (2000), it would have requested that all matrices (groundwater, surface soil, subsurface soil, surface water and sediment) be included. SEAD should be aware that although a complete Remedial Investigation (RI) is not requested at this time, in an effort to adequately categorize present site conditions, a sampling should be conducted at SEAD-13.

Response: Agreed. Additional soil, groundwater, sediment, and surface water sampling was conducted from January 2000 to April 2002 to further categorize present site conditions. The mini risk assessment report has been revised to include the results of the additional sampling efforts.

Specific Comments:

Comment 1: Surface and subsurface soil samples should be taken from within the IRFNA pits themselves (0-2 inches, plus others).

Response 1: Agreed. An additional surface (0-2 inches) soil sample was collected from within the IRFNA pits at SEAD-13-East (SS13-9) in 2001. Although no subsurface soil samples were directly collected within the IRFNA pits, subsurface soil samples have been collected adjacent to the IRFNA pits (e.g., SB13-1, SB13-7, SB13-8, SB13-2, SB13-13, etc.)

Comment 2: Groundwater sampling should indicate if the nitrate/nitrite nitrogen concentrations in the groundwater are decreasing to support that no further action is appropriate.

Response 2: Acknowledged. The additional groundwater sampling results have been added to the decision document. The multiple rounds of groundwater samples collected from MW13-2 and the adjacent area (MW13-13 and MW13-14) indicate that the nitrate/nitrite (expressed as N) concentrations in the IRFNA pits area were elevated. The nitrate/nitrite concentrations detected at MW13-2 were 460 mg/L, 603 mg/L, and 445 mg/L for 1993, 2001, and 2002, respectively. Therefore, it appears that nitrate/nitrite concentrations in the groundwater in the IRFNA pits area have been generally consistent over time.

The elevated nitrate/nitrite concentrations (i.e., exceeding the NY State Class GA Groundwater Standard of 10 mg/L) are limited to the SEAD-13-east disposal area. The nitrate/nitrite concentrations detected at MW13-1 and at MW13-4 (in the west disposal area) were below the NYS Groundwater Standard. Nitrate/nitrite concentrations detected in surface water adjacent to the east disposal area were relatively low (i.e., all concentrations were lower than 1.5 mg/L). There is no evidence that sediment and surface water at SEAD-13 are impacted. In addition, it is expected that a restriction on groundwater use will be required at the site. There is no significant risk to human health posed by the site once the restriction is in place. Based on the consistent levels of nitrate/nitrite over ten years, the conclusions are not expected to change in the short-term.

Comment 3: The EM survey indicates a ground water plume with high concentration of ionic solids north of MW13-2. This could be an indication that the 460 ppm found in MW13-2 is an underestimation of the impact to groundwater at the site. A groundwater well to the north of MW13-2 may be needed to completely categorize the full impact to groundwater in this area.

Response 3: Acknowledged. In 2001, two monitoring wells (MW13-13 and MW13-14) were installed north of MW13-2 where the EM survey indicates a high concentration of ionic solids. Groundwater samples were collected in 2001 and 2002 from these two monitoring wells. Additional groundwater samples were also collected from MW13-2 in 2001 and 2002. The analytical results indicate that the nitrate/nitrite concentrations at MW13-2 and MW13-13 were higher than the concentration at MW13-14 (i.e., the concentrations at MW13-2 and MW13-13 ranged from 445-731 mg/L and the concentration at MW13-14 was 140 mg/L). The additional sample results have been included in the draft final decision document.

Comment 4: The surface soil samples taken at 0-2 feet are not characteristic of surface soil conditions. Surface soil samples (0-2 inches) and subsurface soil samples (0-2 feet, at the one and two foot level) are requested to characterize surface and subsurface soils.

Response 4: Agreed. Additional surface soil samples were collected in 2001 at 0-2 inches (SB13- 14, SS13-1 through SS13-9, and SS13-11). All soil samples have been collected at 0-2 inches, 0- 1 ft, 0-2 ft, and other levels from 4-12 ft bgs. The data are adequate to characterize surface and subsurface soil and have been included in the draft final decision document.

Comment 5: Surface water samples analyzed only for aluminum are not acceptable. Surface water should be analyzed for the complete range of heavy metals.
Response 5: Acknowledged. Three surface water samples collected in 1993 (SW13-1, SW13-2, and SW-3) were analyzed for the complete range of heavy metals. In responding to the comment, additional surface water samples were collected in 2000 and 2001. Six of the collected samples were submitted for the analysis of the complete range of heavy metals (aluminum, antimony, arsenic, barium, beryllium, cadmium, calcium, chromium, cobalt, copper, iron, lead, magnesium, manganese, mercury, nickel, potassium, selenium, silver, sodium, thallium, vanadium, and zinc) and cyanide. These additional data have been included in the draft final decision document.

Comment 6: Sediment and surface water samples from within the Duck Pond area are required as this would be an area most impacted by the IRFNA pits.

Response 6: Acknowledged. Sediment samples (SD13-1, SD13-2, SD13-3, SD13-4, SD13-5 and SD13-6) and surface water samples (SW13-1, SW13-2, SW13-3, SW13-4, SW13-5, and SW13-6) were collected within the Duck Pond. The results are included in the draft final decision document.