Public Affairs Office

451-87

Seneca Army Depot
Romulus,NY 14541-5001
Tele: (607) 869-1235

NEWS RELEASE

For immediate release Nov. 20, 1991 **Release no.** 91-24

Remedial Investigation begins at Seneca Army

Seneca Army Depot began remedial investigations of contamination at its Ash Landfill and Open Burning Grounds areas on Oct. 1.

Contamination at these two areas contributed to the depot being included on the Environmental Protection Agency's National Priorities List in July 1989.

The planned investigations are being conducted according to the requirements of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 and the Superfund Amendments and Reauthorization Act of 1986.

The investigations are being coordinated with the Environmental Protection Agency and the New York State Department of Environmental Conservation. Seneca Army Depot plans to conduct regular briefings to these agencies on the progress of the investigation and report the results to the public.

The aim of the investigations is to define the nature and delineate the extent of hazardous and toxic contamination at each area. Following the completion of the investigations, efforts will focus on the feasibility of remediation alternatives and, subsequently, on actual remediation. The investigations are expected by be complete in one to two years.

The Huntsville Division, U.S. Army Corps of Engineers, is the executing agency for the work to be performed at Seneca Army Depot. Two contracts, the first for $945,000 (investigations at the Ash Landfill area) and the second for $992,000 (investigations at the Open Burning Grounds area), have been awarded to C. T. Main, Inc., of Boston, Mass.

SDSSE-HE (385-100 **22 OCT 1991**

MEMORANDUM FOR Safety Officer

SUBJECT: Authorized Safety Deviation

1. Number

2. Date: 21 Oct 91

3. Subject: Explosive Operations on Demil Grounds Concurrent With Contractor Operations

4. Expiration Date: Conclusion of Contractor Operations

5. Reference: "Construction personnel in the vicinity of a potential explosive site (PES) shall be afforded the maximum practical protection from the effects of an explosion at the PES by using as a minimum Public Traffic Route (PTR) distances." AMC-R 385-100, para 17-3c.

6. Deviation: Request a local safety waiver that will allow contractor personnel to perform Remedial Investigation under CERCLA while D/AO personnel prepare 3.5" Rocket Motors for open burning and detonation. The enclosed diagrams of the demil grounds shows the contract operations will be over 1300 ft from the Potential Explosive Site (burn tray and nearest detonation pit). The minimum distance required is 750 ft. Although propellant and explosive laden vehicles will pass within 750 ft of the contractor work site, and propellant and explosives will be handled at the burning and detonation sites indicated, the frequency and duration of exposure is extremely limited, making the potential hazard minimal. Contractor personnel will be notified to evacuate to the gate area of the demil grounds prior to actual detonation or burning, and will be recalled only upon the all clear. Contractor personnel will not conduct investigations within 300 ft of propellant and 750 ft of explosive operations while the materials are being handled.

7. POC is Randall Battaglia at ext. 41-450.

8. Requested by:

Stephen M Wisdom (signature)

for GARY W. KITTELL, D/EH

9. Concurrence:

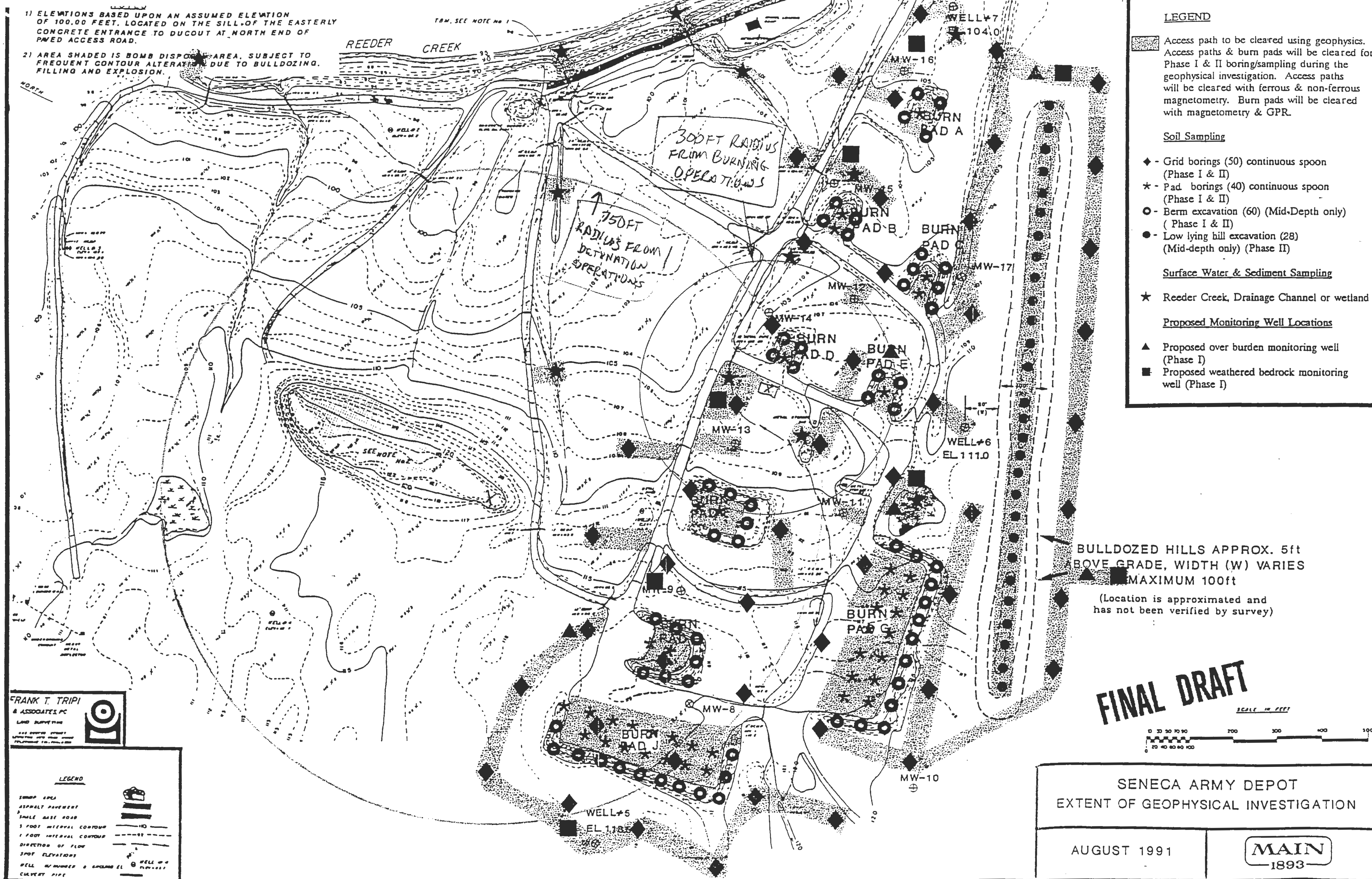
_____
THOMAS STINCIC, Safety Officer

_____
CARSON W. LANKFORD, D/AO

10. Approval:

_____
JAMES B. CROSS
Colonel, Ordnance Corps
Commanding

Encl


1) ELEVATIONS BASED UPON AN ASSUMED ELEVATION OF 100.00 FEET, LOCATED ON THE SILL OF THE EASTERLY CONCRETE ENTRANCE TO DUGOUT AT NORTH END OF PAVED ACCESS ROAD.
2) AREA SHADED IS BOMB DISPO AREA, SUBJECT TO FREQUENT CONTOUR ALTERATI DUE TO BULLDOZING, FILLING AND EXPLOSION.
REEDER CREEK
NORTH
300FT RADIUS FROM BURNING OPERATIONS
750FT RADIUS FROM DETONATION OPERATIONS
SEE NOTE No.2
BURN PAD A
BURN PAD B
BURN PAD C
BURN PAD D
BURN PAD E
BURN PAD G
BURN PAD J
WELL#7 EL 104.0
WELL#6 EL 111.0
WELL#5 EL 118.5
MW-8
MW-9
MW-10
MW-11
MW-12
MW-13
MW-14
MW-15
MW-16
MW-17
BULLDOZED HILLS APPROX. 5ft ABOVE GRADE, WIDTH (W) VARIES MAXIMUM 100ft
(Location is approximated and has not been verified by survey)
LEGEND
Access path to be cleared using geophysics. Access paths & burn pads will be cleared for Phase I & II boring/sampling during the geophysical investigation. Access paths will be cleared with ferrous & non-ferrous magnetometry. Burn pads will be cleared with magnetometry & GPR.
Soil Sampling
◆ - Grid borings (50) continuous spoon (Phase I & II)
★ - Pad borings (40) continuous spoon (Phase I & II)
○ - Berm excavation (60) (Mid-Depth only) (Phase I & II)
● - Low lying hill excavation (28) (Mid-depth only) (Phase II)
Surface Water & Sediment Sampling
★ Reeder Creek, Drainage Channel or wetland
Proposed Monitoring Well Locations
▲ Proposed over burden monitoring well (Phase I)
■ Proposed weathered bedrock monitoring well (Phase I)
FRANK T. TRIPI & ASSOCIATES PC LAND SURVEYING
LEGEND
FINAL DRAFT
SCALE IN FEET
SENECA ARMY DEPOT
EXTENT OF GEOPHYSICAL INVESTIGATION
AUGUST 1991
MAIN 1893

NOTES

1) ELEVATIONS BASED UPON AN ASSUMED ELEVATION OF 100.00 FEET. LOCATED ON THE SILL OF THE EASTERLY CONCRETE ENTRANCE TO DUCOUT AT NORTH END OF PAVED ACCESS ROAD.

2) AREA SHADED IS BOMB DISPOSAL AREA, SUBJECT TO FREQUENT CONTOUR ALTERATION DUE TO BULLDOZING, FILLING AND EXPLOSION.

NORTH

REEDER CREEK

TBM, SEE NOTE No 1

SEE NOTE No 2

300 FT RADIUS FROM BURNING OPERATIONS

1750 FT RADIUS FROM DETONATION OPERATIONS

WELL #7 EL. 104.0

MW-16

BURN PAD A

MW-15

BURN PAD B

BURN PAD C

MW-17

MW-12

MW-14

BURN PAD D

BURN PAD E

MW-13

WELL #6 EL 111.0

MW-11

BURN PAD F

MW-9

BURN PAD I

BURN PAD G

MW-8

BURN PAD J

MW-10

WELL #5 EL 118.5

BULLDOZED HILLS APPROX. 5ft ABOVE GRADE, WIDTH (W) VARIES MAXIMUM 100ft

(Location is approximated and has not been verified by survey)

DRAFT

FINAL DRAFT

SCALE IN FEET

0 10 20 30 40 50 60 70 80 90 100 200 300 400 500

FRANK T. TRIPI & ASSOCIATES, P.C.
LAND SURVEYING

LEGEND

SWAMP AREA
ASPHALT PAVEMENT
SHALE BASE ROAD
5 FOOT INTERVAL CONTOUR
1 FOOT INTERVAL CONTOUR
DIRECTION OF FLOW
SPOT ELEVATIONS
WELL W/ NUMBER & GROUND EL
CULVERT PIPE

LEGEND

- ● - EXISTING OVERBURDEN MONITORING WELL
- ▲ - PROPOSED OVERBURDEN MONITORING WELL
- ■ - PROPOSED WEATHERED BEDROCK MONITORING WELL
- ↑ - GROUNDWATER FLOW DIRECTION BASED UPON GROUNDWATER FLOW CONTOURS SHOWN IN FIGURE 3.3 OF "CRITERIA DEVELOPMENT REPORT FOR THE CLOSURE OF NINE BURNING PADS", M&E; OCTOBER 1989.

SENECA ARMY DEPOT GROUNDWATER MONITORING PLAN

AUGUST 1991

MAIN 1893

FIGURE 27

△ DOWNGRADIENT LOCATION

△ UPGRADIENT LOCATION (BACKGROUND)

NORTH

TBM, SEE NOTE No. 1

REEDER CREEK

300FT RADIUS FROM BURNING OPERATIONS

75FT RADIUS FROM DETONATION OPERATIONS

SEE NOTE No. 2

WELL #7 EL 104.0

MW-16

BURN PAD A

MW-15

BURN PAD B

BURN PAD C

MW-17

MW-12

MW-14

BURN PAD D

BURN PAD E

MW-13

WELL #6 EL 111.0

BURN PAD F

MW-11

MW-9

BURN PAD G

BURN PAD I

MW-8

BURN PAD J

MW-10

WELL #5 EL 118.5

DRAFT

△ BACKGROUND WETLAND (LOCATION TO BE DETERMINED)

BULLDOZED HILLS APPROX. 5ft ABOVE GRADE, WIDTH (W) VARIES MAXIMUM 100ft

(Location is approximated and has not been verified by survey)

FINAL DRAFT

SCALE IN FEET

0 20 50 70 90 200 300 400 500

0 20 40 60 80 100

NOTES

1) ELEVATIONS BASED UPON AN ASSUMED ELEVATION OF 100.00 FEET, LOCATED ON THE SILL OF THE EASTERLY CONCRETE ENTRANCE TO DUCOUT AT NORTH END OF PAVED ACCESS ROAD.

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FRANK T. TRIPI & ASSOCIATES, P.C.
LAND SURVEYING

LEGEND

- SUMP AREA
- ASPHALT PAVEMENT
- GRAVEL BASE ROAD
- 5 FOOT INTERVAL CONTOUR
- 1 FOOT INTERVAL CONTOUR
- DIRECTION OF FLOW
- SPOT ELEVATIONS
- WELL W/ NUMBER & GROUND EL
- CULVERT PIPE

SEDIMENTS AND SURFACE WATER SAMPLES

▲ SURFACE WATER AND SEDIMENTS , READER CREEK and DRAINAGE DITCHES

△ ESTIMATED SURFACE WATER SAMPLE LOCATIONS (OFF SITE MAP)

POTENTIAL WETLAND SAMPLE LOCATION

NOTE: FIGURE 2.0 PROPOSED LOCATIONS FOR SURFACE, SEDIMENT, AND BIOLOGICAL SAMPLING, PROVIDES A CLEARER VIEW OF THE PROPOSED SAMPLING LOCATIONS IN REEDER CREEK.

SENECA ARMY DEPOT
SURFACE WATER AND SEDIMENT SAMPLING PLAN

AUGUST 1991

MAIN 1893

DEPARTMENT OF THE ARMY
U. S. ARMY ENVIRONMENTAL HYGIENE AGENCY
ABERDEEN PROVING GROUND, MARYLAND 21010-5422

REPLY TO
ATTENTION OF

HSHB-ME-SR (40)

15 MAY 1991

MEMORANDUM FOR Commander, Seneca Army Depot, ATTN: SDSS-E-H, Romulus, NY 14541-5001

SUBJECT: Agency for Toxic Substances and Disease Registry (ATSDR) Site Visit, Seneca Army Depot, 11-12 June 1991

1. The scheduling of this visit is based upon the following references:

a. Interagency Agreement (IAG) between Department of the Army and Agency for Toxic Substances and Disease Registry, 30 July 1990.

b. Telephone conversation between Ms. Veronique D. Hauschild, of my division, and Mr. Steve Epsilon, Seneca Army Depot, 10 May 1991, SAB.

2. The purpose of this visit is to execute the Congressionally-mandated Health Assessment process of ATSDR, a branch of the United States Public Health Service. All Department of Defense National Priorities List (NPL) sites are required by law to have a Health Assessment performed by ATSDR. Per reference 1b, ATSDR will visit your facility on 11-12 ~~June~~ July 1991.

3. As provided for in the IAG, USAEHA is the Army central liaison for ATSDR activities. Ms. Veronique Hauschild of this Agency's Waste Disposal Engineering Division, is the POC for coordination with ATSDR and your installation. She will be accompanying ATSDR during the visit and may be reached by calling DSN 584-2953 or commercial (301) 671-2953.

4. Ms. Hauschild has spoken to your POC, Mr. Epsilon, to discuss the upcoming visit. Tentatively, an entrance briefing is requested anytime after 0800 hours on 11 ~~June~~ July 1991. The circumstances surrounding the assessment will be explained at this time. The ATSDR would like to discuss particular aspects of the Seneca NPL site with Mr. Epsilon following the entrance briefing. Representatives from other involved parties (i.e., Corps of Engineers, contractor, State agencies, etc.) may also be invited by your installation.

HSHB-ME-SR
SUBJECT: Agency for Toxic Substances and Disease Registry (ATSDR) Site Visit, Seneca Army Depot, 11-12 June 1991

5. Enclosed are a Fact Sheet and a Scoping Visit Information Sheet containing the details of the ATSDR and the purpose of their visit.

6. An integral part of this assessment is a site survey. Any special requirements necessary to permit a tour of the site should be communicated as soon as possible to Ms. Hauschild.

FOR THE COMMANDER:

Encl

PAUL R. THIES
LTC, MS
Chief, Waste Disposal Engineering Division

CF (w/encl):
HQDA(SGPS-PSP-E)
Cdr, AMC, ATTN: AMCEN-A
Cdr, AMCCOM, ATTN: AMSMC-ISE-E
Cdr, HSC, ATTN: HSCL-P
Cdr, USATHAMA, ATTN: CETHA-IR
COE, ATTN: CEMP-R

ATSDR HEALTH ASSESSMENT
INITIAL SCOPING VISIT

This is provided to inform you of the goals and objectives of the ATSDR Initial Scoping Visit which is scheduled for your installation. It is our intent to make the limited time available to visit your installation as productive and convenient for all parties involved in the process.

Security and Gaining Access on the Installation:

We will be forwarding to you a list of the individuals who will be representing ATSDR during the visit. In addition to the representative from the U.S. Army Environmental Hygiene Agency only ATSDR staff who are either Commissioned Corp Officers in the U.S. Public Health Service or federal employees with ATSDR will be attending under this invitation. Please notify your Security Office and let them know these individuals are expected.

NOTE: While it may be useful during this time to have other participants such as state and local health department personnel, state and federal environmental regulatory personnel, and the project officer from the Corps of Engineers or USATHAMA present, USAEHA nor ATSDR will not invite these individuals. IN RESPECTING YOUR RIGHT TO HAVE ON THE INSTALLATION WHO YOUR COMMANDER WISHES TO HAVE, IT WILL BE YOUR CALL IF YOU CHOOSE TO INVITE THESE OTHER REPRESENTATIVES.

Camera Pass: If possible, ATSDR will be requesting a camera pass to allow photographs in non-sensitive areas.

Entrance Briefing:

A short entrance briefing is requested with the Chief of the Environmental Office. If the Commander would like to receive the briefing that is welcomed, however, it is not imperative if the Commander's schedule does not permit. During this 15-20 minute briefing the relationship between the Army and ATSDR will be explained and ATSDR will elaborate on the Health Assessment process to be conducted at your installation. It also provides you the opportunity to express any concerns or highlight any problem areas associated with your NPL activities currently underway.

Installation Restoration Program Update:

Following the entrance briefing, the ATSDR personnel would like to be brought up to speed with the activities that have taken place and the efforts currently underway in the IR program at your installation. This is an <u>informal</u> discussion and can simply include background information about the installation and it's operation/mission, the work accomplished to date in the IR program including what documents have been finalized, and what is upcoming in the schedule as the program continues.

Site Tour:

The visit will wrap up with a site tour. This again can be an informal orientation. From this, ATSDR can familiarize themselves with the installation and the various sites which contributed to your installation being placed on the Federal Facilities National Priority List. The site visit allows a first hand look at the site, it's location in relation to installation boundaries, and a feel for the population exposure close to the installation.

Follow-up After the Visit:

This is the fist contact in a series of events which will ultimately lead up to a Health Assessment from ATSDR. After the initial visit there will be additional information which must be communicated to ATSDR. Primarily, such things as past reports, surveys, and other documents which relay some of the quantifiable characterizations of the contamination at the site. Where needs for additional information exists, USAEHA will assist in coordinating the transfer of documents. As new information becomes available, it will be necessary to forward this to ATSDR as well. Additionally, if there are any instances where public meetings about your NPL activities are upcoming and ATSDR can be of assistance, we will coordinate this support.

Document Release:

During the comment period of the Health Assessment, USAEHA will be sending you a copy of the draft final document. It will be important that you review the document and reply back to us about the accuracy of the installation information contained in the Assessment. It is our hope that this extra effort in coordinating ATSDR services at Army NPL sites will result in the best end product and interagency relationship in the ATSDR Federal Facilities Program with the minimum inconvenience to your installation's environmental program efforts.

Thank you for your assistance in executing this important element of the total IR program effort.

FACT SHEET

RELATIONSHIP BETWEEN
THE DEPARTMENT OF ARMY
AND
AGENCY FOR TOXIC SUBSTANCES AND DISEASE REGISTRY

WHY DOES THE ARMY HAVE A MEMORANDUM OF UNDERSTANDING WITH ATSDR?

- The Superfund Amendments and Reauthorization Act of 1986 (SARA) Section 211 amended Title 10 of the U.S.C. creating a new Chapter 160 entitled Environmental Restoration. Section 2704(c) of Title 10 states: The Secretary of Defense (DoD) shall transfer to the Secretary of Health and Human Services such toxicological data, such sums from amounts appropriated to the DoD, and such personnel of the DoD as may be necessary (1) for the preparation of toxicological profiles under subsection (b) or (2) for other health related activities under section 104(i) of CERCLA. The law also stipulated that the Secretaries of both agencies would enter into a Memorandum of Understanding (MOU) regarding the manner in which this legislation would be carried out.

  The DoD signed the MOU with ATSDR on 4 October 1989. In accordance with that document Department of Army (DA) signed an Interagency Agreement (IAG) with ATSDR on 30 July 1990.

WHY IS ATSDR PERFORMING HEALTH ASSESSMENTS ON ARMY FACILITIES?

- As prescribed under Section 104(i) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended [42 U.S.C. 9604(i)]. The Agency for Toxic Substances and Disease Registry (ATSDR) shall perform a Health Assessment for each facility on the National Priorities List as well as other health related activities.

  Army is the lead agency for 36 sites on the federal NPL which will recieve a Health Assessment from ATSDR.

  ATSDR will be performing a Health Assessment on all Army NPL sites in FY 91.

WHY ARE TOXICOLOGICAL PROFILES BEING DEVELOPED BY ATSDR?

- O As required by Section 211 of Superfund Admendments Reauthorization Act (SARA), 10 U.S.C. 2704(b) regarding development of Toxicological Profiles and in accordance with the IAG, DA shall submit to ATSDR a separate list of unregulated hazardous substances found at DA facilities which shall constitute DA's portion of the Department of Defense list of 25 required substances.

  Army has submitted a list of 7 prioritized coumpounds and 5 additional coumpounds to comprise the DA contribution to the DoD list.

  Seed money has been transferred to ATSDR to initiate work on four coumpounds.

WHAT OTHER ACTIVITIES WILL BE CONDUCTED BY ATSDR IN SUPPORT OF THE ARMY INSTALLATION RESTORATION PROGRAM?

- O Other related activities to be conducted by ATSDR under the agreement as provided for under CERCLA Section 104(i) if required;

  Pilot studies to determine need for full scale epidemiological studies, epidemiological studies, development of registeries of exposed persons, and health consultations

HOW IS COORDINATION BETWEEN THE ARMY AND ATSDR ACCOMPLISHED?

- O Activities in support of the MOU have been centralized for each organization.

  The U.S. Army Environmental Hygiene Agency is the Army's action office for ATSDR services as directed by the Deputy Assistant Secretary of Army, Installations, Logistics, and Environment, (Environment, Safety, and Occupational Health)

  The Assistant Director, ATSDR, Federal Facilities, Atlanta, is the responsible official for coordination of that Agency's services conducted at Army facilities.

DEPARTMENT OF THE ARMY
U. S. ARMY ENVIRONMENTAL HYGIENE AGENCY
ABERDEEN PROVING GROUND, MARYLAND 21010-5422

REPLY TO
ATTENTION OF

HSHB-ME-SR (40)

24 MAY 1991

MEMORANDUM FOR Division Engineer, U.S. Army Engineer Division, Huntsville, ATTN: CEHND-ED-PM (Mr. Kevin Healy), P.O. Box 1600 West Station, Huntsville, AL 35807-4301

SUBJECT: Final Work Plan, Remedial Investigation/ Feasibility Study at the Ash Landfill, Seneca Army Depot, Romulus, New York, May 1991

1. Primary concerns of the final draft of the subject document are included in Enclosure 1.

2. Our concerns on the draft final workplan have not been addressed by the contractor or the Corps of Engineers. We have enclosed the primary concerns and the detailed comments and recommendations of the draft final document in Enclosure 2 and 3. For each comment, we have included our assessment of the changes, if any, the contractor made on the final document.

3. Because of the seriousness of the concerns raised by the reviewing divisions, this document should be resubmitted to AEHA for further review prior to finalization.

4. The scientist reviewing the changes to this document was Mr. Keith Hoddinott, Waste Disposal Engineering Division. Our points of contact are Mr. Keith Hoddinott or Dr. Jack M. Heller, DSN 584-2953 or commercial (301) 671-2953.

FOR THE COMMANDER:

3 Encls

for PAUL R. THIES
LTC, MS
Chief, Waste Disposal Engineering Division

PRIMARY CONCERNS
FINAL WORK PLAN
REMEDIAL INVESTIGATION/FEASIBILITY STUDY
AT THE ASH LANDFILL
SENECA ARMY DEPOT
ROMULUS, NEW YORK
MAY 1991

Prior Comment Not Addressed

The contractor has ignored or inadequately addressed most of our comments on the draft document.

PRIMARY CONCERNS
DRAFT FINAL WORK PLAN
REMEDIAL INVESTIGATION/FEASIBILITY STUDY
AT THE ASH LANDFILL
SENECA ARMY DEPOT
ROMULUS, NEW YORK
DECEMBER 1990

1. Insufficient Background Soil Samples
The contractor does not plan to collect an adequate number of soil samples to determine background chemical concentrations.

2. Inappropriate Risk Assessment Methodology
The contractor does not plan to use the EPA's approved Risk Assessment methodology.

3. Lack of Justification for Additional Sampling
The contractor has not provided enough justification for the samples they plan to collect.

Encl 2

DETAILED COMMENTS AND RECOMMENDATIONS
DRAFT FINAL WORK PLAN
REMEDIAL INVESTIGATION/FEASIBILITY STUDY
AT THE ASH LANDFILL
SENECA ARMY DEPOT
ROMULUS, NEW YORK
DECEMBER 1990

1. Page 2-29, Table 2.4-2, MAJ Rinehart
Comment: Use of the term "BDL" is not defined by values in this table. The detection limits should be listed in order to make this table of data useful for comparison and data evaluation purposes.
Recommendation: Define the detectable limit for each compound or reference where these values can be found.

AEHA Concern: This comment was not addressed in the contractor's final document.

2. Page 2-30, Table 2.4-2, Note, MAJ Rinehart
Comment: Sample results are for soils, yet concentration is defined in terms of ug/L. The correct term should be ug/Kg or ug/g.
Recommendation: Check terms and make correction.

AEHA Concern: This comment was adequately addressed by the contractor in the final document.

3. Page 3-20, Table 3.3-1, Mr. Hoddinott
ARARs for Protection of Human Health...
Comment: Many of the values depicted in this table are not ARARs. Items such as MCLGs, 10^{-6} risk level, Health Advisories, etc., are to be considered guidance not ARARs. Also, the 10^{-6} risk level assumes an exposure scenario which may not be realistic to this site.
Recommendation: Separate the ARARs from the "to be considered" guidance.

AEHA Concern: This comment was not addressed in the contractor's final document.

4. Page 3-31, Section 3.5, Mr. Hoddinott
Data Gaps
Comment: It is hard to believe that the amount of prior sampling has not adequately characterized the contamination in the shallow aquifer and the subsurface soils.
Recommendation: Delete or justify further characterization of the shallow aquifer and the subsurface soils. Characterization of the lower aquifer should not be performed at this time. No evidence has appeared indicating that the lower aquifer

Encl 3

is affected. Also, any evaluations of additional potential sources need to be justified. Aimlessly searching for unknown sources of contamination is a fruitless waste of time, energy, and money.

AEHA Concern: This comment was not addressed in the contractor's final document.

5. Page 4-4, Table 4.2.1, Mr. Hoddinott
Location Rationale for Proposed Monitoring Wells
Comment: If additional monitoring wells are required, several observations about the monitoring well placement needs further explanation. It is unknown what additional information will be obtained from proposed Well 36 that cannot be obtained from Wells 17, 29, 30, 31, and 25. Proposed deep Well 35D can be sited near one of the several downgradient shallow wells to determine the connection between shallow and deep aquifers. Proposed deep Well 38D is located in one of the potential contamination sources. This poses a high risk of either driving contamination into the lower aquifer or providing a preferred conduit for migrating contamination or both. All three of the proposed deep wells are in line, making it impossible to calculate the direction and planar gradient of the ground-water table.
Recommendation: Delete Well 36, move Well 35D near Well 31, and move Well 38D near Well 37.

AEHA Concern: This comment was not completely addressed in the contractor's final document.

6. Page 4-7, paragraph 4.2.1.3, MAJ Rinehart
Comment: Sampling and analysis for semivolatile organics should also be conducted to fully characterize the environmental conditions. There are sites in the area that could contribute semivolatiles like the landfill, grease pits, and other activities related to the operation of the incinerator.
Recommendation: Add a requirement here and elsewhere in the document to sample and analyze for semivolatile organics in the well samples.

AEHA Concern: This comment was adequately addressed in the contractor's final document.

7. Page 4-13, Section 4.2.2.3, Mr. Hoddinott
Soil Boring Sampling and Analysis
Comment 1: The discussion of the soil sampling does not explain how the number of additional sample locations was determined. The number of samples need to be statistically justified based on the variability of contamination at each depth of the soil.
Recommendation: Statistically justify the number of additional samples.

AEHA Concern: This comment was not addressed in the contractor's final document.

Comment 2: The sampling interval for the surface soil is not adequate to determine a surface soil exposure concentration for a risk assessment. Compositing the soil over a 2-foot depth will not provide a representative concentration for dermal, ingestion, or dust inhalation exposures.
Recommendation: Shorten the sampling interval for the surface soil to 0-6 inches or less.

AEHA Concern: This comment was not addressed in the contractor's final document.

8. Page 4-28, Table 4.3-1, Mr. Hoddinott
Sample Matrix and Analytical Requirements
Comment: The sampling for this site does not include an adequate determination of the soil background chemical concentrations. This determination is critical to the risk assessment and should be performed IAW EPA guidance. The EPA guidance suggests collecting 20 percent of the total number of other soil samples with a minimum of 12-15 samples to adequately determine background.
Recommendation: This study must include an adequate determination of soil background concentrations.

AEHA Concern: This comment was not addressed in the contractor's final document.

9. Page 4-32, Section 4.5.1, Mr. Hoddinott
Human RA
Comment: The method planning to be used by the contractor to assess human risk does not follow EPA methodology.
Recommendation: The contractor must follow EPA methodology for the risk assessment.

AEHA Concern: This comment was not addressed in the contractor's final document.

10. Page C-81, paragraph 2, MAJ Rinehart
Comment: This paragraph mentions a requirement to know the weight of the material collected to ensure that a sufficient quantity is collected. While I am not familiar with the Region II QA manual referenced at the top of the page, it was my understanding that the contamination standard was based upon a weight of contaminant per area wiped rather than a weight per wipe. Therefore, a minimum area to be wiped should be specified, like 100-400 square centimeters, rather than a weight of material collected. Weight of material collected would be appropriate for a bulk sample where contamination is measured on a contaminant weight per sample weight basis.

Recommendation: If a wipe sample is desired, delete the reference to collecting a minimum weight of material and add a requirement to wipe a certain known area. This area wiped must also be recorded.

AEHA Concern: This comment was not addressed in the contractor's final document.

11. Page C-82, paragraph 4.7.5, last sentence, MAJ Rinehart
Comment: Reference to "(Figure 4.7-1)" appears to be an error; the proper reference appears to be Table 4.7-1.
Recommendation: Check reference and make correction.

AEHA Concern: This comment was not addressed in the contractor's final document.

12. Page C-119 thru C-130, paragraph 8.2, MAJ Rinehart
Comment: Reference is made on page C-121 to "service records" and "maintenance log", but I could find no further specifications as to what will be kept in these and how they will be kept. Throughout this section, there is no specific requirement to document maintenance and repairs to equipment. There is also no requirement for an instrument function check and documentation of it prior to use.
Recommendation: Add a requirement to use a maintenance and repair log for each instrument that lists, at a minimum, the date, instrument status versus a standard function check, function check failures, actions taken to correct the problem, repairs/maintenance, and the person performing the work/entry.

AEHA Concern: This comment was not addressed in the contractor's final document.

13. Page C-131, first paragraph, MAJ Rinehart
Comment: The reviewer should also check for analyst transcription and calculation errors. These types of errors are significant and checks must be incorporated into the review process.
Recommendation: Add as the first sentence, "The analyst's supervisor or a designated reviewer will check analyst calculations and transcriptions for errors."

AEHA Concern: This comment was not addressed in the contractor's final document.

14. Page C-132, paragraph 8.4.1, first full paragraph, MAJ Rinehart
Comment: The QA supervisor should also review the explanation of any data qualification statements.
Recommendation: Add as item #6, "Statements about qualified data."

AEHA Concern: I can not find where the contractor addressed this comment in their final document.

15. Page C-152 thru C-155, paragraph 11.0, MAJ Rinehart
Comment: There are a lot of good maintenance actions specified here, but there is no requirement to document the actions. To be legally defensible, these actions must be documented.
Recommendation: Add requirements under each section, 11.1 - 11.8, to document actions. This could be done in the maintenance logbook for each instrument. See above related comment on page C-119.

AEHA Concern: This comment was adequately addressed in the contractor's final document.

DEPARTMENT OF THE ARMY
HUNTSVILLE DIVISION, CORPS OF ENGINEERS
P.O. BOX 1600
HUNTSVILLE, ALABAMA 35807-4301

REPLY TO
ATTENTION OF

CEHND-PM-EP (200-1a)

1 April 1991

MEMORANDUM FOR

Commander, U.S. Army Engineer Division, Missouri River, ATTN: CEMRD-EP-C, P.O. Box 103, Downtown Station, Omaha, NE 68101-0103

Commander, Seneca Army Depot, ATTN: SDSSE-HE (Battaglia), Romulus, NY 14541

SUBJECT: Army Installation Restoration Program (IRP), Remedial Investigations and Feasibility Studies at the Incinerator Ash Landfill, Seneca Army Depot, NY

1. References:

a. Memorandum, SDSSE-HE, 26 February 1991, subject: Comments on the General Statement of Work and Initiation of Fieldwork in the May Time Frame.

b. Memorandum, CEMRD-EP-C, 5 March 1991, subject: SOW Based on Draft Final Work Plan, Incinerator Ash Landfill, Seneca Army Depot, NY.

2. Forwarded for your information is a copy of the Final Scope of Work (SOW) for the subject project. The SOW incorporates those comments provided with the referenced letters. In addition, the comments received, and annotations to the comments are also enclosed.

3. A-E contract actions for this project have been initiated. Point of Contact is John Romeo, CEHND-PM-EP, at 205-955-5803.

FOR THE COMMANDER:

Vincent J. Guarin

Encls

VINCENT J. GUARIN
Director, Programs & Project Management

RBD

U.S. ARMY ENGINEER DIVISION HUNTSVILLE — CORPS OF ENGINEERS

DESIGN REVIEW COMMENTS

PROJECT: SOW for Implementation of the Ash Landfill Work Plan

- [x] SITE DEV & GEO TECH
- [ ] ENVIR PROT & UTIL
- [ ] ARCHITECTURAL
- [ ] STRUCTURAL
- [ ] MECHANICAL
- [ ] MFG TECHNOLOGY
- [ ] ELECTRICAL
- [ ] INSTR & CONTROLS
- [ ] SAFETY
- [ ] ADV TECH
- [ ] ESTIMATING
- [ ] SPECIFICATIONS
- [ ] SYSTEMS ENG
- [ ] VALUE ENG
- [ ] OTHER

REVIEW TYPE: Responses to SEAD Comments
DATE: 27 March 1991
NAME: Healy/ag

ITEM	DRAWING NO. OR REFERENCE	COMMENT	ACTION
1	SEAD Cmt 1	Change made.	
2	SEAD Cmt 2	Change made.	
3	SEAD Cmt 3	Do not concur. The comments/revisions referred to in the SEAD Comment are to be made by ESE to the Work Plan. The revisions discussed in paragraph 3.3 of the SOW for RI implementation are to be made by C.T. Main in an effort to incorporate "C.T. Main-specific" information (analytical labs to be used, resumes of personnel, etc.) that ESE cannot foretell. This "Main-specific" information will indeed be minimal. At present, Main has no responsibility for revising the Work Plan to accommodate regulatory concerns. A SOW modification would be required for that, if the need arises.	
4	SEAD Cmt 4	Concur. Schedule is presently being reworked, intra-actively, with SEAD.	
5	SEAD Cmt 5	Concur. The references to "Phase I" and "/FS" will be deleted.	
6	SEAD Cmt 6	Concur. Corrections made.	
7	SEAD Cmt 7	Feeder Reports will be handled as discussed on 14-15 March.	

ACTION CODES:
A — ACCEPTED/CONCUR
D — ACTION DEFERRED
W — WITHDRAWN
N — NON-CONCUR
VE — VE POTENTIAL/VEP ATTACHED

*U.S.GPO:1989-636-564/00015

DEPARTMENT OF THE ARMY
SENECA army DEPOT
ROMULUS, NEW YORK 14541-5001

REPLY TO
ATTENTION OF

SDSSE-HE (200-1a)

26 FEB 1991

MEMORANDUM FOR Commander, U.S. Army Corps of Engineers, Huntsville Division,
ATTN: CEHND-PM-E (Mr. J. Romeo), P.O. Box 1600,
Huntsville, AL 35807

SUBJECT: Comments on the General Statement of Work and Initiation of Fieldwork in the May Time Frame

1. Enclosed please find Seneca Army Depot's comments on the Ash Landfill RI/FS Scope of Work.

2. The contract statement of work must be finalized in a time frame that will allow fieldwork to commence during the month of May 1991. In order for this deadline to be met, I realize expeditious approval of the workplan by the regulatory agencies is necessary.

3. I anticipate that by having C.T. Main present at the Draft-Final Workplan meeting, the contracting phase to implement the workplan can proceed on a timetable which will allow May field activity. You need to keep in mind if the fieldwork starts too late in the season, the entire process will be extended and this is unacceptable.

4. POC is Mr. James Miller at DSN 489-5450.

FOR THE COMMANDER:

Stephen M Absolom

STEPHEN M. ABSOLOM
Chief, Engineering/Environmental
Management Division

PARA.	PAGE	ITEM/PROBLEM AND ACTION REQUESTED
1.3	AB-2	The incinerator Ash Landfill area of Seneca Army Depot was not exclusively added to the NPL, the installation as a whole was added.
2.0	AB-3	This paragraph should read "...Additionally, all work shall be performed in accordance with the Federal Facilities Agreement that may be signed and in effect for Seneca Army Depot in the near future."
3.3	AB-3	This paragraph should be changed to reflect the fact that substantial revisions may be required by the regulators. At this time (8 Feb 91), both NYSDEC and USEPA have substantial comments on the current workplan submission. They were faxed to Huntsville on 5 Feb 91.
4.6 & 4.7.1.1	AB-11	Timeframes are not all concurrent with Seneca's IAG nor is sufficient time allowed for the Seneca project manager to actually mail copies to the regulators in time to meet IAG schedules. These two paragraphs need to be adjusted to meet the realities of document mailing/submission deadlines and lead times.
4.6	AB-11	Delete from table 4.6, ".Final Phase I RI/FS Report..". This is not a deliverable.
4.7.3	AB-14	The document submittal list needs revision to reflect submittal of preliminary plans and reports which are internally reviewed by the Army. Preliminary documents are not distributed to regulatory agencies.

GENERAL:

Feeder Reports:

AE has to be tasked with providing project manager at Seneca feeder report data IAW reporting requirements of IAG para 26.1 and 26.2 as it pertains to AE's specific activity and phase of work (i.e. field work or non-field work periods).

RBD

U.S. ARMY ENGINEER DIVISION HUNTSVILLE — CORPS OF ENGINEERS

DESIGN REVIEW COMMENTS

PROJECT Ash Landfill RI/FS Implementation SOW

☒ SITE DEV & GEO TECH ☐ MECHANICAL ☐ SAFETY ☐ SYSTEMS ENG
☐ ENVIR PROT & UTIL ☐ MFG TECHNOLOGY ☐ ADV TECH ☐ VALUE ENG
☐ ARCHITECTURAL ☐ ELECTRICAL ☐ ESTIMATING ☐ OTHER
☐ STRUCTURAL ☐ INSTR & CONTROLS ☐ SPECIFICATIONS

REVIEW Responses to MRD Comments
DATE 27 March 1991 TYPE
NAME Healy/ag

ITEM	DRAWING NO. OR REFERENCE	COMMENT	ACTION
1	Waples Cmt 1	Concur. Clarification made. The reference to the guidance document in paragraph 1.3 should suffice.	
2	Waples Cmt 2	As discussed with Mr. Waples on 25 March, the Work Plan discussion of ARAR's is necessarily generalized at this point. A more detailed discussion of ARAR's in relation to disposal alternatives and costs is to be expected in the RI/FS report. At present, this comment will be noted as a preliminary "flag".	
3	Coats Cmt 1	Concur. Correction made.	
4	Coats Cmt 2 and Cmt 3	The initiation of work on the Ash Landfill WP pre-dates both the finalization of ER-1110-1-263 and its approval by EPA II, which is the reason why this Work Plan follows the EPA QAPP format. Ms. Amelia Jackson, of EPA II's QA group, has reviewed the WP for overall acceptability and for conformance to the MRD program as laid out in your recent presentation. The revisions required are presently being incorporated. Consequently, regardless of the specific format, this WP will be acceptable for implementation. In the future, the ER will be relied upon more explicitly, as evidenced by C.T. Maine submittal of the OB Grounds WP, which you are likely reviewing already.	
5	Coats Cmt 4	"ED-EA" has been changed to "EP-C (Williams)". It is our understanding that 8 copies will be distributed by EP-C to all concerned, so the "ED-GL" reference appeared redundant and was removed. (Reference CEMRD-EP-C memorandum dated 18 Jan 91, subj: DERP Review Procedures)	
6	Keeton Cmt 1	Noted.	

ACTION CODES:
A — ACCEPTED/CONCUR
D — ACTION DEFERRED
W — WITHDRAWN
N — NON-CONCUR
VE — VE POTENTIAL/VEP ATTACHED

*U.S.GPO:1989-636-564/00015

DEPARTMENT OF THE ARMY
MISSOURI RIVER DIVISION, CORPS OF ENGINEERS
P.O. BOX 103, DOWNTOWN STATION
OMAHA, NEBRASKA 68101-0103

REPLY TO
ATTENTION OF

CEMRD-EP-C (200-1c) 5 March 1991

MEMORANDUM FOR Commander, U.S. Army Engineer Division,
Huntsville, ATTN: CEHND-ED-PM, P.O. Box 1600,
Huntsville, AL 35807-4301

SUBJECT: SOW Based on Draft Final Work Plan, Incinerator Ash Landfill, Seneca Army Depot, NY

1. Subject submittal, dated 5 February 1991, has been reviewed and is approved subject to incorporation of the enclosed comments properly annotated as to their disposition.

2. Review comments made by your division and those received from other agencies are to be annotated and forwarded to us as soon as possible. In any event, please furnish us all annotated review comments on this project with your next submittal.

3. The CEMRD Technical and Program Managers are Mr. Tomasek, 402/691-4526 and Mr. Miller, 402/691-4550 respectively.

FOR THE COMMANDER:

for JOSEPH J. GRASSO, P.E.
Acting Director, Engineering and
Planning Directorate

File: C:\ARMS\R1150SED.CMT
Printed: Tuesday February 26, 1991 at 10:05:49 a.m.

Project Info: Incinerator Ash Landfill

Num	Name	Office	Page/Sheet	Discipline	Rm/Detail
1	WAPLES	MRD-EP-EE	AB-3	ENV	3.1.

Clarify that the AE shall meet the requirements of the "Approved Work Plan" as well as this Statement of Work. Indicate that if there is a conflict or omission between the SOW tasks and the Work Plan the AE shall get resolution from the COE project manager. The RI/FS must meet the requirements of the EPA Interim Final "Guidance for Conducting Remedial Investigations/Feasibility Studies under CERCLA".

Num	Name	Office	Page/Sheet	Discipline	Rm/Detail
2	WAPLES	MRD-EP-EE	AB-6	ENV	3.4.1.2.5

Clarify that the AE shall develop Action Specific ARAR's that meet the standards provided in the Work Plan. Disposal alternatives for treated groundwater or surface water should not necessarily have the ARAR's. A discharge to a POTW should not be required to be treated to the same level as groundwater reinjection system or a stream discharge.

Draft SOW for RI/FS

☒ MRD ☐ _____ District

CORPS OF ENGINEERS
ENGINEERING REVIEW COMMENTS

TO: CEHND-PM-E (J. Romeo)

PLANS & SPECIFICATIONS AND/OR DESIGN REPORT: ☒ PRELIM ☐ FINAL ☐ AS-ADV.
DESIGNED BY: ☐ AE ☒ DIST
PROJECT: Seneca Army Depot; Incin. Ash Landfill

LOCATION OR BASE: Romulus, NY
INVITATION NO.:
BID OPENING DATE:

COMMENTS BY: K. Coats
BRANCH OR SECTION: CEMRD-EP-EC
DATE: 2/26/91

DRAWING NUMBER OR PARAGRAPH NUMBER	ITEM NUMBER	COMMENTS — SHEET ___ OF ___	PHONED TO: (Name/Date)
section 1.1	1	The second DCE compound listed should probably be "cis-1,2-dichloroethene". Please check previous data.	
section 3.3	2	ER 1110-1-263 requires that a Chemical Data Acquisition Plan be developed for all sampling/analysis activities being performed in support of this project. This document is the functional equivalent of the EPA Quality Assurance Project Plan and described by EPA QAMS 005-080. This document must include general and specific (PARCC parameters) Data Quality Objectives for the sampling/analytical activities (including soil gas). Separate CDAPs would have to be developed for any subsequent project phases such as	

☐ MRD
☐ _____ District

CORPS OF ENGINEERS
ENGINEERING REVIEW COMMENTS

TO:

PLANS & SPECIFICATIONS AND/OR DESIGN REPORT
☐ PRELIM ☐ FINAL ☐ AS-ADV.

DESIGNED BY:
☐ AE ☐ DIST

PROJECT:

LOCATION OR BASE:

INVITATION NO.:

BID OPENING DATE:

COMMENTS BY :

BRANCH OR SECTION :

DATE:

DRAWING NUMBER OR PARAGRAPH NUMBER	ITEM NUMBER	COMMENTS SHEET ___ OF ___	PHONED TO: (Name/Date)
		Phase II investigations or treatability studies.	
Section 3.4.1.1	3	~~This SOW does not~~ Reading this SOW it is not clear that ER 1110-1-263 is being complied with for this project. This reviewer needs to check the status of the ESE Work Plan to guarantee project compliance.	
P.AB-B	4	Change of symbol "CEMRD-ED-EA" to "CEMRD-EP-C (Williams)". Change office symbol "CEMRD-ED-GL" to "CEMRD-EP-L".	

MRD FORM 1 AUG 75 0691 PREVIOUS EDITIONS OF THIS FORM WILL BE USED UNTIL EXHAUSTED

File: A:\SENECA.CMT
Printed: Wednesday February 27, 1991 at 12:06:27 p.m.

Project Info: Seneca Army Depot NY SOW Incinerator Ash Landfill

Num	Name	Office	Page/Sheet	Discipline	Rm/Detail
1	KEETON,J.M.	MRD-EP-TG	SOW-AB-2-1.5	GEO	

The comments on the Work Plan for Remedial Investigations/ Feasibility Studies at the Ash Landfill by the EPA and the State of New York should be sibmitted t this office after their review.

29 Mar 91

ANNEX B
REMEDIAL INVESTIGATIONS AND FEASIBILITY STUDIES
AT THE
INCINERATOR ASH LANDFILL
SENECA ARMY DEPOT, ROMULUS, NEW YORK

1.0 GENERAL STATEMENT OF SERVICES

1.1 Background. As part of its continuing program of evaluating its hazardous waste management practices, the Army is performing Remedial Investigations/Feasibility Studies (RI/FS) at Seneca Army Depot (SEAD). A recently completed site investigation of the abandoned ash landfill area (Solid Waste Management Unit (SWMU) Designations SEAD-3, SEAD-6, SEAD-14 and SEAD-15) has documented the existence of a narrow plume of groundwater contamination which is believed to extend to, and possibly beyond, the Depot's western boundary. The contaminants of concern are chlorinated volatile organic compounds (VOC's); trans-1,2-dichloroethene, trichloroethene and, to a lesser extent, cis-1,2-dichloroethene, vinyl chloride and chloroform. Additionally, some heavy metals were found at concentrations above background. The RI/FS investigations are to be conducted to determine the magnitude of environmental contamination and appropriate remedial actions. The US Army Corps of Engineers, Huntsville Division, on behalf of SEAD, is contracting for the required work.

1.2 Location. Seneca Army Depot is a US Army facility located in Seneca County, New York. SEAD occupies approximately 10,600 acres. It is bounded on the west by State Route 96A and on the east by State Route 96. The cities of Geneva and Rochester are located to the northwest (14 and 50 miles, respectively); Syracuse is 53 miles to the northeast and Ithaca is 31 miles to the south. The surrounding area is generally used for farming.

1.3 Regulatory Status. The Incinerator Ash landfill area of Seneca Army Depot was included on the Federal Facilities National Priorities List on

13 July 1989. Consequently, all work to be performed under this contract shall be performed according to CERCLA guidance as put forth in the EPA Interim Final "Guidance for Conducting Remedial Investigations/Feasibility Studies under CERCLA", dated October 1988 (Reference 11.2).

1.4 Previous Investigations. Previous investigations have been performed at various SEAD units. An "Installation Assessment" and an "Update" (USATHAMA Reports No. 157 (1980) and 157(U) (1987), respectively) were conducted by the U.S. Army Toxic and Hazardous Materials Agency. The purpose of the assessments was to identify potentially contaminated areas at the Depot. The U.S. Army Environmental Hygiene Agency's Groundwater Contamination Survey No. 38-26-0868-88, "Evaluation of Solid Waste Management Units, Seneca Army Depot" identifies and describes all solid waste management units (SWMU's) at SEAD. In addition, a confirmation study has been performed and closure plans are being developed for the burning pads (SEAD-23). USATHAMA also prepared a "Site Investigation Report" in March 1989 for the Burning Pit/Landfill. A complete list of previous investigations is presented as References in Section 11.0.

1.5 Basis of this Investigation. A Work Plan for the intended investigation was prepared by Environmental Science and Engineering of Gainesville, Florida (Reference 11.4). This Work Plan is presently being submitted to the EPA and the State of New York Department of Environmental Conservation (NYSDEC) for a second review, the purpose of which is to assure that prior regulatory comments have been satisfactorally incorporated. Upon receipt of final regulatory approval, this Work Plan shall become the basis under which this RI/FS investigation is carried out.

1.6 Security Requirements. Compliance with SEAD security requirements is mandated. These requirements are presented in Section 9.0.

2.0 OBJECTIVE

The objective of this Statement of Work is to perform a complete RI/FS at the Incinerator Ash Landfill area as defined by the Office of Solid Waste and Emergency Response Directive 9355 and as laid out in the final Work Plan. Additionally, all work shall be performed in accordance with the Federal Facilities Agreement in affect for Seneca Army Depot (Reference 11.5).

3.0 DETAILED DESCRIPTION OF SERVICES

3.1 General Requirements. All work performed by the AE shall be designed and implemented in a manner which complements earlier investigations and shall conform to this Statement of Work (SOW), the approved Work Plan, and the requirements of EPA, NYSDEC and SEAD. In the event that any conflicts arise, it will be the Huntsville Division Project Manager's responsibility to assure resolution. The AE, through RI/FS Reports, shall present a complete description of the RI/FS process as applied to the facility. All work shall be performed under the general supervision of both a Professional Engineer registered in the State of New York and a qualified Geologist.

3.2 (Task 1) Site Visit and Review Existing Data. The AE shall perform a visual inspection of the site, review the records, reports and other data provided by the Contracting Officer and the facility, or made available to the AE from sources such as public records, the USEPA, the State Regulators, the State Geological Survey, or from interviews with local residents and officials who have knowledge of past site activities.

3.3 (Task 2) Preparation of Project-Specific Plans. The existing Work Plan has been prepared to be "generic"; although tasks, procedures, equipment and other technical aspects of the RI/FS performance have, for the most part, been proposed and approved by the regulators, the AE will be required to add project-specific information before the plans are totally acceptable. Such project-specific information will be added to the sampling,

safety and quality assurance plans at a minimum. The AE shall make all additions, wherever appropriate. It is not anticipated that these revisions will be substantial.

3.4 Phase I Remedial Investigation/Feasibility Studies. The objective of Phase I of this SOW is to perform the RI/FS activities corresponding to USEPA's Phase I Remedial Investigation and USEPA Phase I and USEPA Phase II Feasibility Studies. The AE shall perform the RI and FS activities approximately concurrently. When all the field work and data analyses are complete, the AE shall prepare Phase I RI and FS Reports. The AE shall also present specific recommendations for Phase II Remedial Investigations and Feasibility Studies that may be necessary to complete the RI/FS.

3.4.1 Phase I Remedial Investigations.

3.4.1.1 (Task 3) Field Investigations. The work required in this Section corresponds to EPA Task 3 in Appendix B of the RI/FS Guidance Manual. The AE shall perform field investigations as detailed in Reference 11.4 in order to characterize the site and determine the nature and extent of soil, surface water and groundwater contamination. The effort shall include performance of the RI/FS scoping process; installation of monitoring wells; performance of geophysical surveying; soil gas sampling; test pit excavations; installation of soil borings and the collection of soil, surface water and groundwater samples. Numbers for field and QA/QC sampling and analysis are presented in Table 4.3 of the Work Plan (Reference 11.4). QC/QA sampling and analytical requirements shall be coordinated with CEMRD-L and shall conform to Engineering Regulation 1110-1-263 (Reference 11.8). The work shall be performed according to the approved work plan.

3.4.1.1.1 (Task 4) Monthly Field Activity Reports. During field work, the AE shall submit a monthly Field Activity Report, not later than the tenth day of the month, according to the distribution in paragraph 4.7.2 and in the quantities shown in 4.7.3, "Reports, Final", these monthly Field Activity

Reports shall address the following:

3.4.1.1.1.1 A summary of work completed in the field, i.e., sampling events or well installation. Upon request, copies of trip reports and/or field logs shall be provided,

3.4.1.1.1.2 Anticipated or actual delay of a scheduled field activity, to include basis and any effect on subsequent events or scheduled activities;

3.4.1.1.1.3 Discovery or indication of significant additional contamination or any new family of hazardsou substances at an AOC other than that previously recognized or expected for the AOC location;

3.4.1.1.1.4 Quantum increase in concentration of hazardous substances of any media beyond that previously recognized or expected for that AOC location;

3.4.1.1.1.5 Determination of any specific or potential increase of danger to the public, the environment, or to individuals assigned to work at the Site. Such a determination shall be reported to the EPA and NYSDEC as soon as discovered; and

3.4.1.1.1.6 Copies of all Quality Assured Data and sampling and test results and all other laboratory deliverables received by the Army during the month, if any.

3.4.1.1.2 (Task 5) Quarterly Reports. Over the length of the contract, the AE shall submit Quarterly Reports, not later than the tenth day of the month following the close of the quarter, according to the distribution in paragraph 4.7.2 and in the quantities shown in 4.7.3, "Reports, Final". These Quarterly Reports shall address the following:

3.4.1.1.2.1 Minutes of all formal Project Manager, Technical Review COmmittee (TRC), or other formal meetings held during the preceding period. This shall also include a summary of issues discussed by the Project Manager meetings which may have occurred in the last quarter;

3.4.1.1.2.2 Status report on all milestones met on schedule during the

period, report and explanation for any milestones not met during the preceding period and assessment of milestones scheduled for the next reporting period;

3.4.1.1.2.3 Outside inspection reports, audits, or other administrative information developed during the preceding period, including notice of any outside inspections or audits scheduled during the next reporting period;

3.4.1.1.2.4 Permit status as applicable;

3.4.1.1.2.5 Personnel staffing status or update;

3.4.1.1.2.6 Copies of all Quality Assured Data and samplign and test results and all other laboratory deliverables received by the Army during the reporting period, if any; and a

3.4.1.1.2.7 Community relations activity update.

3.4.1.1.3 (Task 6) Field Sampling Letter Reports. At the completion of all field work sampling rounds (initial and any confirmatory rounds), a letter report characterizing the site will be furnizhed to the Army Project Manager (10 copies). This letter report shall, at a minimum, list the locations and quantities of contaminants at the site.

3.4.1.1.4 (Task 7) Preliminary Site Characterization Summary Report. At the conclusion of field work, the AE shall submit a Preliminary Site Characterization Summary Report to the Army Project Manager (10 Copies). This document shall follow the format of the first four chapters of an RI Report.

3.4.1.2 (Task 8) Baseline Risk Assessment. The work required in this Section corresponds to EPA Task 6 in Appendix B of the RI/FS Guidance Manual. Using the information gathered from the record search, the field work and data analyses, the AE shall prepare and submit a quantitative Risk Assessment. The Risk Assessment shall provide an evaluation of the potential threat to human health, the environment, and ecology in the absence of any remedial action and provide the basis for determining whether or not remedial action is necessary. The Risk Assessment Report shall be prepared using the guidance presented in the EPA's Interim Final "Risk Assessment Guidance for Superfund" (Reference

11.6) and "Superfund Exposure Assessment Manual" (Reference 11.7) and shall, as a minimum, contain a baseline risk assessment, an exposure assessment, and a standards analysis. The Risk Assessment shall be submitted with the Phase I RI and FS Reports. The AE shall provide information including, but not necessarily limited to, the following:

3.4.1.2.1 (Subtask 8.1). Identification of Contaminants of Concern. Using the information gathered from field work, record searches, consultations with appropriate local, State and Federal Officials, and in accordance with the applicable portion of Chapter 5 of Reference 11.6, the AE shall identify the contaminants which are of concern. The AE shall provide a summary of each identified contaminant describing why it was selected, and the effects of its chronic and acute toxicity to humans and the environment.

3.4.1.2.2 (Subtask 8.2). Exposure Assessment. The AE, using modeling, shall identify actual or potential exposure paths and routes, characterize potentially exposed populations, and estimate expected exposure levels and chemical intakes in accordance with Chapter 6 of Reference 11.6. As part of the Exposure Assessment, the following Task shall also be performed:

3.4.1.2.2.1 Water Well Survey. The AE shall make a reasonable effort to determine the existence of all operating water wells used for human consumption within one mile of the Installation that may be affected by deteriorated water quality on the Installation. A "house-to-house" survey is not intended. However, whenever possible, the AE shall include well location, depth, screened interval, water use, and number of people served by the well. This task may be performed through the examination of records available at public sources, backed by occasional field checks. The information shall be provided both in tabular form and on suitable maps.

3.4.1.2.2.2 Spring Survey. The AE shall make a reasonable effort to determine the existence of all springs used for human consumption within one

mile of the Installation that may be affected by deteriorated water quality on the Installation. The information shall be provided both in tabular form and on suitable maps.

3.4.1.2.3 (Subtask 8.3). Toxicity Assessment. The AE shall weigh available evidence regarding the potential for contaminants to cause adverse effects in exposed individuals and estimate the relationship between the extent of exposure and corresponding adverse effects. The relationship shall be determined from field data, ARAR's, toxicological data, and the EPA Integrated Risk Information System (IRIS). Work shall conform to applicable sections of Chapter 7 of Reference 11.6. The AE shall make a comparison of acceptable levels of contamination with actual levels identified during the exposure assessment. The comparison shall be based upon available ARARs, TBCs and other toxicological data, where existing.

3.4.1.2.4 (Subtask 8.4). Risk Characterization. The AE shall, based upon other components of the Risk Assessment, characterize the risk associated with the site. The AE shall consider the carcinogenic risk, noncarcinogenic risk and the environmental risk. The characterization shall include a summary of each projected exposure route for contaminants of concern and the distribution of risk across various sectors of the population. Such factors as weight-of evidence associated with toxicity information, the estimated uncertainty of the component parts, and the assumptions contained within the estimates shall be discussed. Work shall conform to applicable sections of Chapter 8 of Reference 11.6.

3.4.1.2.5 (Subtask 8.5). Applicable or Relevant and Appropriate Requirements (ARAR's) and To Be Considered (TBC) Requirements. The AE shall develop and propose contaminant and location specific "Applicable or Relevant and Appropriate Requirements" (ARAR's) and To Be Considered (TBC) Requirements which, after review and possible modification as directed by the Contracting Officer, will be utilized to evaluate subsequent proposed remedial actions.

ARAR's and TBC's shall be prepared using guidance presented in the RI/FS Guidance Manual.

3.4.1.3 (Task 9) Treatability Study Requirements Assessment. The work required in this Section corresponds to EPA Task 7 in Appendix B of the RI/FS Guidance Manual. The AE shall assess existing data on technologies identified as Remedial Action Alternatives to determine data needs required to undertake treatability investigations following completion of alternatives development. The AE shall recommend if specific Treatability Studies are required or if the existing situation is well enough understood and described in scientific, engineering and other technical literature such that site specific treatability studies do not appear to be necessary. The AE shall develop a Conceptual Treatability Study Plan. Actual implementation of the Treatability Study Plan is not part of this SOW. The Treatability Study shall be submitted with the Phase I RI/S Report.

3.4.2 (Task 10) Phase I Feasibility Study. The work required in this Section corresponds to EPA Task 9 in Appendix B of the RI/FS Guidance Manual. The primary objective of this phase of the FS is to develop an appropriate range of waste management options that protect human health and the environment.

3.4.2.1 (Subtask 10.1) Remedial Action Objectives. The AE shall develop remedial action objectives which protect human health and the environment and then describe general response action which will satisfy the remedial action objectives.

3.4.2.2 (Subtask 10.2) Alternative Remedial Actions. The AE shall describe all available technologies that could be reasonably used as remedial actions at SEAD. The AE shall then screen the list to remove any potential Remedial Actions which are clearly illogical, inadequate, unfeasible, or otherwise ill-suited to the site. Remedial actions presented past the initial screening shall consist of only those representing proven technologies

adequate to address site conditions. A detailed evaluation including the strengths and weaknesses of each technology shall be performed. The initial screening shall be based upon effectiveness, implementability and cost. Where appropriate, the AE may combine feasible remedial actions. The "no action" alternative shall be described in detail as part of this task. Additional data needed shall also be described.

3.4.3 (Task 11) Phase I RI/FS Report. The work required in this Section corresponds to EPA Tasks 8 and 11 in Appendix B of the RI/FS Guidance Manual. At the completion of the preceding tasks, the AE shall prepare the Remedial Investigation/ Feasibility Study Report, fully documenting all Phase I work performed. The report shall be prepared according to the requirements of this SOW and the referenced guidance documents. The report shall also describe the recommended work to be performed during the Phase II RI/FS and make specific recommendations, and provide the justification, for sampling locations and analytes proposed for Phase II. As part of this report the AE shall evaluate the need for interim or expedited remedial actions at each of the sites. If the AE recommends that either is appropriate, he shall so propose and justify. The AE shall also propose and justify additional investigations to be undertaken as part of the Phase II Remedial Investigations, if any, for the Contracting Officer's review and approval.

3.5 (Task 12) Post FS Support. Following approval of the RI and FS reports by the regulators, the AE shall be responsible for the preparation of the Proposed Remedial Action Plan (PRAP) and the Record of Decision (ROD). Both documents shall be prepared in accordance with the existing EPA guidance documents.

4.0 SUBMITTALS AND PRESENTATIONS

4.1 Format and Content. The Engineering Reports, consisting of RI/FS reports, presenting all data, analysis, and recommendations shall be prepared in accordance with the suggested RI/FS Format as presented in the RI/FS Guidance Manual. Each submittal shall be accompanied by an EPA completeness checklist (where existing), completed by the AE, which references the specific location within the submitted report, of the required item. All drawings shall be of engineering quality in drafted form with sufficient detail to show interrelations of major features on the installation site map. When drawings are required, data may be combined to reduce the number of drawings. The report shall consist of 8-1/2" x 11" pages with drawings folded, if necessary, to this size. A decimal paragraphing system shall be used, with each section and paragraph of the reports having a unique decimal designation. The report covers shall consist of vinyl 3-ring binders and shall hold pages firmly while allowing easy removal, addition, or replacement of pages. A report title page shall identify the AE, the Corps of Engineers, Huntsville Division, and the date. The AE identification shall not dominate the title page. Each page of draft and draft-final reports shall be stamped "DRAFT" and "DRAFT-FINAL" respectively. Each report shall identify the members and title of the AE's staff which had significant, specific input into the report's preparation or review. Submittals shall include incorporation of all previous review comments accepted by the AE as well as a section describing the disposition of each comment. Disposition of comments submitted with the final report shall be separate from the report document. All final submittals shall be sealed by both the registered Professional Engineer-In-Charge and the Certified Professional Geologist.

4.2 Presentations. The AE shall make presentations of work performed according to the schedule in paragraph 4.6. Each presentation will consist of a summary of the work accomplished and anticipated followed by an open

discussion among those present. The AE shall provide a minimum of two persons at the meetings which are expected to last one day each.

4.3 Conference Minutes. The AE will be responsible for taking notes and preparing the minutes of all conferences, presentations, and review meetings. Conference notes will be prepared in typed form and the original furnished to the Contracting Officer (within five (5) working days after date of conference) for concurrence and distribution to all attendees. This report shall include the following items as a minimum:

a. The date and place the conference was held with a list of attendees. The roster of attendees shall include name, organization, and telephone number.

b. Written comments presented by attendees shall be attached to each report with the conference action noted. Conference action as determined by the Government's Project Manager shall be "A" for an approved comment, "D" for a disapproved comment, "W" for a comment that has been withdrawn, and "E" for a comment that has an exception noted.

c. Comments made during the conference and decisions affecting criteria changes, must be recorded in the basic conference notes. Any augmentation of written comments should be documented by the conference notes.

4.4 Confirmation Notices. The AE will be required to provide a record of all discussions, verbal directions, telephone conversations, etc., participated in by the AE and/or representatives on matters relative to this contract and the work. These records, entitled "Confirmation Notices", will be numbered sequentially and shall fully identify participating personnel, subject discussed, and any conclusions reached. The AE shall forward to the Contracting Officer as soon as possible (not more than five (5) work days), a reproducible copy of said confirmation notices. Distribution of said confirmation notices will be made by the Government.

4.5 Progress Reports and Charts. The AE shall submit progress reports to the Contracting Officer with each request for payment. The progress reports shall indicate work performed, and problems incurred during the payment period. Upon award of this delivery order, the AE shall, within 15 days, prepare a progress chart to show the proposed schedule for completion of the project. The progress chart shall be prepared in reproducible form and submitted to the Contracting Officer for approval. The actual progress shall be updated and submitted by the 15th of each month and may be included with the request for payment.

4.6 Seneca Army Depot - Ash Landfill RI/FS Proposed Schedule

Milestone	Calendar Days Following Contract Award
Finalized Work Plan to Regulators (includes "C.T. Main-Specific" info)	40
Contractor Mobilization Complete/Field Work Begins	80
Preliminary Site Characterization Summary Report	230
Regulatory Review Comments Due to DoD	260
Preliminary Draft RI Report (to DoD)	320
DoD Comments Given to AE	360
Draft RI Report Submitted (to All)	405
Regulatory Review Comments Due	455
Draft-Final RI Report Submitted (to All)	490
Final RI Report (No Disputes)	530
Preliminary Draft FS Report Submitted (to DoD)	550
DoD Comments Given to AE	580
Draft FS Report Submitted (to All)	610
Regulatory Review Comments Due	660
Draft-Final FS Report Submitted (to All)	695

Final FS Report (No Disputes)	735
Preliminary Draft PRAP Submitted (to DoD)	735
DoD Comments Given to AE	765
Draft PRAP Submitted (to All)	795
Regulatory Comments Due	845
Draft-Final PRAP Submitted (to All)	880
Issue PRAP for 30 Day Comment Period Plus	920
30 Day Extension, if requested	
Close on Public Comment Period	980
Preliminary Draft Rod Submitted (to DoD)	960
DoD Comments given to AE	990
Draft ROD Submitted (to All)	1030
Regulatory Comments Due	1080
Draft-Final ROD Submitted (to All)	1115
Final ROD (No Disputes)	1155

4.7 Submittals.

4.7.1 General Submittal Requirements.

4.7.1.1 Distribution. The AE is responsible for reproduction and distribution of all documents. The AE shall furnish copies of submittals to each addressee listed in paragraph 4.7.2 in the quantities listed in the document submittal list. Submittals are due at each of the addressees not later than the close of business on the dates shown in paragraph 4.6.

4.7.1.2 Partial Submittals. Partial submittals will not be accepted unless prior approval is given.

4.7.1.3 Cover Letters. A cover letter shall accompany each document and indicate the project, project phase, the date comments are due, to whom comments are submitted, the date and location of the review conference, etc.,

as appropriate. (Note that, depending on the recipient, not all letters will contain the same information.) The contents of the cover letters should be coordinated with CEHND-PM prior to the submittal date. The cover letter shall not be bound into the document.

4.7.1.4 Supporting Data and Calculations. The tabulation of criteria, data, circulations, etc., which are performed but not included in detail in the report shall be assembled as appendices. Criteria information provided by CEHND need not be reiterated, although it should be referenced as appropriate. Persons performing and checking calculations are required to place their full names on the first sheet of all supporting calculations, etc., and initial the following sheets. These may not be the same individual. Each sheet should be dated. A copy of this statement of work shall be included as appendix A in the Draft RI/FS report only.

4.7.1.5 Reproducibles. One camera-ready, unbound copy of each submittal shall be provided to the Contracting Officer in addition to the submittals required in the document and submittal list.

4.7.2 Addressees.

Commander
U.S. Army Corps of Engineers
Huntsville Division
ATTN: CEHND-PM-EP
PO Box 1600
Huntsville, AL 35807-4301

Commander
U.S. Army Depot Systems
Command (DESCOM)
ATTN: AMSDS-EN-FD
(Mr. Tim Toplisek)
Chambersburg, PA 17201

Commander
U.S. Army Environmental
Hygiene Agency (USAEHA)
ATTN: HSHB-ME-S (Mr. Hoddinott)
Building 1677
Aberdeen Proving Ground, MD
21010-5422

Commander
U.S. Army Corps of Engineers
Missouri River Division
ATTN: CEMRD-EP-C
12565 W. Center Road
Omaha, NE 68144-3869

Commander
U.S. Army Material Command
ATTN: AMCEN-A
5001 Eisenhower Ave.
Alexandria, VA 22333-0001

Commander
HQUSACE
ATTN: CEMP-RI
20 Massachusettes Ave., NW
Room 2209
Washington, D.C. 20314-1000

Commander
U.S. Army Corps of Engineers
Toxic and Hazardous Materials
Agency
ATTN: CETHA-IR-S (Mr. Kauffman)
Aberdeen Proving Ground, MD 21010-5401

Commander
Seneca Army Depot
ATTN: SDSSE-HE (Randy Battaglia)
Romulus NY 14541

Commander
U.S. Army Corps of Engineers,
North Atlantic Division,
ATTN: CENAD-CO-EP
90 Church Street
New York, NY 10007-9998

4.7.3 Document and Submittal List.

	Plans		Reports			
			Preliminary		Draft	
	Draft	Final	Draft	Draft	Final	Final
CEHND-PM	3	3	4	4	4	4
USAMC	0	0	1	1	1	1
DESCOM	0	0	2	2	2	2
CETHA-IR-D	1	1	1	1	1	1
CEMRD-EP-C	1	1	8	8	8	8
SDSSE-HE	5	23	5	23	23	23
CENAD-CO-EP	0	0	0	0	0	0
USAEHA	1	1	7	7	7	7
CEMP-RI	0	0	0	0	0	0
TOTAL	11	29	28	46	46	46

	Post FS Support			
	Preliminary Draft	Draft	Draft Final	Final
CEHND-PM	4	4	4	4
USAMC	1	1	1	1
DESCOM	2	2	2	2
CETHA-IR-D	1	1	1	1
CEMRD-EP-C	8	8	8	8
SDSSE-HE	5	23	23	23
CENAD-CO-EP	1	1	1	1
USAEHA	7	7	7	7
CEMP-RI	1	1	0	1
TOTAL	30	48	47	48

5.0 SAFETY REQUIREMENTS.

5.1 Site activities in conjunction with this project may pose unique safety, chemical, and/or biological exposure hazards which require specialized expertise to effectively address and eliminate. The AE shall conduct the RI/FS activities according to the requirements presented in the Work Plan.

5.2 Prior to commencement of RI/FS field activities the AE shall submit for review an amendment to the Work Plan SHERP which is to contain the following:

5.2.1 A discussion of the AE's organizational structure, to include lines of authority of the AE and all subcontractors, shall be provided along with an organizational chart showing the lines of authority for safety and health from site level to corporate management. Each person assigned specific safety and health responsibilities shall be identified and pertinent qualifications and experience shall be described.

5.2.2 Documentation of compliance with training and medical surveillance requirements for affected employees shall be provided. A format for such documentation is provided in the Work Plan SHERP.

6.0 QUALITY ASSURANCE PROJECT PLAN REQUIREMENTS

The AE shall perform all sampling and analysis activities according to the requirements presented in the Work Plan.

7.0 SOIL BORING AND MONITORING WELL REQUIREMENTS.

All drilling, installation and sampling activities shall be performed according to the requirements presented in the Work Plan.

8.0 SURVEY REQUIREMENTS.

All surveying shall be completed according to the requirements presented in the Work Plan.

9.0 SECURITY REQUIREMENTS

9.1 The following requirements must be followed by the AE at Seneca Army Depot to facilitate entry and exit of AE employees and to maintain security.

9.1.1 Personnel Registration.

9.1.1.1 A list of all AE employees, sub-contractors and suppliers indicating firm name and address will be furnished through POC/COR to the Counterintelligence Division, Building 710, 72 hours prior to commencement of work.

9.1.1.2 A confirmation of employment SDSSE-SC Form 268 will be executed by the AE concerning each employee, to include all sub-contractors and their personnel. No forms will be transferred to another file if the AE has other on-going contracts at SEAD. The AE will provide a list of personnel who are authorized to sign Form 268 for the firm. A sample of each signature is required. Counterintelligence Division must be notified, in writing, of any changes to this list. All completed forms will be provided through COR/POC to the Counterintelligence Division 72 hours prior to commencement of work. Failure to complete Form 268 correctly will result in employee's denial of access to Seneca. The Counterintelligence Division must be notified, in writing through POC/COR to Counterintelligence, at least 72 hours prior to

requesting any action. The chain of command for all AE actions will be through POC/COR to Counterintelligence Division. There will be no exceptions.

9.1.1.3 Camera permits require written notice from the POC/COR prior to access. Open camera permits will not be issued. The following information is required:

(a) Camera make, model and serial number.

(b) Contract name and name of individual responsible for the camera.

(c) Dates camera will be used.

(d) Where it will be used.

(e) What will be photographed and why.

9.1.1.4 If a rental, leased or privately owned vehicle is required in place of a company vehicle, the following information is needed.

(a) Name of individual driving.

(b) Year, make, model, color and license plate of the vehicle.

(c) Typed letter on company letterhead indicating that the company assumes responsibility for rental, leased or privately owned vehicles.

9.1.1.5 All access media will be destroyed upon expiration date of contract. If an extension is required a list of employee names and new expiration date must be furnished to the Counterintelligence Division. Contract extensions must be made prior to the contract expiration date or new Form 268s will be required for each individual that requires an extension.

9.1.2 Traffic Regulations:

9.1.2.1 Traffic Laws, State of New York, apply with emphasis on the following regulations.

9.1.2.2 Speed Limit:	Controlled Area	- as posted
	Ammo Area	- 50 mph
	Limited/Exclusion Area	- 25 mph

9.1.2.3 All of the above are subject to change with road conditions or as otherwise posted.

9.1.3 Parking: AE vehicles (trucks, rigs, etc.) will be parked in areas designated by the Director of Law Enforcement and Security. Usually parking will be permitted within close proximity to the work site. Do not park within 30 feet of a depot fence, as these are clear zones.

9.1.4 Gates:

9.1.4.1 Post 1, Main Gate - NY Highway 96, Romulus, New York is open for personnel entrance and exit 24 hours daily, 7 days a week.

9.1.4.2 Post 3, entrance to North Depot Troop Area, located at end of access road from Route 96-A is open 7 days a week for personnel and vehicle entrance and exit.

9.1.5 Security Regulations:

9.1.5.1 Prohibited Property:

9.1.5.1.1 Cameras, binoculars, weapons and intoxicating beverages will not be introduced to the installation, except by written permission of the Director/Deputy Director of Law Enforcement and Security.

9.1.5.1.2 Matches or other spark producing devices will not be introduced into the Limited/Exclusion or Ammo Area's except when the processor of such items is covered by a properly validated match or flame producing device permit.

9.1.5.1.3 All vehicles and personal parcels, lunch pails, etc. are subject to routine security inspections at any time while on depot property.

9.1.5.1.4 All building materials, equipment and machinery must be cleared by the Director of Engineering and Housing who will issue a property pass for outgoing equipment and materials.

9.1.6 AE Employee Circulation:

9.1.6.1 AE employees are cleared for entrance to the location of contract work only. Sight-seeing tours or wandering from work site is NOT

AUTHORIZED.

9.1.6.2 Written notification will be provided to the Counterintelligence Division (Ext. 30202) at least 72 hours prior to overtime work or prior to working on non-operating days.

9.1.6.3 Security Police (Ext. 30448/30366) will be notified at least two hours in advance of any installation or movement of slow moving heavy equipment that may interfere with normal flow of traffic, parking or security.

9.1.7 Unions: Representatives will be referred to the Depot Industrial Labor Relations Officer (Ext. 41317).

9.1.8 Offenses: (Violations of law or regulations)

9.1.8.1 Minor: Offenses committed by AE personnel which are minor in nature will be reported by the Director of Law Enforcement and Security to the Contracting Officer who in turn will report such incidents to the AE for appropriate disciplinary action.

9.1.8.2 Major: Serious offenses committed while on the installation will be reported to the FBI. Violators may be subject to trial in Federal Court.

9.1.9 Explosive Laden Vehicles:

9.1.9.1 Vehicles such as vans, cargo trucks, etc. carrying explosives will display placards or signs stating "EXPLOSIVES".

9.1.9.2 Explosive ladened vehicles will not be passed.

9.1.9.3 When an explosive laden vehicle is approaching, pull over to the side and stop.

9.1.9.4 When catching up with an explosive laden vehicle, slow down and allow that vehicle to remain at least 100 feet ahead.

9.1.9.5 When approaching an intersection where an explosive laden vehicle is crossing - STOP - do not enter the intersection until such time as the explosive carrier has passed thru, and cleared the intersection.

9.1.9.6 When passing a vehicle that is parked, and displaying

"Explosive" signs, slow down to 10 miles per hour, and take every precaution to allow more than ample clearance.

9.1.10 Clearing Post: All AE employees are required to return all identification badges, and passes on the last day of employment on the depot. The AE is responsible for the completion of all turn-ins by his employees, and informing the Counterintelligence Division and the depot organization administering the contract, for termination of any employee's access to the depot.

10.0 PUBLIC AFFAIRS.

The AE shall not publicly disclose any data generated or reviewed under this contract. The AE shall refer all requests for information to CEHND. Reports and data generated under this contract shall become the property of the Department of Defense and distribution to any other source by the AE, unless authorized by the Contracting Officer, is prohibited.

11.0 REFERENCES

11.1 "U.S. Corps of Engineers Safety and Health Requirements Manual," U.S. Army Engineering Manual No. EM-385-1-1, April 1981.

11.2 Interim Final, "Guidance for or Conducting Remedial Investigations /Feasibility Studies Under CERCLA", U.S. EPA, Office of Solid Waste and Emergency Response, October 1988.

11.3 "Chemical Data Quality Management For Hazardous Waste Remedial Activities", ER 1110-1-263, March 1990.

11.4 "Work Plan for Remedial Investigations / Feasibility Studies at the Ash Landfill, Seneca Army Depot, Romulus, New York", Environmental Science and Engineering, 1991.

11.5 "Federal Facility Agreement under CERCLA Section 120 in the matter of Seneca Army Depot, Romulus, New York", Docket No. II-CERCLA-FFA-00202,

USEPA, U.S. Department of the Army, and the New York State Department of Environmental Conservation, November 1990.

11.6 Interim Final, "Risk Assessment Guidance for Superfund", OSWER Directive 9285.7-01a, September 1989.

11.7 "Superfund Exposure Assessment Manual", EPA/540/1-88/01, OSWER Directive 9285.5-1, April 1988.

11.8 "Chemical Data Quality Management: A Checklist for Chemistry Review", CEMRD-ED-GC, 21 September 1988.