51-14

New York State Department of Environmental Conservation
Division of Environmental Remediation
Bureau of Eastern Remedial Action, 11th Floor
625 Broadway, Albany, New York 12233-7015
Phone: (518) 402-9623 • **FAX:** (518) 402-9627
Website: www.dec.state.ny.us

Erin M. Crotty
Commissioner

Seneca File SEAD 11

FAX to TODD Kevin CC Janet

August 21, 2001

Mr. Stephen Absolom
Chief, Engineering and Environmental Division
Seneca Army Depot Activity (SEDA)
5786 State Route 96
Romulus, NY 14541-5001

Re: Seneca Army Depot Activity
NYS Inactive Hazardous Waste Disposal Site No. 8-50-006
→ July 2001 Draft Action Memorandum for Removal Action at SWMU SEAD-11

Dear Mr. Absolom,

The New York State Department of Environmental Conservation received the above referenced document on July 23, 2001. Several of the issues regarding the above said document are similar to those regarding the Draft Action Memorandum proposing a Time Critical Removal Action at SEADs 59, 71, therefore several of the comments below are identical to those stated in our comment letter of July 31, 2001 and are being repeated for the site record.

As stated in our comment letter of July 31, 2001, the army appears to confuse the purpose of a removal action with those of a remedial response. A removal action is taken to eliminate a substantial, imminent threat at a site while a more complete and thorough study and analysis (i.e. RI/FS) is taken to complete the entire remedial response at a site. The statement "this remedy is intended to be the final remedy for the site" is premature. Regardless of a removal action, only a completed remedial investigation/feasibility study shall determine whether further remediation is necessary. Therefore, the statement should be removed from the text.

The proposed soil cleanup levels are not acceptable to the NYSDEC Division of Fish and Wildlife. Table 5.3-1 is lacking given the contaminants known to be present in the landfill. Attached are three tables: *Screening Benchmark Concentrations for Phytotoxicity of Chemicals in Soil and Soil Solution*, *Screening Benchmark Concentrations for the Toxicity of Chemicals to Earthworms*, and *Screening Benchmark Concentrations for the Toxicity of Chemicals to Soil Microorganisms and Microbial Processes*. The lowest concentration in any of the tables for a given chemical should be chosen as the cleanup value except as identified below. For lead, the soil cleanup value should be 60 ppm, the same value that was used for the Open Burning Grounds (SEAD-23). For cadmium the cleanup value should be 1 ppm as in TAGM 4046. For any chemicals not identified in the 3 attached tables or specifically identified above, soil background values should be utilized. Since the use of this area is intended for conservation/recreation the lower of human health or non-human biota should be the cleanup criteria.

As stated in our letter, the Department finds it a quandary that the Army uses TAGM 4046 as a means to justify the declaration of a Time Critical Removal Action however the draft never recognizes TAGM

4046 as a Chemical Specific ARAR in Section 5.2.1 or a To Be Considered (TBC). Reconciliation is necessary.

In Section 1.2, Purpose, Scope and Objectives, the Army states that this "time critical removal action, which will be completed as a result of this Action Memorandum, is intended to incorporate the necessary measures for removal site closeout." Presented later in the document, the Army proposes groundwater monitoring on a semi-annual basis which is to be reviewed after five years. In addition, the Army proposes to apply deed restrictions to ensure that the future land use remains as Conservation/ Recreation. As discussed above, the Army appears to confuse the purpose of a removal action with those of a remedial response. The need and extent of such items as groundwater monitoring plans and deed restrictions will be developed through completion of the RI/FS process. It appears inappropriate to propose these actions as a removal action and much more so in a proposed "time critical removal action."

Specific comments on Draft Action Memorandum:

1. Page TOC-10, List of Acronyms: TAGM is an acronym for Technical and Administrative Guidance Memorandum not "Chemical and Administrative Guidance Memorandum."

2. Page 2-2, Section 2.3, Site Specific Hydrology and Hydrogeology: Please specify the presence of any wetlands and depict such on corresponding figures.

3. Page 3-1, Section 3.2, Threats to the Environment: Please clarify on how the Army proposes this removal action as the final remedy for the site when "threats to the environment posed by the site have not been quantified," and there's potential for surface water contamination and groundwater contamination posing a threat to aquatic life.

4. Page 3-2, Section 3.4, Additional Justification for Removal Action: It states that "the uncertainty of the contents of the buried items that may remain in the landfill area and contamination in soils and groundwater are considered justification for performing a removal action at SEAD-11." Two sentences later it states that "goals for allowable concentrations will be developed based upon existing conditions and will be used as the basis for returning soil, segregated from the buried items, to the former landfill." Please clarify how the Army plans on developing cleanup goals based on existing conditions when the contents of the drums are unknown.

5. Page 5-1, Section 5.1.2, Proposed Action Description: The excavated soils should be piled so that surface soils and bottom soils are kept separate. The statement that "it is assumed that NYCRR Part 360 will no longer apply because the fill area is being removed," is false. If the Army desires to backfill the "soils with concentrations of metals and other compounds below the cleanup goals" that were developed based on ecological risk calculations yet exhibit residual contamination, then NYCRR Part 360 may be applicable as the contaminated soil may be considered a solid waste. Please note that no backfilling should occur without the prior written approval from the NYSDEC. Also, your proposal for disposing the water from excavation de-watering "into a storm drain or drainage ditch" will require sampling to demonstrate that any discharge will meet surface water quality standards and if appropriate, a SPDES equivalent permit.

6. Page 5-2, Section 5.1.3, Contribution to Remedial Performance: The statement "this work should eliminate the potential for future remedial actions" should be removed from the text. See General Comments.

7. Page 9-1, Section 9.0, Recommendation: Please specify whether the stabilization is to be performed on-site or off-site.

Specific Comments on Draft Decision Document:

8. The Draft Decision Document, which supports the Draft Action Memorandum repeats much of what is stated in the Draft Action Memorandum, section for section. Therefore, the above said comments are applicable here.

9. Page TOC-6, Abbreviations and Acronyms: Please correct each for micrograms per kilogram and micrograms per liter.

Although your Draft Attachment 5 Schedule dated August 9, 2001 states that a public comment period is scheduled for September 18 through October 18, 2001, the Department suggests that the Army contact the regulatory agencies to discuss the proposal and its appropriateness.

Comments from the New York State Department of Health will be forwarded to you at a later date. A facsimile of this letter will be sent to you today. If you have any questions, please contact me at (518) 402-9623 or by email at ajthorne@gw.dec.state.ny.us

Sincerely,

Alicia Thorne

Alicia Thorne
Bureau of Eastern Remediation Action
Division of Environmental Remediation

cc: J. Vazquez, USEPA (w/ attach)
D. Geraghty, NYSDOH (w/ attach)
M. Peachey, NYSDEC Region 8 (w/ attach)
R. Scott, NYSDEC Region 8 (w/ attach)

Table 2. Screening benchmark concentrations for the toxicity of chemicals to soil microorganisms and microbial processes

CHEMICAL	SOIL (mg/kg)
Aluminum	600
Arsenic	100
Barium	3000
Boron	20
Cadmium	20
Chromium	10
Cobalt	1000
Copper	100
Fluorine	30
Iron	200
Lanthanum	50
Lead	900
Lithium	10
Manganese	100
Mercury	30
Molybdenum	200
Nickel	90
Selenium	100
Silver	50
Tin	2000
Titanium	1000
Tungsten	400
Vanadium	20
Zinc	100
Acrylonitrile	1000
Carbon tetrachloride	1000
Cis-1,4-dichloro-2-butene	1000
Hexachlorobenzene	1000
Nitrobenzene	1000
Phenol	100
Pentachlorophenol	400
Trans-1,4-dichloro-2-butene	1000

Table 1. Screening benchmark concentrations for the toxicity of chemicals to earthworms

CHEMICAL	SOIL (mg/kg)
Arsenic	60
Cadmium	20
Chromium	0.4
Copper	50
Lead	500
Mercury	0.1
Nickel	200
Selenium	70
Zinc	200
Chloroacetamide	2
3-chloroaniline	30
2,4-dichloroaniline	100
3,4-dichloroaniline	20
2,4,5-trichloroaniline	20
2,3,5,6-tetrachloroaniline	20
Pentachloroaniline	100
1,2-dichloropropane	700
Dimethylphthalate	200
Fluorene	30
N-nitrosodiphenylamine	20
Phenol	30
4-nitrophenol	7
3-chlorophenol	10
3,4-dichlorophenol	20
2,4,5-trichlorophenol	9
2,4,6-trichlorophenol	10
2,3,4,5-tetrachlorophenol	20
Pentachlorophenol	4
Chlorobenzene	40
1,4-dichlorobenzene	20
1,2,3-trichlorobenzene	20
1,2,4-trichlorobenzene	20
1,2,3,4-tetrachlorobenzene	10
Pentachlorobenzene	20
Nitrobenzene	40

Table 1. Screening benchmark concentrations for the phytotoxicity of chemicals in soil and soil solution

CHEMICAL	SOIL (mg/kg)	SOLUTION (mg/kg)
Aluminum	50	0.2
Antimony	5	--
Arsenic	10	0.001
Barium	500	--
Beryllium	10	0.5
Bismuth	--	20
Boron	0.5	1
Bromine	10	10
Cadmium	3	0.05
Chromium	1	0.05
Cobalt	20	0.06
Copper	100	0.03
Fluorine	200	5
Iodine	4	0.5
Iron	--	10
Lead	50	0.02
Lithium	2	3
Manganese	500	4
Methyl mercury	--	0.0002
Mercury	0.3	0.004
Molybdenum	2	0.5
Nickel	30	0.2
Selenium	1	0.7
Silver	2	0.1
Technetium	0.2	0.2
Tellurium	--	2
Thallium	1	0.02
Tin	50	100
Titanium	--	0.06
Uranium	5	40
Vanadium	2	0.5
Zinc	50	0.4
2,4 Dinitrophenol	20	--
Di-n-butyl phthalate	200	--
Nitrobenzene	--	8
PCBs	40	--
Toluene	200	--
Xylene	--	100

MODE = MEMORY TRANSMISSION START=SEP-19 10:39 END=SEP-19 10:43

FILE NO.= 173

NO.	COM	ABBR/NTWK	STATION NAME/ TELEPHONE NO.	PAGES	PRG.NO.	PROGRAM NAME
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002	OK	<07>	COE HEALY	006/006		

-SENECA ENG/ENV -

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OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL # of pages ▶ 6

To See Dist.	From S. Absolom
Dept./Agency	Phone # (607) 869-1309
Fax #	Fax #

NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

ENG
File
SEAD 11

FAX to
TODD
Kevin
or Janet

August 21, 2001

Mr. Stephen Absolom
Chief, Engineering and Environmental Division
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5786 State Route 96
Romulus, NY 14541-5001

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MODE = MEMORY TRANSMISSION START=SEP-19 09:56 END=SEP-19 10:01

FILE NO.= 167

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002	OK	<07>	COE HEALY	005/005		

-SENECA ENG/ENV -

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Post-it® Fax Note 7671 | Date 9/7/01 | # of pages ▶ 5
To Steve Absolom | From Alicia Thorne
Co./Dept. | Co.
Phone # | Phone #
Fax # (607) 869-1362 | Fax #

September 7, 2001

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5786 State Route 96
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Fax to
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It should be kept in mind that the final remedy for the site will be selected after completion of this interim remedial measure (IRM) and an evaluation of the remaining contamination. Upon completion of the IRM a final remedy will be selected after a feasibility study that takes into consideration factors such as technical practicality, cost, permanence, community acceptance and effectiveness of the remedy against potential future uses of the site and compliance to New York State standards, criteria, and guidelines.

The proposed clean up goals for this IRM are based on the USEPA's ecological soil screening levels for the protection of terrestrial mammals, in this case a shrew. Only three of the parameters listed in Table 5.3-1 are contaminants of concern at this site. Of the three, only antimony is widely detected across the landfill above the USEPA shrew protection levels. The clean up goals for this project do not directly address the volatile and semi-volatile organic compounds found in SEAD-11 soils in excess of NYSDEC TAGM 4046 levels. It is unclear how these contaminants will be affected by this removal action. In theory, soils with VOCs and SVOCs well in excess of the TAGM levels could be put right back into the excavation if the 150 cubic yard stockpile from which they originate contains less than 21 ppm antimony. If the Army hopes to assert that this interim remedial measure is the final remedy for this site it would be appropriate to sample the soils being placed back into the excavation for the VOCs and SVOCs known to be present in the landfill instead of just metals. This information would further assist the agencies in making a post-IRM decision about the final remedy for the site.

I am pleased to see the Army concede on page 5-8 that "the final management of these (hazardous) materials will be the focus of the ultimate Record of Decision (ROD)" and are not the focus of this action". If the cleanup of this site is to be based on protection of a shrew, the New York State Department of Health will want to see a deed that specifically spells out restrictions on anything but conservation reuse by the time a ROD is developed for this site.

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Due to the volume of contaminated soils to be excavated it will be necessary to closely follow the guidance found in the enclosed community air monitoring plan (CAMP). Please have the Army forward a copy of the interim remedial project health and safety plan including the CAMP for my review.

Finally, the third paragraph of Section 2.1 "Base Description and History" which states that Seneca is currently used for "performing maintenance... on conventional and special weapons" is no longer relevant. Please remove the whole paragraph.

A facsimile of this letter will be sent to you today. If you have any questions, please contact me at (518) 402-9623 or by email at ajthorne@gw.dec.state.ny.us

Sincerely,

Alicia Thorne

Alicia Thorne
Bureau of Eastern Remediation Action
Division of Environmental Remediation

Encl.

cc: J. Vazquez, USEPA (w/ attach)
D. Geraghty, NYSDOH (w/ attach)
M. Peachey, NYSDEC Region 8 (w/ attach)
R. Scott, NYSDEC Region 8 (w/ attach)

New York State Department of Health
Generic Community Air Monitoring Plan

A Community Air Monitoring Plan (CAMP) requires real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the downwind perimeter of each designated work area when certain activities are in progress at contaminated sites. The CAMP is not intended for use in establishing action levels for worker respiratory protection. Rather, its intent is to provide a measure of protection for the downwind community (i.e., off-site receptors including residences and businesses and on-site workers not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of investigative and remedial work activities. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, the CAMP helps to confirm that work activities did not spread contamination off-site through the air.

The generic CAMP presented below will be sufficient to cover many, if not most, sites. Specific requirements should be reviewed for each situation in consultation with NYSDOH to ensure proper applicability. In some cases, a separate site-specific CAMP or supplement may be required. Depending upon the nature of contamination, chemical-specific monitoring with appropriately-sensitive methods may be required. Depending upon the proximity of potentially exposed individuals, more stringent monitoring or response levels than those presented below may be required. Special requirements will be necessary for work within 20 feet of potentially exposed individuals or structures and for indoor work with co-located residences or facilities. These requirements should be determined in consultation with NYSDOH.

Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs, dust, and odors at a minimum around the work areas.

Community Air Monitoring Plan

Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for volatile organic compounds (VOCs) and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary. Most sites will involve VOC and particulate monitoring; sites known to be contaminated with heavy metals alone may only require particulate monitoring. If radiological contamination is a concern, additional monitoring requirements may be necessary per consultation with appropriate NYSDEC/NYSDOH staff.

Continuous monitoring will be required for all ground intrusive activities and during the demolition of contaminated or potentially contaminated structures. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells.

Periodic monitoring for VOCs will be required during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. "Periodic" monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence.

VOC Monitoring, Response Levels, and Actions

Volatile organic compounds (VOCs) must be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a **continuous** basis or as otherwise specified. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions. The monitoring work should be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment should be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment should be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

- If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.

- If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.

- If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.

All 15-minute readings must be recorded and be available for State (DEC and DOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

Particulate Monitoring, Response Levels, and Actions

Particulate concentrations should be monitored **continuously** at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations. The particulate monitoring should be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (PM-10) and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level. The equipment must be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration should be visually assessed during all work activities.

- If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m^3) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m^3 above the upwind level and provided that no visible dust is migrating from the work area.

- If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m^3 above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m^3 of the upwind level and in preventing visible dust migration.

All readings must be recorded and be available for State (DEC and DOH) personnel to review.

June 20, 2000

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