51-24

DECISION DOCUMENT FOR THE
NON-TIME-CRITICAL REMOVAL ACTION
AT SOLID WASTE MANAGEMENT UNIT (SWMU)-63
MISCELLANEOUS COMPONENTS BURIAL SITE

SENECA ARMY DEPOT ACTIVITY (SEDA)

1. PURPOSE:

a. This decision document (DD) describes the selected non-time-critical remedial action for SWMU-63 (Defense Site Environmental Restoration Tracking System (DSERTS) Site SEAD-63), Miscellaneous Components Burial Site, at the SEDA. This action is in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA), the National Contingency Plan, the Resource Conservation and Recovery Act, and Army Regulation 200-1, as applicable, and the applicable or relevant and appropriate requirements of the State of New York.

b. The purpose of the subject remedial action at SWMU-63 is to remove military-unique items buried at the site and to mitigate the potential sources of heavy metals and radionuclides contamination through the removal of debris and soils. This will reduce the chance of further degradation of soils and groundwater at the miscellaneous component burial site (SWMU-63). The debris also includes buried drums with unknown contents. Some buried components deposited at SWMU-63 may still be classified or sensitive and will require examination by appropriate military personnel. Due to the uncertainty of the nature of the buried components and the sensitivity of the materials that may remain in the disposal area, we consider a removal action justified at this site. While removal and control of the military items buried at the site is the primary focus of the planned removal action, this action will also remove any contaminated soil that surrounds the items during the proposed excavation.

c. The SWMU-63 is located in the west-central portion of the former special weapons storage area (WSA); i.e., WSA, also known as the "Q Area" at SEDA. The SWMU-63 measures approximately 480-feet long by 300-feet wide; i.e., approximately 3.3 acres. The site is mostly undeveloped, with paved roads on the north, south, and west sides, with open grassland to the east.

d. The site was used during the 1950s and 1960s as a disposal area for classified military parts. Multiple disposal pits were excavated along a north-south line, measuring approximately 200-feet long. The individual pits were between 10- and 30-feet long with a depth most likely down to the surface of the weathered shale. The SEDA personnel have identified the types of materials disposed at this site as metal parts. The SWMU classification report states that "inert materials" were buried within the disposal pits.

e. Contaminants of primary concern at SWMU-63 include cadmium and mercury in soil. Average site-wide concentrations measured for these two metals exceed comparable levels in the SEDA-specific background data set by more than a factor of two. Results of the groundwater sampling indicate that groundwater may be impacted by gross alpha and beta radiation, iron, and manganese. Finally, shallow soils underlying the man-made drainage ditches contain elevated levels of several polynuclear aromatic hydrocarbon compounds, which exceed state criteria levels by a factor of two to three.

f. This non-time-critical removal action was selected by the Army with support from the US Environmental Protection Agency (USEPA), Region II, the New York State Department of Environmental Conservation (NYSDEC), and the New York State Department of Health.

2. SITE RISK: This decision document concentrates on the performance of a non-time-critical removal action to remove military unique hardware, buried drums, and associated soil that may be contaminated with chemicals or radionuclides that are associated with the buried military hardware and drums. Groundwater issues and remedial action for the closure of the disposal site will be covered in a separate decision document after completion of the additional groundwater monitoring. The proposed removal action is "not" intended to be the final action for SWMU-63, but an interim solution that will minimize, and possibly eliminate, future releases of chemical and radiological contaminants to the soil, groundwater, surface water, and drainage ditch soil.

3. REMEDIAL ALTERNATIVES:

a. Since there are possibly classified military components and drums with unknown contents deposited at site SWMU-63, this

removal alternative was the primary one evaluated. The primary objective of this non-time-critical removal action is to remove buried military components, debris, and surrounding soils, potentially contaminated with radionuclides. A secondary objective is to remove sediments; i.e., drainage ditch soils contaminated with semi-volatile organic compounds, which may pose a potential risk to resident ecological populations.

b. The selected alternative is for the excavation, examination, and disposal of miscellaneous military components and surrounding soil that may have been contaminated with radiological or chemical constituents that are associated with the military hardware. There will be hot spot excavation of surface soil contained in man-made drainage ditches that surround the former military component burial site to remove soil that contains semi-volatile organic compounds. The excavation, offsite disposal of debris, and onsite backfilling of soils involves the removal of approximately 4,500 cubic yards of soil and debris and approximately 40-cubic yards of sediment; i.e., shallow soil from drainage ditches. It also involves sorting of the excavated materials, offsite disposal of sorted materials, and backfilling of soils. The contractor will stockpile all soil and debris in a bermed staging area. If necessary, debris will be segregated from the soils through use of a vibratory screen. It is estimated that there is approximately 1,000 cubic yards of debris present within the disposal pits. All debris will be screened by Army personnel to determine if any parts or components are classified. Classified parts will be disposed at Army designated locations. In addition, debris will be scanned for the presence of radioisotopes. Any debris found to be radioactive during scanning or known to be a source of radioactivity will be sent to a facility authorized to accept such materials. Any debris free of radioactivity will be recycled or disposed in an industrial landfill.

c. Groundwater collected from de-watering activities during excavation will be stored in tanks onsite and analyzed for metals and radionuclides to determine if the groundwater requires treatment prior to discharge. If the discharge criteria are not met, treatment appropriate for metals or radionuclides of concern will be implemented before discharge of the water.

d. Upon completion of the removal action, the contractor will collect confirmatory soil samples to confirm that all

residual soil satisfies final status radiological survey requirements, as outlined in the Multi-Agency Radiological Survey and Site Investigation Manual (NUREG-1575, USEPA 402-R-97-016, December 1997).

e. Four new groundwater wells will be installed and the new wells, plus the three existing wells, will be sampled using low-flow, purge-and-pump techniques to reduce the levels of turbidity that are associated with the recovered samples. These samples will be analyzed for metals and radiological constituents, and the resulting data will, hopefully, demonstrate that the groundwater contamination noted during the earlier sampling event results from elevated levels of solids in the samples analyzed. Four additional annual rounds of low-flow, purge-and-pump sampling, and metal and radiological constituent analyses will be performed during the high water season. This will be done to provide additional data to indicate that the local groundwater is not being impacted by releases from the former military component burial site. Finally, 5 years of annual groundwater sampling and analyses will be completed for seven wells to ensure that contaminants associated with the military component burial site are not migrating from the site via groundwater.

f. The selected alternative provides an immediate reduction in exposure to potential contaminants that may be associated with discarded military components that are present in burial pits at SWMU-63. As some of the buried objects may still be classified, excavation will provide appropriate military personnel the opportunity to inspect recovered components immediately upon uncovering, thus allowing for classified objects to be disposed of at Army designated locations. The goal of this interim remedial measure is to remove contaminants above the New York State Chemical and Administrative's guidance memorandum values, which has been accepted by the USEPA Region II to restore the site to predisposal conditions. The alternative summarized here is described in the "Action Memorandum for the Miscellaneous Components Burial Site," dated October 2001, which should be consulted for more detailed descriptions of all the alternatives.

4. PUBLIC/COMMUNITY INVOLVEMENT: It is DOD and Army policy to involve the local community as early as possible and throughout the interim remediation process at an installation. To accomplish this, SEDA is complying with the public participation

requirements of CERCLA/SARA (Sections 113(K)(2)(A) and 117) and DOD and Army policy by advising the NYSDEC, USEPA, the Restoration Advisory Board, and Base Closure Team of the proposed action. The SEDA has a Community Relations Plan (CRP). In accordance with the CRP, SEDA placed a public notice in the Finger Lakes Times newspaper announcing the Army's intent to conduct interim remedial actions at SEAD-63 at least 30 days prior to the initiation of the proposed actions. A public availability session was conducted on 19 February 2002. We received no comments during this meeting of the public comment period. Future community involvement at the Miscellaneous Components Burial Site will consist of a public information session upon completion of the final proposed plan which will present the status of this action as it relates to the overall closure to this SWMU.

5. DECLARATION:

a. The selected interim remedy is protective of human health and the environment, attains Federal and state requirements that are applicable or relevant and appropriate to this interim remedial action, and is cost effective. This interim remedial action is not the final remedy for this SWMU. In the future, the selected final remedy will satisfy applicable or relevant and appropriate regulatory requirements for this SWMU to ensure that the remedy provides adequate treatment of the groundwater and soil for the protection of human health and the environment.

b. Because this remedy will result in hazardous substances remaining onsite above levels that allow for unlimited use and unrestricted exposure, a review will be conducted within 5 years after commencement of this non-time-critical removal action to ensure that the remedy continues to provide adequate protection of human health and the environment.

6. APPROVAL AND SIGNATURE:

a. The selected alternative remedial action is to remove and evaluate military, unique items buried at SEDA DSERTS site 63 and to mitigate the potential sources of heavy metals and radionuclides contamination. This alternative also includes the hot spot excavation of surface soils contained in man-made drainage ditches that surround SWMU-63 to remove semi-volatile organic compounds at concentrations that pose a potential risk

to the resident ecological community. Finally, 5 years of annual groundwater sampling and analyses will be completed for seven wells to ensure that contaminants associated with SWMU-63 are not migrating from the site via groundwater.

b. The cost estimate for the proposed action is $1,090,000. The installation commander approves DDs less than $2 million. For Base Realignment and Closure classified installations, the installation commander is the Headquarters, US Army Operations Support Command's Chief of Staff.

APPROVED ✓

DISAPPROVED _____

C. R. HOBBY
Colonel, GS
Chief of Staff

11 JUN 2002

********** -COMM.JOURNAL- ********** DATE JUN-25-2002 ***** TIME 10:39 *** P.01

MODE = MEMORY TRANSMISSION START=JUN-25 10:29 END=JUN-25 10:39

FILE NO.= 172

NO.	COM	ABBR/NTWK	STATION NAME/ TELEPHONE NO.	PAGES	PRG.NO.	PROGRAM NAME
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OPTIONAL FORM 99 (7-90)

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