

File
EECA
Vto

May 24, 2005

Commander
Seneca Army Depot Activity (SEDA)
Building 123
Commander's Representative
ATTN: SMASE-BEC (Mr. Stephen Absolom)
Romulus, NY 14541

SUBJECT: Submittal of the Final Ordnance and Explosive Action Memorandums, Seneca Army Depot, Romulus, Seneca County, New York, Task Order 52, Contract DACA87-95-D-0018

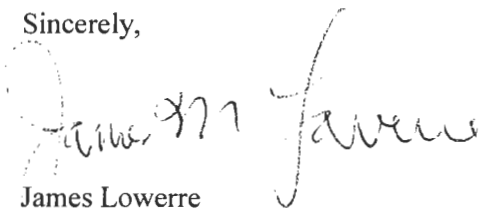
Dear Mr. Absolom:

Parsons is pleased to submit the Final Ordnance and Explosives Action Memorandums for various sites within the Seneca Army Depot Activity located at Romulus, New York.

These Final Action Memorandums include revisions in response to SEDA comments made via conference call May 11, 2005.

Parsons appreciates the opportunity to provide you with these memorandums. Should you have any questions please feel free to call me at (617) 449-1559.

Sincerely,



James Lowerre
Project Manager

cc: Mr. C. Smith, CEHNC-PM-EO
Mr. S. Bradley, CEHNC-IS-FS
Mr. R. Battaglia, USACE, NY District

K. Hoddinott, USACHPPM
C. Boes, AEC





DEPARTMENT OF THE ARMY

SENECA ARMY DEPOT ACTIVITY
5786 STATE RTE 96, P.O. BOX 9
ROMULUS, NEW YORK 14541-0009



January 26, 2004

REPLY TO
ATTENTION OF

Installation Management

Mr. Julio Vazquez
U.S. Environmental Protection Agency
Emergency & Remedial Response Division
290 Broadway
18th Floor, E-3
New York, New York 10007-1866

SUBJECT: Seneca Army Depot Activity; Response to Comments for
the Draft Ordnance and Explosives Engineering
Evaluation\Cost Analysis

Dear Mr. Vazquez:

In reference to your comments on the OE EECA dated February 21,
2003, please find enclosed the Army's responses.

The Army has integrated these responses into the Final document
and intends to issue the Final document in the next 15 days.

If you have any questions, please call me at 607-869-1309.

Sincerely,

Stephen Absolom
Installation Manager/
BRAC Environmental Coordinator

cc: R. Battaglia, USACE, NY District
C. Smith, CEHNC
J. Lowerre, Parsons
J. White, NYSDEC

FAX HEADER

SENECA ARMY DEPOT ACTIVITY
CARETAKER FORCE
PO BOX 9
ROMULUS, NY 14541

TO: Julio VAZQUEZ
USEPA
phone: _____
fax: _____

From: Stephen M. Absolom
Commander's Representative
phone: (607) 869-1309
fax: (607) 869-1362
email: absoloms@seneca-hp.army.mil

Regarding: Julio - Response to Comment Cover
letter as indicated in my email

Stephen M. Absolom

F. I. E. SEAD
Delisting

[Federal Register: April 28, 2008 (Volume 73, Number 82)]
[Rules and Regulations]
[Page 22828-22831]
From the Federal Register Online via GPO Access [wais.access.gpo.gov]
[DOCID:fr28ap08-12]

ENVIRONMENTAL PROTECTION AGENCY

40 CFR Part 300

[EPA-HQ-SFUND-1990-0011; FRL-8558-5]

National Oil and Hazardous Substances Pollution Contingency Plan
National Priorities List

AGENCY: Environmental Protection Agency.

ACTION: Notice of partial deletion of the Seneca Army Depot Activity
Superfund Site from the National Priorities List.-----
SUMMARY: The United States Environmental Protection Agency (EPA) Region 2 announces the deletion from the National Priorities List (NPL) of the following two specific parcels of real property located at the Seneca Army Depot Activity (SEDA) Superfund Site (Site), Romulus, New York: Real Estate Parcel 1, except for a portion of this parcel known as SEAD-24; and the entirety of Real Estate Parcel 2. The NPL, promulgated pursuant to section 105 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended, is found at Appendix B of 40 CFR part 300, which is an appendix to the National

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Oil and Hazardous Substances Pollution Contingency Plan (NCP). This partial deletion of SEDA parcels is done in accordance with 40 CFR 300.425(e) and the Notice of Policy Change: Partial Deletion of Sites Listed on the National Priorities List, 60 FR 55466 (Nov. 1, 1996). This deletion pertains to all media (surface soils, subsurface soils, structures, surface water, and ground water) within Parcel 1, excluding the SEAD-24 portion of Parcel 1, and Parcel 2.

Parcel 1, also known as the Empire Biofuels Redevelopment area, is located midway on the western edge of SEDA. Most of this Parcel did not require remedial investigations under CERCLA. The two areas within Parcel 1 that were investigated under CERCLA are known as SEAD-58 and SEAD-24. SEAD-58 includes two debris disposal areas that have been found to require no active remediation under CERCLA. SEAD-24 is a two-acre area which underwent a soil removal action in 2004 and is awaiting a determination by EPA that all appropriate response actions have been implemented. SEAD-24 is not included in this deletion and will remain on the NPL.

Parcel 2, also known as the Seneca County Public Safety Building and Jail area, is located along the eastern perimeter of SEDA in the southeast quadrant. The parcel encompasses two sub-parcel areas designated as SEAD-50 and SEAD-54, both of which have been remediated. Subsequent sampling of these two areas confirmed that all appropriate CERCLA response actions were performed. However, SEAD-50 and 54 are subject to institutional controls in the form of deed restrictions which prohibit residential use and use of the groundwater as they are part of the encompassing Planned Industrial Development area.

The rest of SEDA will remain on the NPL, and response activities will continue at the remaining areas determined to be in need of response actions. The EPA and the State of New York, through the New York State Department of Environmental Conservation, have determined that all appropriate response actions under CERCLA have been completed at the parcels proposed for deletion. However, the deletion of these parcels does not preclude future actions under Superfund.

DATES: This rule will be effective April 28, 2008.

ADDRESSES: EPA has established a docket for this action under Docket Identification No. EPA-HQ-SFUND-1990-0011. All documents in the docket are listed on the <http://www.regulations.gov> Web site. Although listed in the index, some information is not publicly available, i.e., confidential business information or other information whose disclosure is restricted by statute. Certain other material, such as copyrighted material, is not placed on the Internet and will be publicly available only in hard copy form. Publicly available docket materials are

available either electronically through <http://www.regulations.gov> or in hard copy at the site information repositories. Locations, contacts, phone numbers and viewing hours are:

Regional Repository, U.S. EPA Region 2 Records Center, 290 Broadway, 18th Floor, New York, NY 10007-1866, Hours: 9 a.m. to 5 p.m.--Monday through Friday. (212) 637-4308.

Local Site Repository, Seneca Army Depot Activity, 5786 State Route 96, Building 123, Romulus, NY 14541, Hours: 9 a.m. to 3:30 p.m.--Monday through Thursday. (607) 869-1494.

FOR FURTHER INFORMATION CONTACT: Mr. Julio F. Vazquez, Remedial Project Manager, U.S. EPA Region 2, 290 Broadway, 18th Floor, New York, NY 10007-1866, (212) 637-4323.

SUPPLEMENTARY INFORMATION: The parcels to be deleted from the NPL are Parcel 1, excluding SEAD-24, and the entirety of Parcel 2 of SEDA. A notice of intent for partial deletion for this site was published in the Federal Register on September 11, 2007.

The closing date for comments on the notice of intent for partial deletion was October 20, 2007. Eleven public comments were received, and all the comments relate to the construction of an ethanol plant on Parcel 1. This issue is not related to our finding that Parcel 1, excluding SEAD-24, and Parcel 2 do not present any threat to human health or the environment. A responsiveness summary was prepared and placed in both the docket, EPA-HQ-SFUND-1990-0011, on <http://www.regulations.gov> and in the local repositories listed above.

EPA identifies sites that may present a significant risk to public health, welfare and the environment. The NPL is a list of releases or threatened releases which EPA has determined to be a priority. Deletion of a portion of a site from the NPL does not preclude further remedial action. If a significant release occurs at a site, or any portion thereof, which has been deleted from the NPL, the deleted portions of the site may be restored to the NPL without application of the Hazard Ranking System. Deletion of any portion of a site from the NPL does not affect responsible party liability for further remedial actions, in the unlikely event that future conditions warrant such actions.

Responsiveness Summary

Introduction

A Notice of Intent of Partial Deletion for the Seneca Army Depot Activity (SEDA) Superfund Site was published in the Federal Register on September 11, 2007 (72 FR 51758-51762). The publication of this notice was intended to inform the public that EPA planned to delete two specific parcels from the National Priorities List: Real Estate Parcel 1, except for a portion of that parcel known as SEAD-24; and the entirety of Real Estate Parcel 2. The notice also provided a 30-day public comment period on the proposed partial deletion. The closing date for comments on the Notice of Intent to Partially Delete was October 11, 2007. Eleven written comments were received (these comments are available in the Information Repositories); therefore EPA has prepared this Responsiveness Summary. In addition, all public comments were considered in EPA's final decision to delete these parcels (as identified above) of the Site from the NPL.

Responsiveness Summary

This Responsiveness Summary has been prepared to provide responses to comments submitted to EPA during the 30-day public comment period regarding the Notice of Intent to Partially Delete (72 FR 51762) a portion of Real Estate Parcel 1 and Real Estate Parcel 2 of the SEDA. The original comments are summarized below and available at <http://www.regulations.gov>, Docket ID No. EPA-HQ-SFUND-1990-0001, with the support materials under document type "public submissions" and at the information repositories at the following addresses: U.S. EPA Region 2 Records Center, 290 Broadway--18th Floor, New York, NY 10007-1866, Hours: 9 a.m. to 5 p.m.--Monday through Friday, (212) 637-4308; and Seneca Army Depot Activity, 5786 State Route 96, Building 123, Romulus, NY 14541, Hours: 9 a.m. to 3:30 p.m.--Monday through Thursday, (607) 869-1494.

Summary of Comment from Mary Anne Kowalski: The commenter is opposed to the deletion of Parcel 1 because this land is proposed to be used for an ethanol plant that is proceeding without an environmental impact statement, expressing the view that without an environmental impact statement the residents of Seneca

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County have no way of determining the impact of this construction on

the hazardous materials already there. This deletion action would remove another impediment to construction.

Response: In the summer of 2003, EPA concurred with the Finding of Suitability to Transfer (FOST) for the Conservation/Recreation Area. This Area included Parcel 1, except for SEAD-58 and SEAD-24. In 2006, EPA determined that no action under CERCLA was necessary for SEAD-58. Therefore, EPA's determination is that soils in the Parcel 1 area proposed for deletion do not present an unacceptable threat to human health or the environment. Note that a delisting action has no significant effect upon redevelopment activities. An ethanol plant may or may not be constructed regardless of whether the parcel remains listed on the NPL.

Summary of Comment from Sandra L. Dranias: The commenter expressed concern regarding the potential health hazards that will be unleashed by the premature disturbance of these heavily contaminated soils in the parcels being proposed for deletion. Documents list hazardous materials removed from the site listed as SEAD-24. SEAD-24 is located directly nearby the proposed location of the ethanol refinery. None of the soil surrounding SEAD-24 was ever tested to see if any of these chemicals leached beyond the borders drawn by the Government.

Response: SEAD-24, the abandoned powder burning pit, underwent a time-critical removal action between 2004 and 2006. EPA has not made its final determination on the ultimate adequacy of this action. Therefore, this area is retained by the Army until a final determination is made whether this area no longer presents a significant threat to human health or the environment. SEAD-24 is not the subject of this de-listing from the NPL.

Summary of Comment from Tom and Nancy Hooser: The commenters noted that, if their information is correct, this deletion means that no additional cleanup is necessary at the parcel where an ethanol plant is to be built. We have been provided no environmental impact study, and the prospect of what could happen down the line is enormous. The parcel in question needs to be thoroughly cleaned up before anything as hazardous as an ethanol plant is built in our backyards.

Response: It is correct that it has been determined that no additional action is deemed necessary at both Parcel 1, except SEAD-24 (which is not being deleted) and Parcel 2. They do not present an unacceptable threat to human health or the environment. Parcel 1, SEAD-58, after remedial investigation activities, was found to require no active remediation under CERCLA. Parcel 2, including SEAD-50 and SEAD-54, underwent remediation.

Summary of Comment from Bobbi Clifford: The commenter pointed out that 8,300 acres were identified for conservation/recreation uses according to the Preferred Land Use Plan/Seneca Army Depot Reuse Plan. On page 21-7, under 9(c), Environmental: the State criteria require that a "proposed site not contain any wetlands." In the February, 1998 report of the Administrative Final Environmental Impact Statement, the SEDA Wetlands, Fish and Wildlife Plan identifies "87 distinct wetlands on the depot lands." In the Environmental Assessment Form of 11/06 for the ethanol/biomass project, Malcolm Pirnie identified the following: "sixteen wetlands and eight streams were delineated for the ethanol/biomass project site, with the main site having eleven wetlands and two streams. Within the main site, a large wetland system is approximately 60 acres in size." This comment implies that redevelopment of the property proposed for deletion may negatively impact wetlands.

Additionally, the commenter pointed out that during the 1950s and 1960s, classified metallic parts were buried at the Miscellaneous Components Burial Site. Because the documentation of the disposal is considered classified by the Army, the exact nature of the buried material has not been disclosed. Results of site investigations indicate that previous activities may have adversely impacted soil and groundwater. The commenter implies that contamination may exist at the parcel proposed for deletion could pose a threat to human health and the environment.

Response: In 2003, EPA concurred with the Finding of Suitability to Transfer for the Conservation/Recreation Area. This document served as the basis for the transfer of the 8,300 acre parcel. EPA concurred with this transfer because it had been determined that no further remediation was warranted at this parcel, and none of the investigation performed at this area identified contaminants that would present an unacceptable risk under any land use scenario. The wetlands issue is not related to this de-listing action. EPA's role to oversee the suitability of the property to be de-listed does not include approving any specific redevelopment.

There are many other areas within SEDA that are undergoing investigation and other CERCLA-related efforts, including the Miscellaneous Components Burial Site. These areas are under the control of the Army and will remain on the NPL until all appropriate response actions are implemented or it is determined that the areas pose no significant threat to public health or the environment.

Summary of Comment from John Ghidiu: This commenter objected to the delisting because it was his understanding that solid waste and incinerator ash were disposed of intermittently for 30 years between 1941 and 1979, that radioactive materials were stored in several of the igloos on the south end of SEDA, and herbicides and pesticides were stored there as well. Demilitarization of munitions had also been conducted for forty years by open burning of fuses, projectiles, explosives and propellants directly upon the ground surface. Burial of laboratory wastes occurred between 1940 and 1980 at the Radioactive Waste Burial Sites and the Pitchblende Storage Igloos.

Response: The areas to be de-listed are not included in any of the areas of concern identified by the commenter. Since 1984, when SEDA was proposed to be included on the NPL, EPA, the Army and the State of New York have been working on various areas of concern including the Ash Landfill (SEAD-03, 06, 08, 14 and 15), the Pitchblende Ore Storage (SEAD-48), and the Radioactive Burial Sites (SEAD-12). Although some of the work is still in progress at these Army-retained areas, the parcels proposed to be de-listed from the NPL are areas where either all appropriate response actions have been implemented or there is no significant threat to public health or the environment.

List of Subjects in 40 CFR Part 300

Environmental protection, Air pollution control, Chemicals, Hazardous waste, Hazardous substances, Intergovernmental relations, Penalties, Reporting and recordkeeping requirements, Superfund, Water pollution control, Water supply.

Dated: March 14, 2008.
Alan J. Steinberg,
Regional Administrator, Region 2.

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For the reasons set forth in the preamble, 40 part 300 is amended as follows.

PART 300--[AMENDED]

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1. The authority citation for part 300 continues to read as follows:

Authority: 33 U.S.C. 1321(c)(2); 42 U.S.C. 9601-9657; E.O. 12777, 56 FR 54757, 3 CFR 1991 Comp., p. 351; E.O. 12580, 52 FR 2923, 3 CFR 1987 Comp., p. 193.

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Appendix B--[Amended]

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2. Table 2 of appendix B to part 300 is amended by revising the entry under New York for ``Seneca Army Depot'' to read as follows:

Appendix B to Part 300--National Priorities List

* * * * *

Table 2.--Federal Facilities Section

St	Site name	City/County	Notes \a\
NY.....	Seneca Army Depot.....	Romulus.....	P

(a) * * *
P = Sites with partial deletion(s).

[FR Doc. E8-9077 Filed 4-25-08; 8:45 am]

BILLING CODE 6560-50-P

MODE = MEMORY TRANSMISSION START=FEB-24 14:50 END=FEB-24 14:56

FILE NO. = 093

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002	OK	<07>	COE HEALY	010/010		

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EE/CA*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 2
 290 BROADWAY
 NEW YORK, NY 10007-1868

FEB 21 2003

BRAC Environmental Coordinator
 Seneca Army Depot Activity
 Attn: Stephen Absolom
 PO Box 9
 5786 State Route 96
 Romulus, NY 14541-0009

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL		# of pages ▶ 10
To <i>F. Healy K. Healy</i>	From <i>S. Absolom</i>	
Dept./Agency	Phone # <i>607 269 1307</i>	
Fax #	Fax #	

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

Re: *Draft OE EE/CA Response to Comm
 Seneca Army Depot Activity, Romulus, New York*

Dear Mr. Absolom:

This is in reference to the subject document received by this office on December 17, 2002. Please note that although this document was provided to us as an "informational" copy, Seneca is both an NPL and a "Fast Track" BRAC site within the purview of EPA oversight. Furthermore, an absence of regulatory input runs a potential risk that DoD may develop remedies that are not protective or that DoD will inappropriately conclude that no further action is required. Surveys at Closed, Transferred and Transferring (CTT) ranges strongly suggest that this already occurs, creating significant problems when critical DoD decisions must be made and regulatory concurrence sought. Once DoD selects a remedy that requires regulatory concurrence, or decides to transfer property, or delist a site from the National Priorities List, they may find themselves without the regulatory support needed to complete these actions. This has certainly been the case at many sites containing traditional hazardous substances where DoD has determined the site does not require further action, and site closeouts have been delayed because of the lack of regulatory concurrence.

Although EPA continues to defer Ordnance Explosives (OE) safety issues to the DoD, on March 7, 2002 an Interim Final UXO Management Principles was jointly developed by DoD and EPA. This guidance requires that the criteria and process of selection of the most appropriate and effective technologies to characterize each CTT military range should be discussed with appropriate EPA, other Federal State, or Tribal agencies, local officials, and the public prior to



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

FEB 21 2003

BRAC Environmental Coordinator

Seneca Army Depot Activity

Attn: Stephen Absolom

PO Box 9

5786 State Route 96

Romulus, NY 14541-0009

Re: *Draft OE EE/CA Response to Comments*
Seneca Army Depot Activity, Romulus, New York

Dear Mr. Absolom:

This is in reference to the subject document received by this office on December 17, 2002. Please note that although this document was provided to us as an "informational" copy, Seneca is both an NPL and a "Fast Track" BRAC site within the purview of EPA oversight. Furthermore, an absence of regulatory input runs a potential risk that DoD may develop remedies that are not protective or that DoD will inappropriately conclude that no further action is required. Surveys at Closed, Transferred and Transferring (CTT) ranges strongly suggest that this already occurs, creating significant problems when critical DoD decisions must be made and regulatory concurrence sought. Once DoD selects a remedy that requires regulatory concurrence, or decides to transfer property, or delist a site from the National Priorities List, they may find themselves without the regulatory support needed to complete these actions. This has certainly been the case at many sites containing traditional hazardous substances where DoD has determined the site does not require further action, and site closeouts have been delayed because of the lack of regulatory concurrence.

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the selection of a technology. Therefore, I emphasize the importance of addressing our comments below. Many of the Army's responses have been found to be inadequate or non-responsive.

GENERAL COMMENTS

1. Response Evaluation. Partially Responsive.

The purpose of the initial OE investigation is to determine the boundaries of the area. After this has been done, sampling for the residues can be accomplished in accordance with both:

- EPA OSWER 505 B-01-003 (2002). Interim Final Handbook on the Management of Ordnance and Explosives on Closed, Transferred and Transferring Rangers and Other Sites
- ERDC/CRREL TR-02-1 (2002). Guide for the Characterization of Sites Contaminated with Energetic Material.

The earlier studies by DoD found residue contamination at all sampled OB/OD sites and currently at all OB/OD sites there are varying amounts of residues concentrations found.

The response in reference to the 10% was confusing since the initial comment was for the document to clarify that explosive soil is greater than 10% and explosives soil is equal or less than 10%.

2. Response Evaluation. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

3. Response Evaluation. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

4. Response Evaluation. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

5. Response Evaluation. Non-responsive.

There are underwater technologies available for detecting ordnance, and these should be evaluated for the area.

6. Response Evaluation.

Acceptable with the caveat that the Action Memorandum be provided for review.

SPECIFIC COMMENTS

1. Specific Comment #1: Regarding inclusion of a CSM in the EECA. Not Responsive.

Conceptual Site Models are used from the earliest part of a project and then throughout the life cycle of the project to guide decision makers and design personnel of data needs. COE-HN has produced a draft CSM document that was released in July 02. Reference should be made to the COE authors:

Johnette Shockley	U.S. Army Corps of Engineers HTRW-CX 12565 West Center Road Omaha, NE 68144	402-697-2558	402-697-2639	johnette.c.shockley@usace.army.mil
Heidi Novotny	U.S. Army Corps of Engineers HTRW-CX 12565 West Center Road Omaha, NE 68144	402-697-2626	402-697-2613	Heidi.L.novotny@usace.army.mil

2. Specific Comment #2: Regarding location of burial areas of 40mm rifle-fired grenades. Not Evaluated.

Referenced document has to be verified.

3. Specific Comment #3: Regarding location of the area occupied by EOD Area #2. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

4. Specific Comment #4: Regarding appropriate use of the term No Defense Action Indicated (NDAI).

The term NDAI is only under policy documentation in relation to COE-run FUDS sites. DDESB accepts this term in relation to FUDS, and is working within the Munition Response Committee for more widespread acceptance, but to date has not produced a guidance document.

5. Specific Comment #5: Regarding inclusion of findings of removal actions in EECA. Partial Responsive.

The response states that clarifications have been added to the text but a revised document has not been included.

6. Specific Comment #6: Regarding inclusion of meandering path survey methodology. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not yet been provided.

7. Specific Comment #7: Regarding additional information related to geophysical investigations. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not yet been provided.

8. Specific Comment #8: Regarding possibility of multiple sources of anomalies. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included. Additionally, the rationale should be provided for the 10% QC sampling since this is not in accordance with standard QA/QC methodologies (e.g., MIL STD 1916-Acceptance Sampling).

9. Specific Comment #9: Regarding discussion of bomb bodies recovered from SEAD-45.

Since the revised text has been added, the document needs to undergo a final review.

Additionally, final disposition of ordnance related items are tightly controlled, because without proper certification and disposal, these items may show up at some future date. The statement that all items were inert cannot be verified. If all items had been verified as inert, they should have been handled under DRMO guidance as opposed to remain in place.

10. Specific Comment #10: Regarding investigation of the ordnance disposal pit at EOD Area #3. Not Evaluated.

The response states that clarifications have been added to the text, but a revised document has not been included.

11. Specific Comment #11: Regarding actions completed on excavated soil at SEAD-44A and depths of these excavations. Not Evaluated.

The response states that clarifications have been added to the text, but a revised document has not been included.

12. Specific Comment #12: Regarding investigation of berm into which rockets were fired. Not Evaluated.

The response states that clarifications have been added to the text, but a revised document has not been included.

13. Specific Comment #13: Regarding shot holes that were investigated at SEAD-57. Not Evaluated.

The response states that clarifications have been added to the text, but a revised document has not been included.

14. Specific Comment #14: Regarding estimates of buried material present at SEAD Response Evaluation. Non-Responsive.

This section needs to provide the rationale for the geophysical picks since each different type ordnance items shows a different response.

15. Specific Comment #15: Regarding extent of investigation at Indian Creek Burial Area. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

16. Specific Comment #16: Regarding nature of anomalies present at SEAD-17. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

17. Regarding nature of anomalies present at EOD Area #2. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

18. Specific Comment #18: Regarding characterization at southern boundary at SEAD. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

19. Specific Comment #19: Regarding characterization of northern and eastern boundaries of grenade range. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

20. Specific Comment #20: Regarding complete length of the meandering path investigation and discussion of anomalies in two grids at SEAD-57. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

21. Specific Comment #21: Regarding justification for 1,800 foot radius around demolition berm at SEAD-45. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

22. Specific Comment #22: Regarding language used to describe risk assessment completed in the EE/CA. Non-Responsive.

While it is true that COE has proposed this methodology it, it has not been reviewed nor accepted by EPA. In particular, the use of UXO density as a risk assessment factor, and the method used to determine this density is at issue. See evaluation of response to Specific Comment 24.

23. Specific Comment #23: Regarding use of terms UXO and OE and long-term issues related to UXO. Partially Responsive.

There should be a link to another document that will discuss the assessment of OE residues (see evaluation of response to General Comment 1).

24. Specific Comment #24: Regarding methodology used to calculate UXO density risk assessment factor. Non-Responsive.

The statement made as a response is not accurate. The USACE methodologies that are used have been evaluated and are not reliable (see U.S. EPA 2000, Evaluation of U.S. Army corps of Engineers Statistical UXO Sampling and characterization Methodologies, EPA National Exposure Research Laboratory (NERL), Las Vegas, NV 89014. July). This evaluation has shown that there are many problems with the methodology.

25. Specific Comment #25: Regarding revision and expansion of OE sensitivity definitions. Non-Responsive.

See comment evaluation for #22.

26. Specific Comment #26: Regarding how accessibility factors were determined. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

27. Specific Comment #27: Regarding definition of fuzing types and sensitivities recovered from UXO at all AOIs. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

28. Specific Comment #28: Regarding inclusion of a geophysical prove-out and justification of selected geophysical instrument. Non-Responsive.

See comment evaluation for #22.

29. Specific Comment #29: Regarding definition of the types of fuzing recovered at SEAD-44A. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

30. Specific Comment #30: Regarding summary of overall risk versus qualitative risk assessment. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

31. Specific Comment #31: Regarding inclusion of the prison as a stakeholder for parcels adjacent to SEAD-43 and SEAD-44A. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

32. Specific Comment #32: Regarding scope of response action objectives. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

33. Specific Comment #33: Regarding inclusion of an ordnance-free “buffer” around each AOI. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

34. Specific Comment #34: Regarding determination of clearance depth for each AOI and selection of appropriate geophysical instrument. Partially Responsive.

The issue of this comment is that the clearance depth should be based on the future use of the area, and that depth should be explicitly specified when describing the response action for each area.

35. Specific Comment #35: Regarding areas or igloos that may require additional OE/UXO investigation or re-categorization. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included. Additionally, please include documentation that the explosive certification of the igloos met the requirements of TM 700-4, as supplemented by the Army’s Material Command requirements.

36. Specific Comment #36: Regarding which grids will be cleared during response actions and respective clearance depths at each. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

37. Specific Comment #37: Regarding definition of institutional controls and potential for controls to be implemented at other AOIs. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

38. Specific Comment #38: Regarding clearance areas and costs at SEAD-16. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

39. Specific Comment #39: Regarding depth of clearance of OE in the grenade range. Partially Responsive.

The text should clearly state the maximum depths the OE items were found.

40. Specific Comment #40: Regarding inclusion of miscellaneous clearance areas at SEAD-57 on a figure. Not Evaluated.

The response states that clarifications have been added to the text but a revised document has not been included.

41. Specific Comment #41: Regarding inclusion and exclusion of anomalies from Appendix C. Non-Responsive.

The purpose of providing a complete listing of all items is to assure that the required Archival Records Files (ARF) are complete, as well as documenting that all identified anomalies were adequately investigated. In addition, non-ordnance related finds during an investigation do provide important information about past use of an area. Documentation that an area was not used for ordnance-related activities provides a basis for any no further action recommendations.

A facsimile of this letter will be sent to you today. If you have any questions, please call me at (212) 637-4323.

Sincerely yours,

A handwritten signature in blue ink that reads "Julio E. Vazquez". The signature is fluid and cursive, with the first name "Julio" and last name "Vazquez" clearly legible.

Julio E. Vazquez, RPM
Federal Facilities Section

cc: A. Thorne, NYSDEC
C. Bethoney, NYSDOH
R. Scott, NYSDEC-Avon
K. Healy, USACE-HD
T. Heino, Parsons ES
E. Kashdan, GF

PARSONS

100 Summer Street • Boston, Massachusetts 02110 • (617) 457-7900 • Fax: (617) 457-7979 • www.parsons.com

January 15, 2003

Mr. Robert Nore
CEHNC-PM-EO
U.S. Army Corps of Engineers
Engineering and Support Center, Huntsville
4820 University Square
Huntsville, AL 35816-1822

SUBJECT: Period 39 Monthly Progress Report for OE-EE/CA Activities at the Seneca Army Depot Activity (SEDA) under Contract DACA87-95-D-0018, Task Order 52

Dear Mr. Nore:

Parsons is pleased to submit this Progress Report for the period of November 30, 2002 through December 31, 2002 for the above referenced contract and delivery order.

Work Conducted:

To simplify the tracking of costs, Parsons has divided the 21 tasks under the Scope of Work (SOW) into three (3) Work Breakdown Structures (WBS) as follows:

- WBS 01000, fieldwork tasks (In-scope tasks 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, and out-of-scope tasks 14.1, 14.2, and 14.3)
- WBS 02000, report writing (Tasks 3, 13, 14, 15, 16, 17, and 18)
- WBS 03000, project and program management tasks (Tasks 19 and 20).

WBS 01000

All of the field work tasks have been completed.

WBS 02000

Final responses to EPA comments on the Draft OE EE/CA Report and a cover letter were forwarded to Seneca Army Depot's Steve Absolom by Randy W Battaglia via e-mail 12/10/02 for review. *Task 18, Prepare Action Memorandum*, remains to be completed.

WBS 03000

Task 20, Meetings and Project Management. Funds will need to be reallocated again to cover on going PM costs. A funding reallocation request will follow this report in a separate letter. Period of Performance extension is under way at the program level. *Task 18, Prepare Action Memorandum*, remains to be completed.



Project Activities for Next Period and beyond:

Parsons will produce and issue the Final OE EE/CA Report as directed by our Army Huntsville Project manger. This is anticipated to occur once EPA reviews the final response to EPA comments and appropriate action is taken or the waiting period expires. The development of an *Action Memorandum* detailing how the OE EE/CA findings will be addressed by the Army and any associated public presentations remain to be completed pending Army decisions on what action to take.

Contract Sufficiency:

The over all contract value is sufficient at this time. Parsons will work with the Army to reallocate funds from WBS 02000 to WBS 03000 to fund the extended project management requirements. The project is now 21 months beyond the 18 originally scoped. Table 1 below reflects the current funding allocations.

Table 1

WBS	Budget less Fee	Percent Complete	Spent to Date	Percent Spent
01000	\$ 1,350,563	100	\$1,343,222	99
02000	\$ 212,905	90	\$106,509	50
03000	\$ 157,292	100	\$158,118	101
Total	\$ 1,720,760	98	\$1,607,848	93

If you have any questions or comments regarding this progress report, please contact me at (781) 401-2560.

Sincerely,



James Lowerre
Project Manager

- cc: Mr. Stephen Absolom, Seneca Army Depot Activity
- Mr. Randall Battaglia, CENAN
- Mr. Marshall Greene, CEHNC
- Mr. Kenneth Stockwell, Parsons, Atlanta
- Mr. John Baptiste, Parsons, Boston

SWG

May 7, 2003

Mr. Chason Smith
CEHNC-PM-EO
U.S. Army Corps of Engineers
Engineering and Support Center, Huntsville
4820 University Square
Huntsville, Alabama 35816-1822

**RE: Period 43 Monthly Progress Report for OE-EE/CA Activities
Seneca Army Depot Activity (SEDA) under Contract DACA87-95-D-0018, Task Order 52**

Dear Mr. Smith:

Parsons is pleased to submit this Progress Report for the period of March 30, 2003 through April 30, 2003 for the above referenced contract and delivery order.

Work Conducted

To simplify the tracking of costs, Parsons has divided the 21 tasks under the Scope of Work (SOW) into three (3) Work Breakdown Structures (WBS) as follows.

WBS 01000: Fieldwork Tasks (In-scope tasks 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, and out-of-scope tasks 14.1, 14.2, and 14.3)

WBS 02000: Report Writing (Tasks 3, 13, 14, 15, 16, 17, and 18)

WBS 03000: Project and Program Management Tasks (Tasks 19 and 20).

WBS 01000

All of the fieldwork tasks have been completed.

WBS 02000

EPA comments were received in a letter dated February 21, 2003. In a conference call between the USACE Huntsville and Parsons Project Managers on February 27, 2003, it was agreed USACE Huntsville would define the Army's position on the issues of using the NDIA term, project use of grid stats, and the requirement for site models. Parsons will prepare the response to the EPA, making any required changes in the EE/CA report, and issue the EE/CA report as final. *Task 18, Prepare Action Memorandum*, remains to be completed.

WBS 03000

Task 20, Meetings and Project Management. Project maintenance functions continue. Period of Performance extension through September 2003 was granted at the program level. Funds will need to be reallocated again to cover on going PM costs. A funding reallocation request will be prepared once the Army responses are received and the level of effort is estimated to complete the project. *Task 18, Prepare Action Memorandum*, remains to be completed.



Project Activities for Next Period and Beyond

Pending Army input on the issues of using the NDIA term, project use of grid stats, and the requirement for site models, Parsons will produce and issue the Final OE EE/CA. The development of an *Action Memorandum* detailing how the OE EE/CA findings will be addressed by the Army and any associated public presentations remain to be completed pending Army decisions on what action to take.

Contract Sufficiency

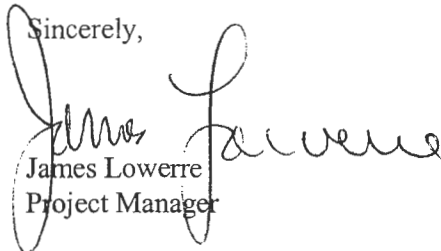
The over all contract value is sufficient at this time. Parsons will work with the Army to reallocate funds from WBS 02000 to WBS 03000 to fund the extended project management requirements. The project is now 24 months beyond the 18 originally scoped. Table 1 below reflects the current funding allocations.

Table 1: Current Funding Allocations

WBS	Budget less Fee	Percent Complete	Spent to Date	Percent Spent
01000	\$ 1,350,563	100	\$1,343,222	99
02000	\$ 212,905	90	\$113,830	53
03000	\$ 157,292	100	\$158,506	101
Total	\$ 1,720,760	98	\$1,615,558	94

If you have any questions or comments regarding this progress report, please contact me at 617-457-7859.

Sincerely,



James Lowerre
Project Manager

- cc: Mr. Stephen Absolom, Seneca Army Depot Activity
- Mr. Randall Battaglia, CENAN
- Mr. Marshall Greene, CEHNC
- Mr. Joe Cudney, Parsons, Atlanta
- Mr. John Baptiste, Parsons, Boston

File
OE
EE/CA

November 6, 2002

Mr. Robert Nore
CEHNC-PM-EO
U.S. Army Corps of Engineers
Engineering and Support Center, Huntsville
4820 University Square
Huntsville, AL 35816-1822

SUBJECT: Period 37 Monthly Progress Report for OE-EE/CA Activities at the Seneca Army Depot Activity (SEDA) under Contract DACA87-95-D-0018, Task Order 52

Dear Mr. Nore:

Parsons is pleased to submit Progress Report Number 37 for the period of September 30, 2002 through October 31, 2002 for the above referenced contract and delivery order.

Work Conducted:

To simplify the tracking of costs, Parsons has divided the 21 tasks under the Scope of Work (SOW) into three (3) Work Breakdown Structures (WBS) as follows:

- WBS 01000, fieldwork tasks (In-scope tasks 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, and out-of-scope tasks 14.1, 14.2, and 14.3)
- WBS 02000, report writing (Tasks 3, 13, 14, 15, 16, 17, and 18)
- WBS 03000, project and program management tasks (Tasks 19 and 20).

WBS 01000

All of the field work tasks have been completed.

WBS 02000

Draft responses to EPA comments on the Draft OE EE/CA Report were completed and forwarded to Seneca Army Depot's Steve Absolom and Randy W Battaglia via e-mail 10/3/02 for discussion, modification, approval and forwarding to EPA. Disposition of EPA's comments was discussed on two Seneca Program conference calls during October. A copy of comments forwarded to Steve Absolom by Randy Battaglia was received 10/30/02. *Task 18, Prepare Action Memorandum*, remains to be completed.

WBS 03000

Task 20, Meetings and Project Management. The submitted request for the reallocation of funds was discussed 10/29/02. We would also like to discuss an extension of the period-of-performance that nominally ended April 2001.



Project Activities for Next Period and beyond:

Parsons will review our draft response to EPA comments with Seneca Army Depot, reconcile Army comments, and issue our responses back to Seneca Army depot for forwarding to the EPA. Once any issues with the response to EPA comments are resolved, Parsons will issue the Final OE EE/CA Report. The development of an Action Memorandum detailing how the EE/CA findings will be addressed by the Army remains to be completed pending Army decisions on what action to take.

Contract Sufficiency:

The over all contract value is sufficient at this time. Parsons has worked with the Army to reallocate funds from WBS 02000 to WBS' 01000 and 03000. The reallocated funds are to pay for unanticipated field effort and Project Management requirements associated with the schedule being extended beyond the 18 months originally scoped. Pending approval of our reallocation request, **Table 1** below still reflects current funding allocations. **Table 2** reflects the requested funding reallocations.

Table 1

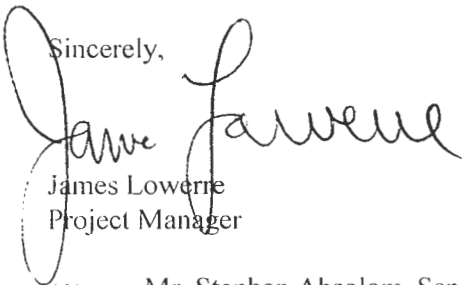
WBS	Budget less Fee	Percent Complete	Spent to Date	Percent Spent
01000	\$ 1,240,182	100	\$1,343,222	108
02000	\$ 345,965	90	\$104,711	30
03000	\$ 134,622	100	\$151,703	113
Total	\$ 1,720,760	98	\$1,599,636	93

Table 2

WBS	Budget less Fee	Percent Complete	Spent to Date	Percent Spent
01000	\$ 1,350,563	100	\$1,343,222	99
02000	\$ 212,905	90	\$104,711	49
03000	\$ 157,292	100	\$151,703	96
Total	\$ 1,720,760	98	\$1,599,636	93

If you have any questions or comments regarding this progress report, please contact me at (781) 401-2560.

Sincerely,



James Lowerre
Project Manager

- cc: Mr. Stephen Absolom, Seneca Army Depot Activity
- Mr. Randall Battaglia, CENAN
- Mr. Marshall Greene, CEHNC
- Mr. Kenneth Stockwell, Parsons, Atlanta
- Mr. John Baptiste, Parsons, Boston



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

REPLY TO
ATTENTION OF:

CEHNC-OE-DC

6 April 2000

*Tom 6
For info*

File

File

CF

*NYSDEC
EPA*

UXO

EE/CA

MEMORANDUM FOR Commander, Seneca Army Depot Activity,
ATTN: SIOSE-BEC (Mr. Stephen Absolom),
5786 State Route 96, Romulus, NY 14541-5001

SUBJECT: Ordnance and Explosives (OE) Characterization Results
and Recommendations for the Old Missile Propellant Test
Laboratory (SEAD-43/56 and 69), Seneca ADA

1. The U.S. Army Engineering and Support Center, Huntsville, has received and reviewed the results from the OE Characterization efforts, performed by EODT, Inc., at SEAD-43/56 and 69. Biased sampling was performed in the areas most likely to contain burial. Characterization was conducted on the surface and subsurface (to a depth of two feet).

2. No DOD Action Indicated (NDAI) is recommended for subject site. This recommendation is based on the enclosed Fact Sheet (encl 1) and Characterization Letter Report (encl 2). Based upon the findings, this area exhibits no signs of OE contamination or drums of propellant and is suitable for release for any purpose intended.

3. If you have any questions or concerns, please call me at 256-895-1510 or Mr. Kevin Healy, Project Engineer, at 256-895-1627.

FOR THE COMMANDER:

C. DAVID DOUTHAT, P.E., CSP
Director, Ordnance and
Explosives Team

2 Encls

CF (w/o encls):

Commander, U.S. Army Engineer District, New York, ATTN: Seneca
Area Office (Mr. R. Battaglia), 5786 State Route 96,
Romulus, NY 14541-5001

FACT SHEET

OLD MISSILE PROPELLANT TEST LABORATORY (SEAD-43/56 and 69), SENECA ARMY DEPOT ACTIVITY ROMULUS, NEW YORK

1. Background.

The area in question is comprised of three Solid Waste Management Units; SEAD's-43, 56 and 69. Total acreage is approximately 5. SEAD-43 consists of the building formerly known as the Old Missile Propellant Test Laboratory (Building 606) and was operated between the early 1960's and mid 1970's. SEAD-56 refers to the same building during its operation as a pesticide storage facility after 1976. SEAD-69 is the approximately 5 acre area that surrounds Building 606. It was indicated that this area may have been used as a disposal area in association with the activities performed in Building 606. The Archive Search Report (ASR), performed in 1998, recommended that further characterization be performed to confirm/discount previous suggestions that bulk quantities of propellants, and possibly IRFNA, might have been disposed at the SEAD-43/56 and 69 site.

Ordnance and Explosives (OE) characterization efforts, performed in 1999, were conducted to determine whether OE was present at this site. The target was drums of propellant. Four grids, totalling roughly two acres, were geophysically mapped. Anomalies large enough to approximate a buried drum were 100% intrusively investigated. A percentage of smaller anomalies were intrusively investigated as well. No drums, OE or OE-related scrap were located (7.62mm and M200 blanks are considered small arms and not OE).

2. Present Condition.

The site was used for almost 20 years as a pesticide storage facility following the period of use as a liquid propellant storage area. Over the course of roughly 35 years, no OE was ever encountered.

The site is now an outlying parcel of the 720 acres being transferred to the New York State Department of Corrections. Construction of a maximum security facility continues and opening of the prison is expected in mid to late 2000. As currently planned, this 5 acre area will be within the portion of the prison site which is heavily restricted since it is beyond the prison building and all anticipated common areas.

The opinion of HNC personnel is that this site poses no OE/UXO concern to anyone and that transfer should proceed.



P.O. Box 24173, Knoxville, Tennessee 37933-2173
(865) 988-6063, Fax (865) 988-6067
e-mail: eodt@eodt.com

March 3, 2000

U. S. Army Engineering and Support Center, Huntsville
ATTN: CEHNC-OE-DC-A (Ms. Lydia Tadesse)
P. O. Box 1600
Huntsville, Al 35807-4301

Re: Contract DACA87-97-D-0005, Task Order 0013, OE Site Sampling and Characterization,
Proposed Prison Site, Seneca Army Depot Activity, Romulus, NY

EODT Document Control No. 0823-0013-133

Dear Ms. Tadesse:

Please find enclosed a summary of Area 43A results of the geophysical surveys for the referenced task, as requested by CEHNC. Area 44 started as an OE site sampling characterization, but due to the number of ordnance items found, this area was turned into a Removal Action and the characterization effort was terminated. This should not be considered a final report, and is provided as interim information only.

EOD Technology, Inc. appreciates the opportunity to be of continued service to the U. S. Army Engineering and Support Center, Huntsville.

Yours very truly,

EOD TECHNOLOGY, INC.

Sal Molle
Project Manager

Enclosure as noted

cc Kevin Healy

0823

SITE WAS FORMERLY A LIQUID PROPELLANT STORAGE AREA; MORE RECENTLY A PESTICIDE STORAGE AREA. OE CHARACTERIZATION WAS PERFORMED LOOKING FOR DRUMS OF LIQUID PROPELLANT.

JWH 4 APRIL 2000

ENCLOSURE 2

SUMMARY OF RESULTS OF GEOPHYSICAL SURVEYS

Seneca Army Depot, Area 43A

by

EOD Technology, Inc.
Lenoir City, Tennessee

The geophysical surveys conducted by EOD Technology, Inc. (EODT) did not reveal any buried drums or other dangerous objects at Area 43 of Seneca Army Depot.

During the period 01 June through 08 June, 1999, EODT conducted a geophysical survey of Area 43. The EM61 (time domain, electromagnetic pulsed, terrain conductivity meter) system was used to conduct the survey. The instrument was subjected to severe distortion from radio frequency (RF) interference produced by an active LORAN transmission tower located in near proximity to the survey site. There were other, unattributable interference problems experienced with the top coil of the EM61.

Because of the severe RF interference, real-time differential GPS could not be used for navigation. Therefore, a fiducial system was used to provide position information.

Initial processing of the survey data (grids 7, 8, 9, and 10) did not produce any useful anomaly information. Subsequently, Bob Selfridge, senior engineering geophysicist at Huntsville (CEHNC) processed the data and, discounting the top coil data, chose 63 anomalies for "dig" investigation (16% of 386 anomalies returned in processing and marked in the field). Table 1 shows the results of dig investigations.

TABLE 1
ANOMALY DIG COMPARISON SUMMARY, Area 43A

Grid number	Number of anomalies	40mm grenades # (%)	OE metallic scrap # (%)	Misc. metallic scrap # (%)	Nothing found when dug # (%)	No record or not dug # (%)
7	141	0	1 (01%) ^a	8 (6%)	0	132 (94%)
8	126	0	3 (02%) ^b	11 (11%)	0	109 (87%)
9	63	0	1 (02%) ^b	14 (22%)	0	48 (76%)
10	56	0	5 (09%) ^{a, b}	17 (30%)	0	22 (39%)
Total	386	0 (0%)	10 (03%)	53 (14%)	0 (0%)	63 (16%)

^a 7.62 blank, fired

^b M200 blanks

The digging of these anomalies resolved the source of the anomaly return but did not disclose any drums or other dangerous buried objects. The “dig” data, an Excel spreadsheet file, is attached to this document.

Also attached is a CADD drawing showing the locations of the investigated anomalies.

If there are any further questions concerning the conduct of the geophysical survey, the survey data, the “dig” data, or this report, please contact Senior EOD Supervisor Sal Molle at (423) 988-6063 or by email at samolle@eodt.com.

~~The digging of these anomalies resolved the source of the anomaly return but did not disclose any drums or other dangerous buried objects. The “dig” data, and Excel spreadsheet file, is attached to this document.~~

~~Also attached is a CADD drawing showing the locations of the investigated anomalies.~~

~~If there are any further questions concerning the conduct of the geophysical survey, the survey data, the “dig” data, or this report, please contact Senior EOD Supervisor Sal Molle at (423) 988-6063 or by email at samolle@eodt.com.~~

The following documents are included with report:

- Prison Site- SEDA 43-OE Sampling Activity, Excel Spreadsheet, 2pp.
- Color contour plots of grids 7,8,9,and 10, Surfer, 4pp
- Grid location maps, CADD, 1p
- Plots of investigated anomalies SEDA 43-Grids 7,8,9, and 10, CADD, 1p.

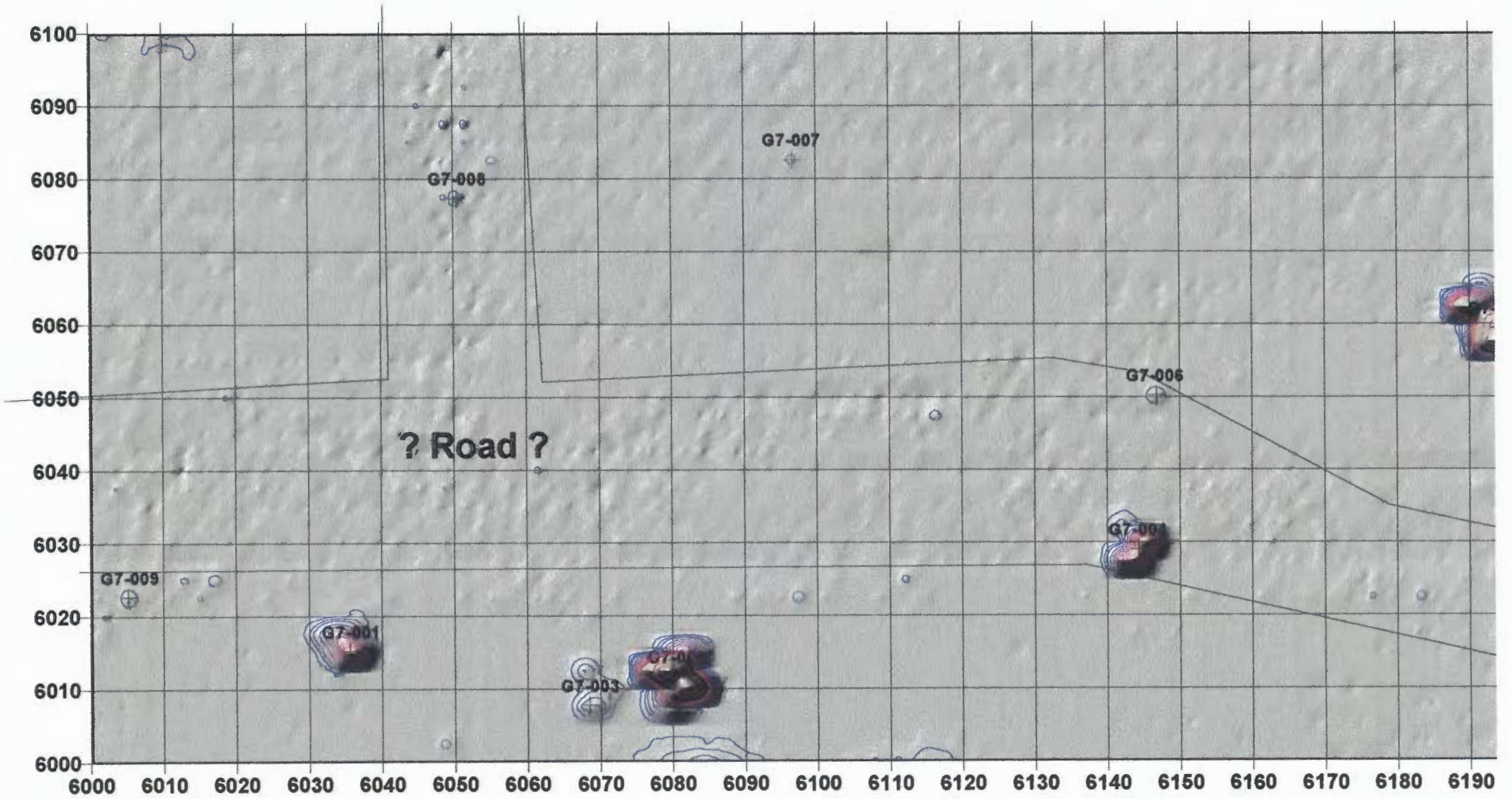
SENECA ARMY DEPOT ACTIVITY
PRISON SITE - SEDA 43 - OE SAMPLING ACTIVITY
08-Jun-99

Point #	Azimuth to Item (Degrees)	Distance to Item (Inches)	Depth to Item (Inches)	Item ID	Comments	Item Weight (lbs)	Condition	Filler	Disposition
7001	0	0		metal rod					Scrap
7002	180	2	4	railroad tie plate					Scrap
7003	180	24	6	Misc. Scrap					Scrap
7004	315	12	7	railroad tie keeper					Scrap
7005	0	0	2	buried pipe					Scrap
7006	360	36	4	Misc. Scrap					
7007	260	12	2	7.62 blank			Fired		Scrap
7008	90	10	5	Misc. Scrap					Scrap
7009	270	4	4	nail					Scrap
8001	0	0	8	copper roofing covered	went 2ft hole still not clear construction debris				Scrap
8002	180	8		copper roofing covered	hole dug 2ft still will not clear with all the construcion debris				
8003					contact in concrete road				
8004	225	10		t post buried to 2 ft					Scrap
8005	0	7	4	steel rod 24inx1in					Scrap
8006	0	0		guy wire stake bent over					left in place
8007	180	12	6	reinforcing wire					Scrap
8008	45	18	2	m200 blanks					Scrap
8009	135	6	5	m200 blanks					Scrap
8010	90	2	3	large bolt					Scrap
8011	0	0	5	m200 blanks					Scrap
8012				Nothing found					
8013	0	12	6	steel stake 24 in x1 in					
8014					in concrete road				
8015					in concrete road				
8016	270	6	4	galvanized pipe 3/4in x8in					Scrap
8017				Nothing found					
9001	360	2		Misc. Scrap					Scrap
9002	360	0			fire hydrant				
9003	340	30		Misc. Scrap					Scrap
9004	360	6		fence post surface to 2ft					Scrap
9005	90	12		guy wire anchor	dug to two foot and still won't come out				left in
9006	180	4	2	m200 blanks			Fired		Scrap
9007	360	18	6	Misc. Scrap					Scrap
9008	360	0		Misc. Scrap					Scrap
9009					contact in the middle of a concrete road not dug				
9010	90	10	4	lead pipe					Scrap
9011	320	12		Misc. Scrap					Scrap
9012	180	8	4		aluminum pipe				Scrap
9013	180	16	8	Misc. Scrap					Scrap
9014					contact in the middle of a concrete road not dug				
9015					contact in a concrete road not dug				
1001	45	12		animal trap					Scrap
1002	0	14	3	5.56mm blank			Fired: Intact		Scrap
1003	180	10	2	reinforcing wire					Scrap
1004	0	4	3	reinforcing wire					Scrap
1005	270	10	1	reinforcing wire					Scrap

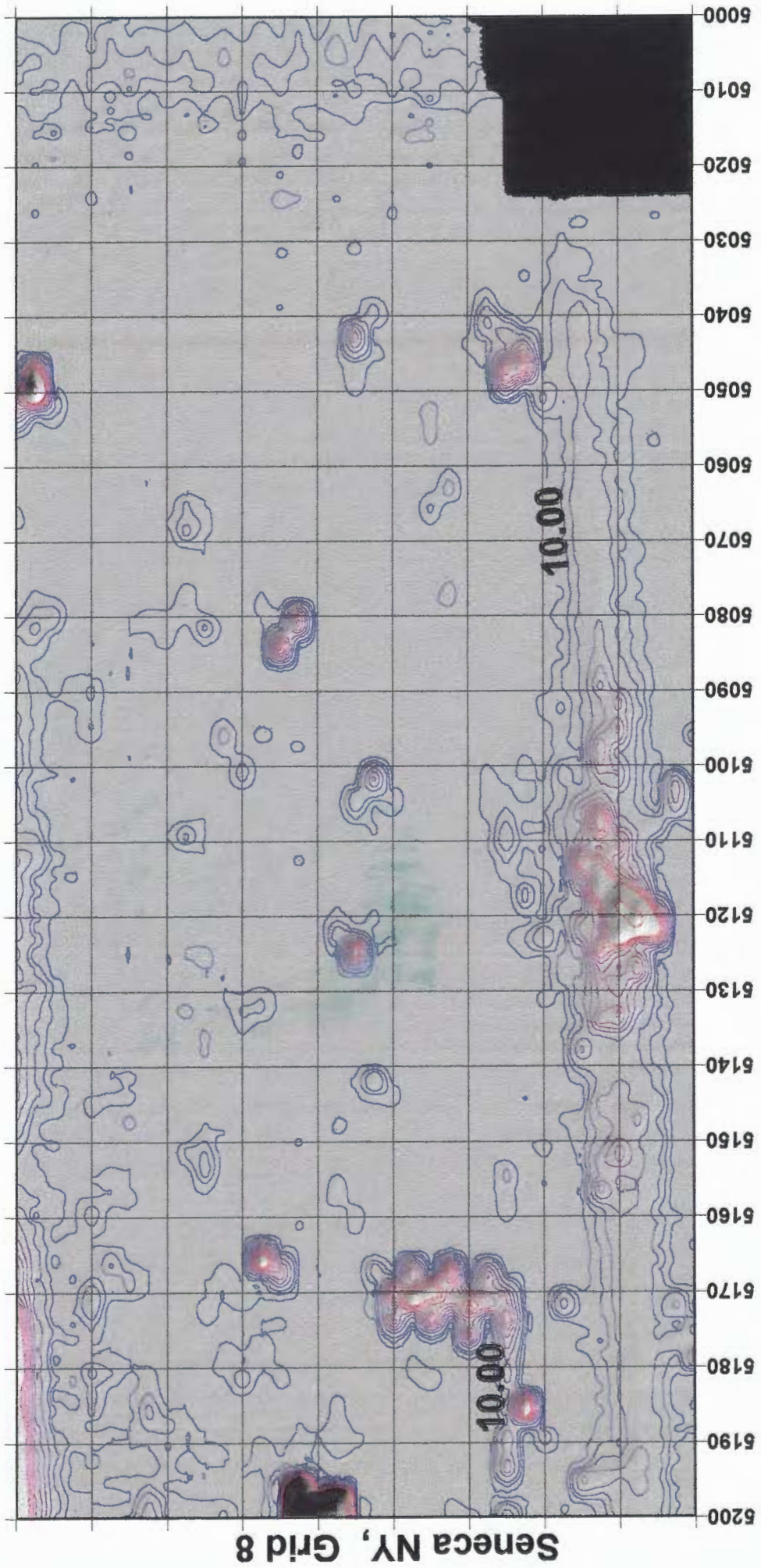
Point #	Azimuth to Item (Degrees)	Distance to Item (Inches)	Depth to Item (Inches)	Item ID	Comments	Item Weight (lbs)	Condition	Filler	Disposition
1006	180	4	4	5.56mm blank			Fired: Intact		Scrap
1007	180	12	2	3in long steel bolt					Scrap
1008	0	8	6	5.56mm blank			Fired: Intact		Scrap
1009	45	16	3	animal trap					Scrap
1010	45	8		reinforcing wire					Scrap
1011	0	0		reinforcing wire					Scrap
1012	90	8	2	reinforcing wire					Scrap
1013	135	18	2	5.56mm blank			Fired: Intact		Scrap
1014					in concrete road				
1015					in side of concrete road				
1016	180	3	2	steel pipe 3 ft long					Scrap
1017	45	12	3	t post burid to 2 ft					Scrap
1018	235	8		7.62 blank withlink			Fired: Intact		Scrap
1019	45	24	5	several small pieces of sheet tin					Scrap
1020	135	12	3	8in nail					Scrap
1021	180	16	1	reinforcing wire					Scrap
1022	0	14		reinforcing wire					Scrap

Seneca NY, Grid 7

Data Processed 2 June 1999 - RJS

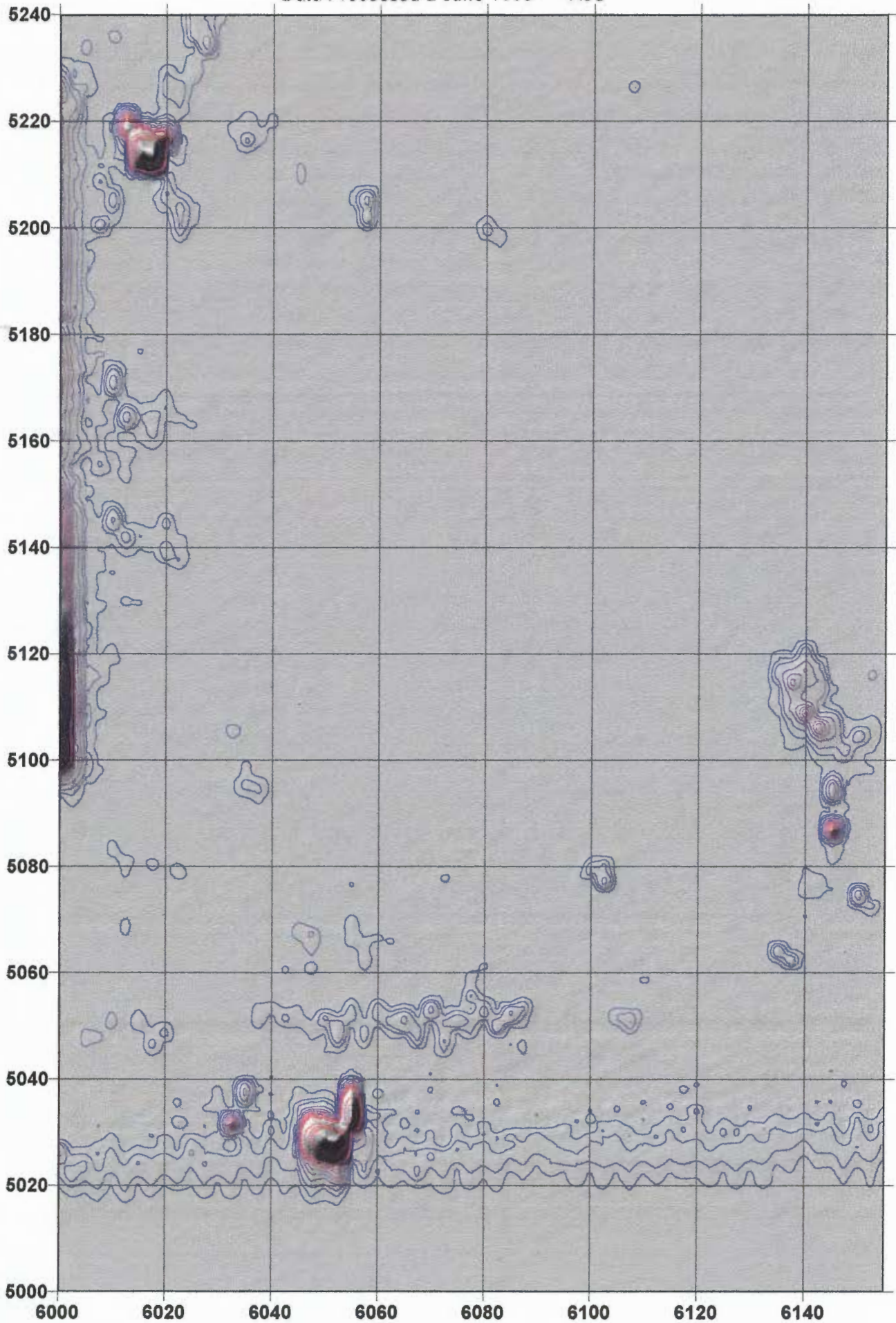


Data Processed 2 June 1999 - RJS



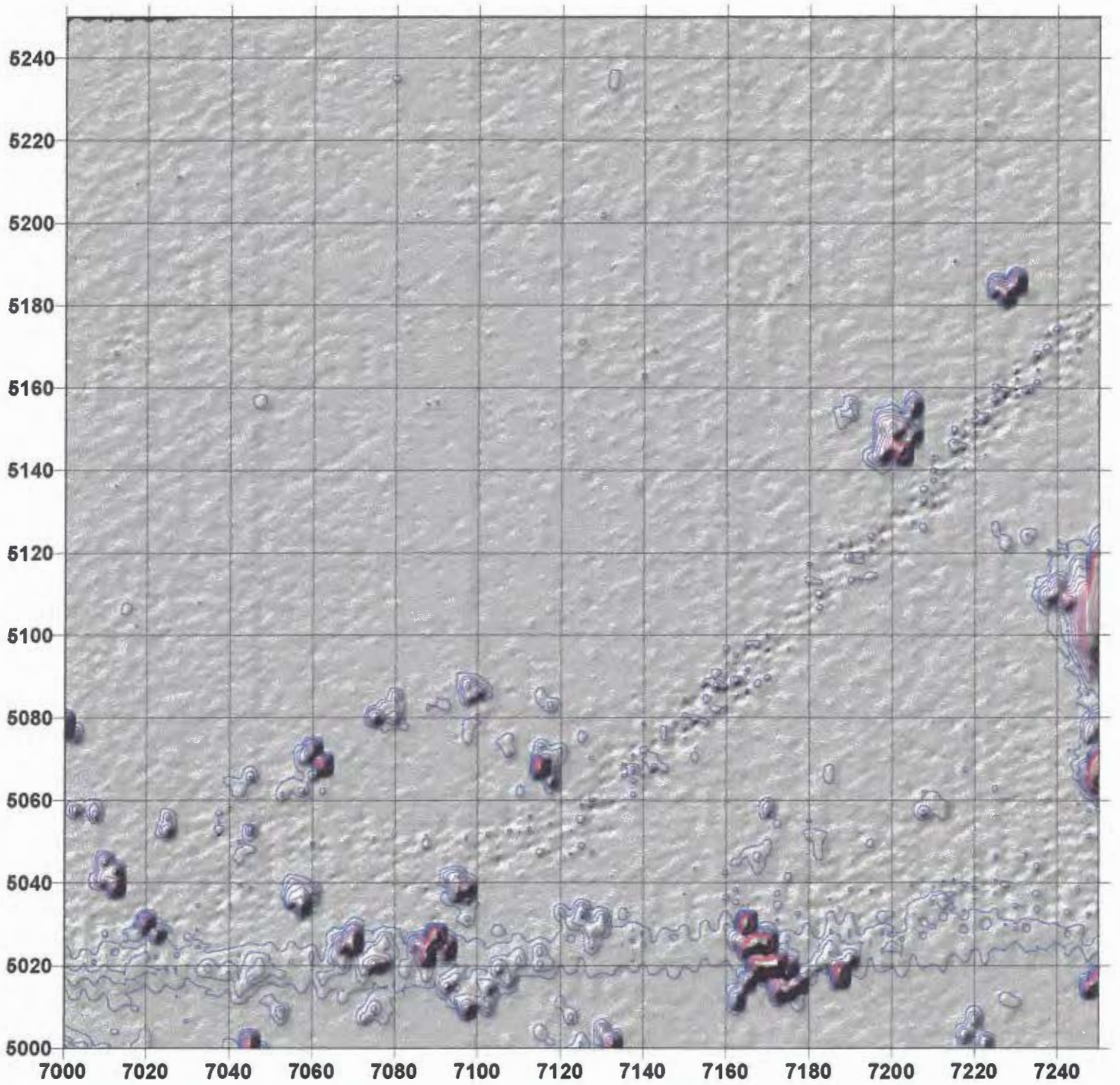
Seneca NY, Grid 9

Data Processed 2 June 1999 -- RJS



Seneca NY, Grid 10

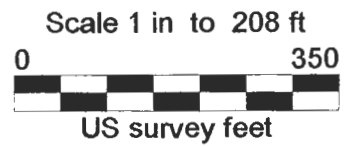
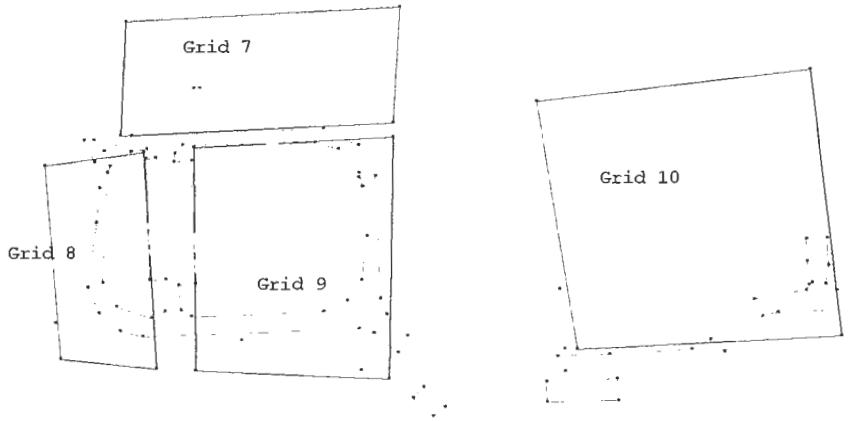
Data Processed 2 June 1999



Field surveyor:

Computer operator:

Reference:



0°00'00"

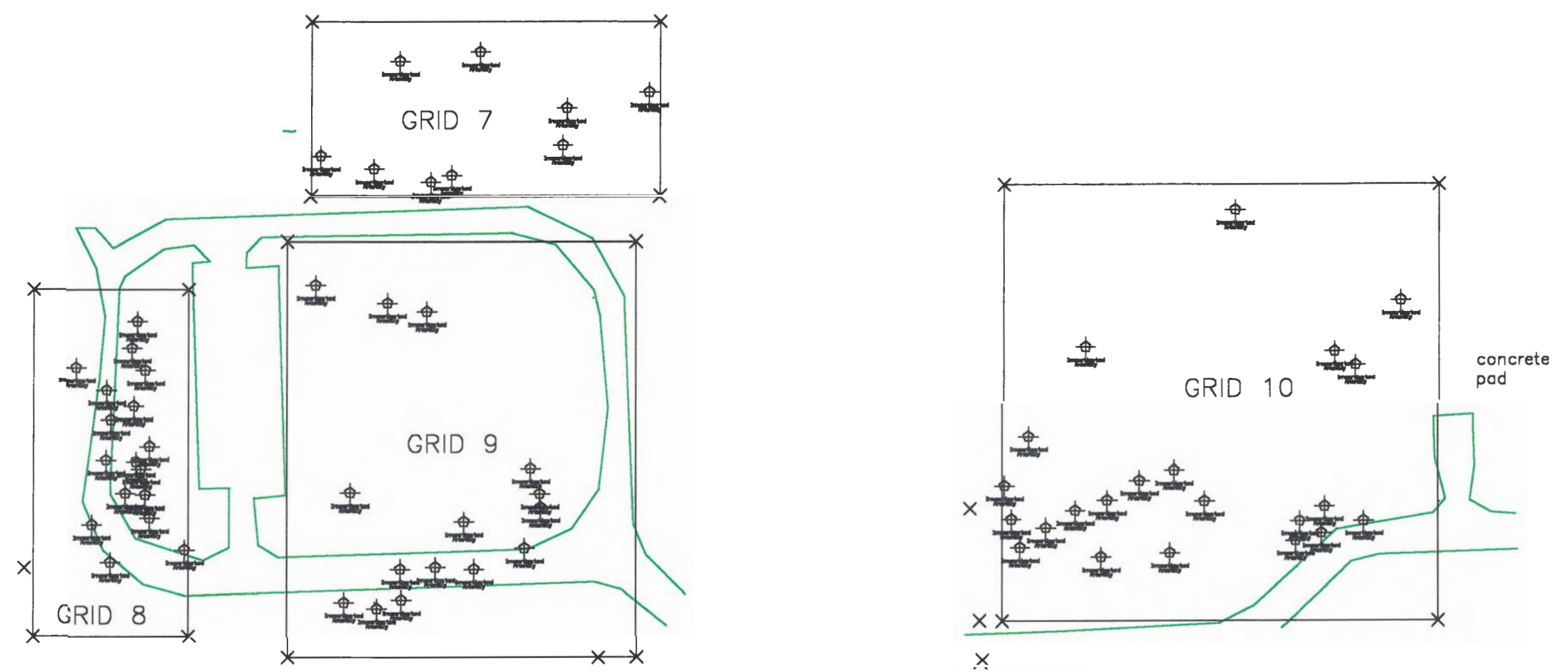
Plot Scale: 1 in to 208 ft
Printed on 4/27/1999, at 7:13:12 AM

Printed from Trimble Survey Office

Site: Not selected, System: U
Zone: New York Central 3102

Project: Seneca Prison
USFeet Template

approx location of prison fenceline



PLOTS OF INVESTIGATED ANOMALIES
SEDA 43 - Grids 7, 8, 9, and 10



Swg

File

September 18, 2002

Mr Robert Nore
CEHNC-PM-EO
U.S. Army Corps of Engineers
Engineering and Support Center, Huntsville
4820 University Square
Huntsville, AL 35816-1822

SUBJECT: Period 35 Monthly Progress Report for OE-EE/CA Activities at the Seneca Army Depot Activity (SEDA) under Contract DACA87-95-D-0018, Task Order 52

Dear Mr. Nore:

Parsons Engineering Science, Inc. (Parsons) is pleased to submit Progress Report Number 35 for the period of Jul 31, 2002 through August 31, 2002 for the above referenced contract and delivery order.

Work Conducted:

To simplify the tracking of costs, Parsons has divided the 21 tasks under the Scope of Work (SOW) into three (3) Work Breakdown Structures (WBS) as follows:

- WBS 01000, fieldwork tasks (In-scope tasks 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13; and out-of-scope tasks 14.1, 14.2, and 14.3)
- WBS 02000, report writing (Tasks 3, 15, 16, 17, 18, and 21)
- WBS 03000, project and program management tasks (Tasks 19 and 20).

WBS 01000

All of the field work tasks have been completed.

WBS 02000

Draft responses to EPA comments on the Draft OE EE/CA Report were completed and forwarded to you 30 August 2002 for discussion, modification and approval. *Task 18, Prepare Action Memorandum*, remains to be completed.

WBS 03000

Task 20, Meetings and Project Management. We prepared and submitted a request for the reallocation of funds as requested. We would also like to discuss an extension of the period of performance which nominally ended April 2001. Depending on the current estimate of the remaining period of performance, we may also ask for additional funding beyond what we have reallocated to continue managing the remaining work



Project Activities for Next Period and beyond:

Parsons will review our draft response to EPA comments with the Army, include Army comments, and issue our responses to the EPA. Once any issues with the Parsons response to EPA comments are resolved, Parsons will issue the Draft Final OE EE/CA Report. The development of an Action Memorandum detailing how the EE/CA findings will be addressed by the Army remains to be completed pending Army decisions on what action to take.

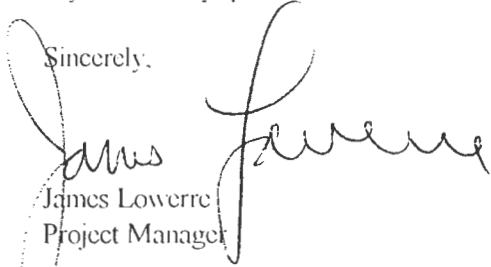
Contract Sufficiency:

The over all contract value is sufficient at this time. Parsons has worked with the Army to reallocate funds from WBS 02000 to WBS 01000 and 03000. The reallocated funds are to pay for unanticipated field effort and Project Management requirements associated with the schedule being extended beyond the 18 months originally scoped. Pending approval of our reallocation request, the table below still reflects current funding allocations.

WBS	Budget less Fee	Percent Complete	Spent to Date	Percent Spent
01000	\$ 1,240,182	100	\$ 1,338,630	108
02000	\$ 345,965	90	\$ 103,739	30
03000	\$ 134,622	100	\$ 146,013	108
Total	\$ 1,720,769	98	\$ 1,588,382	92

If you have any questions or comments regarding this progress report, please contact me at (781) 401-2560.

Sincerely,



James Lowerre
Project Manager

cc: Mr. Stephen Absolom, Seneca Army Depot Activity
Mr. Raddall Battaglia, CEMAN
Mr. Robert Nore, CEHNC
Mr. Kenneth Stockwell, Parsons, Atlanta
Mr. Scott Sauchuk, Parsons, Boston

Subject: [Fwd: Seneca EE/CA funds]

Date: Fri, 06 Aug 1999 12:42:25 -0400

From: Stephen Absolom <absoloms@seneca-hp.army.mil>

Organization: US ARMY

To: Brian Frank <frankb@seneca-hp.army.mil>

CC: Bruce Johnson <johnsonb@seneca-hp.army.mil>

*File
EE/CA
Project
(New file)*

Sir,

Mr. Nida, one of the HQ IOC environmental program liaisons, is in my opinion, holding hostage funds for a project inappropriately. There is no relationship between the EE/CA project and the OB grounds cost avoidance. Furthermore all the correspondence I have had regarding the OB grounds cost avoidance story has been with Mr. Ed Agy whom serves the same function as Mr. Nida. The Cost avoidance is a success story about the incorporation of Resource Conservation and Recovery Act (RCRA) correction action efforts being negotiated into the Federal Facilities Agreement. As a Result of using CERCLA (superfund) rules instead of RCRA cleanup requirements, the project went from clean closure at a price estimated to be \$27 Million to a CERCLA remedial action of \$6 million, thus the cost avoidance. I have told Mr. Agy that I did not want to write and submit a good news story until the Record of Decision (ROD) was signed by EPA as they could always change or back out of the deal we had struck. Mr. Agy agreed with this approach. The ROD was finally signed on 14 June 1999, 4 months after our submission. Since June I have been up to my neck in the transfer /lease of the family housing parcel and this has not been a high priority on my plate. I have asked Randy Battaglia NY District COE Rep. to write the story as he was the one who talked about it originally. He has agreed to do this.

What bothers me even more is that this is the second time Mr. Nida has attempted to derail this effort, from my point of view. The first was when he went directly to DA about a month ago and stated that this EE/CA was improperly estimated and that Seneca should not get this project. He did not write or ask me about it. I began responding to queries on the project after his contact with DA. Ed Agy has been working with me in those responses. I am also aware that he did not coordinate with the AMC environmental counter part as MS. Linda Custer called me about the project to answer the questions DA was asking. She was disturbed that he had gone around the MACOM.

On 5 August 1999, We had a conference call with HQ IOC, DA BRAC Ofc, Army Environmental Center (AEC) and the Huntsville Corps of Engineers. After discussion with the all parties it was agreed that this project was necessary and at a cost of \$3 million dollars, it would proceed. Everyone including Mr. Nida agreed. The DA BRAC Ofc asked that Huntsville COE confirm with Mr. Ken Greg that they can award the project before 30 Sep. 99. Huntsville was doing that on 8/6/99. Mr. Nida had the opportunity during the call to say "NO I don't agree with the project" but he did not.

We need help and support from the HQIOC not road blocks and backdoor politics and agendas. The IOC approved and submitted the project up through the chain originally. They had ample opportunity to deny it. It is now visible and I have successfully defended it twice, once at the work plan meeting and once on a phone conference so I see no purpose in a "hold the money until" scenario. They should be trying to help us get funds if they agree with the project.

Under LTC Olson's command we had an issue with this same individual. That incident was an attempt by him to direct how the money was spent at Seneca after the funds were received here. Mr. Nida's desires were not the best interest of Seneca.

Randy Nida may have an ax to grind either with the COE or Seneca and I am not sure which, but he is counter productive in helping Seneca get things done. I believe you may want to discuss his "support" with Dr. Henry Crain who is his immediate supervisor.

I am available and would like to discuss this further with you at your convenience.

SM Absolom
SEDA BEC

Subject: Seneca EE/CA funds

Date: Fri, 6 Aug 1999 09:40:14 -0500

From: "Nida, Randy" <NidaR@ioc.army.mil>

To: "'Gregg, Ken L HQ02'" <KEN.L.GREGG@HQ02.USACE.ARMY.MIL>

CC: "'Martin, Robert E HQ02'" <ROBERT.E.MARTIN@HQ02.USACE.ARMY.MIL> ,
'Stephen Absolom' <absoloms@seneca-hp.army.mil> ,
'Agy, Edgar C' <AgyE@ioc.army.mil> , "Crain, Henry" <CrainH@ioc.army.mil>

Ken,

Please hold the \$3,000,000 for the Seneca EE/CA at HQ until Ed Agy or I ask for release to Huntsville. I don't think that it will be long although we have been waiting for the details of the cost avoidance (presented by CENAD to BRACO in Mar) from Seneca for months.

v/r

Randall Nida

BRAC Environmental Restoration Program Manager

HQ Army Industrial Operations Command

309-782-4007 or DSN 793-4007 fax x-1379

July 9, 2003

Mr. Chason Smith
CEHNC-PM-EO
U.S. Army Corps of Engineers
Engineering and Support Center, Huntsville
4820 University Square
Huntsville, AL 35816-1822

**RE: Period 45 Monthly Progress Report for OE-EE/CA Activities
Seneca Army Depot Activity (SEDA) under Contract DACA87-95-D-0018, Task Order 52**

Dear Mr. Smith:

Parsons is pleased to submit this Progress Report for the period of May 31, 2003 through June 30, 2003 for the above referenced contract and delivery order.

Work Conducted

To simplify the tracking of costs, Parsons has divided the 21 tasks under the Scope of Work (SOW) into three (3) Work Breakdown Structures (WBS) as follows:

WBS 01000: Fieldwork Tasks (In-scope tasks 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, and out-of-scope tasks 14.1, 14.2, and 14.3)

WBS 02000: Report Writing (Tasks 3, 13, 14, 15, 16, 17, and 18)

WBS 03000: Project and Program Management Tasks (Tasks 19 and 20)

WBS 01000

All of the field work tasks have been completed.

WBS 02000

EPA comments were received in a letter dated February 21, 2003. In a conference call between the USACE Huntsville and Parsons Project Managers on February 27, 2003, it was agreed USACE Huntsville would define the Army's position on the issues of using the NDIA term, project use of grid stats, and the requirement for site models. Parsons will prepare the response to the EPA, making any required changes in the EE/CA report, and issue the EE/CA report as final. *Task 18, Prepare Action Memorandum*, remains to be completed.

WBS 03000

Task 20, Meetings and Project Management. Project maintenance functions continue. Period of Performance extension through September 2003 was granted at the program level. Funds will need to be reallocated again to cover on going PM costs. A funding reallocation request will be prepared once the Army responses are received and the level of effort is estimated to complete the project. *Task 18, Prepare Action Memorandum*, remains to be completed.



Project Activities for Next Period and beyond

Pending Army input on the issues of using the NDIA term, project use of grid stats, and the requirement for site models, Parsons will produce and issue the Final OE EE/CA. The development of an *Action Memorandum* detailing how the OE EE/CA findings will be addressed by the Army and any associated public presentations remain to be completed pending Army decisions on what action to take.

Contract Sufficiency


The over all contract value is sufficient at this time. Parsons will work with the Army to reallocate funds from WBS 02000 to WBS 03000 to fund the extended project management requirements. The project is now 24 months beyond the 18 originally scoped. Table 1 below reflects the current funding allocations.

Table 1: Current Funding Allocations

WBS	Budget less Fee	Percent Complete	Spent to Date	Percent Spent
01000	\$ 1,350,563	100	\$1,343,222	99
02000	\$ 212,905	90	\$115,589	54
03000	\$ 157,292	100	\$158,686	101
Total	\$ 1,720,760	98	\$1,617,496	94

If you have any questions or comments regarding this progress report, please contact me at (617) 457-7859.

Sincerely,



James Lowerre
Project Manager

- cc: Mr. Stephen Absolom, Seneca Army Depot Activity
- Mr. Randall Battaglia, CENAN
- Mr. Marshall Greene, CEHNC
- Mr. Joe Cudney, Parsons, Atlanta
- Mr. John Baptiste, Parsons, Boston

June 6, 2003



Mr. Chason Smith
CEHNC-PM-EO
U.S. Army Corps of Engineers
Engineering and Support Center, Huntsville
4820 University Square
Huntsville, AL 35816-1822

**RE: Period 44 Monthly Progress Report for OE-EE/CA Activities
Seneca Army Depot Activity (SEDA) under Contract DACA87-95-D-0018, Task Order 52**

Dear Mr. Smith:

Parsons is pleased to submit this Progress Report for the period of April 30, 2003 through May 31, 2003 for the above referenced contract and delivery order.

Work Conducted

To simplify the tracking of costs, Parsons has divided the 21 tasks under the Scope of Work (SOW) into three (3) Work Breakdown Structures (WBS) as follows.

WBS 01000: Fieldwork Tasks (In-scope tasks 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, and out-of-scope tasks 14.1, 14.2, and 14.3)

WBS 02000: Report Writing (Tasks 3, 13, 14, 15, 16, 17, and 18)

WBS 03000: Project and Program Management Tasks (Tasks 19 and 20).

WBS 01000

All of the fieldwork tasks have been completed.

WBS 02000

EPA comments were received in a letter dated February 21, 2003. In a conference call between the USACE Huntsville and Parsons Project Managers on February 27, 2003, it was agreed USACE Huntsville would define the Army's position on the issues of using the NDIA term, project use of grid stats, and the requirement for site models. Parsons will prepare the response to the EPA, making any required changes in the EE/CA report, and issue the EE/CA report as final. *Task 18, Prepare Action Memorandum*, remains to be completed.

WBS 03000

Task 20, Meetings and Project Management. Project maintenance functions continue. Period of Performance extension through September 2003 was granted at the program level. Funds will need to be reallocated again to cover on going PM costs. A funding reallocation request will be prepared once the Army responses are received and the level of effort is estimated to complete the project. *Task 18, Prepare Action Memorandum*, remains to be completed.



Project Activities for Next Period and Beyond

Pending Army input on the issues of using the NDIA term, project use of grid stats, and the requirement for site models, Parsons will produce and issue the Final OE EE/CA. The development of an *Action Memorandum* detailing how the OE EE/CA findings will be addressed by the Army and any associated public presentations remain to be completed pending Army decisions on what action to take.

Contract Sufficiency

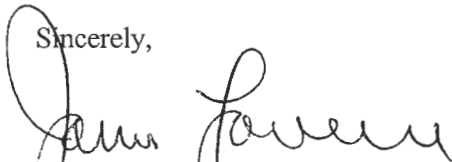
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03000	\$ 157,292	100	\$158,596	101
Total	\$ 1,720,760	98	\$1,617,042	94

If you have any questions or comments regarding this progress report, please contact me at (617) 457-7859.

Sincerely,



James Lowerre
Project Manager

- cc: Mr. Stephen Absolom, Seneca Army Depot Activity
- Mr. Randall Battaglia, CENAN
- Mr. Marshall Greene, CEHNC
- Mr. Joe Cudney, Parsons, Atlanta
- Mr. John Baptiste, Parsons, Boston