

69-06

**PARSONS ENGINEERING SCIENCE, INC.**

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January 9, 1997

Mr. Stephen M. Absolom  
BRAC Environmental Coordinator  
Seneca Army Depot Activity (SEDA), Building 123  
Romulus, New York 14541-5001

**SUBJECT: Fourth Quarterly Report, Ending December 31, 1997, for CERCLA and RCRA Activities at Seneca Army Depot Activity (SEDA)**

Dear Mr. Absolom:

This quarterly report summarizes the activities that occurred during the last quarter of 1996, i.e. October through December. These activities include work performed in accordance with Delivery Orders 1, 2, 3, and 5 of Contract DACA87-95-D0031 and Delivery Orders 9, 10, 18, 19, 29, 31, 35, 36, 37, and 41 of Contract DACA87-92-D0022.

Under Contract DACA87-95-D0031, Delivery Order 1 describes the SOW for conducting an RI/FS at the two former fire training areas, SEAD-25 and SEAD-26. Delivery Order 2 describes the SOW for support of the preparation of an EBS. Delivery Order 3 describes the SOW for conducting an RI/FS at the deactivation furnace areas, SEAD-16 and SEAD-17. Delivery Order 5 describes the SOW for conducting an RI/FS at the Radioactive Disposal Sites.

Under Contract DACA87-92-D0022, Delivery Order 9 involves the preparation of an RI/FS at the former Open Burning grounds (OB). Delivery Order 10 involves the preparation of an RI/FS at the Ash Landfill. Delivery Order 18 involves the investigation of the seven low priority SWMUs. Delivery Order 19 involves the investigation of the eight moderately low priority SWMUs. Delivery Order 29 involves the continuation of the quarterly groundwater monitoring at the OB Grounds and the Ash Landfill. Delivery Order 31 involves the preparation of the groundwater feasibility memorandum. Delivery Order 35 involves preparation of work plans for RI/FSs at five (5) various sites. Delivery Order 36 involves the preparation of Work Plans for three ESIs. Delivery Order 37 involves revisions to the RCRA Permit Documents. Delivery Order 41 involves the preparation of scoping documents for CERCLA RI/FSs at thirteen (13) various sites.

This quarterly report will describe the activities that have occurred as part of Contract DACA87-95-D0031, followed by a description of the activities that have occurred as part of Contract DACA87-92-D0022.

**Contract DACA87-92-D0031**

**DELIVERY ORDER 1 (IMPLEMENTATION of an RI/FS WORKPLAN at SEADs 25 and 26)**

The fieldwork, is approximately 98% complete, the only field task remaining is the disposal of the IDW. A plan for the disposition of the IDW was submitted for Army approval on October 11, 1996. This task is behind schedule due to delays associated with submission of the plan for disposal of the IDW.

The preparation of the RI and FS reports has commenced and is approximately 57% complete. This task is behind schedule due to delays in receiving and responding to regulatory comments. The draft RI was submitted on June 27, 1996. The Federal Facilities Agreement (FFA) indicated that regulatory review is to be completed within 30 days. We received comments from NYSDEC on September 30, 1996 but are

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awaiting EPA comments. The EPA has requested an extension for submission of comments until December 17, 1996. The Draft FS was due to be submitted for regulatory review on November 29, 1996 but has been delayed until January 31, 1997, 45 days from the date that EPA has indicated they will be providing comments on the Draft RI.

Although all regulatory comments on the Draft RI have not been received, Parsons ES has completed a draft of the FS to avoid additional delays. A draft version of the FS will be issued in accordance with the scheduled draft submittal date.

The work proposal was issued to the COE on August 30, 1995. The COE accepted the work proposal in a letter dated September 7, 1995. The fourteenth, fifteenth, sixteenth monthly management reports were issued during this quarter. The field sampling letter report for SEAD-25 and SEAD-26 were issued on April 2, 1996.

#### DELIVERY ORDER 2 (SUPPORT for the PREPARATION of an EBS)

The first task involves providing support to the contractor selected by the Corps of Engineers, Seattle District, Woodward Clyde, Inc., during the preparation of the Environmental Baseline Survey (EBS) document. This document is an Army required document for property transfer. Property transfers will occur as part of the base closure process.

This task is approximately 72% complete. It is behind schedule due to delays in receiving the EBS report. Parsons ES received the draft EBS on March 25, 1996. Parsons ES reviewed the CERFA map and the EBS and provided comments on May 2, 1996. Parsons ES has received the Draft-final EBS but will not be providing comments on this document, as per discussions with SEDA.

Parsons ES has attended and made technical presentations regarding various aspects of the CERCLA program at several Bottom Up Review (BUR) and Restoration Advisory Board (RAB), formerly known as the Technical Review Committee (TRC), meetings held at SEDA. These included meetings on May 30 and May 31, June 27 and 28, July 31, August 1, August 20, 21 and 22, September 17 and 18, 1996, October 17 and 18, 1996 and November 19 and 20, 1996 meeting. We anticipated attending the RAB meeting at SEDA on December 18 and 19, 1996 but this meeting was canceled by the regulators. We are planning to attend the next RAB meeting to be held at SEDA on January 16 and 17, 1996.

#### DELIVERY ORDER 3 (IMPLEMENTATION of an RI/FS WORKPLAN at SEADs 16 and 17)

The fieldwork is approximately 84% complete and currently ahead of schedule. All field tasks are complete with the exception of the second round of groundwater sampling. This task occurred during the week of December 13, 1996. This is not reflected in the quarterly report as the final period of the quarter closed on November 29, 1996.

The preparation of the RI and FS reports has commenced and is approximately 26% complete. This task is behind schedule due to delays associated with receiving all the data, including the surface water and

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sediment data that was only collected during the third week in September. This delay was the result of EPA's comment that the surface water samples be collected during a rainstorm event. The scheduled sampling of surface water did not occur during a rainfall event and was delayed for approximately one month. Parsons ES had rescheduled the submission of the Draft RI to December 19, 1996 and have since rescheduled the Draft RI to January 18, 1997.

DELIVERY ORDER 5 (IMPLEMENTATION of an RI/FS WORKPLAN at SEAD 12)

The fieldwork is approximately 11% complete and behind schedule as the fieldwork is delayed until the workplan is finalized. The original schedule for this delivery order assumed that the workplan would be approved prior to initiation of fieldwork. To avoid continued delays, Parsons ES has begun the portion of the fieldwork that was approved by the regulators while resolution of the workplan is ongoing. The schedule to this delivery order does not reflect this delay.

Mobilization of field equipment began during the week of August 26, 1996. A site meeting at SEAD-12 was held on August 22 and 23, 1996 with representatives of NYSDEC, SEDA, AEC and MRD. An EPA representative did not attend this meeting. The EM-31 electromagnetic survey has been ongoing since September 9, 1996. It was agreed with EPA that the EM-31 work could be performed even though the entire workplan was not completely approved. Although EPA has provided one round of comments on the workplan for SEAD-12 on July 2, 1996, additional comments from EPA are expected. EPA did not object to the completion of the geophysical investigation and this portion of the fieldwork will be completed while the workplan, which is not part of this delivery order, is finalized. The workplan was completed and submitted it for regulatory and Army review on December 2, 1996. The geophysical fieldwork was completed during the second week in December, 1996. It is suggested that the schedule be modified to reflect the delays in producing a finalized workplan.

**DACA87-92-D0022**

DELIVERY ORDER 9 (The RI/FS at the OPEN BURNING (OB)GROUNDS)

The fieldwork is 100% complete.

The preparation of the Remedial Investigation (RI) and the Feasibility Study (FS) reports, is proceeding and is now 99% complete. The RI report was submitted final on September 9, 1994. Parsons ES received an EPA acceptance letter for the RI on October 11, 1994. NYSDEC has verbally indicated that there will be no additional comments and therefore the RI is considered final.

The Pre-Draft FS was submitted to the Army on December 3, 1993. The Draft FS that was submitted to the regulators on March 10, 1994. Parsons ES received comments from NYSDEC on May 5, 1994. EPA comments on the Draft FS were received on September 30, 1994. A period of consultation between the Army and the regulators has ensued to resolve the differences in the comments. Parsons ES submitted the Draft-Final FS on March 19, 1996. EPA and NYSDEC comments on the Draft-final FS were both received on May 2, 1996. The final FS was submitted on June 21, 1996.

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Parsons ES received additional EPA comments on the Final OB FS, dated July 30, 1996, on August 5, 1996 and NYSDEC comments dated July 12, 1996. The most significant comment EPA comment on the Final OB FS regards the use of EPA's action level of 15 ug/L for lead in drinking water as an ARAR. The 15 ug/L action level for lead in drinking water is not a promulgated value and we believe that this value cannot be considered an ARAR. We have agreed to include EPA's action limit of 15 ug/L in the report but will refer to this value as a non-ARAR guidance value to be considered.

During the November 19 and 20<sup>th</sup> meeting held at SEDA, this situation was discussed with the regulators. It was agreed that the FS will not have to reflect the new land use changes and therefore can be issued final, once the July EPA and NYSDEC comments are addressed. These changes are minor and are essentially done.

The preparation of the RI and FS reports is 99% complete. While we have provided the final FS report, we have received additional NYSDEC and EPA comments as described above. This task is currently behind schedule due to the delays associated with resolving FS issues, described above.

Post FS support has begun and is approximately 41% complete. The Pre-draft Preliminary Remedial Action Plan (PRAP) was submitted on April 26, 1996. The Draft PRAP was submitted for regulatory review on July 3, 1996. SEDA submitted a letter dated July 23, 1996 to EPA and NYSDEC indicating that the regulators should discontinue review efforts associated with the draft PRAP. During the RAB meeting held as SEDA on July 31, 1996 and August 1, 1996, Mr. Absolom of SEDA indicated that the PRAP was too long and the selected remedy should be off-site disposal of the soil wastes at the OB Grounds, not the previously agreed upon remedy of on-site landfilling. The revised draft PRAP was submitted on September 4, 1996. Since that time, SEDA has had informal discussions with NYSDEC and EPA. We received NYSDEC comments on the PRAP on November 2, 1996. NYSDEC has indicated that the PRAP is not protective of the environment because the land use for the site has changed. EPA comments, dated November 19, 1996, also indicate that the current plan is not acceptable because it is not sufficiently protective of the environment. The scheduled date for submittal of the Draft-final PRAP is now January 3, 1997. We are currently involved with discussions with SEDA to change the PRAP to an acceptable document.

#### DELIVERY ORDER 10 (The RI/FS at the ASH LANDFILL)

The preferred alternative for the Ash Landfill has yet to be finalized. The Army believes that natural attenuation is an effective alternative, whereas the EPA is requiring a more aggressive engineered solution to extract groundwater and treat the contaminated water using one of the alternatives presented in the FS.

The fieldwork is 100% complete. This task is completed, including the disposal of the IDW.

The preparation of the RI and FS reports is 99% complete. The Draft-Final RI was submitted to the regulators for review on July 19, 1994. Parsons ES received EPA comments on August 16, 1994 and NYSDEC comments on September 5, 1994. The Final RI was submitted to the regulators on October 3, 1994. Since no additional comments have been received, the RI is now a Final Document.

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The Draft Feasibility Study (FS) was issued for regulatory review on September 19, 1994. Parsons ES received comments from NYSDEC on December 12, 1994. EPA comments were received on February 15, 1995. The comments received from both NYSDEC and EPA rejected the recommendations of the FS to implement an intrinsic remediation alternative that would continue to monitor the groundwater plume instead of implementing a traditional "pump and treat" alternative. The Army had requested several extensions for the submittal of the Draft-Final FS, while informal negotiations were ongoing to resolve these differences.

Parsons ES submitted the Draft-final FS on December 15, 1995. The revised modeling report was issued as an addendum to the FS on January 4, 1996. Parsons ES received NYSDEC comments on the Groundwater Modeling Report and the FS on March 20, 1996. Parsons ES received EPA comments on the Groundwater Modeling Report on March 6, 1996 and received EPA comments on the FS on March 29, 1996. Phone conference calls were held between the Army and EPA on April 10, 1996, April 29, 1996 and April 30, 1996 to discuss the EPA comments on the Groundwater Modeling Report and the Draft-final FS.

Due to delays associated with finalizing the response to the regulatory comments on the Ash Landfill FS, SEDA submitted a May 21, 1996 letter to EPA and NYSDEC that requested a schedule change for the submission of the final FS from May 13, 1996 until June 21, 1996. In the meantime, Parsons ES prepared a comment response letter that described our proposed responses to each comment based upon our most recent phone conference discussions with EPA. This response letter was intended to be a mechanism to finalize the Ash Landfill FS and avoid any differences prior to the submission of the final FS. Parsons ES submitted these responses to SEDA during the manager's meeting held at SEDA on May 30 and May 31, 1996. SEDA then provided this response letter to EPA and NYSDEC on May 30, 1996. On June 5, 1996, SEDA requested that the PRAP be delayed until July 26, 1996 as the remaining comments on the final FS have not been resolved. Parsons ES provided the final Groundwater Modeling Report to the regulators on July 9, 1996. SEDA submitted a series of requests for extension of the Draft PRAP pending resolution of the FS comments. Parsons ES received EPA comments on September 23, 1996 to our May 30th, 1996 proposed response to EPA's final comments on the Final FS and the Groundwater Modeling Report. EPA indicated that the proposed alternative, Natural Attenuation, is unacceptable. They also indicated that there is no need to resubmit the Groundwater Modeling Report.

On October 9, 1996, SEDA, in accordance with the procedures of the Federal Facilities Agreement (FFA) Section 17.7 (e), submitted a letter to the regulators that requested formal consultation in order to resolve the proposed plan. The letter requested that a site meeting be held at the Ash Landfill so that the regulators will be able to better understand the conditions at the site. EPA responded that the most recent quarterly monitoring data be provided to the agency to determine if the concentrations in MW-56, a monitoring well at the toe of the plume, has increased. If the concentration of chlorinated organics in this well remained the same as the period before or decreased, then EPA would be willing to discuss the possibility that natural attenuation would be an acceptable alternative for this site. Parsons ES provided the data, via fax, to SEDA, for the third quarter, September, monitoring event of 1996. Unfortunately, the data from MW-56 was 2 ug/L for cis-1,2 dichloroethene. The data from the second quarter of 1996 for this well was 1 ug/L. Based upon this information, EPA has concluded that the plume is not being naturally attenuated and they have declined to partake in formal consultations as, in their opinion, there is no further need to discuss the possibility that intrinsic remediation is an acceptable alternative for this site. EPA has indicated that the Final FS was due on December 16, 1996. Parsons ES submitted the Final FS on December 15, 1996.

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The Post FS support has begun. In order to receive Army comments on the PRAP in time to submit the PRAP to the regulators and get formal input from all Army commenting agencies, Parsons ES submitted the Pre-draft PRAP for Army review on September 30, 1996. The Pre-draft version of the PRAP recommended natural attenuation/intrinsic remediation as the proposed action. Parsons ES will respond to the Army comments and issue the PRAP to the regulators. Natural attenuation and an alternative water supply as the preferred alternative in this version of the PRAP.

The Preliminary Remedial Action Plan (PRAP) is behind schedule due to EPA's request that the PRAP not be submitted until the Draft-Final FS had been received by the regulators. The PRAP was scheduled to be submitted to the regulators on April 12, 1996. This date was changed to June 10, 1996 and then changed to July 26, 1996. It appeared that resolution of the proposed remedial action was going to take time and therefore SEDA submitted a letter, dated July 24, 1996, that indicated that the PRAP will be submitted 30 days following submission of the final FS. In a letter dated July 29, 1996, NYSDEC indicated that this would not be acceptable, as NYSDEC requires a specific date for submission of the document. No date was set in the anticipation that the proposed plan would be acceptable to the regulators following submission of the revised groundwater model report and the proposed response to EPA comments. On September 25, 1996, after receipt of EPA's response letter, SEDA again requested an extension for submission of the Draft PRAP until October 24, 1996 due to the differences that existed between EPA, NYSDEC and the Army regarding the proposed plan of natural attenuation. On October 22, 1996, SEDA requested an extension for submittal of the PRAP until November 24, 1996 in order to resolve the differences as part of the formal consultation process that is expected to occur within 21 days of the request. In the same letter, SEDA indicated that the ROD should be delayed until June 7, 1997 due to the length of time it was going to take to resolve this difference.

An EPA letter of October 23, 1996, reiterated that the agency cannot accept natural attenuation as the preferred alternative for groundwater and cited that one well at the toe of the plume, MW-56, has had a steady increase in concentration suggesting that the plume is moving off-site. EPA agreed to the extension of the PRAP until November 24, 1996 but did not agree with delaying the ROD until June 7, 1997. However, they would agree to delaying the ROD until January 6, 1997. EPA also stated that the need for a formal consultation meeting should be based upon the results of the latest groundwater monitoring data, especially the results from MW-56 as it appears that the concentrations have been increasing. On October 30, 1996, SEDA indicated that the most recent groundwater monitoring data for MW-56 would be provided for EPA review by November 20, 1996. As previously mentioned, we obtained preliminary 3rd quarter monitoring data for MW-56 and faxed this information to SEDA and EPA. EPA then responded on November 1, 1996 that there was no need to have any further discussions and refused to be involved in formal consultation.

Parsons ES submitted the Pre-draft PRAP, for Army review, on September 30, 1996. The submittal date for the Draft PRAP is January 6, 1996. This has been changed to January 21, 1997 to allow for Army review.

DELIVERY ORDER 18 (INVESTIGATION of the SEVEN (7) LOW PRIORITY SWMUs)

The fieldwork is estimated to be 100% complete.

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The preparation of the ESI report is 100% complete. The Preliminary Draft ESI Report was issued to the Army on December 19, 1994. Army comments were received, via fax, on March 9, 1995. The Draft ESI report was issued for regulatory review on April 6, 1995. Parsons ES received NYSDEC comments on January 16, 1996, and received EPA comments on February 27, 1996. The Draft-final ESI report was issued on May 3, 1996. NYSDEC is not going to provide any additional comments and EPA indicated that it was unlikely that they would be providing any additional comments but were not completely sure. Ms. Carla Struble the EPA project manager, indicated that EPA would not be commenting, therefore this task is considered 100% complete.

DELIVERY ORDER 19 (INVESTIGATION of the EIGHT (8) MODERATELY LOW PRIORITY SWMUs)

The fieldwork is 100% complete.

The preparation of the ESI report is 100% complete. The Preliminary Draft ESI Report was submitted to the Army for review on January 8, 1995. Army comments were received, via fax, on March 9, 1995. The draft report was issued for regulatory review on April 14, 1995. NYSDEC review comments were received on October 3, 1995. EPA comments were received on November 30, 1995. The Draft-Final ESI report was issued on January 11, 1996.

NYSDEC is not going to provide any additional comments and EPA indicated that it was unlikely that they would be providing any additional comments but were not completely sure. Ms. Carla Struble the EPA project manager, indicated that EPA would not be commenting, therefore this delivery order is considered complete.

DELIVERY ORDER 29 (CONTINUATION of the QUARTERLY GROUNDWATER MONITORING at the OB GROUNDS and the ASHLANDFILL)

Parsons ES has received COE authorization to perform four (4) additional quarters of groundwater monitoring. These tasks were originally optional tasks to the Delivery Order 29.

The second quarterly monitoring of 1994, is 100% complete.

The third quarterly monitoring of 1994, is 100% complete.

The fourth quarterly monitoring of 1994, is 100% complete.

The first quarterly monitoring in 1995, is 100% complete.

The second quarterly monitoring of 1995 involved groundwater monitoring at the OB/OD Grounds and the Ash Landfill sites for the 2nd quarter of 1995 and additional sampling of the remaining wells at the Ash Landfill site. This task has been completed.

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The third quarterly monitoring of 1995 involves the performance of the 3rd quarter, 1995, groundwater monitoring at the OB/OD Grounds and the Ash Landfill sites. This work is complete.

The fourth quarterly monitoring of 1995 is the first of four optional tasks, involving performance of groundwater monitoring at the OB/OD Grounds and the Ash Landfill sites. This task is complete.

The first quarterly monitoring of 1996 is the second of the four optional tasks. This task schedule is now complete.

The second quarterly monitoring of 1996 is the third of four optional tasks. This work is complete.

The third quarterly monitoring of 1996 is the fourth and final task of the four optional tasks. The sampling for this event was performed during the fourth week in September. In an August 27, 1996, letter EPA had requested that two additional monitoring wells be sampled at the Ash Landfill. During a recent RAB meeting at SEDA it was agreed that two wells that are normally sampled as part of the quarterly sampling would be replaced with the two wells that EPA had requested. Parsons ES has responded to this request and have received the laboratory data and have performed data validation. This task is 100% complete and is on schedule. The interim monitoring letter report was submitted on November 8, 1996. The quarterly report was submitted on November 27, 1996.

Parsons ES suggests that this delivery order be closed.

DELIVERY ORDER 31 (PREPARATION of the GROUNDWATER FEASIBILITY MEMORANDUM)

Parsons ES submitted the Ash Landfill Draft-final FS on December 15, 1995, and provided the Groundwater Modeling Report as an appendix to the Draft-final FS on January 4, 1996. EPA comments on the modeling report, dated March 1, 1996, were received on March 6, 1996.

Parsons ES reviewed these comments and provided our response that was forwarded by SEDA to EPA and NYSDEC on May 30, 1996. SEDA had agreed with EPA that prior to submittal of the final FS, Parsons ES would provide the response to comments letter. This would allow EPA to review our responses prior to submittal of the final document. Parsons ES submitted The Final Groundwater Modeling Report was issued for regulatory review on July 9, 1996.

The performance of the treatability studies is now on-hold due to verbal instructions from CEHNC. Resolution of trench installation will continue pending receipt of a notice to continue and is 17% complete. Previously, bid specifications for the construction of the groundwater collection trench at the Ash Landfill were submitted for bid to four remedial contractors and bids were received on September 12, 1994. Parsons ES awarded the subcontract but has now stopped the process in response to the verbal request from the COE and SEDA.

Preparation of the Feasibility Memorandum is 65% complete. The groundwater modeling effort is complete and a draft modeling report was issued to the Army for review on October 10, 1995. The final modeling report was submitted on January 4, 1996, as an appendix to the Ash Landfill Draft-final FS.



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Parsons ES has not prepared the Feasibility Memorandum as we have not installed the trench. Groundwater from the trench was to be collected and tested using the UV/Ozone treatment technology. This has not happened as the trench installation and testing has been delayed. Parsons ES is waiting for a final decision on the future of this task.

Preparation of the Section C and cost estimate has been deleted from this delivery order.

#### DELIVERY ORDER 35 (PREPARATION OF WORK PLANS FOR RI/FSs AT VARIOUS SITES)

The preparation of the workplans is 99% complete. This task is behind schedule due to the lateness of receipt of the regulatory comments.

The preliminary-draft Generic RI/FS workplan was submitted for Army review on January 24, 1995. Army comments on the Generic Workplan were received, via fax, on March 9, 1995. The draft Generic RI/FS Workplan was submitted for regulatory review on March 24, 1995. EPA comments were received on May 19, 1995, and NYSDEC comments were received on May 30, 1995. The Draft-final Generic Workplan was issued on June 21, 1995. EPA comments were received on August 1, 1995. NYSDEC has verbally indicated that no additional comments will be provided and therefore the Draft-final is the final. However, additional EPA comments were received on August 23, 1995. A phone conference call on September 11, 1995, was used to resolve these final EPA comments. Parsons ES responded to these final EPA comments on September 22, 1995. EPA approved the Generic Workplan in a letter dated October 6, 1995, that was received on October 18, 1995. The Generic Workplan is now a final document. Although the Generic Workplan is considered a final document, EPA continues to provide comments on the Generic Workplan. Comments were received on the Scoping Plan for SEAD-4 contained comments on the Generic Workplan.

The preliminary-draft RI/FS Scoping Plan for the deactivation furnaces operable unit, (SEAD-16 and SEAD-17), was submitted for Army review on January 24, 1995. Army comments on the scoping plan for SEAD-16 and SEAD-17 were received, via fax, on March 9, 1995. The draft RI/FS Scoping Plan was submitted for regulatory review on March 29, 1995. Regulatory comments were received on June 15, 1995. The draft-final Scoping Plan for SEAD-16 and SEAD-17 was issued on July 27, 1995. NYSDEC has verbally indicated that no additional comments will be provided and therefore the Draft-final is the final from their standpoint. Parsons ES received EPA comments on September 1, 1995. Parsons ES responded to EPA comments and issued the scoping plan for SEAD-16 and 17 final on October 20, 1995. The Federal Facilities Agreement (FFA) indicates that a Draft-final document will become final if no comments are received within 30 days of submittal, since EPA comments are over the 30 day period, this document is considered final.

The preliminary-draft RI/FS Scoping Plan for the fire training areas operable unit, (i.e. SEAD-25 and SEAD-26), was submitted for Army review on January 25, 1995. Army comments on the scoping plan for SEAD-25 and SEAD-26 were received, via fax, on March 9, 1995. The draft RI/FS Scoping Plan was submitted for regulatory review on March 29, 1995. Regulatory comments were received on June 15, 1995.

The draft-final Scoping Plan SEAD-25 and 26 was issued for regulatory review on July 14, 1995. NYSDEC has verbally indicated that no additional comments will be provided and therefore the Draft-final is the final. Parsons ES has received EPA comments on August 23, 1995. These comments are considered

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minor with the exception that EPA requires that the flux chamber, deleted from the program, be added back. Following a phone conference call with EPA and NYSDEC on September 12, 1995, Parsons ES provided a response to EPA comments on September 22, 1995. Based on the discussions that took place in the phone conference call on September 12, Parsons ES received conditional approval of the generic workplan on September 18, 1995 that allowed the scheduled fieldwork for SEAD-25/26 to begin.

The preliminary-draft RI/FS Scoping Plan for the Old Construction Debris Landfill, (SEAD-11), and the Open Detonation Area, (SEAD-45) operable units, were submitted for Army review on February 28 and March 1, 1995, respectively. Parsons ES received Army comments on these two scoping plans on April 13, 1995, via fax. The Draft Scoping Plan for SEAD-11 was issued for regulatory review on June 16, 1995. The Draft Scoping Plan for SEAD-11 was combined into an operable unit with SEADs 64A and 64D and issued as Draft-Final on December 1, 1995. EPA and NYSDEC have requested delays in providing comments until February 22 and 16, 1996, respectively. NYSDEC comments were received on April 22, 1996. Receipt of EPA comments are pending.

The Draft Scoping Plan for SEAD-45 was submitted to the regulators on September 20, 1995. NYSDEC responded that, to avoid confusion and additional delays, NYSDEC would not provide comments on this document. Instead, NYSDEC will respond to the Scoping Plan for SEAD-45 when it is combined with SEAD-57 as one operable unit. This combination of scoping plans into operable units was agreed between the Army and NYSDEC. The Draft-final Scoping Plan for the combined SEAD-45 and SEAD-57 was submitted for regulatory review on February 23, 1996. We are awaiting receipt of regulatory comments.

#### DELIVERY ORDER 36 (PREPARATION of WORK PLANS for THREE (3) ESIs)

Modification No. 1 to this delivery order has been negotiated to eliminate one of the sites for evaluation, i.e. Building 804, while adding two sites, SEAD-28, the Former Waste Underground Storage Tanks, and SEAD-68, the Old Pesticide Control Shop. In addition, the investigations that will be performed at these four sites will follow the procedures of a remedial investigation (RI) not an Expanded Site Investigation (ESI), as originally planned. The revised, negotiated, cost estimate for modification #1 to this delivery order was provided to the COE on March 17, 1995. Parsons ES is currently awaiting the notice to proceed with the modification.

The preparation of the workplans is 55% complete. Two of the original three pre-draft workplans for SEAD-46, the Small Arms Range and SEAD-66, the Pesticide Storage Building, were submitted on March 1, 1995 for Army review. Parsons ES received Army comments on the two workplans, via fax, on April 13, 1995. Army comments were received on June 5, 1995. Parsons ES delayed preparation of this workplan until receipt of the approval to proceed of the cost modification. Since this approval has been over a year and does not appear likely to be approved, Parsons ES prepared the workplan for the two SEADs that were authorized, SEAD-46 and 66. Parsons ES issued the draft workplan for SEAD-46, the Small Arms Range on May 8, 1996. We have received Army comments from CHPPM, MRD and CEHNC by fax on June 20, 1996 and via mail on July 5, 1996. We will not respond to the Army comments until we receive regulatory comments.

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This task is behind schedule due to delays associated with receiving approval to proceed with the modifications of this delivery order.

DELIVERY ORDER 37 (REVISION to the RCRA PERMIT DOCUMENTS)

Parsons ES submitted the revised protocol document for air dispersion modeling, baseline ambient air monitoring, and for risk assessments for regulatory review and approval on April 7, 1995. No NYSDEC comments have been received.

The preparation of the Process Evaluation Report is 100% complete. The draft Process Evaluation Report was issued for Army review April 5, 1995. Comments from the Army were provided to Parsons ES, via fax, on May 3, 1995. Complete Army comments were received on June 5, 1995. The Final Process Evaluation Report was issued on December 12, 1995.

The preparation of the RCRA permit application, has begun and is 33% complete. This task is behind schedule due to several factors. First, although SEDA received NYSDEC comments on the Part B permit application that was submitted previously, Parsons ES expected that additional comments would be forthcoming, based upon NYSDEC's comment letter. We anticipated that we would revise this permit and resubmit the Part A and the Part B permit, including the Treatment, Storage and Disposal (TSD) permit, the Subpart X permit and the Trial Burn Plan, as one complete permit application, which is how NYSDEC wanted the permit to be provided. NYSDEC never provided additional comments on the permit previously submitted. Instead, NYSDEC indicated that they would write the Part B permit for the TSD portion of the permit that meant that there was no reason to resubmit the Part A or the TSD portion of the Part B permit. Although NYSDEC indicated that they would write the TSD permit, they never did.

Parsons ES began revising the Trial Burn Plan based upon the plan to respond to the existing comments and revise the permit. However, this was dropped as SEDA indicated that they would not be demilitarizing munitions with the deactivation furnace now that the base is being closed and there was no real need to pursue this permit for the deactivation furnace. We stopped working on the Trial Burn Plan as there is apparently no need to pursue the permit.

Parsons ES had continued to prepare the Subpart X permit, as it appears that even though the base is closing there may be a need to continue OB/OD operations. We issued a working draft copy of the Subpart X permit for use by SEDA, but delayed completion of the permit as there was some potential that the permit would not be required if NYSDEC would allow SEDA to complete their mission under the current interim status provisions of RCRA. All OB/OD operations performed at SEDA for the past 10 years have been performed under the interim status provision of RCRA. At our last meeting at SEDA on July 31 and August 1, 1996, SEDA indicated that NYSDEC would allow some OB/OD operations to continue under interim status, however, this is only for a limited time and amount of material. During a recent project manager's meeting at SEDA, Mr. Absolom indicated that as a result of his discussions with NYSDEC, there is no need to continue on the Subpart X portion of the RCRA Part B permit as NYSDEC will not require this permit in order for SEDA to close out the base. Accordingly, Parsons ES recommends that this task and the entire delivery order be closed.

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The response to notice of deficiencies, has not begun since the revised RCRA permits have not been submitted.

Baseline ambient air monitoring, is 99% complete. Parsons ES has completed the collection of the baseline ambient air monitoring data from the locations surrounding the OB/OD area. The location of these air monitoring stations were identified in the protocol document issued for regulatory review on April 7, 1995. In mid-May, 1995 Parsons ES began the collection of mobile ambient air monitoring data following the performance of OB/OD operations. This has involved close coordination with SEDA personnel to coordinate and discuss the timing and the location of the plume movement. This air monitoring task is complete for open burning operation but has been delayed for open detonation monitoring since SEDA has not performed open detonation activities. Parsons ES has completed this data collection effort. This task is behind schedule due to delays in receiving Army comments, modifying the Subpart X permit application protocols document, awaiting OB/OD operations to commence so that we can collect the monitoring data and initiating the field monitoring program.

Evaluation of air quality impacts is 82% complete. Parsons ES has completed the modeling protocols and submitted them to NYSDEC. Although Parsons ES has not received any response to these protocols, our modeling group has had discussions with the chief of the air modeling group at NYSDEC to clarify various requirements that we have anticipated as possible concerns to NYSDEC. Model output runs have been performed and the data has been plotted and is complete. This information will be used in a risk assessment to evaluate the impacts from OB/OD operations.

Preparation of the risk assessment is 30% complete. The risk assessment protocols was submitted to the Army for review on February 2, 1995. Army comments were received, via fax, on February 28, 1995 and were submitted to NYSDEC on April 7, 1995. We are proceeding with this task now that the air modeling and the air monitoring efforts are complete. Parsons ES has provided a listing of all munitions that will be demilitarized for Army and SEDA review. Based upon a comparison with the model results and the NYSDEC short term and annual ambient air criteria guidelines it appears that some items will exceed the allowable air values. Parsons has requested that this information be reviewed prior to completion of the risk analysis to determine if the items that exceed the air criteria could be eliminated or if the quantity of the munitions that will be demilitarized could be decreased. Parsons ES has stopped with the preparation of this effort as SEDA has indicated that there is no requirement to pursue this permit.

If the RCRA permit will not be required by SEDA then this delivery order should be modified or closed. It appears that the RCRA permit will not be required for the depot and therefore this delivery order should be closed.

#### DELIVERY ORDER 41 (PREPARATION of 13 WORKPLANS for RI/FSs at VARIOUS SITES

The preparation of the 13 workplans is 77% complete. All preliminary-draft and draft versions of the scoping plans have been issued to the Army for review. Parsons ES has issued the draft-final version of SEAD-4 and are preparing the draft-final version of SEAD-12. Since SEAD-12 involves radiological issues there is need to involve other Army groups to resolve several of the regulatory comments. This will delay the submission of the draft-final version of the document until resolution is complete.

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The Draft Scoping Plan for SEAD-4 was issued for review on October 25, 1995. EPA comments on SEAD-4 were received on May 10, 1996. These response comments included comments on the Generic Workplan, which is part of Delivery Order 35. The Draft-final Scoping Plan for SEAD-4 was issued on July 26, 1996.

EPA comments on the Draft-final scoping plan for SEAD-4 were received on August 16, 1996. NYSDEC comments were due on August 26, 1996. The most significant comment regarded the use of the current analytical protocols. The current analytical methodologies cannot attain detection limits that are less than the current groundwater standards, i.e. MCL's for drinking water. Parsons ES issued the workplan final on October 18, 1996 after recommending that the current NYSDEC CLP analytical protocols be modified to attain the lower detection limits. This has involved our laboratory, Inchcape Testing Services, Inc., who will be involved in preparing the modified analytical protocols. We received additional comments from EPA indicating that these new modifications will require MRD certification and should be provided to EPA for review.

The Draft Scoping Plan for SEAD-13 was issued for review on November 14, 1995. NYSDEC comments were received on January 16, 1996. EPA comments were due to be submitted on March 10, 1996.

The Draft Scoping Plan for SEAD-64A and 64D was combined with SEAD-11 and issued for review on December 1, 1995. No comments have been received from EPA and NYSDEC.

The Draft Scoping Plan for SEAD-12, SEAD-48 and SEAD-63 was issued for review on December 19, 1995. EPA's comment letter on this scoping plan was received on July 2, 1996. NYSDEC's comments were received on July 1, 1996. Revisions to this scoping plan are being prepared. During the meeting on August 20, 21 and 22, 1996, a tour was provided with NYSDEC at SEAD-12. Information was provided by the COE that will need to be incorporated into the Draft-final scoping plan for SEAD-12. Also discussed was the incorporation of the requirements of the guidance document NUREG-5849 into the existing workplan. Since this meeting we became aware of a recent document entitled Multi Agency Radiation Site Survey Investigation Manual (MARSSIM) that was developed jointly between EPA, the DOE, the DOD and the NRC that is applicable to our site at SEAD-12. This document incorporates the requirements of NUREG-5849 and has served as the basis of the revised workplan. Following discussions with SEDA it was agreed to eliminate SEAD-48 from consideration in the Draft-final workplan. The revised Draft-final workplan was issued for review on December 2, 1996.

The Draft Scoping Plan for SEAD-52 was combined with SEAD-60 and issued for review on January 19, 1996.

The Draft Scoping Plan for SEAD-5 was combined with SEAD-59 and SEAD-71 and issued for review on January 30, 1996. EPA comments were received on the Draft plan on September 20, 1996.

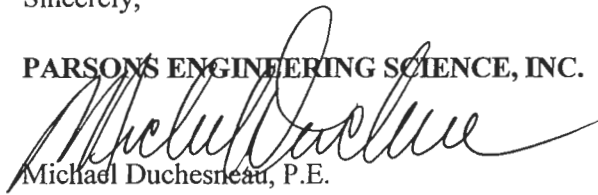
The Draft Scoping Plan for SEAD-57, combined with SEAD-45, was submitted for regulatory review on February 23, 1996. This task is behind schedule due to delays associated with receiving the notice to proceed and receiving comments on the pre-draft and draft scoping plans.

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If you have any questions regarding this or any other project, please, do not hesitate to call me at 617-859-2492.

Sincerely,

**PARSONS ENGINEERING SCIENCE, INC.**



Michael Duchesneau, P.E.  
Project Manager

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