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# DEPARTMENT OF THE ARMY ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT 600 ARMY PENTAGON WASHINGTON DC 20310-0600

9 SEP 1994

REPLY TO ATTENTION OF

DAIM-ED-R (200-1c)

MEMORANDUM FOR COMMANDER, U.S. ARMY MATERIEL COMMAND,

ATTN: AMCEN-A, 5001 EISENHOWER AVENUE,

ALEXANDRIA, VA 22333-0001

SUBJECT: Decision Document for Removal Action at the Ash

Landfill Site, Seneca Army Depot Activity

1. Reference memorandum, SDSTO-SEI-PE, 10 Aug 94, SAB (encl with endorsements).

- 2. The referenced memorandum requested concurrence on the subject Decision Document. The Decision Document is approved and you are authorized to execute the proposed remedy. Please ensure the contract to execute the removal action is awarded prior to the end of FY94.
- 3. The Office of the Director, Environmental Programs point of contact is Mr. Mike Vogt, Comm (703) 696-8078 or DSN 226-8078

FOR THE ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT:

Encl

FRANK R. FINCH, P.E.

Colonel, GS

Director, Environmental Programs

CF:

COMMANDER,

U.S. ARMY ARMAMENT, MUNITIONS AND CHEMICAL COMMAND, ATTN: AMSMC-EQ

U.S. ARMY CORPS OF ENGINEERS, ATTN: CEMP-R

U.S. ARMY ENVIRONMENTAL CENTER, ATTN: SFIM-AEC-IR SENECA ARMY DEPOT ACTIVITY, ATTN: SDSTO-SEI-PE

#### DEPARTMENT OF THE ARMY



SENECA ARMY DEPOT ACTIVITY ROMULUS, NEW YORK 14541-5001

REPLY TO ATTENTION OF

SDSTO-SEI-PE (200)

10 August 1994

MEMORANDUM THRU

Commander, Tobyhamna Army Depot, ATTN: SDSTO-EM, Tobyhanna, PA 18466-5000

Commander, U.S. Army Depot System Command, ATTN: AMSDS-IN-E, Chambersburg, PA 17201-4170

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

FOR HQDA (ENVR-EH), WASH DC 20310-0103

SUBJECT: Decision Document for Removal Action at the Ash Landfill Site, Seneca Army Depot Activity (SEDA)

- 1. Enclosed is the Ash Landfill Decision Document (encl 1), Memorandum Ash Landfill Removal Action, Cost Summary (encl 2), and letters of concurrence on the Action Memorandum from the U.S. Environmental Protection Agency (EPA) (encl 3) and the U.S. Army Environmental Hygiene Agency (encl 4).
- 2. The estimated cost for the removal action is \$5.4 million, to be awarded fourth quarter FY94 by the Corps of Engineers, Omaha district. Seneca Army Depot Activity requests a waiver for the \$2 million limit regarding removal actions.
- 3. Request your concurrence and forwarding on the Decision Document.
- 4. Point of contact for Seneca is Mr. Randall Battaglia, DSN 489-5450.

By E. Johnson

4 Encls

ROY E. JOHNSON LTC, OD Commanding SDSTO-EM (SDSTO-SEI-PE/10 Aug 94) (200) Mr. Maciejewski/jal/DSN 795-7090 SUBJECT: Decision Document for Removal Action at the Ash Landfill Site, Seneca Army Depot Activity (SEDA)

Commander, Tobyhanna Army Depot, ATTN: SDSTO-EM (Mr. Joseph Maciejewski), 11 Midway Rd., Tobyhanna, PA 18466-5086

FOR Commander, U.S. Army Depot System Command, ATTN: AMSDS-IN-E, Chambersburg, PA 17201-4170

- 1. This office concurs with SEDA Decision Document.
- 2. Detailed information is provided as stated in basic correspondence.
- 3. Request your concurrence and forwarding.
- 4. Point of contact at this installation is Mr. Joseph A. Maciejewski, DSN 795-7090, or commercial 717-894-7090.

FOR THE COMMANDER:

4 Encls

JAMES D. SCOTT, P.E.

Director of Public Works

#### DECISION DOCUMENT

## FOR REMOVAL ACTION AT THE ASH LANDFILL SITE, SENECA ARMY DEPOT ACTIVITY

#### PURPOSE OF REMOVAL ACTION

This decision document presents the selected removal action for the Ash Landfill site at the Seneca Army Depot Activity developed in accordance with CERCLA, as amended by SARA, and the National Contingency Plan.

The site, located at the installation boundary, consists of an abandoned incinerator building and stack, a former cooling pond, an ash landfill, and a nearby non-combustible fill landfill (see figure 1). The incinerator was destroyed by a fire on May 8, 1979, and the landfill was subsequently closed. The landfill was capped with native soils of various thicknesses but has not been closed with a permitted cover or cap.

The work for this removal action is based primarily upon data collected during the Remedial Investigation (RI) for the Ash Landfill. The primary focus of this removal action is an area known as the "bend in the road" at the SEDA Ash Landfill. This area was identified during the RI as the primary source of volatile organic contamination at the site.

This removal action is not intended to be the final remedy for the entire Ash Landfill site. The primary objective is to eliminate or significantly reduce the potential for human or environmental exposure to contamination through uncontrolled releases of trichloroethene (TCE), dichloroethene (DCE), and vinyl chloride (VC) to groundwater from contaminated soils. SEDA developed an Engineering Evaluation/Cost Analysis (EE/CA) to evaluate the various remedial options for the site, and to select the best option. The EE/CA is included in Appendix A of the Action Memorandum Ash Landfill Removal Action. The Action Memorandum has been reviewed by the Environmental Protection Agency, Region II (EPA) and by the New York State Department of Environmental Conservation (NYSDEC). The EPA has provided a letter of concurrence on the Action Memorandum.

#### SUMMARY OF SITE RISKS

The contamination at the SEDA Ash Landfill poses a threat to public health or welfare through several mechanisms. The primary threat is through exposure to contaminated ground water. TCE and its breakdown products are present in the ground water over the Maximum Concentration Limits. The contamination has been confirmed at the installation boundary and has been found in ground water and surface seeps off the installation. The contaminated soil has been identified as the primary source of

the ground water contamination. The contaminated soil may also pose a threat through soil exposure to on-site workers. The TCE and DCE in the soils also exceed the State of New York established guidelines for the remediation of contaminated soils.

#### SUMMARY OF ALTERNATIVES

Three general categories of removal actions for the contaminated soils were considered: on-site treatment, on-site containment, and off-site disposal. Three methods of on-site treatment- soil vapor extraction (SVE), thermal desorption, and incineration- were evaluated in detail.

Off-site disposal, on-site containment, and incineration were eliminated from consideration based on costs. Primary advantages of SVE are low cost, ready implementation, and the ability to conduct the remediation in-situ. However, primary disadvantages are long treatment time and ineffectiveness in removing the polyaromatic hydrocarbons and other semivolatile organics present at the site.

Thermal desorption is effective in treating the site contaminants and has short duration, 3 to 6 months. Therefore, on-site thermal desorption is the selected alternative. The estimated cost for this process is \$5.4 million.

#### DESCRIPTION OF THE SELECTED REMEDY

Soil at the Ash Landfill site will be excavated, treated by thermal desorption, and backfilled on site. Otherwise known as low-temperature thermal stripping, thermal desorption is a process in which the contaminated soil is heated in order to vaporize the volatile organic contaminants. The vapor then passes through a series of air emission control units to remove the contaminants.

The effluent soil will be sampled periodically to ensure that sufficient treatment has occurred. The effluent air will be monitored to assure that the levels of organics do not exceed design criteria. The temperature of the thermal desorption vessel will be monitored to ensure proper treatment.

A Quality Assurance/Quality Control (QA/QC) plan will describe the procedures to be followed to ensure that the data collected is valid, and will be accepted as evidence of a successful removal action. At a minimum, the QA/QC plan will address sampling procedures, analytical procedures, data validation and reduction procedures, and quality assurance samples (duplicates, blanks, etc.). The analytical methods specified will be acceptable to NYSDEC and EPA, and will have detection limits low enough to ensure that the treatment criteria have been met.

#### PUBLIC/COMMUNITY INVOLVEMENT

It is Department of Defense (DoD) and Army Policy to involve the local community as early as possible and throughout the installation restoration process at an installation. To accomplish this, a Community Relations Plan (CRP) was developed at SEDA with input from residents and officials from the adjacent towns in the area. The CRP is the guidance document that, under the Federal Facilities Agreement (FFA), will be followed to conduct community relations activities at this site. Furthermore, the Technical Review Committee (TRC), which meets quarterly, has been kept up to date on this project. The TRC is open to the public and attendees include interested environmental groups and newspaper reporters. The developments in each TRC are reported in the local newspapers. A public announcement with a 30-day comment period is scheduled for 10 August through 10 September 1994 with a public meeting scheduled for 17 August 1994.

#### DECLARATION

The selected remedy is protective of human health and the environment, attains Federal and State requirements that are applicable or relevant and appropriate to this removal action, and is cost effective. This remedy satisfies the statutory preference for remedies that employ treatment that reduces toxicity, mobility, and volume as a principal element.

Because this remedy is a source removal and further remedial action may be required to address groundwater contamination, the five-year review will not apply to this removal action. This remedy will be consistent with future remedies needed to address groundwater contamination at this location.

Lewis D. Walker,

Deputy Assistant Secretary of the Army
(Environment, Safety, and Occupational Health)

Roy E. Johnson

Date

Date

Roy E. Johnson LTC, U.S. Army Commanding

## State of New York,

COUNTY OF ONTARIO CITY OF GENEVA

PUBLIC NOTICE PUBLIC NOTICE
SENECA ARMY DEPOT ACTIVITY, DEPARTMENT OF THE
ARMY, INVITES PUBLIC COMMENT ON THE ASH LANDFILL
REMOVAL ACTION, DRAFT DECISION DOCUMENT AND FINAL ACTION MEMORANDUM, SENE-CA ARMY DEPOT ACTIVITY, ROMULUS, N.Y.

The Army is soliciting public comment on the proposed removal action to excavate and treat contaminated soil at the Ash Landfill site, Seneca Army Depot Activity (SEDA), N.Y. Related information is available at the SEDA Information Repository located at:

Romulus Town Hall 1435 Prospect Street Willard, N.Y. 14588 Phone: (607) 869-9326 Hours: Monday-Friday, 8:00am-4:30pm

Comments from the public are encouraged. This public comment period will close on September 10th, 1994. Written comments should be directed to: Mr. Jerry Whitaker Public Affairs Officer

Building 116
Seneca Army Depot Activity
Romulus, N.Y. 14541

The Army will be holding a public meeting to discuss the action being considered on August 17, 1994 starting at 6:00 p.m. at the Romulus Central School, 5705 Main St. (Rt. 96), Romulus, N.Y. At 7:00 p.m., a brief presentation will be given on the removal action. For additional information, contact Mr.. Jerry Whitaker at 607/869-1235. 580

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Final Released 8/10

PUBLIC NOTICE

SENECA ARMY DEPOT ACTIVITY
DEPARTMENT OF THE ARMY
INVITES PUBLIC COMMENT ON

THE ASH LANDFILL REMOVAL ACTION

DRAFT DECISION DOCUMENT AND FINAL ACTION MEMORANDUM

SENECA ARMY DEPOT ACTIVITY

ROMULUS, NY

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### State of New York,

**COUNTY OF ONTARIO** 

SS.

CITY OF GENEVA

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Carl Funt	· of the City of Geneva. O	County of Ontario.
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JEWEL E. HARA

Notary Public State of New York
Ontario County No. 35-6765810
Notary Public, Ontario County No. 35-6765810

# Some contaminants found in depot soil

By MARTIN TOOMBS Finger Lakes Times

ROMULUS - New environmental testing at the Seneca Army Depot Activity has uncovered few surprises, according to officials involved in the cleanup of the military base.

"The extent of what we're finding is not so bad ... it's primarily in the shallow soils," said Kevin Healy of the Army Corps of Engineers.

Lead and byproducts of petroleum-based fuel were among the contaminants discovered.

An update on the testing was given Wednesday during a meeting of the Technical Review Committee, a group made up of local, state, and federal representatives.

The depot is on the National Priorities List for cleanup of contamination resulting from the base's ammunition disposal operations and landfill use. Also being investigated is possible radioactive contamination in the former special weapons area.

Michael Duchesneau of Engineering-Science of Boston reported on tests done at seven high-priority sites, including a munitions washout site, a former fire training area, an abandoned burning pit and a munitions detonation area.

Duchesneau said investigators found fewer explosives than expected in the areas used to detonate obsolete munitions. They were surprised to find a concentration of copper at one location and arsenic in another

Two sites listed as locations for possible radioactive contamination date back to 1956 when the northern area of the depot was the responsibility of the Atomic Energy Commission.

There was a wastewater tank there which may have contained radioactive material, said Randall Battaglia, the depot's environmental cleanup project manager. It's also known that some waste — possibly

radioactive - may have been buried nearby.

In 1986, barrels of radioactive material were dug up and transported to a disposal facility in South Carolina.

Duchesneau said work is continuing on a plan to treat 35,000 tons of soil in the area of the old incinerator ash landfill.

The solvent trichloroethene and its byproducts, dichloroethene and vinyl chloride, have been found in concentrations as high at 540 parts per million.

The soil will be excavated and heated to 400 to 500 degrees to vaporize the chemicals. The exhaust will then be treated in air scrubbing equipment to capture the chemicals. The goal is to get the contamination levels down to .7 parts per million. The work could begin as early as November or December.

The Technical Review Committee will meet again at 12:30 p.m. Aug. 17.