COUNTY OF SENECA STATE OF NEW YORK

EIGHTH MEETING OF THE

TECHNICAL REVIEW COMMITTEE

HELD AT: Seneca Army Depot
Romulus, New York

HELD ON: August 17, 1994

REPORTED BY: MARY GRASEK

MR. ABSOLOM: I would like to introduce Lieutenant Colonel Roy Johnson, Commander of the Seneca Army Depot.

LTC. JOHNSON: It is a great pleasure to welcome you all back here for the quarterly Technical Review Committee We have a pretty good agenda. I hope you will receive copies passed out to each of you of the areas which we are going to cover, the order we are going to cover them today.

At this time, I would like to turn the presentation over to Mr. Kevin Healy from the Huntsville Corps of Engineers for the current status of our program.

MR. HEALY: Good afternoon. As always, we are starting out talking about the remedial investigation. The two main sites are the ash landfill and open burning grounds site. Since the last time we talked to you, our reports are now being reviewed by the regulators and they will be providing us with comments. And we will incorporate those comments as need be Hopefully within another, I'd say, month or two, these documents will be completed.

(Off the record.)

(Back on the record.)

MR. HEALY: I am Kevin Healy from the Huntsville Division Army Corps of Engineers. I am the

lead engineer for the work being done at the Seneca Army Depot.

MR. DUCHESNEAU: Mike Duchesneau, Engineering-Science in Boston. I am the project manager.

MR. CHAPLICK: Jim Chaplick from Engineering-Science in Boston. I am the environmental manager of the office.

LTC. JOHNSON: I am Lieutenant Colonel Roy Johnson, Commander of the Seneca Army Depot.

MR. ABSOLOM: I am Steve Absolom. I am Chief of Public Works at Seneca.

MR. HODDINOTT: Keith Hoddinott, risk assessor for the Surgeon General.

MR. SUEVER: I am Rick Suever. I am with the Huntsville Division Corps of Engineers. I am the project manager for the work at Seneca.

MS. WILSON: Judy Wilson with the Public Affairs office, the Huntsville Division U.S. Army Corps of Engineers in Huntsville.

MS. FALLO: Janet Fallo. I work at the Seneca Army Environmental.

MR. ENROTH: Tom Enroth, Seneca Army Depot alternate project manager.

MR. GERAGHTY: I am Dan Geraghty with the New York State Department of Health.

MR. WHITAKER: Jerry Whitaker, Public Affairs Officer for Seneca Army Depot.

MS. BUCHI: Kathleen Buchi with the Army Environmental Center. My agency does the -- controls the program money for the Army.

MS. STRUBLE: Carla Struble, I am with the U.S. Environmental Protection Agency. I am the project manager assigned to answer Army questions.

MR. NELSON: Bruce Nelson with Malcolm Pirnie providing technical oversight for the USEPA.

MR. BIERNACKI: I am John Biernacki with the Army HQDESCOM. We have four installations throughout the U.S. and Seneca is one of our installations in this program.

MR. STAFFORD: Ken Stafford, Supervisor of the Town of Varick.

MR. COOL: Bill Cool, Seneca Soil and Water Conversation District and Varick Councilman.

MR. DURST: R. A. Durst, Professor of Chemistry at Cornell University. A resident of Varick.

MR. BATTAGLIA: I am Randy Battaglia, the project manager of Seneca Army Depot.

MS. MANASERI: I am Joanne Manaseri. I represent the legal office at Seneca Army Depot.

MS. STANCZAK: I am Marti Stanczak with the

legal office, Tobyhana.

MR. MOLOUGHNEY: I am Joe Moloughney. I am with the New York State DEC Central Office in Albany.

MR. REAMON: Tom Reamon, New York State DEC in Albany.

MR. VELTE: Cliff Velte, Seneca Planning Board.

MR. PICKETT: Jack Pickett, Corps of Engineers, the North-Atlantic Division of New York.

MS. VERA: Linda Vera with the DEC in Avon.

MR. BURNS: Charles Burns, local engineers.

MR. MEHTA: Manmohan Mehta, DEC in Avon.

MR. RICOTTA: Frank Ricotta, New York State Department of Environmental Conservation

MR. CROOK: Steve Crook. I am with the Law Environmental Office in Auburn, New York.

MS. MC NIEAL: I am with The Citizen newspaper in Auburn.

MS. SAMPREE: Lucinda Sampree, a private citizen and member of the Seneca Lake Pure Waters Association.

MS. COLEMAN: Estelle Coleman. I am a resident in Romulus.

MR. HEALY: As I started out, let me briefly rehash the two main sites are the ash landfill and the open burning ground areas. These are the sites at which

we are doing the remedial investigation feasibility study. We are proceeding along two paths. First the remediation reports. These are now in draft final form. We have gotten one round. Our regulatory comments, hopefully, will be incorporated and from there we hope to finalize the documents. That should be within the next month to two months.

As far as the feasibility study report is concerned, that currently is in draft form which means the EPA and the DEC are reviewing them. We will be receiving comments from them within, hopefully, the next month. And it will be up to the Army to respond to those comments and correct the documents accordingly. Records of decision which is somewhat the final decision from these sites is formalized, are expected somewhere in early 1995. That would be calendar year 1995.

As far as the Solid Waste Management Units are concerned, I would like to give an update on the high priority areas of concern. These are ten sites. We have draft documents that have been submitted to the Regulatory Review. The final reports were originally expected by November. We are now looking at a little bit of a delay, possibly early calendar year 1995. The reason for the delay is there has been a lot of higher priority documents that have to be reviewed by the

regulators. So these have slipped the priority in consideration.

The next site of the Solid Waste Management Unit to be dealt with, what that section refers to is the moderate priority of concern site investigation for those fifteen sites were all recently completed. Primarily draft report which is the draft report that goes to the Army only for the Army's inspection is due probably within the next month or so. The final reports were originally expected in late 1994. More likely they will not be arriving until February or March. Again, the reason for this there have been higher priority documents that have been reviewed. From the review on those have been delayed. What I believe we are only talking about a month or two months delay; nothing more serious.

As for the SWMU clarification which is the report that incorporates the Army's position and record search of all SWMUs on site, limited sampling is now done. This report finalization has been completed from basically the Army's standpoint. There is a few issues that remain to be reviewed. Based on some of the names that were received from DEC, we will possibly be required at least to do some altering of the verbiage in the report and very simple statement changes. Additional consolidation work may be necessary, very little.

That is it as far as the update as to all the work that is going on.

MR. DURST: Kevin, as far as the regulatory review of these documents by the EPA and the DEC, are there any other organizations who have priority first?

MR. HEALY: The two main ones are the EPA and NYSDEC. Along with NYSDEC is the Department of Health. And I believe those are the two state agencies that are reviewing these documents. Each one, I would say, has the same priority because this is all site work is being done under the Federal agreement that was signed by the three parties. I believe that they all have equal priority.

At this point, I would like to introduce Mr. Duchesneau -- no, I'm sorry. Randy is going to give a discussion, more detailed discussion of the other areas of concern that we are working with.

MR. BATTAGLIA: This summer, I think the last field work was done in August We have investigated twenty-five sites on Seneca Army Depot which may require further investigation and some may end up being no action because we did not find anything at those sites. Mike will talk later about an ash landfill site which is not one of the twenty-five. It's a previous site -- for some of you that are new here -- that we have been doing in-

depth investigations at. Another site, the open burning ground, has been going through an in-depth investigation. That in-depth investigation is remedial investigation feasibility studies.

Before I get that far into the study, you do initial site investigation at sites. That's also called preliminary assessment and site investigations. Preliminary assessment is a historical review of operations that may have occurred at a facility. And some of those, based on just historical information about a particular area, you can make a reasonable decision that the site does not have to be investigated. You don't have to spend money to look at a site when there is no -- really no need to. If there is any doubt, you go ahead and do the initial site investigation. And twenty-five sites on Depot, we have done a field work this summer on those sites. I am going to go over what -- where the sites are on Depot and what they are and a little bit about what we have found.

We have found -- we have some preliminary information about what we found out when we were in the field. The lab work simply hasn't been performed yet by the labs. We haven't gotten the data back to tell -- to determine just what we do have at a particular site. When we get that information back, we will know whether

we can do a -- just do a cleanup right then and there. If it's pretty simple, such as metals in soils, we can do a removal operation. Those decisions have to go through a lot of review with EPA and DEC before we decide when we can remove the contamination or if you have to do further studies to determine just how much gets removed or what the best alternative is; how to treat the contamination that's there.

On this map here, we have number -- we have ten sites. We call them high management -- high priority sites. Basically in general, based on what we know about the sites, whether it's more than likely to be contaminated. Or sometimes we have limited information that really doesn't wind up on the remedial -- on the list. It may be more contaminated; may be a higher priority in the future as far as which one we look at next.

This is a map of Seneca Army Depot. To get your bearings here, the Town of Romulus is over here, this is Route 96A along here, over here is Depot Airfield, Route 96A runs along here, and this little triangle down here is lake housing area, that's Kendaia Creek that runs up to the Depot. I will just take it from the top here.

Number 4 is the munitions washout facility

leach field. Back in the fifties, we had a washout plant where they washed out things like chromium. They steamed it with water and inside the room removed the explosive. We believe we burned that at the abandoned powder burning pit here on Depot which I think that we don't have much information what they did, where they did it.

At that particular site, we thought we would find explosive contamination, but we did not. The preliminary results is metals in soils; primarily chromium and copper.

Incidentally, a lot of information -- at our public meeting, we are going to be handing out fact sheets. The preliminary results, I hand wrote on here. Again, I want to stress those are preliminary results. We may very well learn a lot more with the lab work when they come whether the contamination is there or not there. We do initially -- just because of some of the results are in some other sites, what they found in the field with some of the monitoring equipment, they know there is paint and solvents there at a particular site -- I will get to that later.

Number 11 which is on the east side of Seneca Airfield in the ammunition area of the Depot is an old construction debris landfill. We have a number of these old construction debris landfills on Depot. The common

practice we have -- we are still doing it, if you have any construction on Depot, say you just built a building, you go to the landfill. On Depot or on post, any other construction debris, whatever, also got landfilled there. Trouble is, you don't know if anything else was disposed of. We have a number of these construction landfills. We don't know what we would find. We found a lot of roadside construction debris. So it varies. We found that there is something underground, we dig it up, we don't know if it's going to be a drum or some kind of construction debris.

Number 13 is over on the east side of the Depot towards Romulus. Some of you that are familiar with the Depot boundaries may know that there is a big pond there. We call them the duck ponds. Number 13 is an IRFNA disposal site which is Inhibited Red Fuming Nitric Acid disposal site. Back in the forties and fifties and sixties where they disposed of Nitric Acid by digging trenches and putting limestone in the trench and pouring acid on the limestone to neutralize it. We found some nitrates in the ground water around those sites. We haven't got as far as what to do about it. Each site, some places we will have to coordinate with the EPA and NYSDEC on which sites to be developed, which sites can't and do interim removal, remove contamination.

Number 16, which is over here. Sixteen and seventeen are two deactivation furnaces, deactivation furnaces, incinerators, which the furnaces which we have disposed of small arms ammunition. When small ammunition, regular size bullets on up to big bullets get old, a lot of them might be duds Some might be hazardous for the soldiers to handle. So they dispose of them in the incinerators We have one that is existing which is No. 17. The abandoned one which they used up until 1962 over here on the east side of the Depot here. And at those sites we have found mostly metals in soils; primarily copper, lead, zinc. And they found some explosive residue in the abandoned deactivation furnaces.

Again, those are preliminary results. And actually those two sites are two candidates where you have the soils with metals contamination. It's a simple project to clean that up. When you get into the ground water contamination, it's a little more complex about what the chemicals are and how you can remove them from the ground water. That is, I have to do more independent studies to determine what to do about that site.

Number 24 which is over on the west side of the Depot is an abandoned powder burning pit. I presume that's where they burned explosives in the washout plant just because of the time of the operation of both of

those areas. It's pretty feasible, but we don't really have good information about the historical use out there. At the abandoned powder burning pit we found explosive residue in the soil and also arsenic. We have no idea where the arsenic came from We found that out there when we did the initial site investigation. In more in-depth remedial investigations, we look for pretty much everything there is. It's a matter of how much -- how many samples you take between the two investigations.

Number 25 which is over here by this end of the Depot is the fire training demonstration pad. In number 26, which is over by the warehouses just south of where we are here, is a fire training pit and area. We did fire training activities at those two areas over the years. And what we did find, we expected. We found gasoline and some fuel products in the soil and in the ground water.

SEAD-45, which is over here and this is the northwest corner; again, this is Route 96A. This is our open detonation area. We open burn and detonate weapons, anything from 9 millimeter to artillery round. We have Korean warheads and there are Korean air war rockets that we stored there. We detonated the warheads on the open burn pit. The propellants -- what we found are contaminations out there normally likely from the old

operations, older operations. I know that because the contents of the chemicals that are in the propellants are in explosives that we are disposing of now. And also in the past, a lot of operations were not regulated as they are now. Also in the detonating area we have found metals in the soil and sediments; primarily copper, lead, zinc, and mercury. We will most likely do a more in-depth investigation around the detonation area just because of the nature of that site.

And SEAD-57, which is nearby there, is an EOD area which is Explosive Ordinance Disposal. That's the Army bomb squad. They used that as a training range in the past. They most likely disposed of material out there, that's why it made the Solid Waste Management Unit. And at 57 we have found some copper in soils.

We have identified 72 areas in total on the Depot that fall into the definition of Solid Waste Management Unit, or is an area that needs to be investigated because of the potential contamination. I have broken up the maps here and the different areas just for simplicity sake. I guess it's pretty messy for all 72. On this map, we have 15 areas.

SEAD-58, which is over here on the west side of the Depot, is called the booster station debris area. We had a report that there was a number of drums out in the

middle of a field. Actually, we had walked out there about four or five times before we even found it. We used to have a dotted area about a half a mile in circumference for that site. When we went out there, there was what looked like a pile of garbage, old drums lying around. So we found the site and identified it as a site. I will give you a little history of what we have done out -- what we do is a lot of work talking to people who have been here for a number of years and some retirees about where they disposed of things on Depot. That's how we find a lot of these IRFNA sites is to get connections. Which again, is up in the air Which maps down the south end of the Depot. It was really two and a half miles away from it. The booster station debris area which is a case of finding the area, some of the sites were just rumors at one time. Actually in talking to -- to find somebody who knew about an operation, then went on from there. We found them on the Depot.

SEAD-67, which is over in this area, is the building for dump site. There is a sewage treatment plant right near SEAD-67 which is one of our no action SWMUs. There are some funny piles. We went out and investigated around there. We don't know if somebody dumped something out there. We don't have any preliminary results yet about that site; whether or not

there is any contamination there, the labs are still working on it. Again, we just went out in the field in August, did the sampling on some of these, we found some things. On actually the first list, the first map was done in June, July, No. 3. Before that, 10 was done about February or March of this year. That's why we knew -- that's how we knew we had metals and so forth with those.

SEAD-50 and 54. Again, this is Route 96 over on the east side of the Depot. We drive down 96, you will see a couple of tanks, large above-ground tanks. They used to be a tank farm. Some of the tanks we still store asbestos in. We store for the Army. The question was, was there environmental contamination around that tank farm. That tank farm stored dry ores. They didn't expect any contamination there. One thing we are looking at is past contamination because there are stories about shoveling asbestos on Depot years ago. Actually, I know somebody who used to be here that did that; whether that was when they filled up those tanks, we don't know. We are testing the site to see if there is asbestos contamination. And, of course, it's a full site investigation, we are testing for everything else.

SEAD-44 which has two areas. They are identified as a site called QA Lab or QA Test Facility.

That's all we know about it. I think they tested explosives at the sites. We knew they did, somebody did. We don't know anything about it. The investigation -- we called for a site investigation there. We looked for everything. Everything that we are looking for at all the other sites.

SEAD-50, which is over in this area. Again, so you have got your bearings, we are here, right here. This is Romulus and SEAD-50 is just west of us. Right now, we had accumulated sewage sludge, a number of piles called sewage sludge piles. And the State EPA feels there is another concern. We ought to have that tested around there. I don't expect to have contamination from the sewage sludge because we have tested our normal generation of sewage sludge. We haven't had anything in there that would be a problem. But things are out there, piled out there, so they tend to attract other disposal areas too. Which, of course, SEAD-59, which is right near there, is a little small to see on here, there is a shop right here. There is a number of disposal areas down in here. SEAD-59 is called the fill area building 135. The fill areas has rumors about disposal out there. When we did our field investigations, we found one spot where two drums were buried. Some other spots, some paint and paint thinners were buried. And next

year, we should have the funding to go and remove those drums and paint and solvent that are behind there.

SEAD-62 which we have identified over here, over in this area, is another example of a rumor. It is called the nicotine sulfate disposal building 606 and 612. There is a confirmed rumor they buried a couple of drums of nicotine sulfate. They might be the two drums we found over here. We don't know yet until we sample these drums. The rumor was the nicotine sulfate used to be used as a pesticide. So, if they are not the two drums, I think I know of a couple of retirees, the best way to find out, the best way to find out where they might be.

SEAD-63, which is over here at the northerly end of the Depot, is called Miscellaneous Components Burial Site. We have buried miscellaneous parts When we dug that site up, we found drums containing metal pieces, metals and wires and so forth. We also, when we do those site investigations, we put a well around there. Then we test the ground water for any contaminants that might have seeped out of those areas. We do a number of the -- we also test the pits where we think there might be something buried or we go in with a backhoe and dig it up to see if it's a drum, piece of concrete, or a rock.

SEAD-64 is a number of areas. One out here, there is a couple at the end -- of the south end of the Depot. When they used to have a municipal incinerator on the Depot which is where the ash landfill site is over here, when this incinerator did not operate, they landfilled the garbage on post. They found those areas. Just like any old landfill, it could have contamination because of something that might have been thrown in there. We don't have any information about that site yet.

Sixty-nine, forty-three and fifty-six, building 606 is currently used for herbicides and pesticides. We have a licensed pesticide applicator who does things like herbicide along the front fencelines. It is a lot cheaper going along with herbicide than men doing it with a weedeater. That's currently used, but it was an old missile test facility. And there is also some disposal area out there. So we have found this one here, right near this, the circle, is the LORAN tower, which is the Coast Guard tower. Down here, there is a lot of disposal activity, some funny looking tanks out there underground too with vent pipes coming up. And we had no idea what they did at that facility. I had stores that they generated nitric acid. We have very little information. We are doing a site investigation around this whole

area. That's still preliminary. We don't have any information.

SEAD-12 in the 800 row -- SEAD-12 is right here and the 800 row is the last row of igloos. Igloos are the ammunition storage bunkers that we have on Depot. Both these sites were excavated in 1976. We excavated around the igloos at the north storage pit bunker which we found remains of Howitzer parts. When the excavated and cleaned up the inside of the igloos, they disposed of the materials that were contaminated in Birmingham, South Carolina, which is a radio active waste disposal facility. When we did that, we did not have any reports that there was enough information for DEC and EPA to sign off that these sites have been cleaned up. We still have to go back and do a site investigation now. So we don't - - that is around SEAD-12 and probably next year we will have to go back and redo the 800 row to confirm for DEC and EPA that the sites were cleaned up.

We did find a number of disposal areas where things were buried, different parts and things around SEAD-12. The preliminary field work where we look for radio activity, we did not find anything that was radio active in our site investigation. Again, this is preliminary. We haven't got all the data back.

SEAD-9, the old wood scrap site. But it's

actually a landfill that's over here by Romulus. Again, that's another one of those construction debris landfill, like landfill. We treated it like it was on a landfill. Hopefully all there are is construction debris and there is not contamination. We don't know until we go out and look. These results aren't back yet either

SEAD-60 which is the south end of the Depot. Over on the east side there is a boiler house that discharged oil on the ground. There is a big oil spot. We don't know anything, yes, the oil spot is on the ground. So we did a site investigation at this site to see if all it was was just oil and clean the dirt that has oil on it.

SEAD-70 is building 2110 fill area which is over here on the west side of the Depot. That is, again, this is another construction debris landfill. We went out there and there it was. We don't have any information yet about that one. And SEAD-71, which we call the alleged paint disposal area, is over in here by the sludge piles and other burial pits. And well, it's not alleged, that is a confirmed rumor. It's a site, when we did the field work in some of the instruments they used for their own personal protection, they could use solvent vapors and paint-type vapors. That one, when you have contamination like that, most likely I do an in-

depth remedial investigation before you go ahead and clean it up.

Going on to my next map. I don't know -- this map is from a list of what we call Solid Waste Management Units that required additional information. We had a number of areas that at this time we don't know if we need to do a full site investigation since we had some information about them and it's right now in the process of being reviewed by DEC and EPA. And some of these other sites vary from what they are. I will show you what the -- building 360 is called the steam cleaning waste tank which is over in this area here. Again, this is Romulus and over in here, if anybody is familiar with the Depot, it's near the IPE shop which is the Industrial Plant Equipment shops. We used -- we have an in-floor concrete tank kind of grate really, the ditch and concrete in the floor of the building. And we used to accumulate steam cleaning water in there for blowing off oil and blowing off the machines. Right now the particular tank has been undergoing -- or is closed under the Hazardous Waste Law where they are going to test the tank. They are going to remove anything that's contaminated. We are going to confirm underneath whether any of the ground water has been contaminated from that tank. Building 360 is on the additional information list

because the Hazardous Waste Division of the State, our lead agency for that project, and they are undergoing -- right now, they are reviewing this closer. This plan -- it's almost approved, we will be able to go out there and clean up the tank.

Twenty-eight and twenty-nine, thirty and thirty-one, which are -- twenty-eight, twenty-nine, thirty, thirty-one, most of them are over here. They're all underground waste oil storage tanks. We generate a lot of waste oil. We generate a lot, between 4,000 and 6,000 gallons a year. We have a number of underground tanks that stored waste oil used to burn in the boilers. Mostly it's the same type of oil you get in the garage because it's a waste oil; made those tanks Solid Waste Management Units. Right now they are under additional information because they are being managed under our tank storage program. You have to have a registered tank to store any petroleum product underground or above ground. These tanks are included with that. And we have to do tightness testing of those tanks. So they are additional information because we are due for the next round of tightness testing to see if those tanks leak. We are providing that information whether they pass the test or not to the State or EPA under these programs.

SEAD-48, as mentioned earlier, is the last row

of igloos which is a pit and other storage.

SEAD-72. There is 29. SEAD-72, the north end of the Depot, is a mixed waste storage facility. And that is currently most likely going to be no action Our representative from the State couldn't make it today. We had talked about that because of the history of the building because it's a management facility. It's not likely to have contamination. So that's one of the ones that is still under additional information.

No. 41 which is building 718. It's not on here. There it is. Forty-one is a boiler plant blow down leach pit. Boiler plants, we have four main ones, building 718, 319, 2079 and 121. All those buildings are boiler houses. They have two to three underground tanks where -- which the full tanks, the old days they used to have the leach pit. When they operate a boiler you used to flush out the boiler. They used to run that down into the leach field. Right now, it goes to the sanitary sewer. These all became Solid Waste Management Units because we burned waste oil in the boilers. We mixed it in virgin oil. They made the tank, boiler, then leach pits Solid Waste Management Units. We have four of these tank sites. They were called sites in general. What we found with the boilers some hydrocarbons. We did limited sampling. The State wanted us to do it. We found some

petroleum products in the soil. Most likely we will do some more testing there. It's not the in-ground site investigation that we did. If anything, we expected -- if you were going to find out it's going to be petroleum, there is a boiler there. The boiler uses fuel oil. Potentially, they could have spilled some around. We don't know what happened over the years. We still have yet to determine whether there is contamination there; whether or not you have to go do more investigation. We are going to do some more because we found something there. Whether it has to be remediated or cleaned up, that's something we will find out in the future after we do some more investigations around that -- in those particular buildings.

Building 2079 is out here on the southwest corner of the Depot. Building 121 is over in the administration area, right over here next to my office. Building 718 is up here at the north end. Again, those are the boiler plants, the underground waste oil tanks. And they used to operate with a leach pit. Actually, that knocked off a lot of them here.

SWMU No. 10. Ten is the present scrap wood site which is over in this area here of the Depot. At that site, we had accumulated scrap wood. We have given that out to the Depot employees and the public.

Periodically we used to use it for the fire training for the firemen. They would use the wood for training because that ended up having an ash. That's most likely going to be a no action site. We tested the ash. The ash didn't have any metals in it. At this time the State and EPA most likely is going to be happy with that. They are not going to cite it which means since you don't -- we don't burn anything like treated lumber, like that. We have ceased that operation. We are now using a wood chipper as far as getting rid of the wood. And the firemen don't want to do fire training any more with the wood.

SEAD-49 is building 357. As you go right down 96, you run by some more piles which look like hills. There is a couple of warehouses down in there we used to store Columbite ore there which I believe contained chromium. It was naturally radio active We had all that shipped out last year to another facility. The State will have a concern because it was radio active. They may have spilled chromium around that building. The State came out here last year and surveyed that building. They didn't find any contamination. Mostly, that's going to be a no action also because of that survey. Again, that's over here on Route 96.

SEAD-51 is herbicide usage. That is part of

the high security area. That's the fenced area where all the lights used to be at the north end. We have herbicided this area for weed control over the years. And we are still controlling that because that's still being sprayed and maintained in that manner. This is going for a no action site because we are still herbiciding. Herbicides are inclined to leave a residue of herbicide to keep the weeds down. In the future, then you just spot treat after that.

SEAD-52 is building 606 and 612, ammunition breakdown area which is out in the area of the Depot, over on the east side. And that building there was the building they disassembled ammunitions, old ammunitions. They used to have a treatment system where the propellant was sucked out through a pipe. It's another building on the other side where it caught that - used to catch it in a tank that had water in it. They used to dump that water out afterwards. We did some limited testing there. We found some amounts -- we did find some explosive contaminants in and around that building. We are going to have to do full site investigation. We did some limited sampling there.

SEAD-66 was an old storage of a couple of little buildings. They stored pesticides there. We did have some hits there. We found DDT at that site

MR. CHAPLICK: That is a good site. We may be able to go to pick up the dirt that has DDT on it. We have to do some more tests to see if it has gotten in the ground water or anything.

MR. BATTAGLIA: Moving on.

MR. DUCHESNEAU: You may want to mention the identification of all the SWMUs and the names that Randy is talking about are in the handouts that I have passed out along with the status. There is a summary of what Randy is saying in this handout for those of you who have it.

MR. BATTAGLIA: This last map is the remainder of the 72 sites on Seneca Army Depot. There is two grounds on this map. Six of these sites are already included in investigations at our ash landfill site and our open burning ground site and those are -- this ash landfill site here, there is a number of areas inside and around that landfill that were, by definition, "distinct" Solid Waste Management Units. There is the cooling water pond, the old landfill incinerator that used to be out there. There is an abandoned ash landfill itself. There is a non-combustible fill area which is another fill area right next to the landfill. They used to burn the garbage in the pits out in the old days. So we have two rough use burning pits and then there is an incinerator

itself.

And over in the area, in the open burning ground which right now we are open burning propellants out in that area. One thing we have changed from the past, in the past, they used to burn underground. We now built a 40-foot long tray. We burn the propellants in the tray out in the open burning ground area. We found metals contamination. In some of those operations, they now just don't have metals in it. What we found contaminated in the soils. So they probably did different types of materials out there when they disposed of them in the past. It is good to mention, when you have a bomb, your metals are usually in the fuse. They are usually in small amounts compared to a regular bomb. The regular bomb would be primarily explosives, not have a lot of metals. What we found in the open burning ground, there is metals in the soil. They may have done a lot of fuses. We don't know what they did in the past; where the metals came from out there.

Moving on. The rest of the ones I am going to talk about are currently -- I have under the list of no action. This is not finalized yet. We have Solid Waste Management Unit clarification report that should be in the management records at Willard Town Hall probably in two months; a month and a half or two months. And you

will have the opportunity to comment on that and review that when that gets finalized and is down there.

Number one and number two, which is over here, are hazardous waste storage facilities. Number one is building 307. We generated hazardous waste either from cleaning a machine or something like that. We store that in a building that has a permit to store hazardous waste. Then we send it to a disposal facility off post that can treat that waste. Building 301, we take transformers down there. We put them in the building when they are burned out. This is another permitted storage building. We test transformers to see if they've got PCBs in them. PCBs, if you are not familiar with PCBs, they are commonly used in transformers and they are regulated because they could bio-accumulate in the environment. That is one of the problems with some of the Eagles as far as the pesticides and PCBs get in them and they have reproductive problems.

No. 7 is titled the shale pit. Right now that's our clean fill area where we landfill concrete, stone, metal, and clean dirt. We keep a close eye on that. When you just have a clean fill area, you don't need a permit like a landfill permit. We inspect that before we push all the dirt into the fill area. It's down here as a site just because it's a site. Right now

I have it on a no action list because for all intents and purposes, it is no action. It is just clean fill.

No. 18 and 19, which are over here; this is 18, and 19 is over here in the same area. They are classified document incinerators. We have operated incinerators. We burned all classified papers. We burned paper in the incinerators They have an air permit. Right now it's under no action because all it was was paper actually. I think the State or EPA still want to look at some of the test results where we tested the ash from the paper years ago to see if the ash was okay.

Then we have three sites that are called sewage treatment plants. We have No. 20 which is Building 4. This is an active sewage treatment plant. Sewage treatment plant 715, which used to operate at the north end. And one titled No. 314 which is actually just a pump station now, but it used to be a sewage treatment plant. Which over here on this side of the Depot, those are sewage treatment plants. Normally you don't have to investigate around a sewage treatment plant, but they fell into our list of potential sites.

Three other no actions are all the boilers in boiler houses which is 718, 121, and 319. 718 is here; 121 is over here; 319 is over here also. These are all

boilers in the boiler houses. And everyone had agreed that these are not likely to have environmental contamination or high concentration in the boiler houses. The main concern around them is underground tanks wherever the leach pits were in the past because the blowdown from the boilers are -- they wash down the boilers before we process or sent our sewage treatment to the plant.

Building 106 was titled preventive medicine lab. We just couldn't plain find this building. We think it's over here where the current health clinic used to be. We really called that no action because we couldn't find any information if that was an actual building in there. There was no other building over there. That was kind of it was an old report. We really couldn't find anything about where it was.

Building 321 and 806 is up here. We had two areas where we had -- where we did calibration of equipment for radiation surveys. This is called the radiation calibration source storage. We have SEDA equipment or radiation surveys. You have to calibrate that so you have a little source as to the specific amount of radiation that comes out of that. We had a couple of labs here that did that kind of calibration for the Army.

Fifty is the old ammunition storage. Here the State wanted that on as a potential area. Right now we are considering it no action, but they have concerns about the storage of ammunition. And if that causes any kind of environmental problems. That is one that was kind of reserved for the future It's on here because it's on their list. When they look at a facility -- this list was generated. The Army had a list and the State had a list and kind of combined the list and wanted to make sure all the numbers stayed the same and get one master list of all the potential areas. Originally, the list was 69 and we found a few more places. Now we are up to 72. Hopefully we found them all.

Building 357, that is the one here, tannin storage. Right now we have shipped all the tannin out. It's actually tannic acid. It's not a hazardous waste or a hazardous substance. It was on here because -- just because we stored the material here. And everyone, the State and EPA, had agreed that this stuff was not hazardous; that it should not be an area of concern. Building 718, underground waste oil tank. That was specifically for waste oil. I think it was about five years ago built an additional tank to store waste oil, modified the boiler because it was more than what we could fit in with our fuel oils. That's a new tank.

Most likely no action because it's a new tank. It is included with our tank problem where we are testing them.

No. 65. We have done some limited sampling on those. They stored acid open -- in open pads. We have done some field sampling around these pads.

MR. CHAPLICK: We couldn't find anything around those pads.

MR. BATTAGLIA: I skipped a number -- those are all our 72 areas on Depot. I want to also mention this was not a statistic or final thing. I am still talking to people about rumors or where certain areas are out here. What I try to do is find somebody who might know something about it. It is the easier and cheaper way. If I can get down and locate an operation, a location, then I will know where the location is and what to look for. Our initial idea was we can do some relatively cheap surveys to determine if anything was buried in an area. The electro-mechanical surveys that usually tell if something is buried. Actually, it tells if some of these ground penetrating radar show us if there was -- the penetrating radar is in the top of the ground. It is straight across. You end up getting a printout that looks like a chart for trolling or a chart for trout. Again to give you an idea if something was buried in a given area, you can do an electro-magnetic survey that

usually tells if something was buried. Actually tells if something was buried. Then we go out and do other surveys like soil gas. We put a pipe in the ground and put a vacuum on this to see if any contamination that could be detected in that area. Then we put a well around the area. Again, a lot of the ones I did not mention what we found at the areas because the -- especially the list of fifteen we just did the field work. We just don't have any information back. The stuff we got back in February, we did in February, we got the results this summer, some of those. It's a little bit of time it takes to get information back from the labs.

If anybody has a question --

MR. DURST: At the earlier meeting you were talking about flyovers with ground penetrating radar and magnetometers or perhaps something to locate some of the anomalies. In other words, you talked about these 55-gallon drums that you were told were in a field that you looked for just on hearsay evidence and that's the sort of thing that -- have these flyovers been done or why haven't these been seen before?

MR. BATTAGLIA: The ground radar, you actually drag across the ground. It's like equipment they put on the equipment and drag it across the ground. On the

flyovers, I think we have a contractor that does aerial flyovers.

MR. DUCHESNEAU: There may be some confusion. The flyovers are used to create our base maps. We use them -- we take the aerial photographs. What we find is that with some land control survey, we generate our base maps. Many of which are in this document. I think you can see the land contour of the buildings, the roads, etc. The flyover is used for that information. Now, we also have some historical aerial photographs that was done in '68 and the fifties. We know that we also can get, from NASA and some other government agencies, that we used to look at the sites in the past. That helps us get an idea where certain activities were done. Again, that focuses where we begin our investigation. So, the flyovers -- we don't go ground penetrating radar from the air. What you are implying is also magnetometers.

MR. CHAPLICK: All that is done is basically a walking over the ground.

MR. DURST: Can't you do that not only as a flyover, but you couldn't graph the flyover?

MR. DUCHESNEAU: I believe that was techniques that was possibly usually applied on a gigantic area. We are talking about a localized area that we have information, historical or otherwise, that we can use to

focus, narrow in our investigation. Our first step is usually to do a site walkover. If you find some strange looking bumps or hills that look out of place, we do some magnetic work; pull this device, either radar, magnetometry, over that area; find out if we are getting any kind of unusual anomalies. From that information, following that, we follow up, you know, soil gas or some soil boring, some soil sample test pits to determine what the identification of those geophysical anomalies are. Then we usually follow that with a monitor well. Once they are confirmed there is something there, you put the monitoring wells in. There is whatever was there has been located in the ground. All these geophysical techniques, they are not -- they are limited. Again, in order to see something like as small as a drum, six or eight feet down, what we have to do, we lay out grid lines; usually ten feet on center in both directions. And then we drag some of the instruments of these small -- you can carry them. They are small. You drag them along these lines over that area. That pretty much allows us to say you are not going to miss anything in that kind of space. If you've gone 25 lines on 25-foot centers, the instruments are not receptive enough if anything was in the middle of the box they are surrounding, you could miss it. It really kind of gives

you an idea of how far they go side to side.

MR. DUCHESNEAU: We are looking at these sites, the entire Depot as one site. We may do something like what you are saying, do an aerial photograph survey That is to say, I haven't personally done it. But I believe that is a viable alternative. It's, like I say too, it depends on the size object you are looking for If you are looking for a drum, you've got to be on a scale I mentioned.

MR. DURST: It seems like the possibility of missing things the way you are going about it as far as hearsay evidence. As far as -- it would seem like a generic screening of the whole Depot would be the way to go.

MR. HEALY: I don't know that the techniques for locating subsurface anomalies from the skies are developed enough that you can count on them. I think if you are talking about surface features, yes; an aerial flyover can be used.

MR. BATTAGLIA: We have done that when we have used what is called USGS. That actually shows where the ground was disturbed in certain areas. So you can go to that map and find out, I think, what might have been land in the area of the washout plant. We could see the building.

MR. CHAPLICK: If you go to the public meeting tonight, there will be some exhibits up in the hallway. On one of the boards is one of the more particular areas of the ash landfill or the burn pits. You can see the pits are excavated. There is refuse in these pits. I don't know what years that was. Was that '68?

MR. DUCHESNEAU: Before the incinerator was built. The incinerator was not there. This was all used as a first starting point. What we are trying to do, again, is to get a handle --

MR. CHAPLICK: I think what you are saying, there is no technique currently available.

MR. COOL: I don't have a connection with the CIA. I believe they have the surveys to do it.

MR. BATTAGLIA: You are not connected to the CIA, are you, Jim?

MR. COOL: Who permits the building for storage of hazardous waste and PCB?

MR. BATTAGLIA: That's under DEC. We have to -- under DEC, have air permits for the sewage treatment plant.

MR. COOL: For everything?

MR. BATTAGLIA: I think the Army tried to exempt themselves. They can't as far as environmental permits go.

MS. SAMPREE: Are those maps that are very clear that you were using in your demonstration, are they going to be part of the public information minutes that are at the Willard Town Hall?

MR. BATTAGLIA: I can make them.

MR. CHAPLICK: Most of the maps are on the back of the fact sheet, Randy. We put that on the back of the fact sheets for tonight. They are being copied.

MR. HEALY: Are you going to be there tonight?

MR. COOL: The '68 flyovers were the flyovers that you have examined?

MR. DUCHESNEAU: I believe there was the fifties -- sometime in the early fifties. We have some information. We contacted a service that does that search for us and provides a list of all available aerial photographs. Now, there is probably fifteen different lists that have been done over the years. We picked three or four of them to look at. We don't look at every single one. We picked enough that we thought we covered the time frame.

MR. HEALY: Did you go back to when the base was first constructed? I heard there was materials buried at the construction phase; paint and plumbing supplies and so forth that was just a big push the contractor left.

MR. DUCHESNEAU: I think the earliest we looked at was '54, '55. But I can --

MR. CHAPLICK: All the area photographs are not taken from the same elevation. Obviously, the lower you are, the better the definition of what you can see. Some of them is up higher. It's really very, very difficult to make out in a map in terms of in-ground features You can see a lot of lines, underground tile lines will show up in the certain time of year if you know specifically what you are looking for.

MR. BATTAGLIA: I think it was the State air on the west side of the area, I thought the aerial photograph one time an old map showed where they basically were to the concrete plant over on the west side. I haven't really found that spot where they were yet. That's on the maybe list. I haven't heard anything about them digging holes or burying them. Before the original building, they had their own concrete plant.

MR. COOL: What I am saying, is this hearsay.

MR. BATTAGLIA: I don't want to call it hearsay. A lot of stuff started as a rumor. If I asked enough people, I found that enough people knew it existed, I actually found a site. That's how we found a lot of these; just checking out those rumors and so forth. We knew as an area some were just something like

that. You talk to somebody else, somebody else knew where it is. Sometimes you find somebody that knows something about where it is.

MR. COOL: The Sampson Naval Base was the same way; when they were finished, it was buried.

MR. BATTAGLIA: Someone told me, someone that just retired told me, they told me that they buried arms. He gave me a couple of areas, a couple of names of people who are retired that might know of it. I haven't told EPA and the State that one. Is it a rumor or is it a site? I don't even have an area to go look at it

MR. COOL: Sounds like a rumor to me.

MR. BATTAGLIA: If I end up a dead end, I kind of leave it open until I hear something.

MR. ABSOLOM: Before we go on to the next presentation, I would like a five-minute break to let our stenographer rest her fingers for a minute. I have learned in the past that she likes that. That she likes to have a break. We will take a five-minute break and come back.

(Whereupon a recess was taken.)

(Back on the record.)

MR. ABSOLOM: As we get started, one thing I would like to remind everyone is that if you have questions, please speak up so the Court Reporter can hear

you. People have a tendency to let their voice trail off as the question goes on. Please remember that.

MR. DUCHESNEAU: My name is Mike Duchesneau. I am the project manager. I work for Engineer Science in Boston. I am the project manager for the Seneca Army Depot activity project.

All my presentations, everything I have, I will be showing up on the overheads. There are handouts that I provided so you can follow along. This organization chart usually is where I like to start. In case people are new, to get a handle on who the players are in the program, EPA is the State we have talked about. We are all working together to identify and solve all these environmental issues that come up. I will be talking to you about where the tanks, some of the AOC investigation. Normally, I would be talking about the action memorandum, the soil remediation project we have planned.

So what I am going to do is move fairly rapidly along to the slides I have. I think Randy and Kevin have pretty much touched on the details of that. We have a SWMU classification flow chart that summarizes in graphics. It is derived from the inter-agency agreement that was signed between the Army, State and EPA. And this graphic depicts the process we are going through to

first identify the SWMUs. Randy has talked about the list of 72. Once we have identified the SWMUs, we perform an investigation; move through what we call a site investigation phase based on those results we get in the RI/FS phase. This whole process is merge of the obligation of RCRA as well as the CERCLA obligation. CERCLA is an acronym used for Superfund project. And basically, all the investigations are being done under the umbrella of the requirements of CERCLA. Comprehensive Environmental Restoration Conservation Liability Act; otherwise known as CERCLA.

So, this depicts that process of trying to mesh the obligations of RCRA, which is a Resource Conservation and Recovery Act as well as the CERCLA obligations.

I think Randy has gone through the list of all the SWMUs. I just want to provide this so you can get an idea where the sites and the classification of all the SWMUs are. I am not going to go through each one individually. Randy has already gone through a lot of that. But I would like to say that we have, at this point, reached an agreement with the State and the EPA on the identification of all 72 Solid Waste Management Units; otherwise known as SWMUs. Basically the site of all of these Solid Waste Management Units. And again, all of this information is in your handout.

The bottom line here, I think the important message is, where do we stand. We have 72 identified Solid Waste Management Units. Twenty-five of those are deemed no action SWMUs. And as the name implies, no action will be performed on them. We are currently investigating a total of 27. We have combined several of these SWMUs into one SWMU. So the middle column indicates the total number that need to be investigated. And we are investigating 27 of those -- wait a minute. This isn't -- yes, right. So, there are 13 low priority Solid Waste Management Units that still need to be investigated in the coming years. I think the important thing to mention, also, is that all the high priority to moderate priority as well as moderately low priority SWMUs are currently under an RI/FS, Remediative Investigative Facility Study, or under investigations as site investigations which is the middle portion of that flow chart.

If you remember, the reports, what we call SWMU classification reports, is the primary document. The list -- that lists all the SWMUs. As I mentioned, all the SWMUs had been classified. It's been issued to EPA and NYSDEC, New York State Department of Environmental Conservation, on June 10th. We have received some comments. We plan on issuing the final documents in

early September. Randy has identified the seven high priority SWMUs listed here. I'm not going to go over that again. Just to bring a quick update on where we stand on this. The field work has been completed. A list of all the tests that have been completed, we submitted the draft report to the EPA and NYSDEC on June 8th. We are currently awaiting comments on that document Likewise, for the three moderate priority SWMUs identified here, Randy has shown you where they are on the map. We performed all the field work, submitted the draft to EPA and NYSDEC to review on August 5th. We are awaiting comments back on this document.

All the moderately low priority SWMUs identified here are under investigation. And we have completed the field work and are in the process of preparing the report. We are waiting for some final laboratory data. We expect this report to be issued sometime in late September. That report will go to the Army for internal review. Following the review, approximately 30 days later, we make that report available to the EPA for their review, and New York State.

The seven low priority SWMUs are identified here. The status of these investigations are, we have also completed the field work this summer. And they are

in process of preparing the pre-draft. We call it the pre-draft form, that will go the Internal Army Review. Thirty days after that, we will be submitting that document to the EPA and the State for review.

The item that I would really like to spend a little bit of time on we call the Action Memorandum for Soil Treatment. It's a primary decision document that identifies the area at the ash landfill that we believe is responsible for a lot of the impacts to the ground water. We have decided on an alternative. That alternative includes excavation of some materials, sizing, some washing of debris. We are talking about excavating a portion of the landfill, wash that debris that can't be processed through a thermal processer, low thermal desorption unit. We have some air pollution control equipment to be in compliance with all New York State regulations. Following compliance of that treatment of that soil, it will be placed back in the excavation pit. Ground water will also be pumped in the area of the excavation. That ground water will be stored temporarily on site in a temporary storage site. That will be disposed of off site at a hazardous waste licensed facility.

Some of the highlights of the action memoranda, I think, are important to talk about briefly here. That

the objectives we are trying to remove what we believe is an existing threat. It is a source of ground water contamination. As I have mentioned, there are some low levels of volatiles being admitted in that area. We are also providing the streamline RI/FS. The RI/FS is again, it's a CERCLA term that is used to define a series of steps and risk base management approach towards remediation, the treatment goals that we are -- the thermal desorption process unit are basically the New York State TAGM value. TAGM stands for Technical Action Guidance Memorandum. They are guidelines that have been established by the State of New York for the cleaning up of soil.

Our target compounds at the site are TEC (tricloroethylene); 1,2DCE (dichloroethylene); and also vinyl chloride. They are chlorinated solvents that were probably used a long time ago at the base.

We are estimating at this point approximately 23,000 cubic yards of material, roughly 35,000 tons of soil will be excavated and processed through our processers, then returned back into the ground.

As I mentioned, we are talking about what we call low temp thermal desorption. This is a process which the soil is heated and the volatiles are allowed to -- the chlorinated solvents we are talking about the

volatiles, they are allowed to basically evaporate or vaporize to the gas phase, swept through the processers and then destroyed or controlled in some kind of an after burner system prior to discharge into the air.

Just some milestones on the documents we described which is the Action Memorandum which is a decision document that determines what a selected alternative will be. In this case, we submitted a draft on December 3rd. We have agreed to submit a final for more additional comments from EPA and/or the State. That was submitted in May. Following that, we prepared plans and specifications. We call it Section C to describe the work that will be done, how it will be done at the site. That document was submitted final on June 17th. At this point, the Army of the Huntsville Division has turned the work over to the Omaha District. The Omaha District has a remedial contract with a contractor. They are now in the process of identifying a remedial contractor that will perform the work, finalize the contract terms and conditions, cost estimates, etc. Following all that work, the contractor will be on site. We expect it to be sometime in October of this year.

The area that we are concerned with is an area at the ash landfill site. We will call that the bend-in-the-road. You can't really see it that well, but it's in

your handout. It's aptly named because it happens to be the majority of the soil that we are having -- wanted to do some treatment or in this area called the bend-in-the-road, just for bearing, north is that way. This is roughly the Depot boundary, Seneca Lake is to the west which would be this way, and the main portion of the Depot would be to the east, that way. The big picture map we are talking about right here, you can see this little road bends here and that is a real good give away as to where it is. That little bend would be right -- right with here. So that's the area we are talking about.

We have done fairly extensive amounts of investigation for work soil gas, soil bores, sill steps, several ground monitoring wells. All of that information has been assimilated, interpreted, and we have identified two areas; Area A, Area B, that we believe are responsible for the impacts to the ground water and is the focus of our removal action.

The process flow diagram that we agreed was probably the most effective way to deal with this problem begins by some excavation, dewatering, to control the amount of water that is in the pit. When the soil is removed, we don't want ground water splashing all over the place. Again, the water will be stored temporarily

on site and disposed of off site in a licensed treatment facility. The soil will go through the segregation operation, large debris that can't be processed through the unit will be sprayed off. That debris will then go through some type of wash operation to make sure that there is no residual material attached to that. The soil then will be stockpiled temporarily on site and processed through the thermal treatment unit at the rate that the unit can deal with it. The air will then go through the baghouse to remove particulates. Following that, through the thermal oxidizer to reduce the oxygen to an acceptable level of discharge to the stack. The clean soil will be stockpiled temporarily and sampled to confirm the target levels have in fact been reached Once we have the analytical data back from the lab, that soil will then be returned to the excavation. If the data indicates that the soil has not been satisfactorily treated, it will then be reprocessed back through the thermal incinerator until we reach our treatment goals.

To provide you with a little bit different depiction of what the low temperature thermal desorption unit kind of looks like is this from Canonie Environmental. A low temperature desorption process is pretty much the same type of unit. You have the feed hopper. That's what feeds into the rotary kiln, a large

direct fired rotary drum where the unit --where the soils are allowed to tumble through the unit being cleaned. As it gets to the end, the cleaned soils are then discharged through the conveyor to the stockpile storage. Then, if necessary, reprocessed. The air then follows through a series of air flow equipment as mentioned, the baghouse particulates removal. In this particular unit there is a venturi scrubber, some type of a wet scrubber. There is also, in this case, using activated carbon to control emissions.

And that process looks like this when things are moving. It's depicted here. Here the baghouse, as I mentioned, the feed conveyor, the clean soil in this case is discharged through the conveyor until -- to the cement mixture. In this particular case, the soils are solidified with the cement because of the high concentration of metal at this particular site. Which is unnecessary here.

I would also like to take a minute just to touch briefly on the status of the remedial investigation at the ash landfill site which is the same site that we are performing this expedited soil cleanup. We still have to go through the process of doing an RI/FS but the Army has -- because we have identified the area, the Army has determined that it's worthwhile to be aggressive and

clean up the soil that we know exists as a threat.

MR. HEALY: Let me interject. For those of you that might be interested, the ash landfill, as all the remaining SWMUs that we have discussed, at one point in time was in the preliminary assessment phase; which is the gathering of information. After that, there is enough suspicion that a site investigation was deemed required Site investigation purpose is simply to confirm or deny a suspicion following a site investigation; if there is reason to go on, you do the remedial investigation and feasibility study. The purpose of which is to remediate whatever contamination may be down there. We are close to the end of the remedial investigation and the feasibility study. We have found these areas that are causing the problem which is why they are now going ahead with the remediation. Hopefully, that gives you a little bit of extra perspective.

MR. DUCHESNEAU: I think, if you look at the handout that is called a SWMU classification flow chart, this site is probably furthest along in that process. In other words, it is getting to the end of that classification flow process. We submitted the draft final remediation investigation on July 9th. It's been currently being reviewed by the EPA. The feasibility

study is scheduled for submittal at the end of next week

The other important issue here related to that site is the ground water plume that we have identified as being present. Again, just to get your bearings here. The area at the bend-in-the-road is the area that we are concerned with. This soil remediation, as we would expect, coincides exactly where the areas of high ground water contaminants are located. I might also mention that the removal action of soil remediation will, to a large degree, eliminate the ground water problem at that area because, also in terms of excavating the soil, ground water will be removed and pumped, then treated. So, there will be some decrease in the contamination of ground water as a result of the soil process that we are and doing that I have already discussed.

We are looking at several options to control ground water. One of which involves the installation of trenches to collect ground water. The ground water will then be discharged to a main sump. This is just preliminary. I wanted to give you an idea of what kind of remedial strategies we are thinking about for ground water here. I have depicted areas of what we call the source area that is the focus of the soil remediation. I have overlaid the ground water plume. I think you can see clearly that there is a nice fit for where the --

where those higher levels and in-ground water coincide with the highest level of soil impacts.

The ground water collection trenches would be installed approximately in that area if it is determined necessary to do that. That is discharged to the main sump. That water will then be pumped to a sump to a treatment facility if necessary. It has potential to get the lower end of the plume, the lower concentration of ground water contamination down at the toe of the plume.

The type of treatment process that we are looking at and we will be performing a treatment study on involves UV oxidation which in this case ground water will be pumped from the trenches to some type of an equalization tank or settling tank to try to settle out the large particles from the ground water. Typically, we install an in-line filter to remove the smaller particles trapped in the ground water. Potentially a hardness removal will be required to protect the UV oxidizer which is a main destruction process removing TCE or DCE from the ground water. So that may be a possibility. We will know further what will be required after we do our treatability study. We are in the process of doing that now.

The process of destroying the TCE and the DCE dissolved in ground water involves the addition of

peroxide a generation of ozone in the contact chamber It's a liquid oxidation process. It occurs in the liquid phase. There are no air discharges other than some ozone which can be controlled to a deoxygenator prior to discharge. But the advantage of this technique, the destruction of the liquid phase, there is no transfer to the atmosphere. It is possible that we may need to add liquid carbon and borsor (phonetic) after that as a populace to get the concentration down to the lowest level for the ground water to meet ground water standards. Then we expect to discharge this water, the surface water, possibly to a drainage ditch that eventually will lead to surface water body nearby. That water will of course be clean.

The other site that we are moving along on, the RI/FS process rapidly is the open burning ground. We submitted the draft final RI to the regulators for review. We have received comments back.

Randy, you are currently in the process of responding to comments. We expect this document to be actually, I think, we have submitted it already; right?

MR. CHAPLICK: What?

MR. DUCHESNEAU: The OB RI, that was submitted?

MR. CHAPLICK: Right.

MR. DUCHESNEAU: They submitted the final to

the regulators earlier this month, the feasibility study. They submitted a draft to the regulators on May 5th. We are currently awaiting comments from EPA.

The issues related to that site involves some areas of metal contamination, particularly lead. We have found high -- relatively high concentration of lead in some of the berms and in some of the areas around the area of Reeder Creek. That's pretty much all I have there.

Are there any questions?

MR. COOL: How much lead is along Reeder Creek?

MR. DUCHESNEAU: The concentrations of lead in sediments there, I believe, are relatively low. But they did exceed some of what they call the limit at that point for maximum vertebrae protection. I think they were the part per million type range. I don't remember the exact number.

MR. COOL: Has the area of the creek where it meets the lake been tested?

MR. DUCHESNEAU: No.

MR. HEALY: How many places have been tested between the OB and the OD grounds in the lake?

MR. DUCHESNEAU: I would say probably five to six sampling locations from the site to the lake.

MR. COOL: If it was washed to the creek, it

would go to the outlet and probably stay there.

MR. HEALY: Which outlet?

MR. COOL: Seneca Outlet.

MR. HEALY: I don't know. Would it -- would you expect it to make it that far?

MR. COOL: What would happen if it a precipitation ever washed off the surface in the creek and proceeded down the creek to the point where -- right where the stream levels out and --

MR. HEALY: It would settle out. It would stay in supported by the ground water or the water in the creek long enough to settle out. How far is the lake from there, Randy? How far down the creek do we get?

MR. DUCHESNEAU: It starts to go off post right where it crosses over 96A.

MR. CHAPLICK: The only place which we found was the OB-OD facility high level.

MR. DUCHESNEAU: The sampling point further down from that point, you are okay. Our approach was, if we found lead or whatever metals or whatever from that consistently down along Reeder Creek, then we would then feel as though there were a need to sample at the mouth of Reeder Creek and Seneca Lake. We found one hot spot. And hot spot probably isn't the right term. One spot right adjacent to the OB-OD area. That area had some

elevated contamination of metals. From that point down, we didn't find that. So the philosophy was, you know, there is no need to go sample the mouth at that point.

MR. COOL: This so-called hot spot, how did that lead get there, by precipitation events washing across?

MR. DUCHESNEAU: Runoff from the OB-OD ground.

MR. COOL: Came suspended after strong precipitation event?

MR. HEALY: It might not have stopped.

Randy, did we find lead in the sample of the pond puddles and things out there?

MR. CHAPLICK: On site, we had lead, yes.

MR. HEALY: Randy, did we find it in the water sample?

MR. CHAPLICK: In the sediments. It doesn't last that much in the water.

MR. DUCHESNEAU: It's not in the water. The water meets all the criteria.

MR. BATTAGLIA: We sampled the pond and surface puddles.

MR. DUCHESNEAU: That's something we can look at; something we can look at that might be worthwhile.

MR. COOL: Maybe one test down there, perhaps just before you get to the bridge.

MR. DURST: It's probably very seasonal in the spring when you get the heavy flow. And I am sure one of the peculiarities in the Reeder Creek is if you watched the creek, I think in late summer you would see the highest level.

MR. HEALY: One other thing, when you talk about -- when this came up before, is sampling at the mouth of the creek the right place to sample? Are there other places in Seneca Lake that we may be testing? Does that lake itself push the sediment someplace that we want to look at? We are of the opinion at this time, at least, that we wanted to first look at Reeder Creek, get some information back in, apply that information, find out if a tremendous amount can make it, to reach the creek from that point and go into the creek.

MR. COOL: Reeder Creek does have a dull area somewhere. It's shallow. The water is shallow because of the outloading of the creek.

MR. HEALY: But do you sample at the mouth? Do you sample along the creek?

MR. COOL: You are the engineer and I am the citizen at this point.

MR. DUCHESNEAU: You have approximately three miles of the creek between the OB grounds and the lake. Chances are it would not carry over the entire three

miles without being seen through us.

MR. HEALY: You don't need anything as to how large the Beaver dam is to the section stored to pick up the precipitation events, enter Reeder Creek, make it all the way down to the lake.

MR. COOL: When it enters, would it be spring, during spring run?

MR. DUCHESNEAU: There is variations. There would be a large variance of the peculiarities; ice that would enter the creek. At that time, all of it would have metals or wash it down because it cannot change paths. It is not iron selective. So the particularities that would fall out at the interim depositional environment would be picked up by the samples especially by the part per million number.

MR. COOL: Only if there was areas where perhaps the water is proceeding downstream as well as up in eddies and that sort of thing; otherwise, it wouldn't carry

MR. DUCHESNEAU: Which I am sure that there are small eddies, areas along there.

MR. COOL: I don't know if that creek is caused by geography or geological sound bedrock.

MR. HODDINOTT: It's a pretty straight shot, you know. It's not much until you get down near the --

near on the East Lake Road.

MR. DUCHESNEAU: What I would say, we consider that we talk it up. See if there is really a need to do that. It's not something we can't do.

Are there any other questions other than that? I guess --

MR. CROOK: My name is Steve Crook with Law Environmental. I have a question. Are there any bedrock wells as part of the area we were just discussing or the one previous to that?

MR. DUCHESNEAU: We have an ash landfill site. We have four or five layers of bedrock wells, shallow bedrock wells and also deep water wells at the OB ground site. We had installed screen wells in what we call the weather shale portion of the bedrock. Again, the idea here was the open burning ground, if the weather shale wells indicated that there was a potential problem, then we would follow that up with some deeper bedrock work. The weather shale wells came back clean. And therefore, the conclusion was there was no need to do additional bedrock investigatory work at the ash landfill site.

Followed by a similar type of a brief we do some bedrock investigation packer test to try to identify in the zone in the deep bedrock portion that would yield water, the bedrock is very tight, it does not yield

water. What water we found was clean. So, the result of that bedrock investigation indicated that the ground water contamination is penetrated into the -- into the bedrock which is the shale.

MR. COOL: Your trench developed there, would be along the top of the bedrock?

MR. DUCHESNEAU: Right. That would be in the component portion of bedrock. We would excavate the shale as much as we could with excavating techniques. What we call the component rock, install the trench in that portion, take up to about a foot below the surface.

MR. COOL: Would be something like a French drain?

MR. DUCHESNEAU: Exactly, with a pipe in it. To intercept that flow of ground water perpendicular to the trench.

MR. ABSOLOM: I would love to open up to any general questions that anybody might have at this point.

Anybody have any other questions?

MR. DURST: I would just like to make a comment that I in general am quite impressed by the thoroughness of the study. As I said in the past, in some ways, as a resident, I am pleased to say that I feel a lot better as far as DEC and EPA oversight on this kind of activity.

I guess as a taxpayer, I think it's a little

bit of an overkill. I think more money is being spent that may be needed. In many respects, I am not sure maybe many of our back yards couldn't stand this kind of abuse.

MR. HEALY: Doctor, in response to that. I would like to point out what the Army is doing is what we are required to do based on law It's not something that we are doing because we are enjoying doing this.

MR. DUCHESNEAU: I believe what we are trying to do is the most cost effective approach. And I understand that we have spent quite a bit of money. And the costs are extremely high. As you might know, particularly when you are talking about 350 buildings and lakes. You are talking about a wide range of variety of chemicals, organic or inorganic compounds. You are talking about drilling costs, sampling costs. I mean, it's just -- I can assure you that we have tried in our best effort here to try to make this streamlined and cost effective as possible. I mean, that's the numbers that they are only because that's what they are. I can't control laboratory costs type of thing.

MR. DURST: I can appreciate that.

MR. CHAPLICK: It's a process that has grown, but not at this particular site as the sites all over the country. The way Congress passed the law and EPA has

written regulations

MR. COOL: There was discussion of secret records disposal areas. Has anyone qualified from a scientific end of that, is that end of the secret documents being pursued as a possible lead to certain waste disposal areas?

MR. BATTAGLIA: Well, I think he is talking about the other sites too. Primarily, as far as we talked, I think now we are getting -- I mentioned classified document incinerator where we incinerated papers in that area. We have identified actually three distinct areas; one is a burial pit which was excavated in '86. When they did the 800 row, cleanup materials from both those sites were disposed of in South Carolina which is a radio active waste burial area. That was all low level residue in the 800 row. No. 63 where they buried miscellaneous parts, metal parts, we dug that, that was drum, part of SEAD No. 12 which is two areas which the waste water training and burial pit In and around that area, we found other things, things had been buried, things with geophysical works. When we were doing all of that up there, they were either parts or training items. And we didn't find anything as far as drums in the preliminary field work. We did not find any radio active contaminants. And we do still have some lab

work going on. And we will have data, well samples, that are being still processed in the labs, and also soil data, soil samples, that are being processed.

MR. COOL: Those locations were discovered through a search of the classified documents or were they discovered otherwise?

MR. BATTAGLIA: Really, otherwise We did -- we have done some of this work with the -- we have a couple of documents from them that we have to send up to our headquarters. Whether or not some of -- all of the information in these documents will be released, I personally think it's all releasable. Based when they gave it to us, Mike was there. He doesn't have any clearance to see any classified documents. I don't think they actually saw anything that was classified. They did give us a list of information about the history of the site. Actually, a lot of this information can be justified why it should not be contaminated. Probably by the next TRC, we will get approval from headquarters. It will be a lot simpler if they give out what they gave us instead of kind of beating around the bush about the history of the area. We did dig up anywhere, all areas that we thought there might be something buried. We found a number of things. Some of the pictures in the field are a blessing on that from the -- from the higher

up pictures are worth a thousand words It's a burial of the parts. There is also a report of all the field data and all the reports is going to be public knowledge, just like any other site out there. Some of the history also goes back to the forties and fifties when we had when we got somebody at Sandia involved in things out in other parts of the country. I actually talked to somebody that worked here back in the forties. Things about waste water tanks. We sampled and didn't find -- identify anything. We found out it was routinely used as a waste water tank. All these reports that I am talking about and the information will be released when we get headquarters approval to do that. Both from Public Affairs side of things and the confirm or deny situation; and both from the classified people and legal people. And the decision really is up to their -- up to them about all the historical information.

MR. HEALY: The half -- the other half of the question would be: Do you anticipate that there are any classified documents remaining that might be proof or provide other evidence as to burial sites, in your opinion?

MR. BATTAGLIA: No.

MR. HEALY: No is the answer?

MR. COOL: Very short, too.

MR. HEALY: I may live in Alabama, but I know how to interpret New Yorkers.

MR. DUCHESNEAU: I have talked with people in Sandia. They have clearance. They have certain - some of the classified archives, the process they have gone through, that involves identifying documents. These are like forty, fifty CERCLA documents. Year documents They pull them out of the archives. They go through a series of steps to get them declassified. Yes, there have been people at Sandia who have reviewed formerly classified documents and made them unclassified and that is a lot of the sources of what Randy is now discussing with you

MR. HEALY: We don't care if it's unclassified or not. What we are doing is looking for waste problems; whether it's classified waste or not. That's where I am coming from. I don't remember if they are classified or not classified.

MR. DUCHESNEAU: As another follow-up to that, the areas that are known to have activities associated with the use of classified material have been thoroughly investigated by us. We have done our geophysical. We have identified the whole process that we described earlier has been done at the sites. As far as we know, that we have done thorough investigation of things that

would have been buried out there.

MR. HEALY: I think more directly, we have examined every document that we know is available, that we know is involved in the investigation.

MR. COOL: Meaning the Army?

MR. CHAPLICK: Well, it's been an Army base. What other source --

MR. COOL: We meaning your company.

MR. HEALY: Yes.

MR. CHAPLICK: We do not have security classification. We do not have looked at such documents.

MR. DUCHESNEAU: But again, the Sandia people have for us.

MR. ABSOLOM: Are there any other questions? If not, what I would like to do is establish the date for the next TRC for those of us with calendars. It is once a quarter, November time frame would be appropriate. I would like to go through, around the table, and see if possible the 16th of November, it's a Wednesday.

It would be here. Anybody has - does anybody else have a conflict with that date? Kathleen has a conflict. The other reason it might be a good time, at that time the activity at the remediation site, at the removal site, would be ongoing. It may be -- at that time, maybe we would be able to give perhaps give a tou

of the site or at least take the TRC so they could in fact see what's going on to get a first-hand view of that area to see what's happening.

MR. COOL: Bring a VCR and save the tour, Steve.

MR. ABSOLOM: Does anybody have a problem with the 9th?

I recommend we do it on the 9th of November at 12:30 here at the NCO Club. The invitation letters will identify if we in fact put the tour together so you can dress appropriately. November, it could be a little bit cold, possibly snowing. Okay. If not, it's the 9th of November.

I would like to thank everyone for coming. The meeting is concluded.

For anyone who has comments on the removal action, there is a 30-day period that you can send your comments or questions, send them to Mr. Whitaker here at the Depot. We will get -- we'll address all the comments and questions.

The other point I would like to make is that there is a public meeting tonight and that everyone is invited to the public meeting. We are going to present the plan for the removal action at the ash landfill So all of you are welcome to attend.

September 10th is the 30-day period

The meeting is done.

* * * * *

REPORTER'S CERTIFICATION

I, Mary Grasek, do hereby certify that I reported in stenotype shorthand the Technical Review Committee meeting held on the 17th day of August, 1994;

That the transcript herewith numbered pages 1 through 72 is a true, accurate and correct transcript of those stenotype shorthand notes.

DATED AT: Rochester, New York

this 8TH day of September, 1994.

Mary Grasek

Next TRC 11/19/94
1230

EIGHTH MEETING OF THE TECHNICAL REVIEW COMMITTEE

SENECA ARMY DEPOT ACTIVITY

17 AUGUST 1994

REMEDIAL INVESTIGATIONS

STATUS UPDATE

ASH LANDFILL
AND
OPEN BURNING GROUND
SITES

REMEDIAL INVESTIGATIONS

- RI REPORTS - DRAFT FINAL DOCUMENTS HAVE BEEN SUBMITTED. IF REGULATORS JUDGE RESPONSES TO PRIOR COMMENTS AS ACCEPTABLE, DOCUMENTS WILL BECOME FINAL.
- FS REPORTS - CURRENTLY DRAFT DOCUMENTS ARE BEING REVIEWED.
- RECORDS OF DECISION STILL EXPECTED BY EARLY ~~FY~~ CY 1995.

SOLID WASTE MANAGEMENT UNITS

STATUS UPDATE

SENECA'S HIGH PRIORITY AREAS OF CONCERN

SITE INVESTIGATIONS

- DRAFT DOCUMENTS HAVE BEEN SUBMITTED FOR REGULATORY REVIEW.
- FINAL REPORTS ORIGINALLY EXPECTED BY NOVEMBER 1994... MORE LIKELY WILL BE EARLY 1995 DUE TO HIGHER PRIORITY DOCUMENT REVIEWS (I.E. RI'S AND FS'S).

SOLID WASTE MANAGEMENT UNITS

STATUS UPDATE

SENECA'S MODERATE PRIORITY AREAS OF CONCERN

SITE INVESTIGATIONS

- FIELD WORK RECENTLY COMPLETE AT ALL. PRELIMINARY DRAFT REPORT DUE SHORTLY.
- FINAL REPORTS ORIGINALLY EXPECTED BY LATE 1994 OR EARLY 1995... MORE LIKELY WILL BE FEBRUARY TO MARCH 1995 DUE TO HIGHER PRIORITY DOCUMENT REVIEWS (I.E. RI'S AND FS'S).

SOLID WASTE MANAGEMENT UNITS

STATUS UPDATE

FINALIZATION OF THE SWMU CLASSIFICATION STUDY

LIMITED SAMPLING

- FIELD WORK COMPLETE.

REPORT FINALIZATION

- REPORT FINALIZED FROM AN ARMY VIEWPOINT. NYSDEC AND EPA HAVE SOME CONCERNS THAT WILL REQUIRE ADDITIONAL WORK.

TECHNICAL REVIEW COMMITTEE

CHARTER

Seneca Army Depot Activity
Romulus, New York

TECHNICAL REVIEW COMMITTEE CHARTER

for

SENECA ARMY DEPOT ACTIVITY

ROMULUS N.Y.

I. Agencies Forming the Technical Review Committee (TRC) -

This Technical Review Committee (TRC) Charter is being entered into by the U.S. Army, the New York State Department of Environmental Conservation (NYSDEC), the U.S. Environmental Protection Agency (USEPA) and the local authorities.

II. Basis and Authority for the TRC Charter -

The basis and authority for this Charter is the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), particularly Sections 120(a), 120(f) and 121(f); 10 U.S.C 2705, enacted by Section 211 of SARA; Army Regulation 200-1, Section 9-10.

III. Purpose -

(1) The primary purpose of the TRC is to establish a body which will facilitate communication and coordination among members. The TRC is intended to provide a forum for cooperation between the U.S. Army, concerned local officials and citizens, and the regulatory agencies in order to provide a meaningful opportunity for members of the TRC to become informed and to express their opinion about the technical aspects of the Remedial Investigation/Feasibility Study (RI/FS) or Remedial Design/Remedial Action (RD/RA) process at any site at Seneca Army Depot Activity (SEDA).

(2) A purpose of the TRC shall be to coordinate technical review procedures and schedules to be followed by the Army during the Installation Restoration Program (IRP) for SEDA.

IV. Structure -

TRC membership

(1) Appendix 2.0 of this Charter presents a listing of TRC

members as of June 2, 1994. Absences of any of the members listed in Appendix 2.0 from the TRC due to illness, job transfer or unavailability, may be filled by a duly designated representative.

(2) *Working Sessions of the TRC:*

(a) In accordance with AR 200-1, section 9-10(b), meetings of the TRC will consist of working meetings and public information meetings. Working sessions will consist of the U.S. Army and regulatory agency conducting discussion of operational progress, recommended Applicable or Relevant and Appropriate Requirements (ARAR's), problems, and scheduling. At working sessions, the TRC members, who are community representatives, are full participants in the discussions. Working meetings will be held at Seneca Army Depot Activity on a quarterly basis during normal business hours.

(b) Working sessions will serve to facilitate and enhance the Army's decision making process regarding all phases of the IRP process leading to the implementation of remedial responses at SEDA. While concurrence and consensus on various issues will be reached at working sessions, which will ultimately provide direction to the IRP program at the Depot, final decisions will not be made by either the Army, NYSDEC or USEPA Remedial Project Managers during TRC meetings. Recommendations of committee members are not binding on SEDA or the Army.

(c) Working sessions of the TRC are open to the general public and/or news media. Sufficient notice will be posted in print media and by mail, and also by broadcast media if community interest is substantial.

(3) *Public Information Meetings:*

(a) At certain milestones in the IRP process, as indicated in the Community Relations Plan (CRP) for SEDA, public meetings will be held to discuss project activities. The Depot will organize these public meetings and TRC members will be expected to attend. The TRC members will constitute the panel of experts at these public meetings.

(b) Public Information Meetings will be held in the evening, during dates convenient to the general public. Advance notification of the public meeting will be provided by SEDA in a major local newspaper of general circulation.

V. General Responsibilities of Committee Members -

(1) When requested by any TRC member, more frequent meetings or an alternate location may be called by the Chair upon a simple majority vote by present voting members. The normal meeting place for working sessions of the TRC will be at Seneca

Army Depot Activity, Building 142 (NCO Club), Romulus, N.Y.

(2) In the event that any member cannot be in attendance for a scheduled meeting of the TRC, the Chair should be contacted two (2) days in advance of the scheduled meeting. A substitute for the absentee committee member may be appointed by the non-attending member.

(3) TRC members wishing to comment on and make recommendations about proposed IRP actions to be taken at SEDA must submit their comments and recommendations in writing to the Chair.

(4) Members will serve without compensation. All expenses incident to travel and review inputs will be borne by the respective members organization.

(5) For working sessions of the TRC, members intent on bringing guests (contractors, additional technical representatives of the TRC members agencies, or any other employee of the members agency or group) should notify the Chair in advance of any scheduled TRC meeting to insure necessary physical accommodations. Attendance by members representing any new group or agency not described in Section IV (1) of this Charter shall be an agenda at a working session of the TRC for discussion.

(6) If an imminent health hazard is discovered by any member during the effort covered by the Charter, immediate action will be taken to notify all TRC members in addition to the required notification by the installation to regulatory agencies and appropriate local health officials. Additionally, the installation may take appropriate emergency response measures.

VI. Specific Committee Member Responsibilities -

(1) *Responsibilities of the U.S. Army:*

(a) The Commanding Officer of Seneca Army Depot Activity shall serve as the TRC Chair, and preside over the orderly administration of TRC business.

(b) The Chair is responsible for notifying each member, in writing, of the date, time, location, and agenda of all TRC meetings.

(c) The Chair is responsible for collecting a written list of attendees at each meeting and assuring the written list of attendees is incorporated into the minutes.

(d) The Chair is responsible for assuring that the minutes for each TRC meeting are recorded and copies are provided to each committee member within fifteen (15) days of the date of

any such meeting. The Chair is also responsible for assuring the minutes are promptly incorporated into the Information Repository or appropriate Administrative Record files.

(e) The Chair is responsible for maintaining a mailing list for organizations that wish to receive meeting minutes, the upcoming agenda, and other TRC notices. Mailings should be sent in a timely manner.

(f) In the event that the Chair is unable to attend a TRC meeting, the Executive Secretary shall serve as Acting Chair.

(g) The Army is responsible for, when necessary, supplying appropriate visual aids and other materials associated with conducting presentations relating to past and future IRP projects, issues and progress at SEDA. The Army will deliver presentations as appropriate, provided ample notification of the need for a presentation is provided by the Chair.

(2) *Responsibilities of the USEPA Representatives:*

(a) The USEPA shall notify the Chair two (2) weeks in advance of a scheduled meeting of the TRC if USEPA consultants will be attending the TRC meetings.

(b) The USEPA should use the TRC as a forum through which advice can be given to the regulated agencies on environmental restoration and waste management and technology development issues related to environmental restoration.

(c) The USEPA's participation in this TRC shall be in addition to and not in lieu of the relationship and obligation established by the IAG developed pursuant to section 120 of CERCLA, 42 U.S.C., Section 9620 for SEDA.

(3) *Responsibilities of the NYSDEC Representatives:*

(a) The NYSDEC shall notify the Chair two (2) weeks in advance of a scheduled meeting of the TRC if NYSDEC consultants will be attending the TRC meetings.

(b) The NYSDEC should use the TRC as a forum through which advice can be given to the regulated agencies on environmental restoration and waste management and technology development issues related to environmental restoration.

(c) The NYSDEC's participation on this TRC shall be in addition to and not in lieu of the relationship and obligation established by the IAG developed pursuant to section 120 of CERCLA, 42 U.S.C. Section 9620 for SEDA.

(4) *Responsibility of Town Officials:*

(a) TRC members that are official town representatives

have the responsibility of keeping Town Councilmen, relevant Town Boards and town organizations up to date regarding environmental restoration activities at the Seneca Army Depot Activity.

(b) TRC members who are local government officials have the responsibility to participate in the planning and selection of Army response actions by reviewing and, where warranted, commenting on various Installation Restoration Program actions.

(5) *Responsibilities of NYSDOH Representatives:*

The NYSDOH representative should use the TRC as a forum for assisting the NYSDEC representative in proposing any State health standard, requirement, criteria, or limitation that is legally applicable or relevant and appropriate under the circumstances of the release or threatened release of any hazardous substance, pollutant or contaminant which will remain or be treated on site.

(6) *Responsibilities of the County Health Department Representatives:*

The County Health Department representatives should use the TRC as a forum for assisting the NYSDOH representative in proposing any county or municipal health standard, requirement, criteria, or limitation that is legally applicable or relevant and appropriate under the circumstances of the release or threatened release of any hazardous substance, pollutant or contaminant which will remain or be treated on site.

VII. Revision and Termination of the Charter -

(1) This charter may be amended from time to time as requested by any charter member, and any approval should be by mutual consensus.

(2) The provisions of this Charter shall be satisfied and considered complete when all members agree so in writing.

VIII. Effective Date -

(1) The effective date of this charter shall be the date of the last signature.

IX. Proposed Signatories to the Implementation of the TRC Charter -

All members entering into this Charter recognize that mutual consensus and cooperation will result in the best possible solutions to potential and actual environmental problems and protect the health and welfare of the local citizenry and the environment.

X. DISCLAIMERS-

(1) The Charter does not create obligations which are legally binding on the NYSDEC, USEPA, U.S. Army, NYS Department of Health, Seneca County Department of Health, local authorities, or the signatories herein listed, including any citizen participants. The goal of the charter is to provide guidance and structure to meetings of the TRC, and to maximize efficient use of time during the meetings. This will enhance coordination among TRC members which will result in the best possible solutions regarding the Restoration of Hazardous Waste Sites at Seneca Army Depot Activity.

(2) Nothing in this charter impairs, alters, limits or in any way affects NYSDEC's, U.S. Army's or the USEPA's statutory or common law rights, including, but not limited to, the right under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), Resource Conservation and Recovery Act (RCRA), and NYS Environmental Conservation Law. No statements made in this charter shall be deemed a statement, admission or position adopted by the NYSDEC, U.S. Army or the USEPA.

(3) The provision of the IAG pursuant to CERCLA 120(e)(2) with reference to this site will govern if a conflict arises between the provisions and the terms of this charter.

Roy E Johnson — 3 November 1993

Roy E. Johnson — DATE
Lt. Col., U.S. Army
Commanding Officer, Seneca Army Depot Activity

Kathleen C. Callahan — May 12, 1994

Kathleen C. Callahan — DATE
Division Director, ERRD
U.S. Environmental Protection Agency, Region II

Michael J. O'Toole Jr — 7/29/94

Michael J. O'Toole — DATE
Director, Division of Hazardous Waste Remediation
New York State Department of Environmental Conservation

Allen Nivison — 12-5-93

Allen Nivison — DATE
Town of Romulus Supervisor

Kenneth Strafford — 7/12/94

Kenneth Strafford — DATE
Town of Varick Supervisor

Robert N. Favraeu — 12/3/93

Robert N. Favraeu — DATE
Town of Ovid Supervisor

APPENDIX 1.0
ARMY REGULATION 200-1
Section 9-10

9–10. Technical review committees

a. Per 10 USC 2705(c), a TRC will be established whenever possible and practical to review and comment on the Army's actions with respect to releases or threatened releases of hazardous substances at installations. For the TRC, the rules governing Federal advisory committees do not apply.

b. The IC will be responsible for establishing and designating a chairperson for the TRC as part of any ongoing IRP cleanup program at and related to the installation, if the installation is included or proposed for inclusion on the NPL, or if a high level of community interest has been expressed about the cleanup, or if the ACE has so requested. For a FUDS cleanup, the same criteria apply in deciding whether a TRC should be established; if the decision is affirmative, CEMP will appoint a representative to convene and chair the TRC. The chairperson of the TRC will be an employee of the Army. For related IRP and FUDS activities, see paragraph 9–5c.

c. Meetings of the TRC serve as—

(1) *Working sessions of the involved Army and regulatory agency representatives for discussing operational progress, recommended ARARs, problems, and scheduling.* If policy questions arise, they should be forwarded through command channels to HQDA (ENVR–E) WASH DC 20310–2600.

(a) Membership generally consists of representatives from the Army; i.e., the installation (or CEMP representative, if the cleanup is a FUDS project, and USATHAMA and the supporting USACE FOA, if the cleanup is an IRP project); the MACOM; the Army contractors for the cleanup; the EPA regional office; the State, regional, and local regulatory agencies; local governments of all potentially affected communities; and concerned neighborhood groups.

(b) A charter may be adopted, although none is required. Decisions on matters of technical management are made by consensus of the representatives of the Army and the regulatory agencies. At working sessions, the community representatives are full participants in the discussions. These meetings, which are open to the public, may be held monthly (or as often as needed) during business hours. Each agenda must provide a comment period for any visitors who wish to speak.

(2) *Public information meetings.* Quarterly, or at milestones in the IRP or FUDS schedule, the TRC will hold a public meeting to report progress and to provide a forum for comments and questions. This meeting should be held in the evening, and the date, time, and location should be convenient for general public attendance.

d. The following provisions for all working sessions and public meetings of the TRC should be made—

(1) Minutes should be kept of each meeting and should be prepared in written form within 1 week after the date of the meeting. A court reporter is not required.

(2) A public file of TRC documents, including minutes of all meetings, should be maintained in an information repository at a public library or other easily accessible location.

(3) A mailing list should be maintained for individuals and organizations that wish to receive meeting minutes, the upcoming agenda, and other TRC notices. Mailings should be sent in a timely manner.

(4) A telephone number for information should be made known to the public.

(5) Sufficient notice, at least 21 days, should be posted in the print media and by mail, and also by broadcast media if community interest is substantial. The notice should state where to obtain a work product that is available for review and the minutes of previous TRC meetings. The notice should also list the telephone number to call for additional information.

Appendix 2.0 - TRC Members as of November 3, 1993

MEMBER	MEMBERS AGENCY or GROUP
Lt. Col. Roy E. Johnson, Chairman	U.S Army - Seneca Army Depot Activity
Stephen M. Absolom, Executive Secretary	U.S. Army - Seneca Army Depot Activity
Jeremiah Whitaker	U.S. Army - Seneca Army Depot Activity
Randall Battaglia	U.S. Army - Seneca Army Depot Activity
Thomas R. Enroth	U.S. Army - Seneca Army Depot Activity
Kevin Healy	U.S. Army Corps of Engineers - Huntsville Division
Dr. Kathleen Buchi	U.S Army Environmental Center
John Biernacki	U.S. Army - Depot Systems Command
Lani Rafferty	New York State Department of Health
Brian Dombrowski	Seneca County Department of Health
Carla Struble, P.E.	U.S. Environmental Protection Agency, Region II
Kamal Gupta	New York State Department of Environmental Conservation
Frank Ricotta	New York State Department of Environmental Conservation
Dr. Richard A. Durst	Township of Varick, N.Y.
Allen Nivison	Township of Romulus, N.Y.
Kenneth Stafford	Township of Varick, N.Y.
Robert Favreau	Township of Ovid, N.Y.
James Terryberry	Township of Romulus, N.Y.
William Cool	Township of Varick, N.Y.