



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

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NEW YORK, NY 10007-1866

James T. Moore CPG PMP  
Seneca Army Depot – BRAC Environmental Coordinator  
Environmental Division – Army National Program Manager  
Headquarters, U.S. Army Corps of Engineers HQUSACE, ATTN: CEMP-CED (3050)  
441 G Street, NW  
Washington, DC 20314-1000

Re: Evaluation of Groundwater Contaminants of Concern at SEAD-16 and SEAD-17, Draft Tech Memo, Former Seneca Army Depot, Romulus, New York

Dear Mr. Moore,

EPA has reviewed the Evaluation of Groundwater Contaminants of Concern at SEAD-16 and SEAD-17, Draft Tech Memo, for the Former Seneca Army Depot in Romulus, New York.

The Tech Memo recommends that two major changes be made to the Record of Decision (ROD) for SEADs 16 and 17:

- 1) Modification of the original Remedial Action Objective (RAO), which read “Prevent ingestion of groundwater containing constituents in excess of their federal and state drinking water standards or criteria, or which pose a threat to public health.”; and
- 2) The establishment of a list of contaminants of concern (COCs) for SEAD 16 and 17, as the original ROD did not contain a list of COCs for either site.

Unfortunately, EPA cannot support changes to either of these aspects of the original ROD at this time.

However, if recent and upcoming groundwater sampling results are acceptable to EPA, we will support the submission of an Explanation of Significant Difference (ESD) to remove the land use control / institutional control (LUC/IC) in the ROD which restricts the use of groundwater at SEAD 17, as well as the cessation of long term groundwater monitoring at SEAD 17. It is our understanding that per the Army’s December 21, 2020 Response to Comments (RTC) to EPA comments on the SEAD 16/17 draft final 2019 Year 9 Annual Report, that groundwater sampling was to be conducted at SEAD 17 in March 2021 and will also be conducted in October 2021. Please notify me immediately if this is not the case. Once all of the new groundwater results are compiled, validated, and presented in a report for

submission to the regulators, EPA will evaluate the report and notify the Army as to whether to proceed with an ESD for SEAD 17.

Please note that it will not be necessary for the Army to submit a revised Tech Memo for SEADs 16/17 to EPA.

If you have any questions concerning these comments, please contact me at 212 -637-4432 or have your staff contact Bob Morse, of my staff, at 212-637-4331.

Sincerely,

Douglas Pocze, Chief  
Federal Facilities Section  
Superfund Emergency Management Division

cc: M. Sweet, NYSDEC

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau A

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June 22, 2021

Kathleen Cuzzolino  
Project Manager  
US Army Corps of Engineers - NY District  
26 Federal Plaza  
New York, NY 10278

Re: Evaluation of Groundwater Contaminants of Concern at SEAD-16 and SEAD-17  
Seneca Army Depot, NYSDEC Site 850006

Dear Kathleen Cuzzolino:

The New York State Department of Environmental Conservation (referred to as the "State") has reviewed the Evaluation of Groundwater Contaminants of Concern at SEAD-16 and SEAD-17 at the Seneca Army Depot dated May 26, 2021.

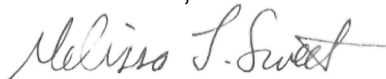
The State disagrees with the exclusion of Antimony from the list of COCs for SEAD-17. The maximum detection of Antimony was 4.4 ug/L which exceeds the NYSDEC GA Standard of 3 ug/L as well as the background UTL. The New York State GA standard for groundwater from 6 NYCRR Part 703.5 for Antimony is based on human health non-oncogenic evaluation. Although the maximum concentration does not exceed the EPA RSL, the Standard by which the Antimony concentrations are evaluated cannot be chosen because they are preferred. The State Standard should be deferred to given that it is the lower, and more protective, value of human health.

We agree with the list of COCs for SEAD-16.

We agree with the proposed changes to the language in the RAO.

If you have any questions on this matter please contact me at (518) 402-9614 or [melissa.sweet@dec.ny.gov](mailto:melissa.sweet@dec.ny.gov).

Thank You,



Melissa L, Sweet, PE  
Project Manager



Department of  
Environmental  
Conservation

ec: J. Swartwout – NYSDEC  
M. Sergott, J. Deming – NYSDOH  
B. Morse – USEPA  
J. Moore, C. Heaton, B. Hodges – USACE  
B. Badik – Parsons

## Army's Response to Comments from the New York State Department of Conversation

**Subject:** Evaluation of Groundwater Contaminants of Concern at SEAD-16 and SEAD-17  
Technical Memo

Seneca Army Depot  
NYSDEC Site No. 850006  
Romulus, New York

**Comments Dated:** 22 June 2021

**Date of Comment Response:** 15 September 2021

### NYSDEC COMMENTS

**Comment 1:** The State disagrees with the exclusion of Antimony from the list of COCs for SEAD-17. The maximum detection of Antimony was 4.4 ug/L which exceeds the NYSDEC GA Standard of 3 ug/L as well as the background UTL. The New York State GA standard for groundwater from 6 NYCRR Part 703.5 for Antimony is based on human health non-oncogenic evaluation. Although the maximum concentration does not exceed the EPA RSL, the Standard by which the Antimony concentrations are evaluated cannot be chosen because they are preferred. The State Standard should be deferred to given that it is the lower, and more protective, value of human health.

**Army Response to Comment 1:** Agree. Although antimony has not been detected above the GA standard since 2014, antimony was added to the list of COCs at SEAD-17 because the constituent is associated with former site use (small arms) and was detected in groundwater above the GA standard in the past.

Please note that based on the EPA comment letter dated 02 July 2021, an ESD will not be prepared for SEAD-16 and SEAD-17 and a new memo will not be prepared.

**Comment 2:** We agree with the list of COCs for SEAD-16.

**Army Response to Comment 2:** Comment acknowledged. Given the EPA comment letter dated 02 July 2021, an ESD will not be prepared for this site. The data will be evaluated following the November 2021 sampling event at SEAD-17.

**Comment 3:** We agree with the proposed changes to the language in the RAO.

**Army Response to Comment 3:** Comment acknowledged. Given the EPA comment letter dated 02 July 2021, an ESD will not be prepared for this site, and the RAOs will not be redefined. The data will be evaluated following the November 2021 sampling event at SEAD-17.

**END OF COMMENTS**