

From: [Gallo, Christopher T CIV USARMY CENAN \(USA\)](#)
To: [REDACTED]
Cc: [Heaton, Charles H Jr CIV USARMY CEHNC \(USA\)](#); [Hodges, Barry A CIV USARMY CEHNC \(USA\)](#); [Chesnut, Alexandria R CIV USARMY CEHNC \(USA\)](#)
Subject: [EXTERNAL] FW: SEAD 17 LTM Tech Memo
Date: Wednesday, July 13, 2022 12:07:35 PM

Sorry should have forwarded.

-Chris

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From: Morse, Bob <Morse.Bob@epa.gov>
Sent: Tuesday, July 12, 2022 3:59 PM
To: Gallo, Christopher T CIV USARMY CENAN (USA) <Christopher.T.Gallo@usace.army.mil>
Cc: Moore, James T CIV USARMY CEHQ (USA) <James.T.Moore@usace.army.mil>; Sweet, Melissa L (DEC) <melissa.sweet@dec.ny.gov>; Pocze, Doug <Pocze.Doug@epa.gov>
Subject: [Non-DoD Source] SEAD 17 LTM Tech Memo

Chris,

EPA has reviewed the SEAD 17 LTM Tech Memo. EPA comments are presented below.

1. **General:** Are there relevant recently collected metals background data from hydrogeologically-similar locations on the depot? Can it be demonstrated that the isolated iron exceedance of the GA standard in MW17-4 (668 J µg/L; 12/2021) is attributable to an anthropogenic or naturally occurring non-site-related background source? A comparison of the iron detection at MW17-4 in 12/2021 to background would be useful
2. **General:** Why do the data from the 12/2021 sampling event overwhelmingly consist of estimated concentrations?
3. **LTM Results:** Paragraph 1 states that "*concentrations of [iron, manganese, and lead] have remained below their respective regulatory standards consistently from Round 4 to Round 11.*" There was an exceedance of the state iron standard at

MW17-4 in 2021. Please correct the text.

4. **LTM Results:** Paragraph 5 contains a discussion of screening levels relevant to determining site COCs. COCs at Site 17 were determined in the 2006 ROD, and this text should be removed.

5. **Summary and Conclusions:** References to concentrations below "screening levels" should be removed or changed to reference relevant standards. This site is undergoing long-term monitoring and cleanup goals for groundwater include federal MCLs and state GA standards.

Please let me know if you have any questions. Thanks.

Bob

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