

Morse, Bob

From: Morse, Bob
Sent: Friday, July 05, 2019 4:40 PM
To: Randy.W.Battaglia@usace.army.mil
Cc: Melissa.Sweet@dec.ny.gov; Pocze, Doug
Subject: EPA Comments on the Seneca AD 2018 LUC/IC Report

Randy,

EPA has reviewed the Seneca Army Depot 2018 LUC/IC Report. EPA comments are presented below.

- 1) It would be helpful if the names and dates for the applicable RODs and LUC/IC RD documents were added to the text discussions for each AOC / site. It is noted that citations from the Reference Section of the Report (e.g., Parsons 2009a) for RODs are included in the text discussions but the draft text doesn't explicitly name the applicable ROD or LUC/IC RD document.
- 2) A clean version of the latest final Addendum to the Seneca LUC/IC RD (Addendum 6?) should be added as an appendix to the LUC/IC Report. This should include the figure showing all of the LUC/IC locations. The most recent version of that figure to have been received by EPA is Figure 1 Addendum 6_v2. If a more recent figure is available it should be provided.
- 3) Although aerial photos of each site are included in the Report, the gps coordinates for each site - LUC/IC area are not provided. Figures that display the gps coordinates for each AOC / site need to be added to the report.
- 4) It would be useful if a crosswalk table matching AOCs / sites to parcel names / numbers could be included in the report. Such a table could also include the tax ID for each parcel as well as the name of the current owner. These aspects would be column headings. Then an "x" could be placed in each box where a LUC/IC has been implemented matching the parcel to the AOC/site.
- 5) The current status of the metes and bounds surveys required to implement the LUC/ICs should be discussed.

End of Comments –

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

Bob

Bob Morse
Remedial Project Manager
USEPA Region 2
Superfund and Emergency Management Division
Federal Facilities Section
290 Broadway 18th Floor
New York, NY 10007-1866
Phone: Office (212) 637-4331
Cell: 908-581-3791

Response to Comments from EPA

Subject: Seneca Army Depot, Draft 2018 LUC Annual Report
SENECA ARMY DEPOT ACTIVITY
ROMULUS, NEW YORK

Comments Dated: 05 July 2019

Date of Comment Response: 18 December 2019

Response to Comments

Comment 1: It would be helpful if the names and dates for the applicable RODs and LUC/IC RD documents were added to the text discussions for each AOC / site. It is noted that citations from the Reference Section of the Report (e.g., Parsons 2009a) for RODs are included in the text discussions but the draft text doesn't explicitly name the applicable ROD or LUC/IC RD document.

Response 1: The requested references were added at the end of each AOC section (e.g., Section 2.1.2.6).

Comment 2: A clean version of the latest final Addendum to the Seneca LUC/IC RD (Addendum 6?) should be added as an appendix to the LUC/IC Report. This should include the figure showing all of the LUC/IC locations. The most recent version of that figure to have been received by EPA is Figure 1 Addendum 6_v2. If a more recent figure is available, it should be provided.

Response 2: Addendum 6 was added as Appendix D.

Comment 3: Although aerial photos of each site are included in the Report, the gps coordinates for each site - LUC/IC area are not provided. Figures that display the gps coordinates for each AOC / site need to be added to the report.

Response 3: Figures that display GPS coordinates for each AOC are provided in Appendix E. Additionally, the coordinates are provided in table form (Table E-1).

Comment 4: It would be useful if a crosswalk table matching AOCs / sites to parcel names / numbers could be included in the report. Such a table could also include the tax ID for each parcel as well as the name of the current owner. These aspects would be column headings. Then an "x" could be placed in each box where a LUC/IC has been implemented matching the parcel to the AOC/site.

Response 4: Table 1 was added as a crosswalk for the site AOCs. It includes AOC ID, Site Name, Tax Map ID, Owner and LUC Requirements.

Comment 5: The current status of the metes and bounds surveys required to implement the LUC/ICs should be discussed.

Response 5: Table 1 includes a column summarizing the survey status for each AOC. AOCs with a professional land survey are labeled "PLS", those with GPS coordinates for AOC corners as "GPS", and AOCs with no survey are labeled "None".