

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau A

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April 5, 2019

Mr. Randall Battaglia
Project Manager, New York District
Seneca Army Depot BRAC Environmental Coordinator
Seneca Army Depot Activity
Building 123, P.O. Box 9
5786 State Route 96
Romulus, NY 14541-0009

RE: Seneca Army Depot, Site 850006
Draft Work Plan for the PFAS Expanded Site Investigation, SEAD-25 and 26

Dear Mr. Battaglia:

The New York State Department of Environmental Conservation (NYSDEC) has reviewed the Final Work Plan for the PFAS Expanded Site Investigation, SEAD-25 and SEAD-26 for the Seneca Army Depot Activity. Based on our review we offer the following comment:

The understanding of potential health effects from exposures to these emerging contaminants and the establishment of federal and state regulations is an evolving and on-going process that may result in the establishment of MCLs, groundwater standards, and soil cleanup objectives that differ from the Project Action Levels used to evaluate the data generated during this investigation. As this understanding of toxicological effects and establishment of regulations progresses, the data to be collected may need to be re-evaluated, and recommendations adjusted. This work plan's objective is to further characterize the source and the fate and transport of PFAS in groundwater at SEAD-25 and 26. A Preliminary Assessment is planned to investigate the former depot via records search for the potential for PFAS sources and impacts. Following the ESI, an RI will be scoped to determine the nature and extent of the PFAS impacts to the former depot property. Since this workplan recommends further investigation following the ESI including deeper aquifer and soil characterization and ecological and human health risk assessment, we find this work plan acceptable, with the understanding that interpretation of emerging contaminant data and identification of appropriate remedial actions may be necessary in the future.

In addition to this comment, the NYSDEC also agrees with the comments (dated March 29, 2019) submitted by Mr. Bob Morse of the United States Environmental Protection Agency (to Randy Battaglia – Seneca AD BRAC Environmental Coordinator/Caretaker New York District CENAN-PP-E) on the referenced work plan.

If you have any questions, please contact me at melissa.sweet@dec.ny.gov or (518) 402-9614.

Sincerely,

A handwritten signature in cursive script that reads "Melissa L. Sweet". The signature is written in black ink on a white background.

Melissa L. Sweet, PE
Environmental Engineer
Bureau A, Section C
Division of Environmental Remediation

ec: J. Swartwout, NYSDEC
B. Schilling, NYSDEC
M. Sergott / J. Deming, NYSDOH
B. Morse, USEPA
B. Badik / T. Belanger, Parsons