

From: [Gallo, Christopher](#)
To: [Cuzzolino, Kathleen CIV USARMY CENAN \(USA\)](#); [REDACTED]
Subject: [EXTERNAL] Comments Regarding the Technical Memo on Optimizing the BTEX LTM program at SEAD 25 – Seneca Army Depot
Date: Monday, March 15, 2021 6:30:59 PM
Attachments: [image001.png](#)

Kathleen/Beth,

See comments below regarding SEAD 25 LTM:

Specific Comments

1. **LTM Status section** – I believe that the exit strategy as described is appropriate for evaluating groundwater monitoring completion at SEAD 25 for COCs as described in the ROD: *“Once a monitoring well has documented concentrations below the applicable groundwater quality standard after two rounds of sampling, no further groundwater monitoring will be performed.”*

This strategy is supported by the analysis conducted in the March 2020 memo, which considered other site-specific factors, such as RAOs, duration of monitoring, potential impacts to receptors, evidence of attenuation/degradation/stabilization, plume size/stability, and concentration trends. Decisions about groundwater monitoring are site-specific, and will typically need to consider factors such as these to in order to determine a monitoring frequency or cessation at a given site.

2. **Recommendations section** – I agree that it is appropriate to remove MW25-3, MW25-9, MW25-10, and MW25-17 from the sampling plan at this time.
3. **Recommendations section** – I disagree with the recommendation to replace MW25-2. No information was provided in the memo which suggests that this monitoring well was compromised or providing non-representative data.
4. **Recommendations section** – I agree with the proposed sampling strategy for MW25-2 outlined in the above bullet.

Please let me know if you have any questions.

Thanks!

-Chris

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NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau A

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February 10, 2021

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

Re: Tech Memo for Optimizing the BTEX LTM Program at SEAD-25
Seneca Army Depot, NYSDEC Site 850006

Dear Kathleen:

The New York State Department of Environmental Conservation and the New York State Department of Health have reviewed the Technical Memo for Optimizing the BTEX LTM Program at SEAD-25 at the Seneca Army Depot, dated January 22, 2021. The memo recommends among several recommendations the abandonment and replacement of MW25-2 in order to ensure collection of quality data. However, there has been no presentation of information that would lead to the conclusion that the data collected from MW25-2 is not an accurate reflection of the groundwater in that area of SEAD-25. Please provide documentation to support the need to abandon and replace this well.

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

Thank You,



Melissa L, Sweet, PE
Project Manager

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

Army's Response to Comments from the New York State Department of Environmental Conservation

Subject: Tech Memo for Optimizing the BTEX LTM Program at SEAD-25

Seneca Army Depot

NYSDEC Site No. 850006

Romulus, New York

Comments Dated: 10 February 2021

Date of Comment Response: 23 March 2021

NYSDEC COMMENTS

Comment 1: The New York State Department of Environmental Conservation and the New York State Department of Health have reviewed the Technical Memo for Optimizing the BTEX LTM Program at SEAD-25 at the Seneca Army Depot, dated January 22, 2021. The memo recommends among several recommendations the abandonment and replacement of MW25-2 in order to ensure collection of quality data. However, there has been no presentation of information that would lead to the conclusion that the data collected from MW25-2 is not an accurate reflection of the groundwater in that area of SEAD-25.

Army Response to Comment 1: The Government is making the decision to replace the well based on the age (1993) of the well. A newer well of high quality will be installed with modern techniques and well construction. The new well will give a better, more representative result of the groundwater quality as was observed within the replacement wells installed at the OD Grounds site. The new well is proposed to be installed approximately 5 ft to the downgradient side of the existing MW25-2. The text below was added to the Recommendations section, bullet #2.

Well MW25-2 was installed in 1993. A newer well of high quality will be installed with modern techniques and well construction. The new well will give a better, more representative result of the groundwater quality. The new well is proposed to be installed approximately 5 ft to the downgradient side of the existing MW25-2.

END OF COMMENTS

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

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April 9, 2021

Kathleen Cuzzolino
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26 Federal Plaza
New York, NY 10278

Re: Army's Response to Comments from NYSDEC
Tech Memo for Optimizing the BTEX LTM Program at SEAD-25
Seneca Army Depot, NYSDEC Site No. 850006

Dear Kathleen:

The New York State Department of Environmental Conservation, having reviewed the Army's Response to Comments on the Tech Memo for Optimizing the BTEX LTM program at SEAD-25, agrees with the Army's reasoning for the recommendation to replace monitoring well MW 25-2. Please provide specifications for the replacement well.

Additionally, given that all SEAD-25 monitoring wells were installed in approximately the same time period, the quality of data from all SEAD-25 monitoring wells should be considered, as it relates to future sampling events. The NYSDEC recommends replacement in kind of all SEAD-25 wells that will be sampled in future events either as part of BTEX LTM or PFAS investigation.

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

Thank You,



Melissa L, Sweet, PE
Project Manager

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