From: To:

Hud Heaton; Hodges, Barry A CIV USARMY CEHNC (USA)

Cc: Subject:

Date:

FW: SEAD 25 Tech Memo October 2021 Friday, November 05, 2021 10:57:27 AM

From: Morse, Bob < Morse. Bob@epa.gov> **Sent:** Friday, November 05, 2021 10:56 AM **To:** Christopher.T.Gallo@usace.army.mil

Cc: Moore, James T CIV USARMY CENAN (USA) < James.T.Moore@usace.army.mil>; Sweet, Melissa L

(DEC) <melissa.sweet@dec.ny.gov>;

Subject: [EXTERNAL] SEAD 25 Tech Memo October 2021

Chris,

EPA has no comments on the SEAD 25 Tech Memo.

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

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NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Remedial Bureau A 625 Broadway, 12th Floor, Albany, NY 12233-7015 P: (518) 402-9625 I F: (518) 402-9627 www.dec.ny.gov

November 8, 2021

Christopher Gallo Environmental, InterAgency & International Services Branch US Army Corps of Engineers New York District 26 Federal Plaza, Room 17-401 New York, NY 10278-0090

Re: SEAD-25 VOC Long term monitoring, 2021 Technical Memo

Seneca Army Depot, NYSDEC Site 850006

Dear Chris Gallo:

The New York State Department of Environmental Conservation (referred to as the "State") has reviewed the SEAD-25 VOC Long-Term Monitoring 2021 Technical Memo for the Seneca Army Depot dated October 2021. We are providing the following comments on the document:

Conclusions and Recommendations: The State disagrees with the recommendations. Monitoring Well MW25-31 should be sampled for VOCs to continue to analyze trends in both BTEX and CVOCs once every 5th quarter. Monitoring Well MW25-2 will be sampled every 5 years as that was already agreed upon.

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

Thank You,

Melissa L. Sweet, PE Project Manager

Melisso J. Sweet

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 Environmental Conservation

Subject: 2021 Technical Memo for SEAD-25 VOC Long-term Monitoring

Seneca Army Depot

NYSDEC Site No. 850006

Romulus, New York

Comments Dated: 08 November 2021

Date of Comment Response: 05 January 2022

Revised response date: 18 January 2022

NYSDEC COMMENTS

Comment 1: The State disagrees with the recommendations. Monitoring Well MW25-31 should be sampled for VOCs to continue to analyze trends in both BTEX and CVOCs once every 5th quarter. Monitoring Well MW25-2 will be sampled every 5 years as that was already agreed upon.

Army Response to Comment 1: The Army agrees that Monitoring Well MW25-31 will be sampled for VOCs for the next 5 years to continue to analyze BTEX and CVOC trends. Based on observations during past sampling events at SEAD-25, the wells at SEAD-25 are typically dry during three of the four seasons. The Spring season (particularly March or April) is the time when water levels are sufficient to collect groundwater samples. As such, the Army suggests a sample frequency of once annually in the late spring or early summer rather than every 5th quarter. Monitoring Well MW25-2 will be sampled every 5 years, as previously agreed upon.