Seneca Army Depot Activity
Romulus, New York

USACE – New York District
US Army, Engineering & Support Center
Huntsville, AL

Community Involvement Plan

Seneca Army Depot Activity

Contract No. W912DY-20-D-0017
Task Order No. W912DY21F0310
EPA SITE ID# NY0213820830
NY Site ID# 8-50-006

November 2022

DEPARTMENT OF THE ARMY
US ARMY CORPS OF ENGINEERS, NEW YORK DISTRICT
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09 November 2022

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SUBJECT: Community Involvement Plan, Seneca Army Depot Activity in Romulus, NY; EPA Site ID# NY0213820830 and NY Site ID# 8-50-006

Dear Mr. Morse, Ms. Sweet, and Mr. Sergott:

On behalf of the Army, please find attached the Final Community Involvement Plan for the Seneca Army Depot Activity, located in Romulus, New York. This Community Involvement Plan provides a framework to facilitate two-way communication between the US Army Corps of Engineers and the local community during the investigation of per- and polyfluoroalkyl substances (PFAS) and other ongoing environmental remedies and active land use controls being implemented at various areas of concern at the Site.

Responses to comments received from EPA (10/19/22) and NYSDEC (10/04/22) on the Draft Final version of the document are addressed and included in the Final document as Appendix D.

If you have any questions about the attached document, please call me at 917-575-1819.

Sincerely,

Digitally signed by GALLO.CHRISTOPHER.T.1604778820
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Christopher T. Gallo
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FINAL

COMMUNITY INVOLVEMENT PLAN

SENECA ARMY DEPOT ACTIVITY, ROMULUS, NEW YORK

Prepared for:

U.S. ARMY, CORPS OF ENGINEERS, ENGINEERING AND SUPPORT CENTER
HUNTSVILLE, ALABAMA

U.S. ARMY, CORPS OF ENGINEERS, NEW YORK DISTRICT
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Contract Number W912DY-20-D-0017
Task Order No. W912DY21F0310
EPA Site ID# NY0213820830
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November 2022

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ACRONYMS AND ABBREVIATIONS

AFFF	Aqueous Film-Forming Foam
AOC	Area of Concern
BRAC	Base Realignment and Closure
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERFA	Community Environmental Response Facilitation Act
CIP	Community Involvement Plan
DoD	Department of Defense
EBS	Environmental Baseline Survey
EJSCREEN	Environmental Justice Screening and Mapping Tool
ERP	Environmental Restoration Program
ESD	Explanation of Significant Difference
FAQ	Frequently Asked Questions
FFA	Federal Facilities Agreement
FS	Feasibility Study
FYR	Five-Year Review
GenX	hexafluoropropylene oxide (HFPO) dimer acid and its ammonium salt
HA	Health Advisory
HI	Hazard Index
HQ	Hazard Quotients
HRR	Historical Records Review
IC	Institutional Control
LTM	Long Term Monitoring
LUC	Land Use Control
MEC	Munitions and Explosives of Concern
MC	Munitions Constituents
MCL	Maximum Contaminant Level
MRS	Munitions Response Site
OD	Open Detonation
OU	Operable Unit
NPL	National Priorities List
NY	New York
NYSDEC	New York State Department of Environmental Conservation
PA	Preliminary Assessment
PFAS	per- and polyfluoroalkyl substances
PFBS	perfluorobutane sulfonic acid
PFHxA	perfluorohexanoic acid
PFOA	perfluorooctanoic acid
PFOS	perfluorooctanesulfonic acid
PFNA	perfluorononanoic acid
PID	Planned Industrial/Office Development and Warehousing Area
ppt	parts per trillion
RA	Remedial Action
RAB	Restoration Advisory Board
RCRA	Resource Conservation and Recovery Act
RD	Remedial Design
RI	Remedial Investigation
ROD	Record of Decision
RSL	Regional Screening Level
SCIDA	Seneca County Industrial Development Agency
SEDA	Seneca Army Depot Activity
SI	Site Investigation
SWMU	Solid Waste Management Units
TAG	Technical Assistance Grant
TSCA	Toxic Substances Control Act
TRC	Technical Review Committee
TSDF	Treatment, Storage, and Disposal Facility
UCMR	Unregulated Contaminant Monitoring Rule
UFP-QAPP	Uniform Federal Policy Quality Assurance Project Plan
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency
UU/UE	Unlimited use and unrestricted exposure
UXO	Unexploded Ordnance

Section 1 Introduction

This Community Involvement Plan (CIP) was prepared for the former Seneca Army Depot Activity (SEDA or the Depot) located in Seneca County, New York (**Figure 1**). The purpose of this CIP is to facilitate two-way communication between the U.S. Army Corps of Engineers (USACE) and the local community during the investigation of per- and polyfluoroalkyl substances (PFAS) and other ongoing environmental remedies and active land use controls (LUCs) being implemented at various areas of concern (AOC) at the Site. AOCs are typically identified with the format SEAD-##.

This CIP supports effective two-way communication between the Army and the surrounding communities most affected by environmental investigations and remedies, including: Varick, Romulus, and Ovid, NY. Effective communication and timely information exchanges are essential for maintaining community support and understanding for the Army's effort to close out the remaining AOCs under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and transfer the property to future users. The proposed methods of outreach described in this CIP were developed based on the experience of the Army with successful CIPs used at different sites and community input received during informal interviews. This CIP is an update to the first CIP issued at SEDA (Dames & Moore, 1992) and is developed with the intent of maintaining open and consistent communication with the surrounding communities.

Section 2 General Background

2.1 LOCATION

SEDA is located approximately 40 miles south of Lake Ontario in Seneca County, New York (NY) (**Figure 1**). The Depot lies immediately west of the town of Romulus, NY, 12 miles south of the village of Waterloo and the town of Seneca Falls, and 2.5 miles north of the town of Ovid, NY. The two closest major cities are Rochester, NY, which is located approximately 60 miles northwest, and Syracuse, NY, which is located approximately 60 miles northeast.

SEDA is located in an uplands area, where the ground elevation ranges from approximately 600 feet along the western boundary of the Depot to approximately 760 feet in the central portion of the eastern boundary. The uplands area where SEDA is located forms a divide separating two of the New York Finger Lakes: Cayuga Lake on the east and Seneca Lake on the west. Sparsely populated farmland covers most of the surrounding area. New York State Highways 96 and 96A border SEDA to the east and west, respectively. **Figure 2** presents an aerial view of SEDA.

2.2 BRAC

In October 1995, the SEDA was designated for closure under the Department of Defense (DoD) 1995 Base Realignment and Closure (BRAC) process. As part of the BRAC process, the Army commissioned an Environmental Baseline Survey (EBS) of the Depot. Under the EBS, all of the property identified as subject to transfer or lease at the facility was classified into one of the seven standard environmental conditions of property area types as defined by the Community Environmental Response Facilitation Act (CERFA) guidance and the DoD BRAC Cleanup Plan Guidebook. This was achieved by identifying, characterizing, and documenting the obviousness of the presence or likely presence of a release or a threatened release of a hazardous substance or petroleum product associated with the historical and current use of SEDA. Areas that were designated as Category 1, 2, 3, or 4 under the CERFA process were suitable for transfer or lease, subject to consideration of the qualifiers. Areas that were designated as Categories 5, 6, or 7 were not suitable for transfer, pending further investigation and remediation, as may be needed. The complete details of the EBS are summarized in the document U.S. Army Base Realignment and Closure 95 Program, Environmental Baseline Survey Report, Seneca Army Depot Activity, New York (Woodward-Clyde Federal Services, 1997).

At the completion of the EBS, 113 BRAC parcels of land were identified and classified within the 10,634 acre Depot. Of the total area, approximately 8,690 acres were found to be suitable for lease or transfer (as designated by Categories 1 through 4), while the remaining areas (approximately 1,945 acres) were designated as Categories 5 through 7 and were not deemed suitable for immediate transfer for reuse. Once SEDA was added to the 1995 BRAC list, the primary objective of the Army was expanded from performing remedial investigations and completing necessary remedial actions to include the release of non-affected portions of the Depot to the surrounding community for their reuse for other, non-military purposes (i.e., industrial, municipal, and residential). The designated future use of land within the SEDA was first defined and approved by the Seneca County Local Redevelopment Authority in 1996. The planned use for portions of the SEDA was modified by Seneca County Industrial Development Agency (SCIDA) in 2005 (**Figure 3**).

2.3 HISTORY OF ENVIRONMENTAL INVESTIGATION

Between 1941 and 2000, SEDA was owned by the United States Government and operated by the Department of the Army. The Depot began its primary mission of receipt, maintenance and supply of ammunition in 1943. After the end of World War II, the mission of the Depot shifted from supply to storage, maintenance, and disposal of ammunition. SEDA was selected for closure by the DoD in 1995; its military mission terminated in September 1999, and the installation was closed in September 2000. Since 2000, the majority of the Depot has been transferred to other parties for reuse. The history of contamination for each AOC is described in further detail in the Five-Year Review (FYR) (Parsons, 2021). The FYR report,

along with other documents regarding the site, are part of the Administrative Record, which will be available on the former SEDA Environmental Cleanup Website (https://senecaarmydepotar.com).

SEDA was proposed for the National Priorities List (NPL) in July 1989. In August 1990, the listing of SEDA as a NPL site was finalized in Group 14 on the Federal Section. After SEDA was listed on the NPL, the Army, United States Environmental Protection Agency (USEPA) Region II, and New York State Department of Environmental Conservation (NYSDEC) identified 57 Solid Waste Management Units (SWMU) where data or information suggested, or evidence existed to support, that hazardous substances or hazardous wastes had been handled, and where releases to the environment may have occurred. Additionally, the USEPA, NYSDEC, and the Army negotiated and finalized a Federal Facilities Agreement (FFA) for the Site in 1993 (USEPA, Army, and NYSDEC, 1993).

The FFA established if SWMUs required action or not. If no action was required at a SWMU it was closed out and documented in a Record of Decision (ROD). If the SWMU required action, it became designated as an AOC. The number of SWMUs (identified with the acronym SEAD and a unique number, e.g., SEAD-25) was subsequently expanded to include 72 AOCs once the Army finalized the SWMU Classification Report for the Depot in 1994 (Parsons ES, 1994).

The SEDA was a generator and a treatment, storage, and disposal facility (TSDF) for hazardous wastes and thus, subject to regulation under the Resource Conservation and Recovery Act (RCRA). Under the RCRA permit system, corrective action is required at all SWMUs, as needed. Remedial goals are the same for CERCLA and RCRA; thus, once the 72 AOCs were listed, the Army recommended that they be identified as either areas requiring No Action or as AOCs under CERCLA and the FFA, where additional investigation, study, or actions were needed. SWMUs listed as AOCs were then scheduled for investigations based upon data and potential risks to the environment. Additional sites have been identified and to date, SEDA consists of 22 Operable Units (OUs) and 84 SEADs or AOCs. RODs have been signed for 83 out of 84 AOCs at SEDA. The Open Detonation Grounds Feasibility Study was issued on 02 March 2022, and the ROD is anticipated to be signed for the OD Grounds by the beginning of 2023. Forty-two sites have ongoing long-term monitoring (LTM), including LUCs, and are covered in the Five-Year Review. Sites with previously completed investigations are being re-evaluated for PFAS impacts.

2.4 CURRENT REMEDIAL INVESTIGATIONS AND REMEDIES

Remedies are in-place or complete for 83 AOCs (**Table 1**). The basis for taking action for each AOC is described in further detail in the FYR (Parsons, 2021). Generally, an action was required at the AOCs to ensure the remedy or land use remains protective of site users. The contaminants of concern (COCs) and results of the human health and ecological risk assessments at each AOC are summarized in the individual appendices in the FYR. Risk assessments were performed to determine if the human health cancer risks were below the CERCLA cancer risk management range of 1×10^{-4} to 1×10^{-6}, and if the calculated non-cancer hazard index (HI) were less than 1.0. Ecological risk assessments were performed to determine if the hazard quotients (HQ) were less than 1 (no adverse effects), between 1 and 10 (some potential for adverse effects), between 10 and 100 (significant potential for adverse effects), or greater than 100 (adverse effects expected). Generally, the greater the HQ, the greater the likelihood of an effect.

For each AOC where a remedy is in-place or complete, the ROD specifies the details of the selected remedy. The RODs for each AOC where the selected remedy requires the implementation of LUCs specify that the LUCs will continue until the concentrations of hazardous substances in site media are reduced to levels that allow for unlimited use and unrestricted exposure (UU/UE). The FYR presents a summary with the corresponding LUCs or institutional controls (ICs) required by the RODs and their location within SEDA (**Table 4** and **Figure 2** of the FYR). For real estate parcels that were transferred to new owners, the responsibility to implement LUC/ICs required by the ROD were technically transferred to the new owner; however, the Army retains overall responsibility to ensure LUC implementation through its 5-year review process and through enforcement of the LUCs (in coordination with USEPA and NYSDEC). LUC/IC compliance will be monitored and reported on annually by the Army and the Army will issue letters annually to current property owners requesting a status update on property use and anticipated use. LUC/ICs were implemented as deed restrictions and environmental easements. **Table 1** within this CIP summarizes site status and any current remedy in place.

2.5 ON-GOING INVESTIGATIONS (NON-PFAS)

Currently, SEAD 006-R-01 (SEAD-45) Open Detonation (OD) Grounds is under assessment. This site was formerly used for demolition of excess, obsolete, or unserviceable munitions. The OD Grounds was investigated for residual unexploded ordnance (UXO)/munitions and explosives of concern (MEC), as well as contamination resulting from the release of munitions constituents (MC) to the environment. MC are the chemicals that could cause contamination of site soil, surface water, sediment and groundwater as a result of munitions use/disposal at the site. The OD Grounds Feasibility Study (FS) Report was issued on 02 March 2022 (Parsons, 2022b) and the signed ROD is anticipated by the end of 2022.

In the FS, the most favorable remedy for the OD Grounds is Alternative 4: excavate OD Hill (area of elevated topography at the center of the OD Grounds munitions response site (MRS) where OD operations occurred), perform surface/subsurface clearance over the entire site, and implement LUCs.

2.6 PFAS INVESTIGATIONS

2.6.1 PFAS REGULATORY STATUS

The EPA identified perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA) as emerging contaminants in 2014. PFOS and PFOA are part of a group of manufactured chemicals called PFAS which can adversely impact human health and the environment. In 2016, EPA issued a lifetime Health Advisory (HA) for the sum of PFOS and PFOA at 70 parts per trillion (ppt) as a guidance level when applied to drinking water. In February 2020, EPA announced its proposal to regulate PFOA and PFOS under the Safe Drinking Water Act. In 2021, the EPA published its PFAS Strategic Roadmap (https://www.epa.gov/system/files/documents/2021-10/pfas-roadmap_final-508.pdf) outlining many goals and objectives to address PFAS. Some of these objectives include: developing a Notice of Proposed Rulemaking to designate PFOA and PFOS as CERCLA hazardous substances; enhanced PFAS reporting under the Toxics Release Inventory (TRI); review of new and existing PFAS listed on the Toxic Substances Control Act (TSCA) inventory; establishing a national primary drinking water regulation for PFOA and PFOS; toxicity assessments for GenX chemicals and five additional PFAS; restrictions on PFAS discharges; updated analytical methods; and monitoring of, and guidance for publishing fish advisories. On December 27, 2021, EPA published the final fifth Unregulated Contaminant Monitoring Rule (UCMR), which will require sample collection for 29 PFAS in the nation's drinking water systems between 2023 and 2025. On 15 June 2022, EPA released four drinking water health advisories for PFAS. Interim updated health advisories were reduced for both PFOA (0.004 ppt) and PFOS (0.02 ppt). Final health advisories were published for GenX chemicals (10 ppt) and Perfluorobutane sulfonic acid (PFBS) (2,000 ppt) (EPA, 2022a).

In July 2020, New York state formally adopted maximum contaminant levels (MCLs) for drinking water for PFOA and PFOS at 10 ppt (NYSDOH, 2020). The MCLs were promulgated by the State's Drinking Water Quality Council, a body of water quality experts and scientists charged with setting limits in absence of federal standards for these emerging chemicals that have been pervasive in drinking water systems nationwide. While the MCLs adopted by the Department of Health (DOH) provide protection for finished drinking water, in October 2021, the NYSDEC released proposed guidance values which will provide complementary protection of ambient waters used as drinking water sources. These proposed guidance values also provide protection for aquatic life. The proposed NYSDEC human health guidance values for a raw water source (Class GA) are 6.7 ppt for PFOA and 2.7 ppt for PFOS (NYSDEC, 2021) at the time this document was prepared. Guidance values for PFAS compounds continue to shift as new data are available. The latest NYS values may be available on their website: https://regs.health.ny.gov/sites/.

On 06 July 2022, the DoD adopted the most recently published EPA Risk Screening Levels (RSLs) calculated for PFOS, PFOA, PFBS, perfluorononanoic acid (PFNA), perfluorohexanoic acid (PFHxA), and GenX in tap water and soil (OSD, 2022) (**Appendix C**). These RSLs will be used to determine if further investigation in the remedial investigation (RI) phase is warranted or if no further action is required.

2.6.2 ON-GOING PFAS INVESTIGATIONS

In January of 2016, USEPA requested the Army sample for PFAS in groundwater in areas where firefighting activities may have occurred. The Army launched a Site Investigation (SI) at three previously investigated sites (SEAD-25, SEAD-26, and SEAD-122E), in response to concerns surrounding the presence of emerging contaminants at former fire training areas due to the use of aqueous film forming foam (AFFF). The 2018 SI report concluded that at SEAD-25 and SEAD-26 concentrations of two PFAS constituents, PFOA and PFOS, were measured in exceedance of the EPA lifetime HA levels (70 ng/L or ppt) (Parsons, 2018). As a result, SEAD-25 and SEAD-26, and a former firehouse, progressed to an expanded SI (ESI) which was conducted in phases between May 2019 and March 2021, with a focus on further delineating the PFAS extents in the area (Parsons, 2022a). Concentrations of PFOA and PFOS were found at all three sites above the NY state MCL; however, there are no current exposure pathways to public water supplies from the three AOCs investigated.

The Army is conducting a Historical Records Review (HRR)/Preliminary Assessment (PA) of potential sources of PFAS at SEDA, a SI at 34 suspected PFAS sites (plus any sites identified during the PA/HRR), and a Remedial Investigation (RI) at four known PFAS sites where PFAS were detected (**Table 2**). The investigations will assess whether the former SEDA has been impacted by PFAS containing materials from historic site activities which may have included: 1) the release of AFFF during on-base firefighting, 2) other DoD related site-use (e.g., landfills, munitions use), or other non-DoD related disposal activities (e.g., wastewater treatment, agricultural activities).

Table 2. PFAS Investigation Sites

PFAS SITE INSPECTION (SI) AREAS OF CONCERN	
SEAD-002-R-01 EOD Areas #2 and #3 OU11	SEAD-22, Sewage Treatment Plant # 314, OU14
SEAD-003-R-01 EOD #1 (SEAD 57) OU11	SEAD-23, Open Burning Grounds, OU2
SEAD-007-R-01 Grenade Range, OU11	SEAD-24, Abandoned Powder Burning Pits, OU13
SEAD-3, Incinerator Cooling Water Pond, OU1	SEAD-45, Open Detonation Grounds, OU17
SEAD-5, Sewage Sludge Storage Piles, OU13	SEAD-46, Small Arms Range (aka 3.5-inch Rocket Range), OU11
SEAD-6, Abandoned Ash Landfill, OU1	SEAD-58, Debris Area Near Booster Station 2131, OU14
SEAD-7, Shale Pit, OU14	SEAD-59, Fill Area West of Building 315, OU6
SEAD-8, Non-Combustible Fill Area, OU1	SEAD-64A, Garbage Disposal Area, South of Storage Pad, OU12
SEAD-9, Old Scrap Wood Site, OU14	SEAD-64B, Garbage Disposal Area, South of Classification Area, OU14
SEAD-10, Scrap Wood Site, OU14	SEAD 64C, Garbage Disposal Area, OU14
SEAD-11, Old Construction Debris Landfill, OU8	SEAD 64D, Garbage Disposal Area, West of Building 2203, OU14
SEAD-14, Refuse Burning Pits (2 units), OU1	SEAD-67, Dump Site East of Sewerage Treatment Plant #4, OU14
SEAD-15, Abandoned Solid Waste Incinerator (Building 2207), OU1	SEAD-68, Old Pest Control Shop (Building S-335), OU14
SEAD-16, Building S311, Abandoned Deactivation Furnace, OU4	SEAD-69, Building 606 Disposal Area, OU14
SEAD-17, Building 367, Active Deactivation Furnace, OU4	SEAD-70, Former Building T-2110, Filled Area, OU11
SEAD-20, Sewage Treatment Plant #4, OU14	SEAD-122D, Airfield Hot Pad Spill
SEAD-21, Sewage Treatment Plant # 715, OU14	Fire House Building 722
PFAS Remedial Investigation (RI) Areas of Concern	
Firehouse – Building 103	SEAD-26, Fire Training Pit
SEAD-25, Fire Training and Demonstration Pad	SEAD-122D, Airfield Hot Pad Spill and SEAD-122E, Plane Deicing Areas

OU = Operable Unit UXO = Unexploded Ordnance

Section 3 The Community

This section describes the communities near the former SEDA, provides a brief history of past community involvement, and summarizes community concerns expressed during informal interviews.

3.1 COMMUNITY SETTING

Prior to the American Revolution, the area was controlled by the Algonquians followed by the Seneca and Cayuga nations of the Iroquois. Displacement of the indigenous peoples in 1779 led to non-native settlement beginning in approximately 1789. The town of Romulus was established in 1794 and at that time extended north to Ontario Lake. In 1800, the portion of Romulus just south of the Seneca River became the current town of Fayette and in 1830 the remaining northern portion of Romulus became the current towns of Varick. By 1850, the majority of the land that would become SEDA were farms. By 1880, farming, dairy and the wine industry were the base of the economy until the early 1900s (Gable and Zogg, 2012). In the 20th century, agricultural activities continued to grow, with approximately 105 farms occupying the area that is now SEDA, covering roughly 10,600 acres. Small industries began to develop in the area and government related jobs became available. The availability of transportation sources such as railroads and canals, the remote location and lightly populated country, and a reasonable distance to the Atlantic coast made SEDA an attractive location for the Army ordnance depot and Navy training station. The Army acquired the area for SEDA in 1941. After its military mission ended, the installation was closed in September 2000.

Varick is home to four wineries, all closer to the eastern end of the town, along Cayuga Lake. From north to south, the five are Swedish Hill Vineyard, Lakeshore Winery, Knapp Winery and Vineyard Restaurant, and Goose Watch Winery (All but Lakeshore Winery are participating members of the Cayuga Lake Wine Trail, and while the Seneca Lake Wine Trail certainly runs through Varick, none of its stops quite fall within its town lines.) The Simon Ritter Cobblestone Farmhouse was listed on the National Register of Historic Places in 2008. Varick includes the following communities and locations: East Varick (hamlet), Fayette (hamlet), Kings Corner, MacDougall, McDuffie Town, Romulus (hamlet), Varick, and East Lake Road.

The town of Romulus is situated at the heart of the Finger Lakes between Seneca and Cayuga lakes. Romulus is predominately agricultural and tourism-focused with historical museums, nationally renowned wineries, and many other attractions. The town of Romulus is made up of the following communities: Elm Beach, Hayts Corners, Kendaia, Lake Shore Landing, Poplar Beach, Romulus, Spring Meadows, and Willard (Town of Romulus, NY, n.d.).

Ovid is a town in Seneca County, New York, United States. The town is named after the Roman poet Ovid, a name assigned by a clerk interested in the classics. The town of Ovid contains a village also called Ovid, one of the county seats of Seneca County. The following communities and locations are located in the town of Ovid: Coan Corners, Gilbert (hamlet), Kidders (hamlet), Ovid (village), Scot Corners, Sheldrake (hamlet), Sheldrake Springs (hamlet), Starett Corners, Willard (hamlet), Willard State Hospital and Willard Wildlife Management Area.

Larger population centers are located approximately 7 to 10 miles to the north of SEDA in the city of Geneva, Village of Waterloo and town of Seneca Falls. The city of Ithaca is located approximately 30 miles south of SEDA.

Within Seneca County, the Amish settled in approximately 1981 and as of 2021 there are approximately 1,090 community members (Elizabethtown College, 2022). Arriving in the late 1970s, two factions of Mennonites groups exist in Seneca County: Weaverland Mennonites (Horning) and Groffdale Mennonites (Wenger). The majority of the Amish and Mennonite populations are engaged in agriculture and operate many of the area's dairy farms. Success is based on running small farms with large families whose many children help to grow and harvest crops and produce, thereby eliminating hired labor costs. Most of the parcels leased within the farming sector of SEDA are for agricultural use by Mennonite families.

As described above, since the closure of SEDA, the majority of the acreage has been transferred for reuse. Major landowners include Deer Haven Park, LLC., Seneca Depot LLC., FirstLight Fiber, and the New York State Department of Corrections. Primary land uses include: Conservation/Recreation, Data Storage, Farming, Industrial and Warehousing, County Training areas, and a Prison Area (**Figure 3**). Other smaller parcels are used by the Seneca County Sewer District, Seneca County Water District, and the Seneca County Sheriff.

3.2 DEMOGRAPHICS

Table 3 provides demographic information for the towns of Romulus, Ovid and Varick and the Census defined area of SEDA, compared to the State of New York.

Table 3. Demographic Profile

	State of NY	Town of Romulus	Town of Ovid	Town of Varick
Total population, 2010	19,378,102	409	602	1,857
Total population, 2020	20,201,249	356	535	1,656
Percent non-white	30.4%	7.1%	4.5%	9.0%
Hispanic or Latino	19.3%	0.79%	3.93%	2.1%
Median Age	39.2	45.6	34.6	38.1
Median Household Income, 2020	$72,108	$46,050	$51,250	$61,750
Unemployment rate (civilian labor force)	5.7%	0.7%	1%	0.8%
People living below the poverty level, 2020	13%	23.6%	17.1%	10.9%
Percent over 18 years old who speak English less than "very well"	9.0%	2.9	4.1%	2.3%

[a] U.S. Census Bureau, 2020

3.3 ENVIRONMENTAL JUSTICE

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, amended by executive order (E.O.) 12948, directs federal agencies to "make achieving environmental justice part of its mission." This is achieved, in part, by identifying and addressing disproportionately high and adverse human health or environmental impacts, specifically on minority and low-income populations, to the greatest extent practicable and permitted by law. Environmental justice refers to the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies (EPA, 2021).

The Army is aware of environmental justice issues and seeks to ensure that actions and activities at the sites do not disproportionately affect any segment of the population. An environmental justice screening was conducted for this CIP using a mapping tool developed by the EPA called the Environmental Justice Screening and Mapping Tool (https://www.epa.gov/ejscreen) (EPA 2022b). EJSCREEN uses data on low-income and minority populations at the Census-block-group level (rather than town-level, as shown in **Table 3**), to develop a demographic index. EJSCREEN was used to develop a demographic index for a 3-mile radius around the SEDA. Results of the EJSCREEN, which can be found in **Appendix A** indicated that, within the 3-mile radius, 36% of the population is low income (household income is less than or equal to twice the federal "poverty level") and 27% of the population are people of color. As such, these populations warrant specific environmental justice considerations.

3.4 SCHOOLS AND RECREATION

The Seneca County School District consists of four central school districts with 14 schools total. Romulus Central School District consists of one elementary school and one high school located approximately 0.25 miles from the former SEDA boundary. Seneca Falls Central School District consists of two elementary schools, one middle school, and one high school. South Seneca Central School District consists of one elementary school, one middle school, and one high school. Waterloo Central School District consists of one primary school (grades K-2), one intermediate school (grades 3-5), one elementary school, one middle school and one high school.

Several recreational opportunities exist in Seneca County, including boating and/or fishing in local ponds and lakes, hunting, camping, and/or nature watching in natural/forested areas, biking, cross-country skiing and other outdoor activities. The Montezuma National Wildlife Refuge and the Finger Lakes National Forest attract recreation enthusiasts who take part in various outdoor activities.

3.5 LOCAL WATER USE

Surface water and groundwater from SEDA flow to five primary creeks. In the southern portion of the Depot, the surface drainage flows through man-made drainage ditches and streams into tributaries of Indian Creek. These creeks then merge and flow into Seneca Lake just south of the former airfield near the Hamlet of Willard. The central and administration areas of SEDA drain into Kendaia Creek. Kendaia Creek flows in a predominant westerly direction and discharges into Seneca Lake at a location north of Pontius Point and the former SEDA Lake Shore Housing Area (now Sampson State Park). Areas along the western SEDA boundary, north of Kendaia Creek, drain into Silver and Wilcox Creek; these creeks flow west into Seneca Lake. The majority of the northwestern and north-central portion of the SEDA drains into Reeder Creek. Reeder Creek flows predominantly northwesterly and leaves the Depot at a point that is north of the Open Detonation Area (i.e., SEAD-45) and west of the former Weapons Storage Area before it turns to the west and flows into Seneca Lake. The northeastern portion of the Depot, which includes a marshy area called the Duck Pond, drains into Kendig Creek and then flows north approximately 8 miles into the Cayuga-Seneca Canal and to Cayuga Lake. Other minor creeks are also present and drain portions of the Depot.

Regionally, four distinct hydrologic units were identified within Seneca County. These include two distinct shale formations, a series of limestone units, and unconsolidated beds of Pleistocene glacial till. Groundwater is found seasonally in the overburden/weathered bedrock zone (subject to precipitation); however, the water in overburden wells would be difficult to use as a potable source due to low well yield (less than 1 to 0.5 gallons per minute). Recharge of the underlying shallow saturated zone is dependent on precipitation. Rainwater or snow melt slowly infiltrates into the till/weathered bedrock water bearing zone; however, during larger precipitation events, the infiltration rate is likely not high enough, and overland flow transports excess precipitation to local drainage ditches and low areas. The water table aquifer of the unconsolidated surficial glacial deposits of the region would be expected to flow in a direction consistent with the ground surface elevations. Geologic cross-sections across Seneca and Cayuga Lakes have been constructed by the State of New York (Mozola, 1951, and Crain, 1974). The geologic cross-sections suggest that a groundwater divide exists approximately halfway between the two Finger Lakes. SEDA is located on the western slope of this divide and therefore regional groundwater flow is expected to be primarily westward towards Seneca Lake. Within SEDA, groundwater discharges to wetlands, ponds, man-made drainage ditches, and streams which generally discharge to Seneca Lake. Local hydrogeology is overall consistent with the regional hydrogeology. The groundwater in the county is very hard (high concentration of calcium and magnesium), and therefore, the quality is minimally acceptable for use as potable water.

3.6 HISTORY OF COMMUNITY OUTREACH AND INVOLVEMENT

From 1991 through 1995, the Army solicited community involvement through quarterly meetings with the Technical Review Committee (TRC). The TRC was comprised of community leaders with an active interest in the CERCLA process at the former SEDA. These meetings were open to the public and were announced in the local newspaper and on the radio. Following inclusion of the former SEDA on the final BRAC closure list in late 1995, the Army transitioned from the TRC and formed the Restoration Advisory Board (RAB), which increased the frequency of the meetings to a monthly basis. The RAB was comprised of several of the TRC members with the addition of Army and regulatory representatives. The occurrence of RAB meetings became less frequent and eventually ceased as the Reuse Plan and Implementation Strategy for Seneca Army Depot was completed and adopted by the Local Redevelopment Authority in October 1996 and the majority of AOCs were closed with signed RODs.

Two interviews were completed in July 2021 with two of the primary SEDA property owners. These interviews were conducted for the Five Year review at the SEDA and were required by CERCLA to ensure current remedies are protective at the site. Current land uses reported by the landowners include: industrial, farming, a solar farm, wildlife management, cell

tower, egg processing/pasteurization facility, processing facility to provide food to a food-bank, and a restaurant supply company. Potential future land uses include additional solar farms, warehouses and light manufacturing. At this time, housing is not planned within SEDA; however, logging and forestry operations may be started. In the western portions of SEDA, corn is planted for the deer graze. The planting is done in coordination with NYSDEC and an ecologist. Within the southwest portion of SEDA, beef cattle and goats graze in the former igloo areas. There are currently no dairy operations. Throughout SEDA, groundwater is not used for drinking water. Grazing animals and wildlife have access to surface water. The Planned Industrial/Office Development and Warehousing (PID) Area (**Figure 3**) is not being used for agricultural or livestock purposes.

3.7 COMMUNITY ISSUES AND CONCERNS

Various community concerns have arisen recently regarding the clean-up at SEDA. The Seneca Lake Pure Water Association requested that steps be taken to identify and remove the source(s) of phosphorus, coliform and E. coli which are polluting Reeder Creek, Seneca Lake and other downstream waterways. Other concerns involve the munitions cleanup at the OD Grounds and presence, and extent, of PFAS contamination.

Section 4 Community Involvement Plan

In cooperation with EPA and NYSDEC, the Army functions as the lead agency responsible for managing the community involvement plan at the former SEDA. The Army will facilitate communications with the community based not only on the community involvement requirements of CERCLA, but also on the community's interests and concerns. This community involvement plan will enable the Army to respond to public interest in, and concerns about existing sites, sites with LUCs and/or LTM, the current PFAS environmental investigations, and remediation activities at the former SEDA.

Historically, community involvement activities have been conducted in accordance with CERCLA. Required activities have included public notices, public meetings, and public comment periods for specific documents, such as records of decision (ROD) and five-year reviews. Informal interviews of the major SEDA landowners were conducted during the last five-year review and major concerns are described above in **Section 3.7**.

The activities described in this Section compose the Army's community involvement strategy for the former SEDA. This CIP is a dynamic document that will evolve as the project progresses.

4.1 COMMUNITY INVOLVEMENT OBJECTIVES

The main goal of the CIP is to promote effective, open communication about the investigations and remedies at the sites, including the PFAS investigations, among the Army, EPA, NYSDEC, other local agency stakeholders, and residents of the towns of Romulus, Ovid and Varick. Specific objectives of the CIP are detailed in Section 1.

4.2 CONTENTS OF THE COMMUNITY INVOLVEMENT PLAN

Several community involvement activities are required as part of the CERCLA process. Required community involvement activities under CERCLA are described in the following subsections.

4.2.1 DESIGNATED CONTACT

- **Description:** Provide a point of contact and information resources to respond to inquiries from the public.
- **Goal:** Provide accurate, timely, and easy-to-understand information to community members seeking information about the former SEDA.
- **Current Implementation:** Christopher Gallo, the USACE NY District Project Manager, is the point of contact for the Army. James Moore is the BRAC Environmental Coordinator for the SEDA. Mr. Gallo will be the primary public point of contact for the Army. Mr. Gallo serves as the central information source for public and media inquiries. They are also responsible for responding to telephone calls and written inquiries about site activities. Additional contact information for the Army, state and federal regulatory agencies and elected officials is available in **Appendix B**.
- **Planned Implementation:** The Army will continue to publicize Mr. Gallo's contact information as the primary point of contact and will ensure their contact information is made available on public notices, fact sheets, announcements, and other community outreach materials and to the Romulus Planning Board.
- **Contact Information:**

  Christopher Gallo
  Project Manager
  USACE, New York District
  2890 Woodbridge Avenue
  USACE c/o US EPA Region 2
  Edison, NJ 08818
  Christopher.T.Gallo@usace.army.mil
  917.790.8230 (Office)

- **Timing:** Ongoing.

4.2.2 INFORMATION REPOSITORY

- **Description:** An information repository is a record storage area (at or near SEDA) that contains all correspondence, reports, Administrative Record files, and documents related to the Site, that can be accessed by the public. The information repository will allow community members, and other members of the public, to easily find information about CERCLA in general, the statuses of cleanup and remediation project sites, and other information of general public interest. The repository should be located in an easily accessible public location. Storage considerations may necessitate that the repository reference an online source for Administrative Records or other documents.
- **Goal:** Provide convenient access to site-related information for community members.
- **Current Implementation:** An information repository was recently created online, with all paper-copy documents being scanned and transferred to an online portal. Access to the online information repository is available at the following website: https://senecaarmydepotar.com.
- **Planned Implementation:** Fall 2022. The website is now online.
- **Timing:** Ongoing maintenance.

4.2.3 ADMINISTRATIVE RECORD FILES

- **Description:** The Administrative Record includes documents that were considered or relied upon in selecting a response to action. There are multiple Administrative Record Files for Seneca Army Depot, one for each remedy decision (ROD) that is made. Post-remedy documents (e.g., long term monitoring reports) are not required to be placed in the Administrative Record but will be kept as part of the project files should these documents be relevant to a later response selection decision.
- **Goal:** Provide community members with a comprehensive record of all documents and resources used by the Army in reaching all decisions about a specific site and its remedy.
- **Current Implementation:** For the former SEDA, the Administrative Record was transferred to an online website (https://senecaarmydepotar.com). Some printed copies were retained at the Army's last remaining office (Building 125) at SEDA. The availability of these documents for review can be determined by contacting the Army's contact person (see Section 4.2.1).
- **Planned Implementation:** The Army will continue to update the Administrative Record files as needed. The Administrative Record was transferred to online paperless access. Access to the online information repository is available at the following website: https://senecaarmydepotar.com. The Army will post all Administrative Record documents issued since the late 1990s in electronic format on the website. The website will be provided to the Romulus Planning Board, SCIDA, landowners within the former SEDA and will be provided to the NYSDEC and EPA to post on the SEDA Superfund page.
- **Timing:** The Army will continue to update the Administrative Record file as needed and will post new documents in the electronic Administrative Record on the website. The Administrative Record was established as soon as site investigations began and will remain open until the last ROD is signed. After the last ROD is signed, the Administrative Record may be closed, but a records file will remain open for post-ROD documents, such as 5-year reviews. Alternatively, the Army may choose to keep the Administrative Record open until the former SEDA is delisted from the NPL.

4.2.4 TECHNICAL ASSISTANCE GRANT INFORMATION

- **Description:** A technical assistance grant (TAG) is an EPA-administered program that provides funding to community groups that may be affected by a release or threatened release at any installation on the NPL. A TAG may be used to contract with an independent technical advisor who can interpret and explain information about the nature of the hazard, or the process or results of any of the investigations and plans in the CERCLA process, including technical reports, site conditions, EPA's proposed cleanup and other decisions, to the community. EPA has specific guidelines for groups that apply for and administer TAGs. Only one group may hold a TAG for an NPL site.

- **Goal:** Provide resources for community groups to hire technical advisors who can assist them in interpreting technical information.
- **Current Implementation:** Currently, no community groups hold a TAG.
- **Planned Implementation:** The Army does not need to implement this activity because a TAG is awarded and administered by the EPA.
- **Timing:** No action needed.

4.2.5 FORMAL PUBLIC MEETINGS

- **Description:** A public meeting is a structured, formal meeting that is open to the general public, in which members of the public may ask questions and make public comment. Generally, the purpose of the public meeting is to present information to the audience and receive feedback from the community. A public meeting typically includes a presentation on a specific topic by the Army and other members of the site team.
  Public meetings are required at specific steps in the CERCLA process. If a public meeting is held during a public comment period, then a court reporter will be used to produce a written transcript of the meeting to become part of the Administrative Record. Public meetings must be held on request whenever a formal public comment period is required under CERCLA regulations.
- **Goal:** Provide stakeholders with opportunities to learn about the status of site remedies and investigations, receive responses to their questions and concerns, and have an opportunity to submit comments on proposed actions or decisions.
- **Current Implementation:** Currently, public meetings are held as appropriate under CERCLA for specific technical activities, such as during the public comment period on proposed plans and decision documents.
- **Planned Implementation:** The Army will continue to hold formal public meeting as required by CERCLA. The Army will advertise formal public meetings in various ways. In addition to paid public notices in local newspapers, meeting notifications and information will be forwarded to individuals and groups on the site mailing list and to nearby towns for distribution through their social media and email networks. Notices will also be placed on the SEDA website. **Appendix B** provides a list of newspapers for public notices and a list of potential public meeting locations.
- **Timing:** The Army will continue to hold formal public meetings whenever a public comment period is required.

4.2.6 PUBLIC COMMENT PERIODS

- **Description:** Public comment periods, lasting a minimum of 30 days, are held to give community members an opportunity to provide input on major decisions in the CERCLA process, such as the selection of removal actions or selected cleanup remedies.
  When a public meeting is held during a public comment period, a court reporter is used to accurately capture comments made during the meeting. This transcript becomes part of the final ROD. Community members may also submit written comments at any time during the public comment period. The public comment period can be extended an additional 30 days, if requested by the public. As required, a written response is prepared for significant comments received; this response is included in the ROD.
- **Goal:** Provide community members an opportunity to give the Army valuable feedback to assist in making decisions, creating meaningful involvement for community members.
- **Current Implementation:** Public comment periods are held as required under CERCLA and DoD policy for specific technical activities. The Army places the document that is available for public comment in the information repository and publishes a notice announcing a 30-day public comment period (for an engineering evaluation/cost analysis) or a 45-day public comment period (for a proposed plan) in local newspapers. The notice includes a brief description of the document and advertises the availability of the document in the information repository.
- **Planned Implementation:** The Army will continue to hold and publicize comment periods as appropriate and required under CERCLA.
- **Timing:** Comment periods will be held and publicized for specific technical activities, as required. In addition to paid public notices in local newspapers, the Army will publicize public comment periods in other ways, such as by

forwarding notifications to individuals and groups on the site mailing list and forwarding announcements to the towns for distribution through their social media and email networks. Notices about public comment periods will also be placed on the former SEDA website.

4.2.7 RESPONSIVENESS SUMMARY

- **Description:** At the end of a public comment period, a responsiveness summary will be prepared summarizing comments received and the Army's responses to public comments. The summary will inform the decision makers about the community preferences, as well as any general concerns. It also will provide the public with documentation of the concerns raised and the Army's responses to those concerns. Responsiveness summaries are made available to the public in the Administrative Record as a part of the ROD.
- **Goal:** Summarize comments received during comment periods; document how the Army has considered those comments during the decision-making process; and provide responses to major comments.
- **Current Implementation:** Responsiveness summaries are prepared and published as an appendix to the ROD. A ROD is placed in the information repository for 30 days after it has been signed and is placed in the Administrative Record.
- **Planned Implementation:** The Army will continue to produce responsiveness summaries as part of RODs and will place the RODs in the information repository and in the Administrative Record, available online on the website (https://senecaarmydepotar.com) or at the Army's BRAC office.
- **Timing:** The Army will continue to issue responsiveness summaries whenever a ROD is prepared.

4.2.8 CIP UPDATES

- **Description:** The CIP is a written plan of action that provides for interaction with the public, elected officials, and environmental groups, allowing them to share their input at appropriate points during the environmental restoration process. The CIP reflects community concerns, needs, and expectation and as such, periodic updates or consideration of an update are required at various steps in the CERCLA process.
- **Goal:** To provide a current foundation for establishing two-way communication with the public to create an understanding of site investigations and remedies, to assure public input into decision-making processes related to affected communities, and to make certain that the Army is aware of and responsive to public concerns.
- **Current Implementation:** This is the second CIP developed for the former SEDA.
- **Planned Implementation:** Updates will be made to the CIP, as needed, and will be made available to the public in the information repository and on the former SEDA website.
- **Timing:** Under CERCLA, a revision to the CIP should be considered: (1) after a ROD is signed, if significant community concerns are discovered that pertain to the remedial design (RD) and construction phase, or (2) as appropriate when a major change in the site remedy at the former SEDA occurs. The Army may choose to issue an addendum to this CIP to update small portions of the document, as needed.

4.3 ADDITIONAL COMMUNITY INVOLVEMENT ACTIVITIES

4.3.1 MAINTAIN A MAILING LIST

- **Description:** A mailing list of people known to be interested in the PFAS investigation at the former SEDA activities may be maintained to enable the Army to directly notify community members of website updates, meetings, and other community outreach such as fact sheets. The list may include mailing addresses and email addresses.
- **Goal:** Provide project information to stakeholders who want to be kept informed about the PFAS investigation or other active investigations.
- **Current Implementation:** Currently, the Army does not have an official mailing list. Informally, there are lists of agency stakeholders and property owners, as well as older lists for those interested in prior investigation activities.

- **Planned Activity:** If community interest supports it, the Army may compile a site mailing list from concerned citizens, property owners, private well owners, and other informally maintained lists. The Army will continue to maintain and periodically update this mailing list; interested community members and groups will be added to the list upon request. The updated mailing list will be maintained in a database or spreadsheet to facilitate sorting and printing labels for different types of mailings. In addition, email addresses will be maintained to the extent possible, to enable the Army to send out electronic notifications. The Army will use the mailing list to send notifications of upcoming activities, such as potential public meetings, as well as project updates, fact sheets, and information about proposed plans and other site activities.
- **Timing:** Development and use of the site mailing list will be implemented within one year of finalization of this CIP.

4.3.2 PREPARE AND DISTRIBUTE EMAIL UPDATES

- **Description:** Email updates can be used to provide additional information to the community between public meetings. The updates can be sent to the electronic site mailing list. They can also be sent to local towns for distribution through their social media and email networks.
- **Goal:** Increase the frequency that the Army provides project updates to community members. Make obtaining project updates easy and convenient.
- **Current Implementation:** Currently, the Army does not prepare and distribute email updates.
- **Planned Implementation:** If community interests support the maintenance of an email list, the Army will prepare and distribute email updates between public meetings. By sending brief updates on current activities, community members on the site mailing list and those who obtain the emails through their towns will be kept updated more frequently than only at public meetings. A template will be developed to make the email updates engaging.
- **Timing:** The Army will begin preparing and distributing email updates between public meetings within one year of finalization of this CIP if community interests support this initiative.

4.3.3 PREPARE AND DISTRIBUTE FACT SHEETS

- **Description:** Fact sheets are brief documents to inform stakeholders about technical information and progress of the investigation and cleanup process. Fact sheets are written for nontechnical audiences and use straightforward graphics to describe technical issues.
- **Goal:** Provide stakeholders with current, accurate, easy-to-understand information about the Army's environmental restoration program (ERP), including the PFAS investigation and cleanup process.
- **Current Implementation:** The Army produces fact sheets as required or occasionally as needed to communicate about a specific ERP issue. The DoD (https://denix.osd.mil/dod-pfas/) and Army (https://www.denix.osd.mil/army-pfas/index.html) maintain websites with the latest information on PFAS investigation within the DoD.
- **Planned Implementation:** A recent DoD PFAS Fact Sheet and PFAS Frequently Asked Questions (FAQ) are included in **Appendix C**. The results of informal interviews indicate that local stakeholders want to know more about the PFAS, Ash Landfill and OD Grounds investigations at the former SEDA. Currently, most community members who are aware of the investigations are those who are property owners within the former SEDA boundaries. In addition, many respondents were not aware of past ERP activities. Therefore, the Army will produce brief project status fact sheets as needed (such as, one PFAS update per year and/or at key project milestones, such as when a 5-year review is issued). Fact sheets will be distributed broadly in the surrounding community, via email to the electronic site mailing list, and electronic files to the towns to be distributed through their social media and email distribution mechanisms. Fact sheets will also be posted on the former SEDA Environmental Cleanup website and physical copies will be posted in local town offices (e.g., Romulus Town Hall). Fact sheets will be brief documents intended to provide an overview, with links for how to find more information (such as, website, contact person, information repository, public meetings). The Army will continue to develop fact sheets required under CERCLA, such as for completion of RD. For proposed remedial actions that require a public comment period, the proposed plan is a summary document that serves the function of a fact sheet.

- **Timing:** The Army will produce required fact sheets in accordance with CERCLA policy. In addition, the Army will develop at least one project status fact sheet per year. When produced, fact sheets will be posted on the former SEDA website, distributed by email to the electronic site mailing list, and distributed to towns for posting on their social media and distribution through their email lists.

4.3.4 MAINTAIN AND UPDATE THE FORMER SEDA WEBSITE

- **Description:** Internet technology allows new information to be made available quickly and enables information to be delivered in a user-friendly manner, at the convenience of the user. Increasingly, people rely on the internet to obtain information. Furthermore, maintaining a website, rather than printing large numbers of documents and fact sheets, saves paper and money spent on printing and mailing.
- **Goal:** Enable community members to access key information about the PFAS investigation and cleanup on their own time and at minimal expense.
- **Current Implementation:** The Army established the former SEDA Environmental Cleanup website in fall 2022. The website is a source of historical documents and shares information about the PFAS and other on-going investigations. The website provides historical and overview information about historical and active investigations, past public meeting minutes, fact sheets, and access to technical documents related to the PFAS investigation and cleanup.
- **Implementation:** The website was put online in fall 2022. The Army will continue to update the website regularly as active investigations progress. Documents, such as project updates, fact sheets, meeting minutes, this CIP, and other documents of interest to the public, will be posted on the website.
- **Timing:** The Army SEDA website (https://senecaarmydepotar.com/) is online. Regular updates (including adding agendas, minutes, and documents) will be an ongoing task, as needed.

4.3.5 PROVIDE A MECHANISM FOR CONTINUED COMMUNITY INPUT

- **Description:** An ongoing mechanism for community input will allow community members to continue to provide their input as the Army implements various community involvement activities in this CIP.
- **Goal:** Enable community members to provide input on community involvement activities and provide a means for them to submit questions and comments at any time, rather than only at periodic public meetings.
- **Current Implementation:** The Army does not currently provide a mechanism for continuous community input, other than calling the BRAC Environmental Coordinator (and this information may not be widely known).
- **Planned Implementation:** As part of the website design described in subsection 4.3.4, the Army has included a "Contact Us" link which enables community members to ask questions and provide feedback on community involvement activities as they are implemented. Providing an ongoing means of community input will enable the Army to adjust the program as it is implemented, rather than waiting to complete another CIP update. It will also enable community members to submit comments and questions in a convenient way.
- **Timing:** The Army has included a "Contact Us" link on its website.

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TABLES

Table 1
Summary of Areas of Concern (AOC) Subject to Previous CERCLA Investigations,
On-Going PFAS Investigations, LUC Requirements and Disposition Status
Seneca Army Depot Activity

Site Status	Site Number	Site Name	Site Remedy	Operable Unit (OU)	PFAS Investigation Status	LUC Reference
Planned Industrial/Office Development (PID)/Warehouse Area (Parcels: 08-1-03.5, 08-1-03.1, 08-1-01.12, 08-1-02, 08-1-01.2, 08-1-03.4, 08-1-03.3, 08-1-03.2)						
	SEAD 1	Hazardous Waste Container Storage Facility (Building 307)	LUC	OU13		Addendum #4
	SEAD 2	PCB Transformer Storage Facility (Building 301)	LUC	OU13		Addendum #4
	SEAD 5	Sewage Sludge Storage Piles	LUC	OU13	PA / SI	Addendum #4
NA	SEAD 9	Old Scrap Wood Site	LUC	OU14	PA / SI	PID Area-Wide LUC
NA	SEAD 10	Present Scrap Wood Site	LUC	OU14	PA / SI	PID Area-Wide LUC
	SEAD 16	Building S311, Abandoned Deactivation Furnace	LUC / LTM	OU4	PA / SI	Addendum #4
	SEAD 17	Building 367, Active Deactivation Furnace	LUC / LTM	OU4	PA / SI	Addendum #4
NA	SEAD 20	Sewage Treatment Plant No. 4	LUC	OU14	PA / SI	PID Area-Wide LUC
NA	SEAD 22	Sewage Treatment Plant No. 314	LUC	OU14	PA / SI	PID Area-Wide LUC
	SEAD 25	Fire Training and Demonstration Pad	LUC / LTM	OU3	RI	Addendum #1
	SEAD 26	Fire Training Pit	LUC	OU3	RI	Addendum #1
	SEAD 27	Steam Cleaning Waste Tank (Building 360)	LUC	OU12		Remedial Design LUC
NFA	SEAD 28	Building 360, Underground Waste Oil Tanks (2)	LUC	OU14		Remedial Design LUC
NFA	SEAD 30	Building 118, Underground Waste Oil Tank	LUC	OU14		Remedial Design LUC
NFA	SEAD 31	Building 117, Underground Waste Oil Tank	LUC	OU14		Remedial Design LUC
NA	SEAD 33	Building 121, Underground Waste Oil Tank	LUC	OU14		Remedial Design LUC
NFA	SEAD 34	Building 319, Underground Waste Oil Tank	LUC	OU14		Remedial Design LUC
NA	SEAD 36	Building 121, Waste Oil Burning Boilers (2 units)	LUC	OU14		Remedial Design LUC
NA	SEAD 37	Building 319, Waste Oil Burning Boilers (2 units)	LUC	OU14		Remedial Design LUC
	SEAD 39	Building 121 Boiler Plant Blowdown Leach Pit	LUC	OU14		Addendum #2
	SEAD 40	Building 319 Boiler Plant Blowdown Leach Pit	LUC	OU14		Addendum #2
NA	SEAD 42	Building 106, Preventive Medicine Laboratory	LUC	OU14		PID Area-Wide LUC
NA	SEAD 47	Building 321, Radiation Calibration Source Storage	LUC	OU14		PID Area-Wide LUC
NA	SEAD 49	Building 356, Columbite Ore Storage	LUC	OU14		PID Area-Wide LUC
NFA	SEAD 50	Tank Farm	LUC	OU15		PID Area-Wide LUC
NFA	SEAD 54	Asbestos Storage	LUC	OU15		PID Area-Wide LUC
NA	SEAD 55	Building 357, Tannin Storage	LUC	OU14		PID Area-Wide LUC
	SEAD 59	Fill Area West of Building 135	LUC	OU6	PA / SI	PID Area-Wide LUC
	SEAD 64A	Garbage Disposal Area, South of Storage Pad	LUC	OU12	PA / SI	Remedial Design LUC
	SEAD 66	Pesticide Storage Area near Buildings 5 and 6	LUC	OU12		Remedial Design LUC
	SEAD 67	Dump Site east of Sewage Treatment Plant No. 4	LUC	OU14	PA / SI	Addendum #2
NA	SEAD 68	Building S-355, Old Pest Control Shop	LUC	OU14	PA / SI	PID Area-Wide LUC
	SEAD 71	Alleged Paint Disposal Area	LUC	OU6		Addendum #4
	SEAD 121C	Defense Reutilization and Marketing Office (DRMO) Yard	LUC	OU16		Addendum #4
	SEAD 121I	Rumored Cosmoline Disposal Area	LUC	OU16		Addendum #4
n/a	n/a	Firehouse, Building 103	None	n/a	RI	n/a
Conservation / Recreation Area (Parcels: 07-1-50, 07-1-46, 07-1-47, 07-1-48, 07-1-49)						
	SEAD 002-R-01	Explosive Ordnance Disposal Areas #2 and #3	LUC	OU11	PA / SI	Addendum #6
	SEAD 003-R-01	Explosive Ordnance Disposal Area (#1) (SEAD 57)	LUC	OU11	PA / SI	Addendum #6
Active	SEAD 006-R-01	Open Detonation Area (SEAD-45)	Active	OU17	PA / SI	Pre-ROD
	SEAD 007-R-01	Grenade Range	LUC	OU11	PA / SI	Addendum #6
	SEAD 13	Inhibited Red Fuming Nitric Acid (IRFNA) Disposal Site	LUC	OU9 & OU14		Addendum #2
	SEAD 23	Open Burning Ground	LUC[3]	OU2	PA / SI	No LUC Requirements
	SEAD 46	Small Arms Range (aka 3.5-inch Rocket Range)	LUC	OU11	PA / SI	Addendum #6
NA	SEAD 65A	Acid Storage Area	None	OU14		None - NA Site
NA	SEAD 65B	Acid Storage Area	None	OU14		None - NA Site
NA	SEAD 65C	Acid Storage Area	None	OU14		None - NA Site
NA	SEAD 70	Former Building T-2110, Filled Area	None	OU11	PA / SI	None - NA Site
Institutional Area (Parcels: 07-1-16.2, 07-1-16.12, 07-1-16.112)						
NA	SEAD 7	Shale Pit	None	OU14	PA / SI	None - NA Site
NA	SEAD 18	Building 709, Classified Document Incinerator	None	OU14		None - NA Site
NA	SEAD 21	Sewage Treatment Plant No. 715	None	OU14	PA / SI	None - NA Site
NFA	SEAD 29	Building 732, Underground Waste Oil Tank	None	OU14		None - NFA Site
NFA	SEAD 32	Building 718, Underground Waste Oil Tanks (2)	None	OU14		None - NFA Site
NA	SEAD 35	Building 718, Waste Oil Burning Boilers (3 units)	None	OU14		None - NA Site
	SEAD 41	Building 718 Boiler Plant Blowdown Leach Pit	LUC	OU14		Addendum #2
NFA	SEAD 61	Building 718, Underground Waste Oil Tank	None	OU14		None - NA Site
n/a	n/a	Firehouse, Building 722	None	n/a	PA / SI	n/a

Table 1
Summary of Areas of Concern (AOC) Subject to Previous CERCLA Investigations,
On-Going PFAS Investigations, LUC Requirements and Disposition Status
Seneca Army Depot Activity

Site Status	Site Number	Site Name	Site Remedy	Operable Unit (OU)	PFAS Investigation Status	LUC Reference
Data Storage / Telecommunications Area (Parcel: 07-1-44)						
	SEAD 12	Radiological Waste Burial Sites	LUC	OU5		Addendum #5
NA	SEAD 19	Building 801, Classified Document Incinerator	None	OU14		None - NA Site
NA	SEAD 47	Building 806, Radiation Calibration Source Storage	None	OU14		None - NA Site
NA	SEAD 51	Herbicide Usage, Perimeter of High Security Area	None	OU14		None - NA Site
NFA	SEAD 63	Miscellaneous Components Burial Area	None	OU14		None - NFA Site
NA	SEAD 72	Building 803, Mixed Waste Storage Area	None	OU5		None - NFA Site
Farming Area (Parcel: 02-1-01)						
NFA	SEAD 4	Munitions Washout Facility Leach Field	None	OU7		None - NFA Site
NFA	SEAD 11	Old Construction Debris Landfill	None	OU8	PA / SI	None - NFA Site
NFA	SEAD 38	Building 2079, Boiler Plant Blowdown Leach Pit	None	OU7		None - NFA Site
NFA	SEAD 48	Pichblende Ore Storage Igloos	None	OU13		None - NFA Site
NFA	SEAD 24	Abandoned Powder Burning Pit	LUC	OU13	PA / SI	None - NFA Site
NA	SEAD 53	Munitions Storage Igloos	None	OU14		None - NA Site
NA	SEAD 58	Debris Area near Booster Station 2131	None	OU14	PA / SI	None - NA Site
	SEAD 64B	Garbage Disposal Area, South of Classification Area	LUC	OU14	PA / SI	Addendum #2
	SEAD 64D	Garbage Disposal Area, West of Building 2203	LUC	OU14	PA / SI	Addendum #2
Ash Landfill Operable Unit						
	SEAD 3	Incinerator Cooling Water Pond	LUC / LTM	OU1	PA / SI	Addendum #3
	SEAD 6	Abandoned Ash Landfill	LUC / LTM	OU1	PA / SI	Addendum #3
	SEAD 8	Non-Combustible Fill Area	LUC / LTM	OU1	PA / SI	Addendum #3
	SEAD 14	Refuse Burning Pits (2 units)	LUC / LTM	OU1	PA / SI	Addendum #3
	SEAD 15	Abandoned Solid Waste Incinerator (Building 2207)	LUC / LTM	OU1	PA / SI	Addendum #3
Prison Area (Parcel: 16-1-21)						
	SEAD 43	Building 606 Old Missile Propellant Test Laboratory	LUC	OU14		Addendum #2
	SEAD 44A	Quality Assurance Test Laboratory, West of Building 616	LUC	OU14		Addendum #2
	SEAD 44B	Quality Assurance Test laboratory, Brady Road	LUC	OU14		Addendum #2
	SEAD 52	Building 608 and 612 Ammunition Breakdown Area	LUC	OU10 & OU14		Addendum #2
	SEAD 56	Building 606 Herbicide and Pesticide Storage	LUC	OU14		Addendum #2
NFA	SEAD 60	Oil Discharge adjacent to Building 609	LUC	OU10 & OU14		None - NFA Site
	SEAD 62	Nicotine Sulfate Disposal Area near Building 606 and 612	LUC	OU14		Addendum #2
	SEAD 64C	Garbage Disposal Area	LUC	OU14	PA / SI	Addendum #2
	SEAD 69	Building 606 Disposal Area	LUC	OU14	PA / SI	Addendum #2
Airfield Parcel (Parcels: 11-1-02, 11-1-11)						
	SEAD 122B	Small Arms Range, Airfield	LUC	OU14		Addendum #2
NFA	SEAD 122D	Airfield Hot Pad Spill	LUC	OU14	RI	Addendum #2
	SEAD 122E	Plane Deicing Area	LUC	OU14	RI	Addendum #2
n/a	n/a	Firehouse, Building 2305	None	n/a		n/a

Acronyms
LTM = Long Term Monitoring
LUC = Land Use Control
n/a = not applicable
NA = No Action
NFA = No Further Action
OU = Operating Unit
PA = Preliminary Assessment
SI = Site Investigation
RI = Remedial Investigation

FIGURES

Former Seneca Army Depot Activity Boundary

0 1,500 3,000 6,000 9,000 12,000 Feet

0 10 20 40 Miles

N

W E

S

Coordinate System: NAD 1983 StatePlane New York Central FIPS 3102 Feet
Projection: Transverse Mercator
Datum: North American 1983
Units: Foot US

SENECA ARMY DEPOT ACTIVITY

FIGURE 1
Former SEDA Location Map

1 in = 4,000 ft | July 2022

Document Path: \\MABOS07FS01\Projects\PITProjects\Huntsville WERS\Seneca LTM, TO 23\02 - GIS\LUC\2019_Report\Fig1_SEDA_Location_Map.mxd

SENECA ARMY DEPOT ACTIVITY

FIGURE 2
Aerial View of Former Depot

735000 740000 745000 750000 755000 760000

1020000 1015000 1010000 1005000 1000000 995000 990000 985000 980000

N W E S

INSTITUTIONAL AREA

SEAD-21

SEAD-7

Firehouse_722

DATA STORAGE / TELECOMMUNICATIONS

SEAD 006-R-01

SEAD-23

SEAD 003-R-01

SEAD 007-R-01

SEAD-70

SEAD 002-R-01

SEAD-46

CONSERVATION / RECREATION

SEAD-20

SEAD-67

PLANNED INDUSTRIAL / OFFICE DEVELOPMENT AND WAREHOUSING (PID) AREA

SEAD-58

SEAD-9

SEAD-10

SEAD-24

Firehouse_103

SEAD-59

SEAD-5

SEAD-25

SEAD-14

SEAD-22

SEAD-68

SEAD-3

SEAD-6

SEAD-15

SEAD-8

FARMING

SEAD-64A

SEAD-64D

SEAD-26

SEAD-122E

FORMER AIRFIELD COUNTY FIRE TRAINING & FACTORY

SEAD-122D

FED TO FED TRANSFER

SEAD-122E

SEAD-11

SEAD-69

Firehouse_2305

SEAD-122E

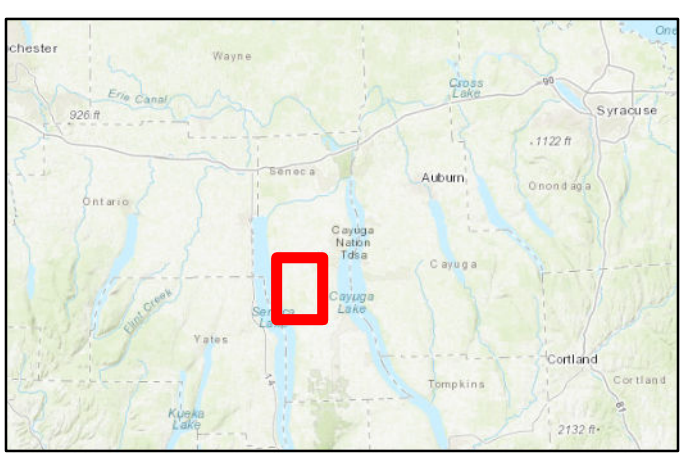
SEAD-64B

SEAD-64C

PRISON AREA

0 2,500 5,000 10,000 Feet

Yale Farm Rd · Access Rd · Route 96A · Secor Rd · Marsh Rd · State Route 96 · Cranberry Marsh · E Patrol Rd · Perimeter Rd · Maintenance Rd · Reeder Creek · North-South Baseline Rd · Main Rd · East-West Base Line Rd · White Rd · Hahnel Rd · Silver Creek · W Patrol Rd · Deal Rd · Kennedy Rd · W Romulus Rd · Romulus · Cayuga St · County Road 148 · W Kendaia Rd · E Kendaia Rd · Fayette Rd · Yerkes Rd · State Route 414 · Nimitz Rd · Shooting Star Ln · E Lake Rd · Sampson State Park · Sabre Rd · Varidenta Rd · Ovid Rd · W Blaine Rd · Log City Rd · Finger Lakes · Seneca Army Depot Activity



Legend

- PFAS AOCs
- Other AOCs
- Former SEDA Boundary

SENECA ARMY DEPOT ACTIVITY

FIGURE 3 - PFAS AOCs and SEDA Future Land Use

1 inch = 3,000 feet | June 2022

Path: \\MABOS07FS01\Projects\PIT\Projects\Huntsville - MEGA\Seneca_HGL_PFAS\Deliverables\05 GIS\CIP\Maps\Fig2_SenecaLandUseMap_v106.mxd

APPENDIX A: EJSCREEN RESULTS

EJScreen Report (Version 2.0)

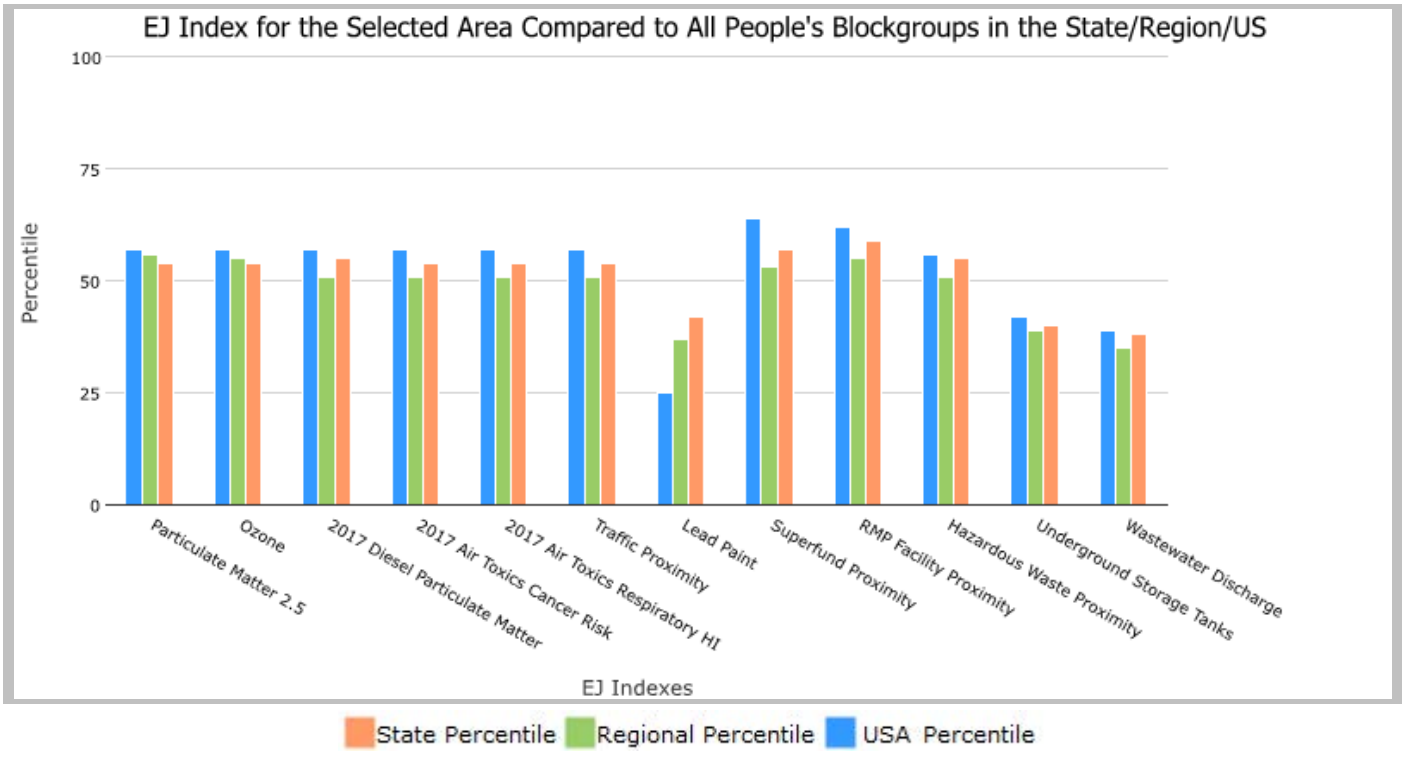
3 miles Ring around the Area, NEW YORK, EPA Region 2

Approximate Population: 6,934

Input Area (sq. miles): 94.64

SEDA_EJScreen

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
Environmental Justice Indexes			
EJ Index for Particulate Matter 2.5	54	56	57
EJ Index for Ozone	54	55	57
EJ Index for 2017 Diesel Particulate Matter*	55	51	57
EJ Index for 2017 Air Toxics Cancer Risk*	54	51	57
EJ Index for 2017 Air Toxics Respiratory HI*	54	51	57
EJ Index for Traffic Proximity	54	51	57
EJ Index for Lead Paint	42	37	25
EJ Index for Superfund Proximity	57	53	64
EJ Index for RMP Facility Proximity	59	55	62
EJ Index for Hazardous Waste Proximity	55	51	56
EJ Index for Underground Storage Tanks	40	39	42
EJ Index for Wastewater Discharge	38	35	39



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

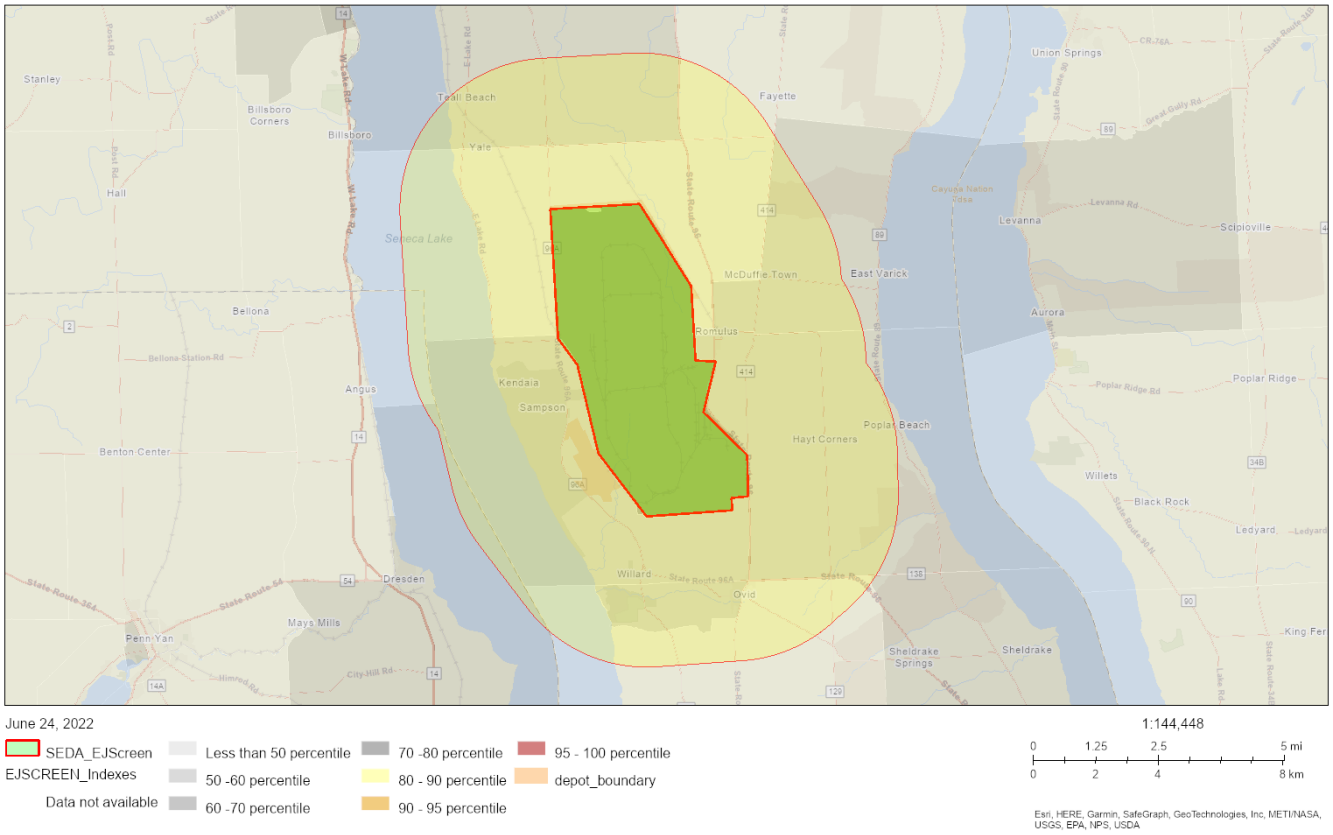
EJScreen Report (Version 2.0)

3 miles Ring around the Area, NEW YORK, EPA Region 2

Approximate Population: 6,934

Input Area (sq. miles): 94.64

SEDA_EJScreen



Sites reporting to EPA	
Superfund NPL	1
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.0)

3 miles Ring around the Area, NEW YORK, EPA Region 2

Approximate Population: 6,934

Input Area (sq. miles): 94.64

SEDA_EJScreen

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Pollution and Sources							
Particulate Matter 2.5 (µg/m^3)	6	7.9	5	8.03	3	8.74	4
Ozone (ppb)	39.4	41.6	17	41.8	12	42.6	28
2017 Diesel Particulate Matter* (µg/m^3)	0.0748	0.646	6	0.558	<50th	0.295	<50th
2017 Air Toxics Cancer Risk* (lifetime risk per million)	20	29	42	29	<50th	29	<50th
2017 Air Toxics Respiratory HI*	0.2	0.39	24	0.37	<50th	0.36	<50th
Traffic Proximity (daily traffic count/distance to road)	0.0019	870	0	840	0	710	0
Lead Paint (% Pre-1960 Housing)	0.46	0.55	38	0.46	48	0.28	75
Superfund Proximity (site count/km distance)	0.19	0.23	69	0.28	64	0.13	85
RMP Facility Proximity (facility count/km distance)	0.25	0.5	50	0.62	48	0.75	44
Hazardous Waste Proximity (facility count/km distance)	0.062	6.2	2	4.9	3	2.2	9
Underground Storage Tanks (count/km^2)	0.15	8.1	22	9.3	25	3.9	25
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.00017	3.9	36	2.3	31	12	35
Socioeconomic Indicators							
Demographic Index	31%	37%	51	41%	47	36%	51
People of Color	27%	44%	42	49%	37	40%	44
Low Income	36%	30%	67	32%	64	31%	63
Unemployment Rate	3%	5%	39	6%	36	5%	40
Linguistically Isolated	2%	8%	42	14%	37	5%	53
Less Than High School Education	29%	13%	87	13%	87	12%	90
Under Age 5	4%	6%	32	6%	34	6%	28
Over Age 64	14%	16%	45	16%	45	16%	49

*Diesel particular matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's 2017 Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: https://www.epa.gov/haps/air-toxics-data-update.

For additional information, see: www.epa.gov/environmentaljustice

APPENDIX B: CONTACT INFORMATION, MEETING LOCATIONS AND LOCAL NEWSPAPERS

Agency Contacts and Elected Officials

Agency Contacts			
NAME	AGENCY	PHONE	EMAIL / WEBSITE
Chris Gallo District Project Manager	US Army Corps of Engineers (USACE) – New York District	Office: 917-790-8230 Cell: 917-575-1819	Christopher.t.gallo@usace.army.mil https://www.nan.usace.army.mil/Missions/Environmental/Environmental-Remediation/BRAC/Seneca-Army-Depot/
Charles "Hud" Heaton Technical Lead and Contracting Officer's Representative	USACE – Huntsville, Engineering & Support Center	Office: 256-895-1657 Cell: 256-324-9097	Charles.Heaton@usace.army.mil https://www.hnc.usace.army.mil//
Barry Hodges Technical Manager	USACE – Huntsville, Engineering & Support Center	Office: 256-895-1894 Cell: 256-503-0153	Barry.A.Hodges@usace.army.mil
James Moore BRAC Environmental Coordinator	USACE – Headquarters (HQ)	Cell: 347-271-0226	James.T.Moore@usace.army.mil
Bob Morse Remedial Project Manager	US Environmental Protection Agency (USEPA), Region 2	Office: 212-637-4331 Cell: 908-581-3791	Morse.Bob@epa.gov https://www.epa.gov/aboutepa/forms/contact-epa https://www.epa.gov/aboutepa/epa-region-2
Melissa Sweet Regional Project Manager	New York Department of Environmental Conservation (NYSDEC), Division of Environmental Remediation	Office: 518-402-9614 Central DEC Office: 518-402-8044	melissa.sweet@dec.ny.gov contact@dec.ny.gov https://www.dec.ny.gov/index.html
Mark Sergott Public Health Specialist	New York State Department of Health (NYSDOH), Bureau of Environmental Exposure Investigation	Office: 518-402-7860 Regional Office: 585-423-8076	mark.sergott@health.ny.gov https://www.health.ny.gov/
n/a	Seneca County Health Department	Environmental Health: 315-539-1945 Public Health: 315-539-1920	https://senecacountyhealthdepartment.com/

Elected Officials			
NAME	AGENCY	PHONE	EMAIL / WEBSITE
Bob Hayssen Supervisor	Town of Varick, NY	4782 Rt. 96 Romulus, NY 14541 315-549-7121	Supervisor: rhayssen@rochester.rr.com Town Website https://varicknewyork.com/varick.html
Jeff Gallahan Assemblyman	New York State (NYS) Assembly District 131, (Seneca Co. north of Romulus, NY)	District Office 70 Elizabeth Blackwell St. Geneva, NY 14456 315-781-2030	gallahanj@nyassembly.gov https://nyassembly.gov/mem/Jeff-Gallahan/
Philip A. Palmesano Assemblyman	New York State (NYS) Assembly District 132, (Seneca Co. south of Romulus, NY)	District Office 105 E. Steuben St. Bath, NY 14810 607-776-9691	palmesanop@nyassembly.gov https://nyassembly.gov/mem/Philip-A-Palmesano/
Pamela Helming Senator	NYS Senator 54th Senate District	District Office 425 Exchange St Geneva, NY 14456 Phone: 315-568-9816	helming@nysenate.gov https://www.nysenate.gov/senators/pamela-helming
Kirsten Gillibrand	US Senator	James M. Hanley Federal Building 100 South Clinton Street Room 1470 PO Box 7378 Syracuse, NY 13261 Tel. 315-448-0470	https://www.gillibrand.senate.gov/contact/email-me https://www.gillibrand.senate.gov/
Chuck Schumer	US Senator	James M. Hanley Federal Building 100 South Clinton Street, Room 841 Syracuse, NY 13261 Phone: 315-423-5471	https://www.schumer.senate.gov/contact/email-chuck https://www.schumer.senate.gov/

Local Newspapers and Other Information Sources

Finger Lakes Times

218 Genesee St.
Geneva, New York 14456
(315) 789-3333
1-800-388-6652
https://www.fltimes.com/

Ithaca.com

109 N Cayuga Street
Ithaca , NY 14850
607-277-7000
Email: production@ithacatimes.com
https://www.ithaca.com/

Town of Romulus, NY

https://romulustown.com/

Town of Ovid, NY

https://www.townofovid.net/

Town of Fayette, NY

https://townoffayetteny.org/

Seneca Army Depot Activity Administrative Record

https://senecaarmydepotar.com

Public Meeting Locations

Town	Location	Phone	Notes
Fayette	Fayette Town Hall 1439 Yellow Tavern Road Waterloo, NY 13165	315-585-6282	
Romulus	Romulus Town Hall 1435 Prospect St, Willard, NY 14588	607-869-9326	
Romulus	Seneca Army Depot 5786 State Rt. 96 Romulus, NY 14541	917-790-8230	
Waterloo	Quality Inn Meeting Facilities 2468 State Route 414 Waterloo, NY 13165	315-577-6068	Requires fee. https://www.choicehotels.com/new-york/waterloo/quality-inn-hotels/ny676

APPENDIX C: PFAS FACT SHEETS

Per- and Polyfluoroalkyl Substances (PFAS) 101

What are PFAS?

- PFAS refers to the entire class of approximately 600 per- and polyfluoroalkyl substances in commerce, of which perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA) were historically the most widely-used throughout the U.S.
- PFAS are man-made chemicals found in many industrial and consumer products because they increase resistance to heat, stains, water, and grease. PFAS are not uniquely attributable to Department of Defense (DoD) activities.
- Commercial and consumer use of PFAS started in the 1950s. Uses include keeping food from sticking to cookware, making sofas and carpets resistant to stains, and making clothes and mattresses more waterproof. PFAS are also found in food packaging and firefighting materials. A variety of other industries use PFAS because they help reduce friction, including the aerospace, automotive, building and construction, and electronics industries.
- In the 1970s, DoD began using aqueous film forming foam (AFFF) that contained PFOS and, in some formulations, PFOA. AFFF is mission critical because it quickly extinguishes petroleum-based fires.
- PFOS, PFOA, and other PFAS have been found in people, the environment, wildlife, and fish all over the world; do not break down easily in the environment; might affect people's health; and are the subject of increasing regulation worldwide.
- In 2016, the U.S. Environmental Protection Agency issued a lifetime Health Advisory (HA) for PFOS (perfluorooctane sulfonate) and PFOA (perfluorooctanoic acid) in drinking water of 70 parts per trillion. For context, one (1) ppt is equivalent to one (1) drop of water in 20 Olympic-sized swimming pools.

How are People Exposed to PFAS?

- Sources of PFAS in the environment may include industrial sources, areas with frequent use of products containing PFAS (e.g., airports, fire training areas), and consumer products. There are no natural sources of PFAS in the environment.
- Places where PFAS can be found include:
    - Public water systems and drinking water wells, soil, and outdoor air near industrial sources or areas with frequent PFAS use;
    - Indoor air in spaces that contain carpets, textiles, and other consumer products treated with PFAS to resist stains;
    - Consumer products including non-stick coatings on cookware, grease-resistant paper, and stain-resistant coatings on carpets, upholstery, and other fabrics;

    - Surface water (e.g., lakes, ponds) and runoff from areas where AFFF has been used, such as military or civilian airfields;
    - Locally caught fish from water containing PFAS;
    - Food items sold in the marketplace; and
- Although PFOS and PFOA use in the United States has declined dramatically since 2006, as a result of EPA's PFOA Stewardship Program, they are still produced internationally and can be imported into the United States in consumer goods. However, other PFAS are manufactured in the United States as replacements to PFOS and PFOA.
- Due to PFAS' ability to build up in the body, even small amounts consumed regularly can result in measurable levels in exposed people.
- Scientists are still studying the health effects of exposure to PFAS. Although more research is needed, some studies in people have shown that certain PFAS may affect health. Service members, family members, civilians, and veterans should see their healthcare provider if they have any concerns with PFAS exposure and possible health effects.
- Low levels of PFAS can be detected in most environmental media, including water, food and inside people's homes.

How has DoD Historically Used or Released PFAS to the Environment?

- DoD used AFFF containing PFOS and PFOA in firefighting and crash response vehicle testing, fire training exercises, crash crew training exercises, hangar system operations and testing, responses to fuel fires or spills, and emergency response actions. DoD also uses materials that can contain PFAS in the vapor suppression systems at plating shops.
- Releases to the environment can result from use, spills and leaks of these materials during handling or in storage, wastewater treatment, and disposal locations such as landfills.

How Does DoD Respond to PFAS Releases?

- Although EPA's HA is guidance and is not an enforceable drinking water standard, DoD proactively addressed drinking water impacted by DoD releases.
- DoD's priority is to quickly address PFOS and PFOA in drinking water from DoD activities under the federal cleanup law (i.e., the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA)). DoD follows the CERCLA process to fully investigate releases, prioritize responses, and determine appropriate cleanup actions based on risk.
- No one is currently drinking water above the HA level, on or off base, where DoD is the known source.
- DoD is investigating and addressing all of its sites with a known or suspected release of PFAS. Under CERCLA, DoD investigates if a release occurred, takes short-term cleanup actions (called "removal actions") where there is an immediate need for action, and takes long-term cleanup actions (called "remedial

actions") to address any remaining unacceptable risks. The process from the initial assessment to the beginning of actual cleanup is a multi-year effort.

What is DoD Doing About AFFF?

- AFFF is mission critical because it quickly extinguishes petroleum-based fires.
- DoD is one of many users of AFFF, and other major users include commercial airports, the oil and gas industry, and local fire departments.
- DoD updated the Military Specification (MILSPEC) for AFFF, so that new supplies available for emergency firefighting responses, do not contain detectable levels of PFOS or PFOA.
- To prevent future releases to the environment, DoD prohibits using AFFF for maintenance, testing, and training on DoD installations world-wide and is actively researching fluorine-free alternatives to AFFF. AFFF is used during emergency responses and each use is treated as a spill response to limit environmental effects.
- No fluorine-free foam has proved it can meet military specifications to protect DoD Service members by rapidly extinguishing dangerous fuel fires. However, DoD is actively seeking an alternative that can meet this critical safety need.

# # #

December 12, 2019

Army PFAS FAQ

What is PFOS/PFOA, and how does the Army use it?
Perfluorooctanesulfonic acid (PFOS) and Perfluorooctanoic acid (PFOA) are two of the most widely used per- and polyfluoroalkyl substances known as PFAS, a group of man-made chemicals that have been widely used in industrial and consumer products since the 1940s due to their resistance to heat, stains, water and grease. In addition to household items such as non-stick cookware, food packaging, clothing, shoes, furniture and carpets, PFAS are commonly used in firefighting foams and are especially effective at extinguishing fuel fires. Since the 1970s, the Army has used aqueous film-forming foam (AFFF) for fuel firefighting purposes; this historic use of AFFF was the primary mechanism for release of PFAS on Army installations. However, the Army has ceased the use of AFFF containing PFOS/PFOA except for emergencies, and is collaborating with the Navy and the rest of the Department of Defense (DoD) in its assessments of substitutes.

What are health advisory levels?
Health advisory (HA) levels identify the concentration of a contaminant in drinking water at and below which adverse health effects are not anticipated to occur over specific exposure durations (e.g., 1 day, 10 days, a lifetime). HA levels serve as informal technical guidance to assist federal, state, and local officials, and managers of public or community water systems in protecting public health when emergency spills or other releases occur. An HA provides information on the environmental properties, health effects, analytical methodology, and treatment technologies for removing drinking water contaminants.
The Safe Drinking Water Act (SDWA) is a federal law designed to protect the quality of drinking water supplied to the American public. In 2016, the EPA issued SDWA lifetime HA levels for PFOS/PFOA in drinking water of 70 parts per trillion (ppt). The HA is an advisory – not an enforceable regulatory standard – that represents a concentration in drinking water that is not expected to produce adverse health effects if the water is consumed over a lifetime.

Does PFOS/PFOA impact human health?
Scientists are still studying the health effects of exposure to PFAS. Due to their ability to build up in the body, even small amounts consumed over a lifetime may result in measurable levels in people. Although more research is needed, some studies suggest that certain PFAS may affect human health. People should contact their healthcare providers if they have concerns with PFAS exposure and possible health effects.

What are some different terminology being used to describe PFOS/PFOA?
What are the more commonly studied PFAS?
Perfluoroalkyl substances (PFAS) are a family of hundreds of human-made chemicals. The two best known groups of this family of chemicals are the perfluorocarboxylic acids (PFCAs), which include perfluorooctanoic acid (PFOA), and the perfluorosulfonates (PFSAs), which include perfluorooctane sulfonate (PFOS). PFOS/PFOA may also be referred to as Perfluorinated Compounds (PFCs).
Some PFAS checmials have been studied more than the others: PFOA (perfluorooctanoic acid), PFOS (perfluorooctane sulfonate), PFHxS (perfluorohexane sulfonate), PFOSA (perfluorooctane sulfonamide), PFNA (perfluorononanoate), PFDeA (perfluorodecanoate), Et-PFOSA-AcOH 2 [(N-ethyl-perfluorooctane sulfonamido) acetate], and Me-PFOSA-AcOH 2 [(N-methyl-perfluorooctane sulfonamido) acetate]. Scientists know the most about PFOS/PFOA; less is known about the other PFAS.

RESOURCES FOR ADDITIONAL INFORMATION

Army and DoD PFAS Policy and Guidance

Prohibition of Testing and Training with Fluorinated Aqueous Film Forming Foam [167 KB]

Guidance for Agreements to Share Monitoring Data Related to PFAS and Other Emerging Contaminants of Concern [153 KB]

Comprehensive Environmental Response, Compensation, and Liability Act Process [230 KB]

Investigating PFAS within DoD Cleanup Program [150 KB]

Monitoring of PFAS Sampling for Installations with non-DoD Drinking Water Systems [511 KB]

Supplemental Drinking Water Management Guidance for PFAS at US Army Installations [235 KB]

PFAS Sampling of DoD Drinking Water Systems [762 KB]

Army PFAS Policy [156 KB]

Progress at Installations Being Assessed for PFAS Use or Potential Release [170 KB]

Active Army, Army Reserve, Base Realignment and Closure (BRAC), and non-BRAC excess

https://aec.army.mil/index.php/PFAS

Army National Guard

https://www.nationalguard.mil/Environmenta

What does part per trillion (ppt) in drinking water mean in simple terms?
For context, 1 ppt is equivalent to:

- 1 inch in 16 million miles (600+ times around the earth)
- 1 cent in $10 billion
- 1 second in 320 centuries

How do I know if my family or I am drinking water with levels of PFOS/PFOA above the HA?
There are currently no Army personnel or families drinking water on Army installations with levels of PFOS/PFOA above the HA. The Army proactively tests its drinking water systems and coordinates with other purveyors of drinking water to installations to ensure PFOS/PFOA remains below the Environmental Protection Agency's lifetime health advisory (HA) level of 70 ppt for PFOS and PFOA (individually or combined). In accordance with DoD policy and EPA recommendations, the Army provides alternate water to consumers at locations with detections above the EPA HA until detected levels fall below the HA.

Since the historic use of AFFF was the primary mechanism for release of PFAS on Army installations, is the Army still using it?
The Army no longer uses AFFF for testing, training or maintenance; it is restricted to use during fire emergencies and the foam is contained to minimize releases into the environment. The Army is actively collaborating with the Navy and DoD to find AFFF substitutes, and will replace AFFF in first-responder vehicles and firefighting systems with AFFF substitutes that do not contain PFAS when available.

How is the Army cleaning up PFAS?
The Army follows the federal cleanup law, the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The Army works closely with appropriate state or federal regulators where the Army has identified potential areas of concern where PFAS were potentially released into the environment. The Army assesses if past activities may have resulted in a release, assesses the potential for human exposure, and takes action to protect human health and the environment as necessary. Further CERCLA actions are prioritized and sequenced based on risk, with higher-risk sites being addressed before lower-risk sites. The Army regularly reports an inventory of those sites undergoing PFAS investigations, and a map of the locations can be found at https://www.defense.gov/Explore/Spotlight/pfas/ in the Resources section. The total number of Army installations may continue to change, as assessments are still ongoing. The identification of installations reflects the Army's vigorous and diligent examination efforts, and our dedication to ensuring the safety of our Soldiers, families and surrounding communities.

Department of Defense Per- and Polyfluoroalkyl Substances (PFAS)

https://www.defense.gov/Explore/Spotlight/

Department of Defense PFAS and Map of Military Installations

https://denix.osd.mil/dod-pfas/

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
3400 DEFENSE PENTAGON
WASHINGTON, DC 20301-3400

ENERGY, INSTALLATIONS,
AND ENVIRONMENT

July 6, 2022

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY (INSTALLATIONS, ENERGY AND ENVIRONMENT)
ASSISTANT SECRETARY OF THE NAVY (ENERGY, INSTALLATIONS AND ENVIRONMENT)
ASSISTANT SECRETARY OF THE AIR FORCE (INSTALLATIONS, ENVIRONMENT AND ENERGY)
DIRECTOR, NATIONAL GUARD BUREAU (JOINT STAFF, J8)
DIRECTOR, DEFENSE LOGISTICS AGENCY (INSTALLATION MANAGEMENT)

SUBJECT: Investigating Per- and Polyfluoroalkyl Substances within the Department of Defense Cleanup Program

The Department of Defense (DoD) conducts cleanup under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), and the Defense Environmental Restoration Program (DERP). Our goal is protection of human health and the environment in a risk-based, fiscally-sound manner. This memorandum provides clarifying technical guidance on the investigation of perfluorooctane sulfonate (PFOS), perfluorooctanoic acid (PFOA), perfluorobutanesulfonic acid (PFBS), perfluorononanoic acid (PFNA), perfluorohexane sulfonate (PFHxS), and hexafluoropropylene oxide dimer acid (HFPO-DA, or GenX), based on recent U.S. Environmental Protection Agency (EPA) information. This guidance is applicable to investigating these chemicals at Environmental Restoration Account-funded, Base Realignment and Closure Account-funded, and federal Air and Army Guard Operation and Maintenance account-funded sites.

This revised memorandum accounts for the May 2022 EPA screening levels for PFOS, PFOA, PFNA, PFHxS and HFPO-DA. PFBS remains unchanged since the May 2021 update. EPA has provided screening levels for these PFAS compounds using, updated, final, peer-reviewed information from the Agency for Toxic Substances and Disease Registry[1] and the EPA Office of Water.[2]

PFOS, PFOA, PFBS, PFNA, PFHxS, and HFPO-DA are part of a larger class of chemicals known as per- and polyfluoroalkyl substances (PFAS). PFAS shall be addressed in the same manner as other contaminants of concern within the DERP. HFPO-DA has primarily

[1] Agency for Toxic Substances and Disease Registry (ATSDR), May 2021. *Toxicological Profile for Perfluoroalkyls*.

[2] U.S. Environmental Protection Agency (EPA), *Provisional Peer-Reviewed Toxicity Values for Perfluorobutane Sulfonic Acid (CASRN 375-73-5)* and October 2021. *Human Health Toxicity Values for Hexafluoropropylene Oxide (HFPO) Dimer Acid and Its Ammonium Salt (CASRN 13252-13-6 and CASRN 62037-80-3), Also Known as "GenX Chemicals."* Office of Water.

been used as a replacement for PFOA in the manufacture of fluoropolymers, so it is not likely to have been released at the vast majority of DoD properties. As with other chemicals, the conceptual site model should be used to determine the necessity for addressing HFPO-DA.

Under CERCLA, site-specific regional screening levels[3] (RSLs) for these chemicals are shown in the EPA RSL Tables or may be calculated using the EPA online calculator. The values are provided in the attachment. When multiple PFAS are encountered at a site, RSLs set at a hazard quotient of 0.1 are used for screening purposes. These RSLs should be used to determine if further investigation in the remedial investigation (RI) phase is warranted or if no further action is required. Consistent with the CERCLA process, DoD Components will incorporate these screening values into ongoing and future preliminary assessment/site inspections (PA/SI) and will reevaluate completed PA/SIs with a determination of "no further action," to assess if an RI is now necessary.

During the RI phase, the RfDs for PFOS, PFOA, PFBS, PFNA, PFHxS, and HPFO-DA and the oral cancer slope factor (CSF) for PFOA of 0.07 $(mg/kg\text{-}day)^{-1}$ will be used to conduct site specific risk assessments in accordance with Risk Assessment Guidance for Superfund Volume I, Part A (EPA/540/1-89/002, December 1989).[4] Site-specific risk assessment results will depend on the levels of PFAS found at each site, and will be used to determine if any necessary remedial actions are required in accordance with CERCLA, DERP, and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

This memorandum is effective immediately and supersedes and cancels the Assistant Secretary of Defense for Sustainment memorandum, "Investigating Per- and Polyfluoroalkyl Substances within the Department of Defense Cleanup Program," September 15, 2021. The point of contact for this matter is Ms. Alexandria Long, at 703-571-9061 or alexandria.d.long.civ@mail.mil.

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Date: 2022.07.06 13:39:15 -04'00'

Michael McAndrew
Deputy Assistant Secretary of Defense for Construction
Performing the Duties of Principal Deputy Assistant Secretary of Defense for Energy, Installations, and Environment

Attachment:
As stated

[3] For sites on the National Priorities List, the DoD Components will use the EPA site specific screening levels, if provided.
[4] Currently there are six PFAS – PFOS, PFOA, PFBS, PFNA, PFHxS, HPFO-DA (GenX) – with established toxicity values that DoD can use to perform a baseline risk assessment to determine whether remedial action is needed under CERCLA.

Attachment: Risk Screening Levels Calculated for PFOS, PFOA, PFBS, PFNA, PFHxA, HFPO-DA in Groundwater or Soil Using EPA's RSL Calculator

Chemical	Carcinogenic Slope Factor - Oral (SF) (mg/kg-day)-1	Non-Carcinogenic Reference Dose (RfD) (mg/kg-day)	Residential Scenario Screening Levels Calculated Using EPA RSL Calculator								Industrial/Commercial Composite Worker Screening Levels Calculated Using EPA RSL Calculator			
			Tap Water (ng/L or pptr)				Soil (mg/kg or ppm)				Soil (mg/kg or ppm)			
			HQ = 0.1	HQ = 1.0	ILCR = 1E-06	ILCR = 1E-04	HQ = 0.1	HQ = 1.0	ILCR = 1E-06	ILCR = 1E-04	HQ = 0.1	HQ = 1.0	ILCR = 1E-06	ILCR = 1E-04
PFOS	NA	2.00E-06	4	40	NA	NA	0.013	0.13	NA	NA	0.16	1.6	NA	NA
PFOA	7.00E-02	3.00E-06	6	60	1,100	111,000	0.019	0.19	7.8	775	0.25	2.5	33	3,280
PFBS	NA	3.00E-04	601	6010	NA	NA	1.9	19	NA	NA	25	250	NA	NA
PFNA	NA	3.00E-06	6	59	NA	NA	0.019	0.19	NA	NA	0.25	2.5	NA	NA
PFHxS	NA	2.00E-05	39	394	NA	NA	0.13	1.30	NA	NA	1.6	16	NA	NA
HFPO-DA	NA	3.00E-06	6	60	NA	NA	0.023	0.23	NA	NA	0.35	3.5	NA	NA

HQ=Hazard Quotient
ILCR=Incremental Lifetime Cancer Risk
NA=Not available/applicable

NOTES:

- Apply the Tap Water RSLs to groundwater used as drinking water.
- The table represents screening levels based on residential and industrial/commercial worker receptor scenarios for either direct ingestion of groundwater (residential scenario only) or incidental ingestion of soil (both residential and composite worker scenarios).
- Default exposure assumptions for each potential receptor scenario, contained in EPA's RSL Calculator on May 2022.
- Final peer reviewed toxicity values considered valid for risk assessment, and the screening levels may be found in EPA's RSL table or EPA's RSL calculator used to develop them.
- Other potential receptor scenarios (e.g., recreational user, site trespasser, construction worker) are not included in the above table, but could be relevant receptors at a site potentially containing PFAS. These receptors, and their associated exposure scenarios, should be further considered in the scoping phase and completion of the Baseline Human Health Risk Assessment typically completed during an RI.
- The shaded values represent conservative screening levels in groundwater or soil that when exceeded should be considered a contaminant of potential concern in the risk assessment process and calculations of site-specific risk posed.

APPENDIX D: RESPONSE TO COMMENTS

Army's Response to Comments from the Environmental Protection Agency

Subject: Community Involvement Plan for Seneca Army Depot
Seneca Army Depot

NYSDEC Site No. 850006

Romulus, New York

Comments Dated: 19 October 2022

Date of Comment Response: 08 November 2022

EPA COMMENTS

Comment 1: A list of agency contacts should be added. For example, names, emails and phone numbers for:

- US Army
- US Army Corps
- USEPA
- NYSDEC (central office in Albany)
- NYSDOH (central office location)
- County Health Department

Army Response to Comment 1: Reference to Appendix B was added to Section 4.2.1., Current Implementation bullet: "*Additional contact information for the Army, state and federal regulatory agencies and elected officials is available in Appendix B.*" A table of agency and elected officials contact information was added to Appendix B and is attached below at the end of the comments.

Comment 2: A list of elected officials should be added as well:

- Town or Village Supervisor or Mayor
- NYS Assembly rep
- NYS Senate rep
- US Senator Gillibrand (regional office contact)
- US Senator Schumer (regional rep)

Army Response to Comment 2: See RTC #1.

Comment 3: Language in Section 4.2.3, Administrative Record File, needs to be revised to more clearly indicate that there are multiple Administrative Record Files for Seneca Army Depot, one for each remedy decision that is made. Every decision made has a separate administrative record, even if it is not compiled as such, and their respective contents can overlap. There is an AR for each ROD. References should be made to Administrative Record Files, not File. Also, the text states: "After the last ROD has been signed, the Administrative Record may be closed, but a records file may remain open for post-ROD documents, such as 5-year reviews." Change "may" to "will" after "records file".

Army Response to Comment 3: The word File was pluralized to 'Files'. The suggested language "*There are multiple Administrative Record Files for Seneca Army Depot, one for each remedy decision (ROD) that is made.*" The word 'may' was replaced to read 'will'.

Comment 4: a) EPA supports NYSDEC's comment # 2 regarding LUCs in their Oct 4, 2022 letter commenting on the CIP as follows: "Section 2.4: Although it is accurate to say that the transferred parcels' LUC responsibilities are transferred to the new owner, the Army retains responsibility through its 5-year review process and through enforcement of the LUCs (in coordination with USEPA and NYSDEC). This information should be added for clarity."

b) Furthermore, this section should state that LUC/IC Compliance will be monitored and reported on annually by the Army, and that the Army will issue letters annually to current property owners requesting a status update on property use and anticipated use.

c) Also, I note that you are listed as POC in the CIP, and that your contact info is included.

Army Response to Comment 4: a) The suggested text from NYSDEC was added. The sentence was revised as follows: "For real estate parcels that were transferred to new owners, the responsibility to implement LUC/ICs required by the ROD were technically transferred to the new owner; *however, the Army retains overall responsibility to ensure LUC implementation through its 5-year review process and through enforcement of the LUCs (in coordination with USEPA and NYSDEC).*" **b)** The suggested language was added: "*LUC/IC compliance will be monitored and reported on annually by the Army and the Army will issue letters annually to current property owners requesting a status update on property use and anticipated use.*" **c)** Comment noted. Chris Gallo is main POC for the Army and his information is included in Section 4.2.1 and Appendix B.

Note: Language referencing the creation of an administrative record online was changed to state that the website was created and is available at https://senecaarmydepotar.com. Reference to the website was also added to Appendix B.

Appendix B table attached below.

END OF COMMENTS

Agency Contacts and Elected Officials

Agency Contacts			
NAME	AGENCY	PHONE	EMAIL / WEBSITE
Chris Gallo District Project Manager	US Army Corps of Engineers (USACE) – New York District	Office: 917-790-8230 Cell: 917-575-1819	Christopher.t.gallo@usace.army.mil https://www.nan.usace.army.mil/Missions/Environmental/Environmental-Remediation/BRAC/Seneca-Army-Depot/
Charles "Hud" Heaton Technical Lead and Contracting Officer's Representative	USACE – Huntsville, Engineering & Support Center	Office: 256-895-1657 Cell: 256-324-9097	Charles.Heaton@usace.army.mil https://www.hnc.usace.army.mil//
Barry Hodges Technical Manager	USACE – Huntsville, Engineering & Support Center	Office: 256-895-1894 Cell: 256-503-0153	Barry.A.Hodges@usace.army.mil
James Moore BRAC Environmental Coordinator	USACE – Headquarters (HQ)	Cell: 347-271-0226	James.T.Moore@usace.army.mil
Bob Morse Remedial Project Manager	US Environmental Protection Agency (USEPA), Region 2	Office: 212-637-4331 Cell: 908-581-3791	Morse.Bob@epa.gov https://www.epa.gov/aboutepa/forms/contact-epa https://www.epa.gov/aboutepa/epa-region-2
Melissa Sweet Regional Project Manager	New York Department of Environmental Conservation (NYSDEC), Division of Environmental Remediation	Office: 518-402-9614 Central DEC Office: 518-402-8044	melissa.sweet@dec.ny.gov contact@dec.ny.gov https://www.dec.ny.gov/index.html
Mark Sergott Public Health Specialist	New York State Department of Health (NYSDOH), Bureau of Environmental Exposure Investigation	Office: 518-402-7860 Regional Office: 585-423-8076	mark.sergott@health.ny.gov https://www.health.ny.gov/
n/a	Seneca County Health Department	Environmental Health: 315-539-1945 Public Health: 315-539-1920	https://senecacountyhealthdepartment.com/

Elected Officials			
NAME	AGENCY	PHONE	EMAIL / WEBSITE
Bob Hayssen Supervisor	Town of Varick, NY	4782 Rt. 96 Romulus, NY 14541 315-549-7121	Supervisor: rhayssen@rochester.rr.com Town Website https://varicknewyork.com/varick.html
Jeff Gallahan Assemblyman	New York State (NYS) Assembly District 131, (Seneca Co. north of Romulus, NY)	District Office 70 Elizabeth Blackwell St. Geneva, NY 14456 315-781-2030	gallahanj@nyassembly.gov https://nyassembly.gov/mem/Jeff-Gallahan/
Philip A. Palmesano Assemblyman	New York State (NYS) Assembly District 132, (Seneca Co. south of Romulus, NY)	District Office 105 E. Steuben St. Bath, NY 14810 607-776-9691	palmesanop@nyassembly.gov https://nyassembly.gov/mem/Philip-A-Palmesano/
Pamela Helming Senator	NYS Senator 54th Senate District	District Office 425 Exchange St Geneva, NY 14456 Phone: 315-568-9816	helming@nysenate.gov https://www.nysenate.gov/senators/pamela-helming
Kirsten Gillibrand	US Senator	James M. Hanley Federal Building 100 South Clinton Street Room 1470 PO Box 7378 Syracuse, NY 13261 Tel. 315-448-0470	https://www.gillibrand.senate.gov/contact/email-me https://www.gillibrand.senate.gov/
Chuck Schumer	US Senator	James M. Hanley Federal Building 100 South Clinton Street, Room 841 Syracuse, NY 13261 Phone: 315-423-5471	https://www.schumer.senate.gov/contact/email-chuck https://www.schumer.senate.gov/

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

Subject: Community Involvement Plan for Seneca Army Depot
Seneca Army Depot

NYSDEC Site No. 850006

Romulus, New York

Comments Dated: 04 October 2022

Date of Comment Response: 08 November 2022

NYSDEC COMMENTS

Comment 1: General: The document inconsistently uses the word town. It's upper and lower case throughout the document. Please use town consistently.

> **Army Response to Comment 1:** The document was revised so that the capitalization of town (lowercase) was used consistently.

Comment 2: Section 2.4: Although it is accurate to say that the transferred parcels' LUC responsibilities are transferred to the new owner, the Army retains responsibility through its 5-year review process and through enforcement of the LUCs (in coordination with USEPA and NYSDEC). This information should be added for clarity.

> **Army Response to Comment 2:** The sentence was revised as follows: "For real estate parcels that were transferred to new owners, the responsibility to implement LUC/ICs required by the ROD were technically transferred to the new owner; *however, the Army retains overall responsibility to ensure LUC implementation through its 5-year review process and through enforcement of the LUCs (in coordination with USEPA and NYSDEC).*"

Comment 3: Section 3.1, 7th paragraph: This section refers to primary land uses and references "Country Training areas", when it should refer to "County Training areas".

> **Army Response to Comment 3:** The typo was corrected.

Comment 4: Section 4.3.3, Prepare and Distribute Fact Sheets: The planned implementation of fact sheet distribution relies heavily on electronic distribution. Given the skew of median age in the Town of Romulus towards older residents, it may be beneficial to have a physical distribution of fact sheets, such as a physical posting at the Town's office, and/or a physical mailing of fact sheets to residents in a particular radial distance from the depot.

> **Army Response to Comment 4:** The paragraph was revised to note that physical copies will be posted in local town offices. "Fact sheets will also be posted on the former SEDA Environmental Cleanup website *and physical copies will be available in local town offices (e.g., Romulus Town Hall).*"

Comment 5: Section 4.3.5, Provide a Mechanism for Continued Community Input: The planned implementation of an interactive comment page, provides a solution to the ability for the community

to provide fast and easy feedback to the Army. However, the implementation of that comment page, if comments are viewable by all, must be moderated heavily to prevent abuse of the webpage.

> **Army Response to Comment 5:** Language regarding an interactive comment page was removed. The section was revised to state that the Army has included a "Contact Us" link to allow members of the community to submit questions or comments.

Note: Language referencing the creation of an administrative record online was changed to state that the website was created and is available at https://senecaarmydepotar.com. A reference to the website was added to Appendix B.

END OF COMMENTS